Initial Study/Mitigated Negative Declaration

924-940 San Rafael Avenue Rowhouse Project



Prepared by

City of Mountain View

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

June 2026

924-940 San Rafael Avenue Rowhouse Project

Draft Mitigated Negative Declaration

Project: 924-940 San Rafael Avenue Rowhouse Project

Lead Agency:

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City of Mountain View
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Email: Vinson.Kwan@mountainview.gov
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Project Proponent:

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Prometheus Real Estate Group, Inc.
1 North B Street, Suite 4000, San Mateo, CA 94401
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Availability of the Initial Study:

Copies of the draft Initial Study for this Mitigated Negative Declaration is attached and available for review at the following locations:

- City of Mountain View, Community Development Department, 500 Castro Street, 1st Floor, Mountain View, (650) 903-6306, during business hours, Monday to Friday, 8:00 a.m. to 4:00 p.m.
- Mountain View Public Library, 585 Franklin Street, Mountain View, (650) 903-6887.
- City of Mountain View website: on the City's website at: www.mountainview.gov/CEQA

Project Location and Description:

The approximately 1.8-acre (or 78,224 square foot) project site is comprised of two parcels located at 924 and 940 San Rafael Avenue, between Terra Bella Avenue and San Pablo Drive in the City of Mountain View (Assessor's Parcel Numbers [APNs] 153-17-045 and 153-17-044).

The project proposes a General Plan Map Amendment, Zoning Map Amendment, Planned Unit Development Permit, and Development Review Permit to demolish the existing structures on-site

and redevelop the project site with a residential development that would include 36 three-story, rowhome units, and an open space area along the northern site boundary.

Refer to the Initial Study for additional details on the project components.

Proposed Findings:

The City has prepared the attached Initial Study and determined that the analysis in the Initial Study identifies potentially significant project effects, but:

1. Mitigation measures required by the City, and agreed to by the applicant, would avoid or mitigate the effects to a point where no significant effects would occur; and
2. There is no substantial evidence, in light of the whole record before the agency, that the project with implementation of mitigation measures may have a significant effect on the environment.

Based on the above reasons, pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15064(f)(3) and 15070(b), a Mitigated Negative Declaration has been prepared for the project.

Basis of Findings:

Based on the environmental evaluation presented in the attached Initial Study, the project would not cause significant adverse effects related to aesthetics, agricultural and forestry resources, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. The project does not have impacts that are individually limited, but cumulatively considerable. The environmental evaluation has determined that the project would have potentially significant impacts on air quality and the implementation of the mitigation measure listed below would reduce impacts to a less than significant level.

MM AIR-1.1: The project shall implement a feasible plan to reduce diesel particulate matter emissions by 60 percent such that increased cancer risk from construction would be reduced below the Bay Area Air District single-source threshold. The 60-percent reduction can be achieved in one of the following ways:

1. All construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 Final emission standards for PM (PM_{10} and $PM_{2.5}$).

2. A combination of some of the following measures to achieve a reduction in construction diesel particulate matter emissions by 60 percent or greater:

- Use of equipment that meet U.S. EPA Tier 4 Final emissions standards (as stated above),
- Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,
- Use of electrically-powered equipment,
- Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
- Change in construction build-out plans to lengthen phases, and
- Implementation of different building techniques that result in less diesel equipment usage.

Table of Contents

Section 1.0 Introduction and Purpose 1
1.1 Purpose of the Initial Study 1
1.2 Public Review Period 1
1.3 Consideration of the Initial Study and Project 1
1.4 Notice of Determination 1
Section 2.0 Project Information 2
2.1 Project Title 2
2.2 Lead Agency Contact 2
2.3 Project Applicant 2
2.4 Project Location 2
2.5 Assessor's Parcel Number (APN) 2
2.6 General Plan Designation and Zoning District 6
2.7 Project-Related Approvals, Agreements, and Permits 6
Section 3.0 Project Description 7
3.1 Proposed Building Development 7
3.2 Utility Improvements and Stormwater Treatment 11
3.3 Landscaping 14
3.4 Right-of-Way and Off-Site Improvements 14
3.5 Construction 15
Section 4.0 Environmental Setting, Checklist, and Impact Discussion 16
4.1 Aesthetics 17
4.2 Agriculture and Forestry Resources 24
4.3 Air Quality 27
4.4 Biological Resources 44
4.5 Cultural Resources 51
4.6 Energy 58
4.7 Geology and Soils 64
4.8 Greenhouse Gas Emissions 73
4.9 Hazards and Hazardous Materials 83
4.10 Hydrology and Water Quality 96
4.11 Land Use and Planning 107

4.12 Mineral Resources 111
4.13 Noise 113
4.14 Population and Housing 126
4.15 Public Services 129
4.16 Recreation 137
4.17 Transportation 140
4.18 Tribal Cultural Resources 149
4.19 Utilities and Service Systems 153
4.20 Wildfire 164
4.21 Mandatory Findings of Significance 165
Section 5.0 References 169
Section 6.0 Lead Agency and Consultants 176
6.1 Lead Agency 176
6.2 Consultants 176
Section 7.0 Acronyms and Abbreviations 177

Figures

Figure 2.4-1: Regional Map 3
Figure 2.4-2: Vicinity Map 4
Figure 2.4-3: Aerial Photograph and Surrounding Land Uses 5
Figure 3.1-1: Proposed Site Plan 8
Figure 3.1-2: Building Complex Elevations 10
Figure 3.2-1: Utility Site Plan 12
Figure 3.2-2: Stormwater Management Control Plan 13
Figure 3.5-1: Landscaping Plan 15
Figure 4.3-1: Location of Project Site, MEIs, and Nearby TAC and $PM_{2.5}$ Sources 38
Figure 4.13-1: Noise Measurement Locations 118

Photos

Photos 1 and 2 20
Photos 3 and 4 21

Tables

Table 3.1-1: Building Complex Unit, Area, and Height Summary 9
Table 4.3-2: Air District Air Quality Significance Thresholds 33
Table 4.3-3: Bay Area Air District Health Risks and Hazards Thresholds 33
Table 4.3-6: Cumulative Health Risk Impacts at the Project MEIs 40
Table 4.3-7: Impacts from Cumulative Sources to Project Site Receptors 43
Table 4.8-1: Greenhouse Gas Reduction Plan Consistency 82
Table 4.10-1: Approximate Existing and Proposed Impervious/Pervious Surfaces 106
Table 4.13-1: General Plan Outdoor Noise Acceptability Guidelines 116
Table 4.13-3: Summary of Short-Term Noise Measurement Data (dBA) 119
Table 4.13-4: Operational Noise Levels for the Ground-Level AC Condensers 122
Table 4.13-5: Vibration Source Levels for Construction Equipment 122
Table 4.15-1: School Enrollment and Existing Capacity 132

Appendices

Appendix A: Air Quality and Greenhouse Gas Assessment
Appendix B: Historic Resource Evaluation
Appendix C: Phase I and Limited Phase II Environmental Site Assessments
Appendix D: Additional Sampling Investigation
Appendix E: Phase I Environmental Site Assessment
Appendix F: Peer Review of Phase I and Limited Phase II Environmental Site Assessments
Appendix G: Peer Review of Additional Sampling Investigation
Appendix H: Peer Review of Phase I Environmental Site Assessment
Appendix I: Noise and Vibration Assessment
Appendix J: Multimodal Transportation Analysis Checklist
Appendix K: Utility Impact Study

All appendices are incorporated herein by reference.

Section 1.0 Introduction and Purpose

1.1 Purpose of the Initial Study

The City of Mountain View, as the Lead Agency, has prepared this Initial Study for the 924-940 San Rafael Avenue Rowhouse project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of Mountain View, California. The project proposes to construct 36 residential rowhouse units (with nine being designated as below market rate) on an approximately 1.8-acre site. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 Public Review Period

Publication of this Initial Study marks the beginning of a 20-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 20-day public review period should be sent to:

Vinson Kwan
Associate Planner
Community Development Department, Planning Division
City of Mountain View
500 Castro Street
Mountain View, CA 94041
Vinson.Kwan@mountainview.gov

1.3 Consideration of the Initial Study and Project

Following the conclusion of the public review period, the City of Mountain View will consider the adoption of the Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled meeting. The City shall consider the Initial Study/MND together with any comments received during the public review process. Upon adoption of the MND, the City may proceed with project approval actions.

1.4 Notice of Determination

If the project is approved, the City of Mountain View will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

Section 2.0 Project Information

2.1 Project Title

924-940 San Rafael Avenue Rowhouse Project

2.2 Lead Agency Contact

Vinson Kwan
Associate Planner
Community Development Department, Planning Division
City of Mountain View
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2.3 Project Applicant

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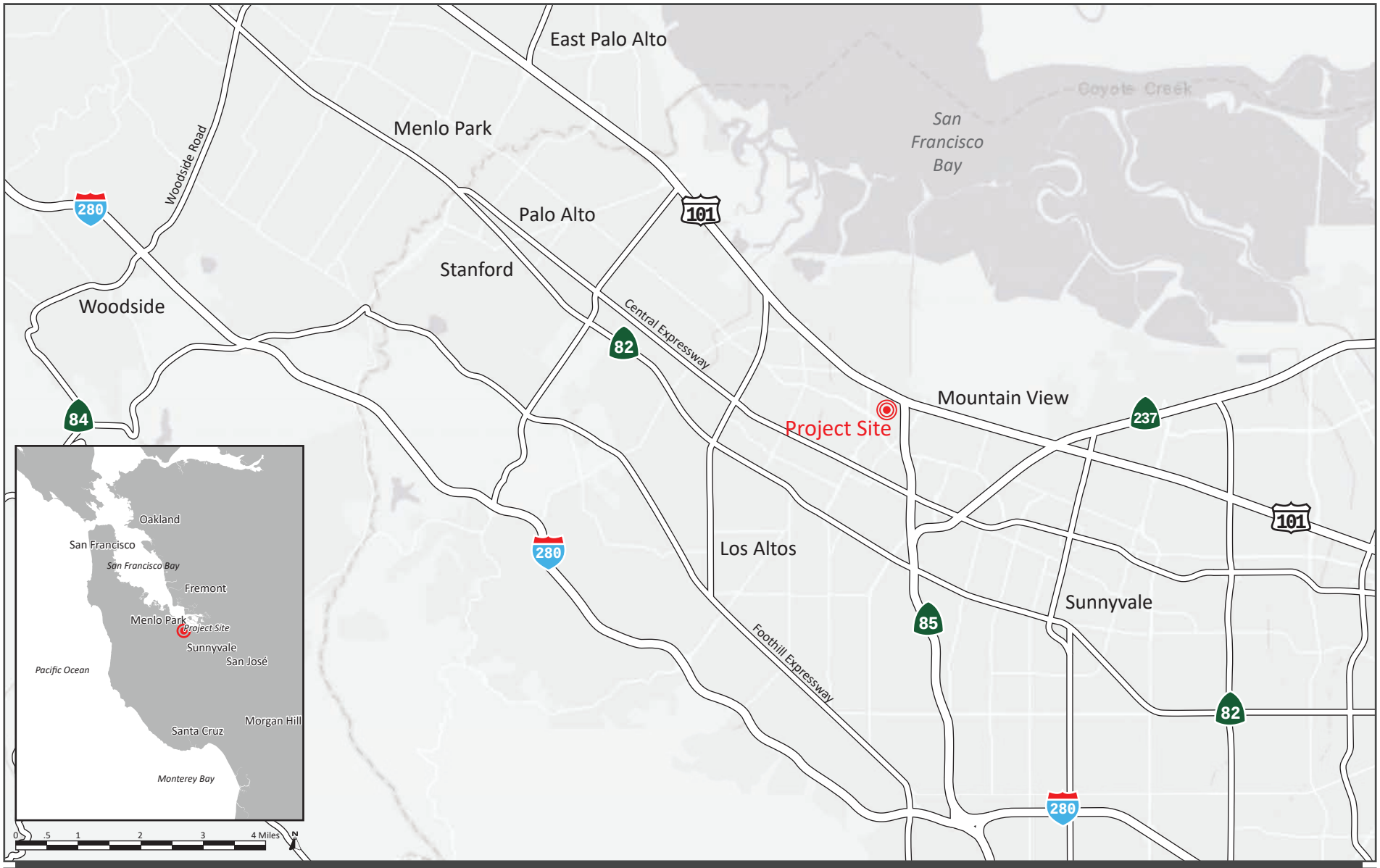
2.4 Project Location

The approximately 1.8-acre (or 78,224 square foot) project site is comprised of two parcels located at 924 and 940 San Rafael Avenue in the City of Mountain View. The project site is located directly west of San Rafael Avenue, between San Simeon Drive/San Pablo Drive and Terra Bella Avenue. The project site is approximately 850 feet west of State Route (SR) 85. Surrounding land uses include single-family residences adjacent to the southern boundary of the project site, industrial uses to the west and north, and a mix of single-family residences, office, and commercial uses to the east.

A regional map and vicinity map of the project site are shown in Figure 2.4-1 and Figure 2.4-2, respectively. An aerial photograph with surrounding land uses is shown in Figure 2.4-3.

2.5 Assessor's Parcel Number (APN)

APNs 153-17-045 and 153-17-044



REGIONAL MAP

FIGURE 2.4-1

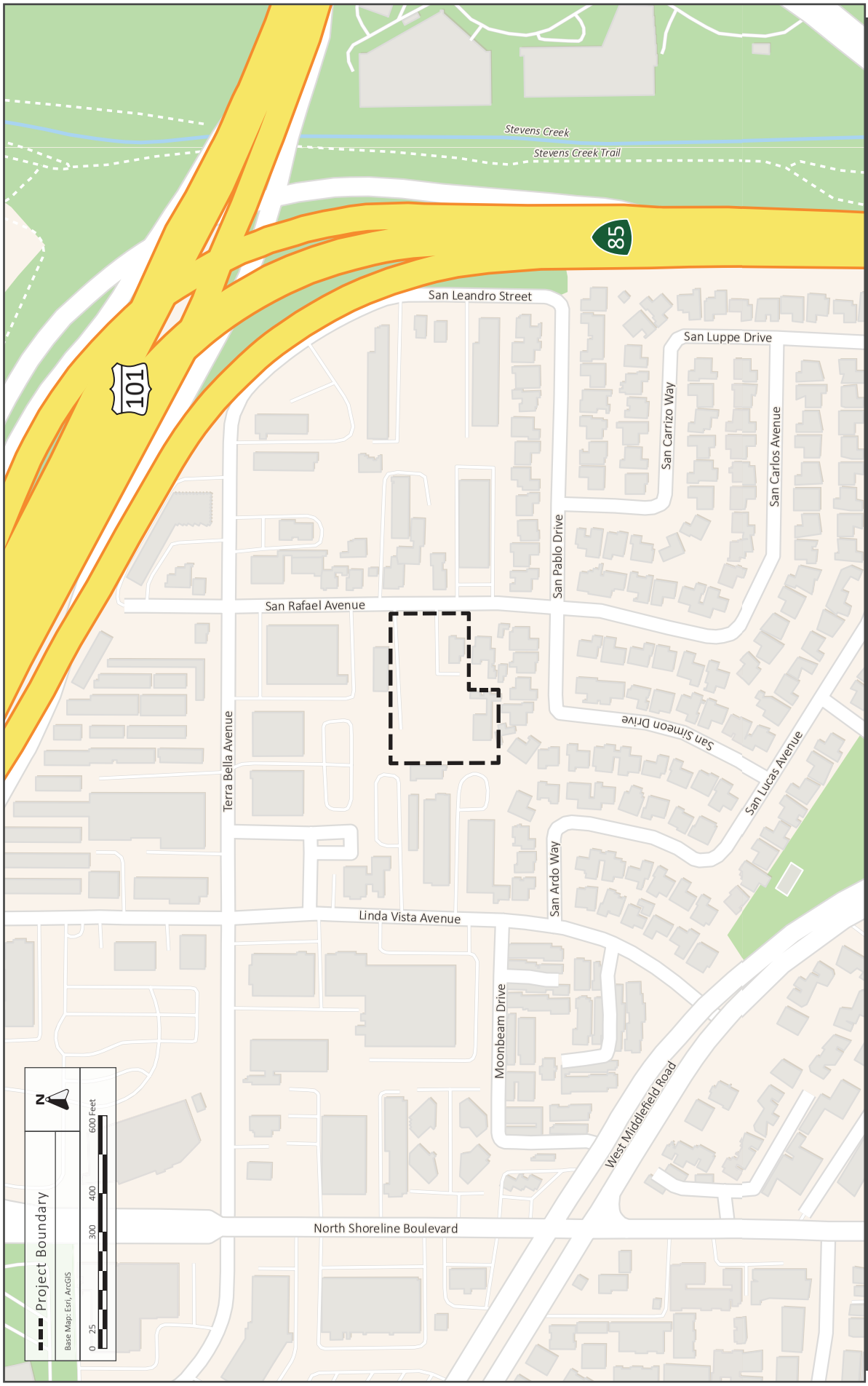


FIGURE 2.4-2

VICINITY MAP

AERIAL PHOTOGRAPHY AND SURROUNDING LAND USES | FIGURE 2.4-3

2.6 General Plan Designation and Zoning District

The project site is designated General Industrial in the Mountain View 2030 General Plan and in the General Industrial Zoning District.

2.7 Project-Related Approvals, Agreements, and Permits

This Initial Study/MND provides decision-makers in the City of Mountain View (the Lead Agency), responsible agencies, and the general public with relevant environmental information to use in considering the proposed project. It is intended that this Initial Study be used for discretionary approvals necessary to implement the project, as proposed. These discretionary actions may include, but are not limited to, the following:

- General Plan Amendment
- Zoning Map Amendment
- Development Review Permit
- Planned Unit Development Permit
- Heritage Removal Permit

The project would also require several ministerial approvals, including grading permits, demolition permits, and building permits.

Section 3.0 Project Description

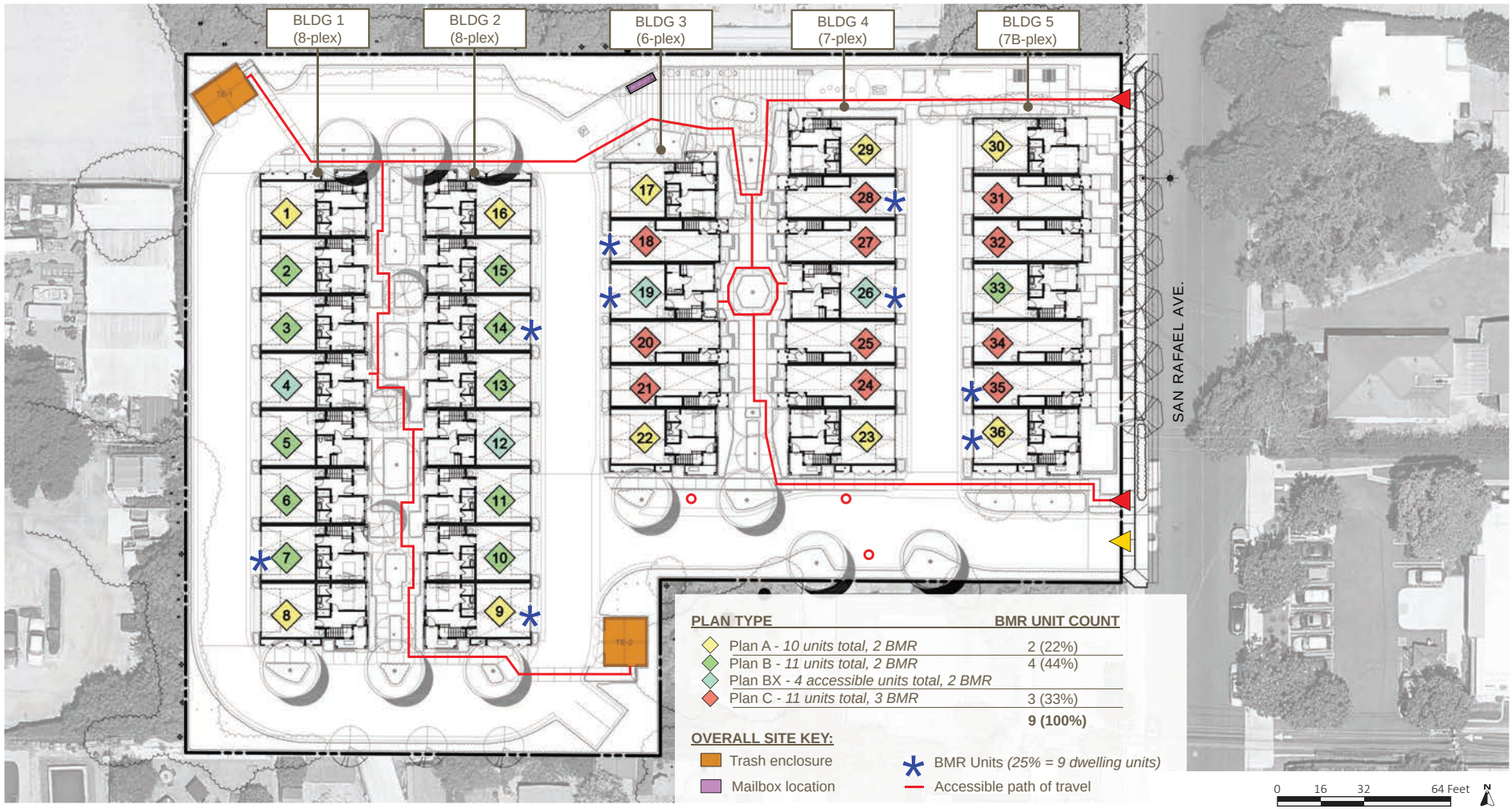
3.1 Proposed Building Development

The project would result in the demolition of the two existing (vacant) commercial structures (which total approximately 4,100 square feet) on-site and redevelopment of the project site with 36, three-story rowhouse units, resulting in a density of 20 dwelling units per acre (du/ac). Of the 36 rowhouse units, nine would be designated as below market rate (BMR) units for sale or rent to moderate income households. The project would construct a six-foot tall wooden fence along the northern, southern, and western boundaries of the site. The project would require a General Plan Amendment to change the land use designation from General Industrial to Medium Density Residential and a rezone from General Industrial (MM) to Multiple-Family Residential (R3-2.2). The Medium Density Residential designation allows single-family detached and attached residential, duplex residential, multi-family residential, and parks and open space at a density of 13 to 25 du/ac. The Multiple-Family Residential Zoning District allows a maximum height of 45 feet (or three stories). The proposed site plan is shown in Figure 3.1-1.

Since the project would provide 25 percent BMR units, the project is entitled to utilize the State Density Bonus Law per Government Code Section 65915. Based on the number of BMR units provided, the project is eligible for a density bonus of 20 percent above base zoning, one concession/incentive[1], unlimited waivers, and a reduction in parking requirements. The project applicant does not seek a density bonus, an incentive, nor a reduction in parking requirements. The project proposes the following waivers summarized below.

- Site coverage of 38 percent instead of the maximum of 35 percent
- Landscaped open area coverage of 31.4 percent instead of the minimum of 35 percent
- Private open space of 77 square feet instead of the minimum of 100 square feet
- Frontage setback reduction from 15 feet to 14 feet
- Residential accessory structure (trash enclosure) side and rear setback reduction from 15 feet to three feet three inches and two feet, respectively
- Landscape buffer of two feet wide instead of the required five foot wide minimum

[1] The State Density Bonus Law defines "concession or incentive" with a single definition and uses the terms interchangeably. For ease of reference, this document uses the term "concession" to mean "concession or incentive."



Source: Dahlin Group, January 14, 2026.

PROPOSED SITE PLAN

FIGURE 3.1-1

3.1.1.1 *Primary Project Design Components*

Site Coverage, Heights, and Setbacks

As shown above in Figure 3.1-1, the proposed 36 rowhouse units would be split between five distinct building complexes (one six-unit complex, two seven-unit complexes, and two eight-unit complexes) (see BLDG 1 through 5 on Figure 3.1-1). The five building complexes would have a site coverage of 29,164 square feet. In addition, there would be two communal trash enclosures with a site coverage totaling 571 square feet. The proposed project would have a total site coverage of 29,735 square feet, which is 2,357 square feet (or 3.0 percent) over the maximum allowable site coverage of 27,378 square feet. The project also includes new landscaped open space at approximately 24,580 square feet (which is below the City's requirement of 27,378 square feet by 3.6 percent), common open space at approximately 4,125 square feet along the northern site boundary, and private open space at 77 square feet per unit (which is below the City's requirement of 100 square per unit) as shown in Figure 3.5-1. All site coverage area inconsistencies would be waived per the State's Density Bonus Law as described above.

The proposed rowhouse units would each be three stories with height varying between approximately 38 feet five inches to a maximum height of 41 feet one and three quarters inch.[2] There would be some design variation between the building complex designs but generally the first floor would include a two-car garage, while the second and third floor would be the main living areas. Conceptual elevations for the building complexes are shown on Figure 3.1-2.

A summary of the building design details per complex is shown below in Table 3.1-1.

Table 3.1-1: Building Complex Unit, Area, and Height Summary

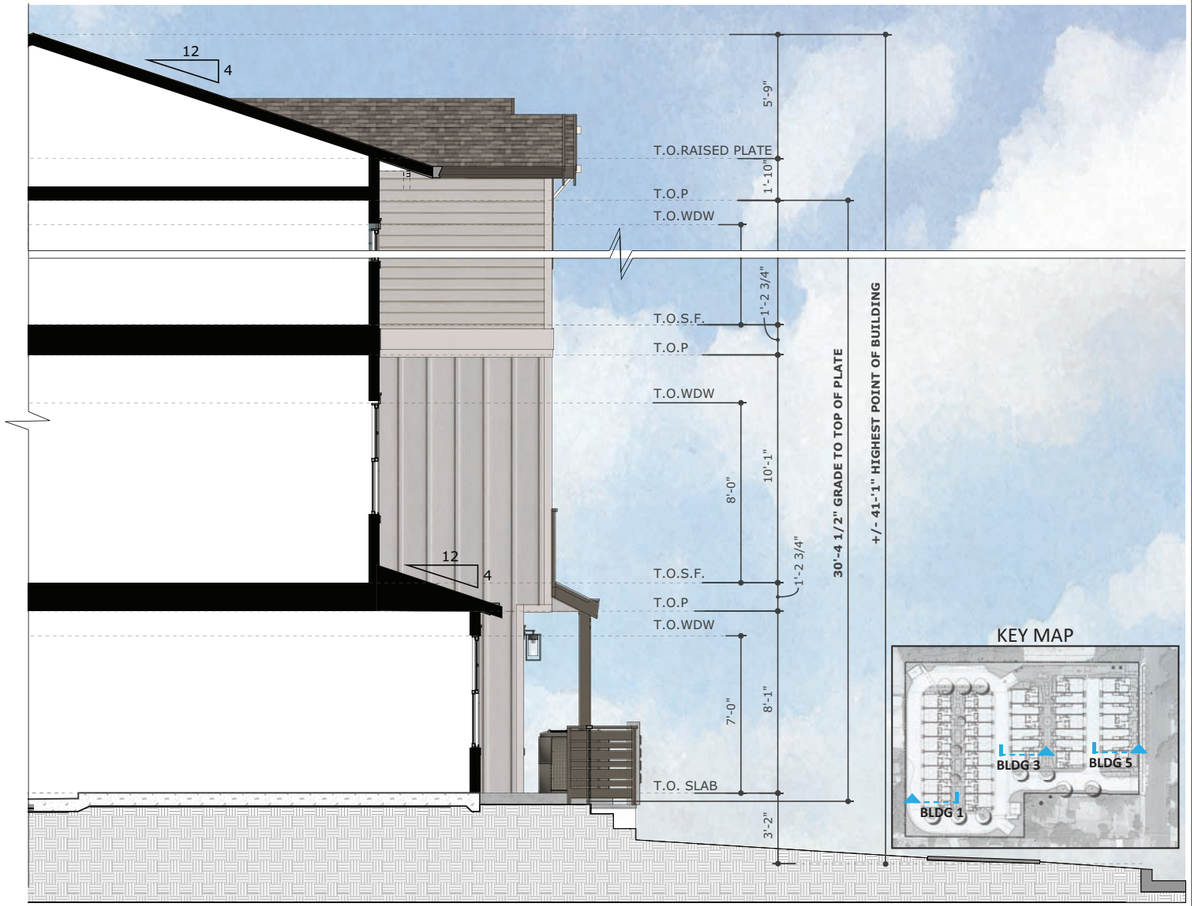
Building Complex Number	Unit Count	Below Market Rate Units	Building Site Coverage (square feet)	Total Building Height (feet and inches)
1	8	1	6,887	38' 5"
2	8	2	6,887	38' 5"
3	6	2	4,684	39' 1 ¾ "
4	7	2	5,361	39' 2 ¾"
5	7	2	5,345	41' 1 ¾"

The proposed rowhouse building complexes would have a minimum front setback of 14 feet (which is below the required 15 foot setback), a minimum side setback of 19 feet nine inches, and a minimum rear setback of 27 feet four inches from the existing adjacent property lines surrounding the site.

[2] Note that the total building height is based on the height from the top of the foundation slab to the roof ridge plus the height of the curb.



8-Plex (BLDG 1) 6-Plex (BLDG 3)



7B-Plex (BLDG 5)

Source: Dahlin Group, January 14, 2026.

BUILDING COMPLEX ELEVATIONS | FIGURE 3.1-2

Site Access and Parking

The project site would be accessible by vehicles via one, new, two-way driveway off San Rafael Avenue at the southeastern corner of the site. Pedestrians would be able to access the project via the existing sidewalk on San Rafael, which would connect to two proposed, private pedestrian paths at the northeastern and southeastern corners of the site. Refer to Figure 3.1-1 above for the vehicular and pedestrian site access points.

Each residential unit would include a two car garage on the first floor. The garages would be equipped with one level 2 (208/240 volt) electric vehicle charging station (EVCS) and rated at 40 amperes minimum and one electric vehicle (EV) ready space conduit system. In addition, one bicycle parking space would be provided per garage for a total of 36 bicycle parking spaces.

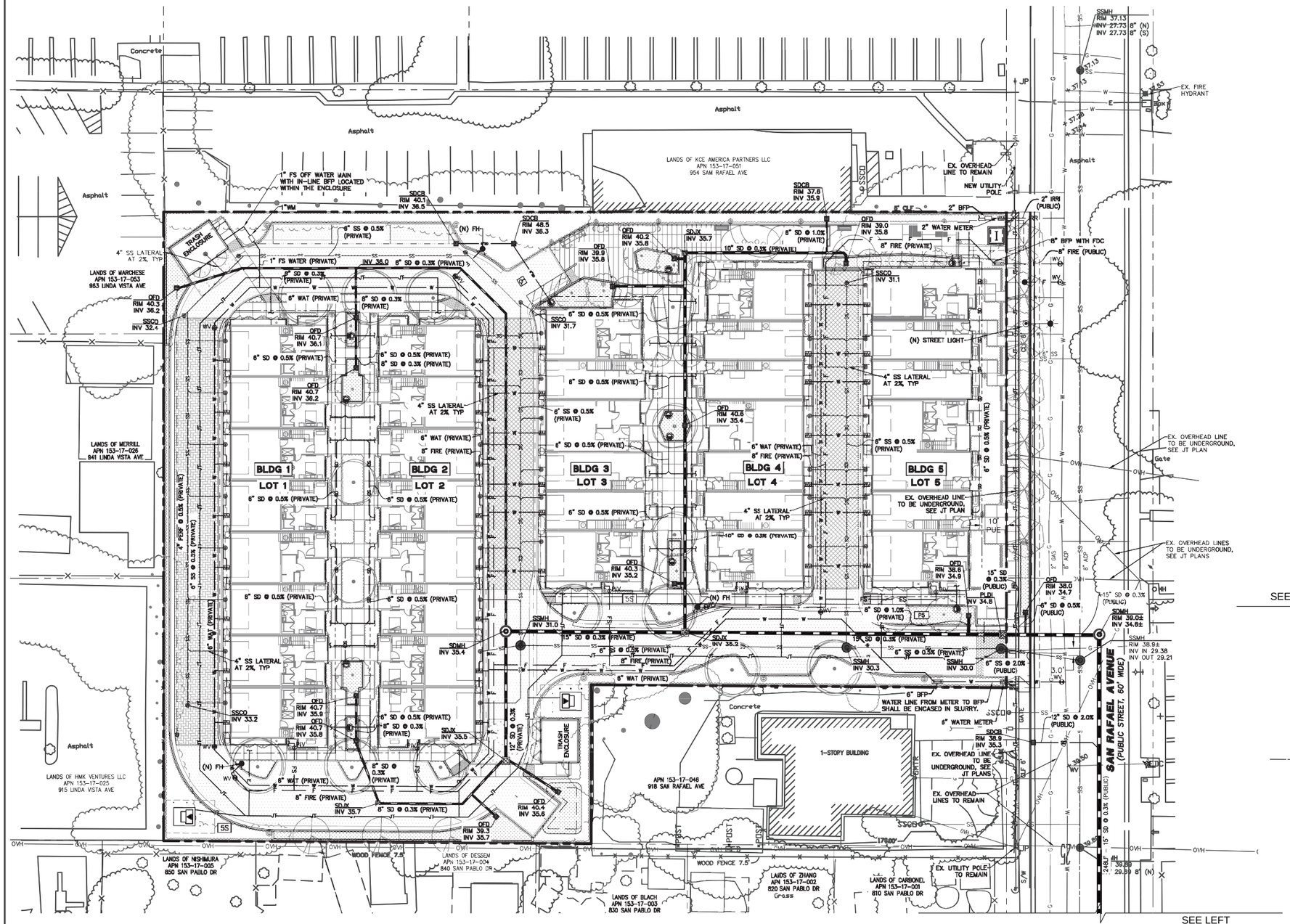
For guests visiting the site, there would be nine on-site parking spaces located throughout the site as shown in Figure 3.1-1. Of the nine parking spaces, one would be an accessible space and one would be an EV space.

Sustainable Design Features

The applicant for the development has voluntarily proposed the new residences be all-electric with no natural gas infrastructure. The voluntary Tier 2 California Green Building Standard Code (CALGreen) standards for electrical vehicles would also be part of the project design. For single-family residential units, the CALGreen Tier 2 measures require that each dwelling unit install a dedicated 208/240 -volt branch circuit in the electrical raceway as required by Section 4.106.4.1. The branch circuit and associated overcurrent protective device shall be rated at 40 amperes minimum. Additionally, the building complexes would include rooftop solar in compliance with the City of Mountain View Municipal Code Chapter 8, Division III, Section 8.20.8, Subsection 101.10.1.1.2(d). The buildings would also include water-efficient fixtures and high-efficiency appliances that meet CALGreen standards.

3.2 Utility Improvements and Stormwater Treatment

The project would include the construction of a new sanitary sewer, fire water, domestic water, storm drain, and electrical facilities on-site. The project would require new utility laterals that would connect to existing utility lines located in San Rafael Avenue and a new, proposed storm drain line extension. The new storm drain main line would be 15-inches in diameter and would be approximately 248 feet long. It would extend from the project site, in the San Rafael Avenue right-of-way to the existing storm drain line in San Pablo Drive south of the project site. The utility plan, including this proposed storm drain line extension, is shown on Figure 3.2-1. The project would reduce the impervious area on-site from 80,284 to 62,184 square feet (which is a 18,100 square foot or 22.5 percent decrease). As a result, the amount of stormwater runoff from the site would decrease proportionally. To control stormwater on-site, the project would include 13 drainage management areas (DMA) on-site with runoff treated via flow-through planters and one unlined bioretention basin. Refer to Figure 3.2-2 for the proposed stormwater control plan for the project site.



LEGEND

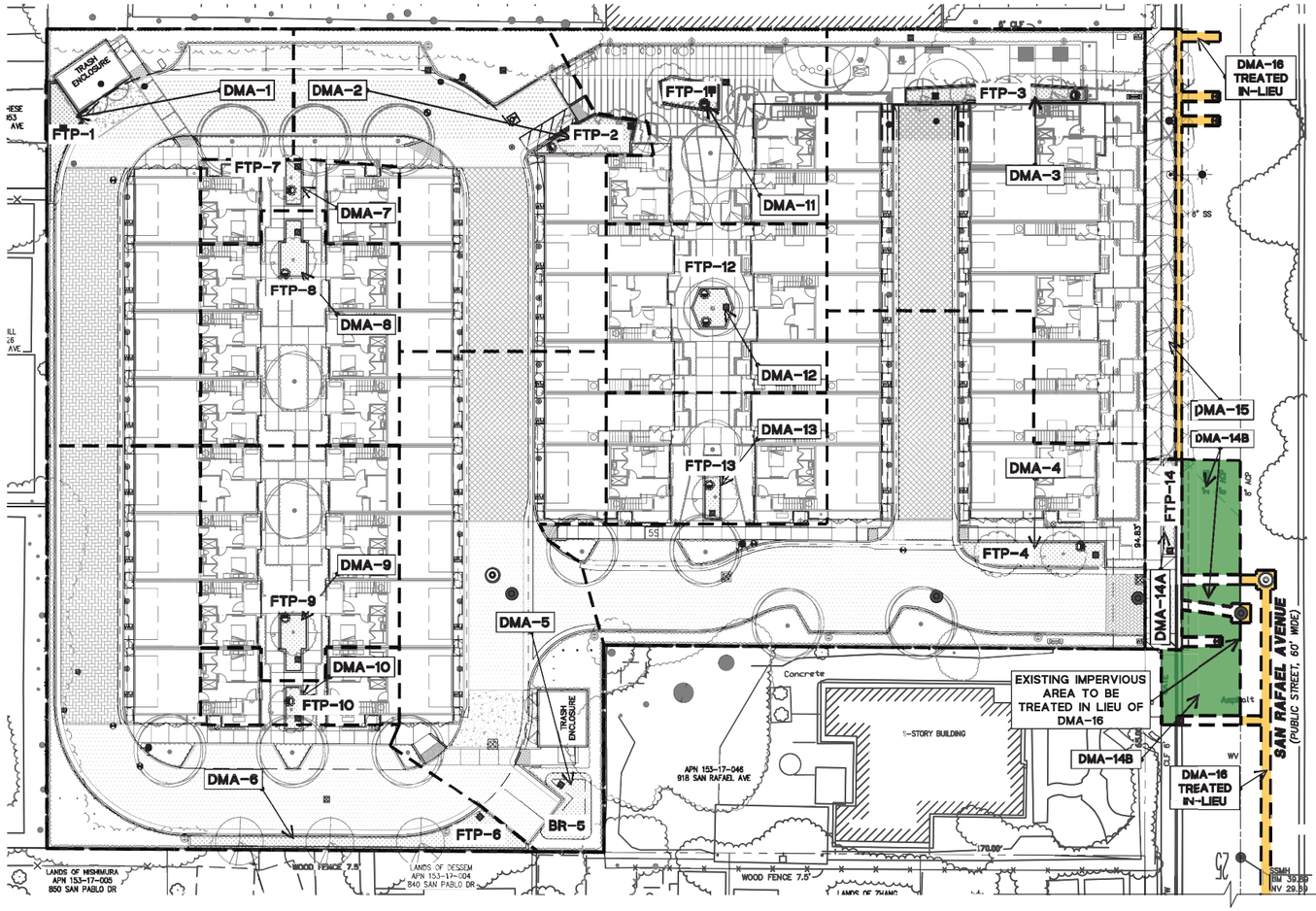
- PROPERTY LINE
- STORM DRAIN (UNTREATED) — SD — SD
- STORM DRAIN (TREATED)
- SANITARY SEWER — SS — SS
- DOMESTIC WATER — W — W
- FIRE WATER MAIN — F — F
- FIRE SERVICE — FS — FS
- JOINT TRENCH — JT
- ELECTRICAL LINE — E — E
- SANITARY SEWER MANHOLE
- STORM DRAIN MANHOLE
- SANITARY SEWER / STORM DRAIN CLEANOUT
- JUNCTION BOX
- BUBBLER BOX
- FIRE HYDRANT
- CATCH BASIN/OVERFLOW DRAIN
- WATER VALVE
- TRANSFORMER
- BACKFLOW PREVENTER

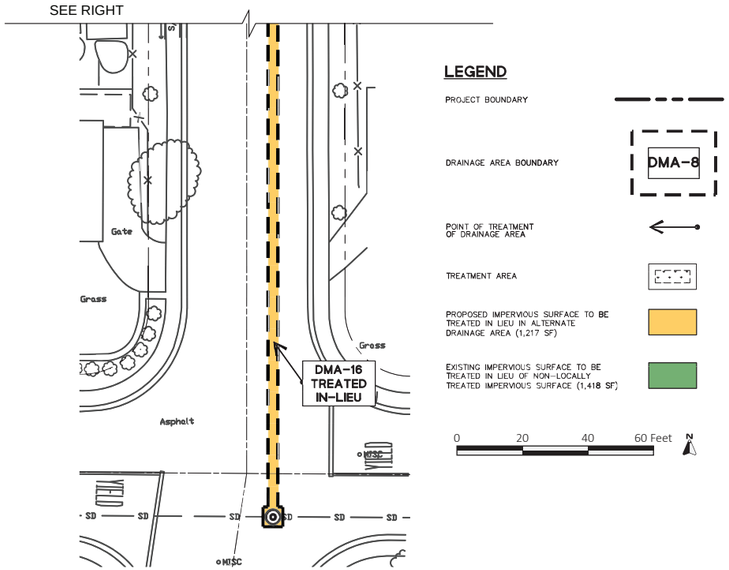
NOTES

1. ALL ON-SITE WATER MAIN WILL BE A SEPARATED DOMESTIC AND FIRE SYSTEM AND WILL BE PRIVATELY OWNED AND MAINTAINED BY THE HOA. THE ON-SITE WATER METERS WILL BE READ AND MAINTAINED BY THE CITY.
2. ALL SANITARY SEWER, STORM DRAIN AND WATER LINES AND ASSOCIATED STRUCTURES IN THE PUBLIC STREET WILL BE OWNED AND MAINTAINED BY THE CITY OF MOUNTAIN VIEW.
3. ALL ON-SITE SANITARY SEWER AND STORM DRAIN LINES AND ASSOCIATED STRUCTURES IN THE PRIVATE STREETS WILL BE OWNED AND MAINTAINED BY THE HOA.
4. UTILITIES SHALL COMPLY WITH THE "STANDARD DESIGN CRITERIA (AUG 2002)" AND "STANDARD DESIGN CRITERIA FOR COMMON GREEN DEVELOPMENTS AND ROWHOUSES CONDOMINIUMS (NOV 1990)."
5. ALL UNUSED EXISTING UTILITY SERVICES SHALL BE ABANDONED PER CITY STANDARDS.
6. EACH UNIT WILL HAVE A SEPARATE WATER SERVICE AND 4" SANITARY SEWER LATERAL.
7. TREES SHALL BE PLANTED 10 FEET CLEAR FROM SANITARY SEWER AND STORM DRAINS. 5 FEET CLEAR FROM WATER LINES.
8. STORM WATER TREATMENT SYSTEMS SHALL BE MAINTAINED BY HOA.
9. THE ON-SITE UTILITIES SHALL MEET ALL CURRENT SEPARATION STANDARDS OF THE CALIFORNIA OFFICE OF DRINKING WATER.
10. WHERE GATE VALVES ARE LOCATED NEAR THE DRIVEWAY AND IN THE ACCENT PAVEMENT, PLACE CONCRETE BAND AROUND THE STRUCTURE.
11. DRY UTILITY LINES AND STRUCTURES ARE SHOWN SCHEMATICALLY AND REFERENCE ONLY.
12. STORM DRAIN INLETS SHALL BE LABELED IN ACCORDANCE WITH THE CITY'S STORM DRAIN INLET LABEL PROGRAM ("NO DUMPING, FLOWS TO BAY").
13. THE PROPERTY OWNER/HOA SHALL BE RESPONSIBLE FOR MAINTAINING ALL ONSITE UTILITIES.
14. PIPE MATERIAL:
    - A) PRIVATE SD: PVC SDR-26, UNLESS NOTED OTHERWISE
    - B) PUBLIC SD: RCP CLASS III
    - C) PRIVATE SS: PVC SDR-26
    - D) PUBLIC SS: PVC SDR-26
    - E) WATER (PUBLIC & PRIVATE): PVC C900 CLASS 200
    - F) WATER (IRRIGATION): TYPE "K" COPPER TUBBING

Source: Dahlin Group, January 14, 2026.

UTILITY SITE PLAN | FIGURE 3.2-1





TREATMENT CONTROL MEASURE SUMMARY

AREAS DRAINAGE		DRAINAGE AREA SIZE (SF)	PERVIOUS SURFACE (SF)	TYPE OF PERVIOUS SURFACE	IMPERVIOUS SURFACE (SF)	TYPE OF IMPERVIOUS	EFFECTIVE IMPERVIOUS SURFACE (SF)	WATER QUANTITY REQUIRED (SF)	WATER QUANTITY PROVIDED (SF)	PROPOSED TREATMENT NO.	SIZING METHOD
ON-SITE	DMA-1	7,351	2,075	Landscape / Pervious Paver	5,276	Roof/Pavement	5,484	158	172	FTP-1	Combination
	DMA-2	7,856	1,640	Landscape / Pervious Paver	6,216	Roof/Pavement	6,380	255	274	FTP-2	4%
	DMA-3	10,317	2,188	Landscape / Pervious Paver	8,129	Roof/Pavement	8,348	240	240	FTP-3	Combination
	DMA-4	12,097	1,737	Landscape / Pervious Paver	10,360	Roof/Pavement	10,534	303	350	FTP-4	Combination
	DMA-5	9,176	1,080	Landscape / Pervious Paver	8,096	Roof/Pavement	8,204	236	268	BR-5	Combination
	DMA-6	9,459	3,089	Landscape / Pervious Paver	6,370	Roof/Pavement	6,679	267	479	FTP-6	4%
	DMA-7	1,408	257	Landscape	1,151	Roof/Pavement	1,177	47	67	FTP-7	4%
	DMA-8	4,173	679	Landscape	3,494	Roof/Pavement	3,562	103	129	FTP-8	Combination
	DMA-9	4,171	673	Landscape	3,498	Roof/Pavement	3,565	103	122	FTP-9	Combination
	DMA-10	1,298	208	Landscape	1,090	Roof/Pavement	1,111	44	66	FTP-10	4%
	DMA-11	4,381	1,119	Landscape	3,262	Roof/Pavement	3,374	135	137	FTP-11	4%
	DMA-12	3,670	644	Landscape	3,026	Roof/Pavement	3,090	124	124	FTP-12	4%
	DMA-13	2,864	648	Landscape	2,216	Roof/Pavement	2,281	91	96	FTP-13	4%
OFF-SITE	DMA-14A	843	112	Landscape	731	Roof/Pavement	742	30	112	FTP-14	4%
	DMA-14B	1,473	0	-	1,473	Pavement	1,473	59	112	FTP-14	4%
	DMA-15	1,283	599	Landscape	684	Pavement	-	342	599	Self-Retaining	2:1
	DMA-16	1,217	0	Landscape	1,217	Pavement	1,217	49	0	Treat in Lieu	4%
TOTAL	-	83,037	16,748	-	66,289	-	67,220	2,586	3,347	-	-

Note: FTP-14 PROVIDE ENOUGH TREATMENT FOR DMA-14 AND THE EXISTING IMPERVIOUS AREA TO BE TREATED IN LIEU OF DMA-16

Source: Dahlin Group, January 14, 2026.

STORMWATER MANAGEMENT CONTROL PLAN | FIGURE 3.2-2

3.3 Landscaping

During project construction, a total of 18 existing trees would be removed (17 on-site trees and one off-site tree), with two of the 18 trees being Heritage Trees.[3] The project would provide a total of 48 replacement trees: seven, 24-inch box sized off-site street trees and 41, 24-inch box sized trees on-site. Replacement trees would be planted in areas surrounding the building complexes and along San Rafael Avenue. In addition to the replacement trees, the project would plant other new landscaping, including new shrubs and groundcover, throughout the project site. The landscaping would incorporate low to moderate water use plants and California native species throughout the project site. A conceptual landscaping plan is shown in Figure 3.5-1.

3.4 Right-of-Way and Off-Site Improvements

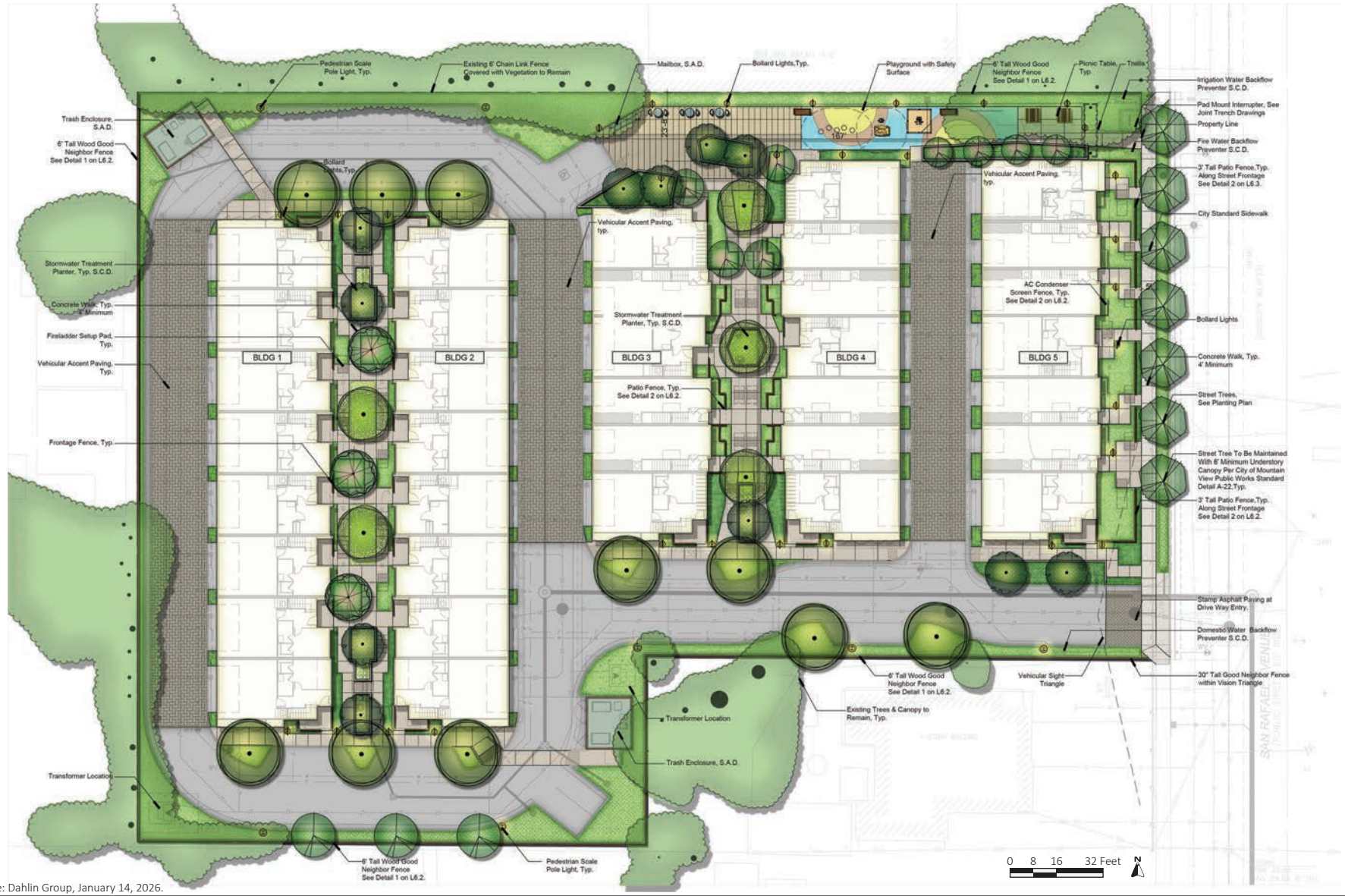
The project would complete following right-of-way and off-site improvements:

- Remove and replace all curb, gutter, and sidewalk fronting the project site
- Install one new street light on San Rafael Avenue along the site frontage
- Construct a new, approximately 248 foot long, 15-inch diameter storm drain main line extension from the site to San Rafael Avenue to an existing storm drain line in San Pablo Drive (as discussed previously in Section 3.3)
- Create a new bioretention basin to treat stormwater runoff from San Rafael Avenue and a self-retaining area to treat stormwater runoff from the new public sidewalk along the site frontage
- Locate new public street trees in the planter strip on San Rafael Avenue in front of the site
- Relocate overhead utility lines serving the project site along the project site frontage underground

3.5 Construction

The project is estimated to be constructed over a duration of 12 to 14 months. Construction phases would include demolition, site preparation, grading, trenching, building construction, architectural coating, and paving. During grading, approximately 400 cubic yards of soil would be imported to balance the site. The maximum depth of excavation would approximately 9.5 feet for utility improvements.

[3] A "Heritage Tree" is any tree that has a trunk with a circumference of 48 inches or more measured at 54 inches above natural grade. Multi-trunk trees are measured just below the first major trunk fork. Three species, quercus (oak), sequoia (redwood) or cedrus (cedar) are considered "Heritage" if they have a circumference of 12 inches measured at 54 inches above natural grade. Source: City of Mountain View. "Municipal Code: Section 32.23 – Definitions."
Accessed July 7, 2025.
https://library.municode.com/ca/mountain_view/codes/code_of_ordinances?nodeId=PTIITHCO_CH32TRSHPL



Source: Dahlin Group, January 14, 2026.

LANDSCAPING PLAN

FIGURE 3.5-1

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Noise
4.3	Air Quality	4.14	Population and Housing
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.16	Recreation
4.6	Energy	4.17	Transportation
4.7	Geology and Soils	4.18	Tribal Cultural Resources
4.8	Greenhouse Gas Emissions	4.19	Utilities and Service Systems
4.9	Hazards and Hazardous Materials	4.20	Wildfire
4.10	Hydrology and Water Quality	4.21	Mandatory Findings of Significance
4.11	Land Use and Planning		

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Mitigation measures are numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section. "Conditions of Approval" are measures that the City uniformly applies to development projects as applicable.

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and requires lead agencies to use alternatives to level of service (LOS) for evaluating transportation impacts, specifically vehicle miles traveled (VMT). SB 743 also included changes to CEQA that apply to transit-oriented developments, as related to aesthetics and parking impacts. Under SB 743, a project's aesthetic impacts will no longer be considered significant impacts on the environment if:

- The project is a residential or mixed-use residential project, or employment center project and
- The project is located on an infill site within a transit priority area.[4]

SB 743 also clarifies that local governments retain their ability to regulate a project's aesthetics impacts outside of the CEQA process.

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. In Santa Clara County, the one state-designated scenic highway is SR 9 from the Santa Cruz County line to the Los Gatos City Limit.

[4] An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." A "transit priority area" is defined as "an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: California Legislative Information. "Chapter 2.7. Modernization of Transportation Analysis for Transit-Oriented Infill Projects [21099- 21099.]." Accessed October 22, 2025. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=13.&part=&chapter=2.7.&article=.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts to aesthetics. The following policies are applicable to the project.

Policy	Description
LUD 6.1	**Neighborhood character.** Ensure that new development in or near residential neighborhoods is compatible with neighborhood character.
LUD 9.1	**Height and setback transitions.** Ensure that new development includes sensitive height and setback transitions to adjacent structures and surrounding neighborhoods.
LUD 9.3	**Enhanced public space**. Ensure that development enhances public spaces: • Encourage strong pedestrian-oriented design with visible, accessible entrances and pathways from the street. • Encourage pedestrian-scaled design elements such as stoops, canopies and porches. • Encourages connections to pedestrian and bicycle facilities. • Locate buildings near the edge of the sidewalk. • Encourage design compatibility with surrounding uses. • Locate parking lots to the rear or side of buildings. • Encourage articulation and use of special materials to provide visual interest. • Promote and regulate high-quality sign materials, colors and design that are compatible with site and building design. • Encourage attractive water-efficient landscaping on the ground level.
LUD 9.5	**View preservation.** Preserve significant views throughout the community.
LUD 9.6	**Light and glare.** Minimize light and glare from new development.

City of Mountain View Zoning Ordinance

The City Zoning Ordinance (Chapter 36 of the Municipal Code) sets forth specific design guidelines, building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements. The Zoning Ordinance promotes careful planning of development projects to enhance the visual environment. The City's development review process includes the review of preliminary plans, the consideration of public input at and by the Development Review Consultation (DRC), Zoning Administrator, Environmental Planning Commission (EPC), and the City Council. The City's Planning Division reviews private development applications for conformance with City plans, ordinances, and policies related to zoning, urban design, subdivision, and CEQA.

The Zoning Administrator makes recommendations to the City Council for development projects located in some Precise Plan areas and makes final decisions for development, variance, and use permits. The DRC reviews the architecture and site design of new development and provides project applicants with design comments/direction. The development review process ensures the architecture and urban design of new developments would protect the City's visual environment.

4.1.1.2 *Existing Conditions*

Scenic Vistas

The term "scenic vista" typically refers to an expansive view of an area that is visually or aesthetically pleasing, usually as seen from an elevated point or open area. The scenic quality of the City is characterized by extensive views to the Santa Cruz Mountains to the south and west and views of other natural features such as the Diablo Mountain range to the southeast, Mission Peak to the east, and Stevens Creek in the eastern portion of the City.[5] Views of San Francisco Bay are generally available only from Shoreline Park in the North Bayshore Area.[6]

The project is located within a developed portion of the City that has industrial, commercial, office, and residential uses. The site is relatively flat and is surrounded by trees and existing developments, which limits views from the site. Views of Santa Cruz Mountains to the south of the site are visible but obstructed by the existing development south of the site.

There are no state-designated scenic highways in Mountain View. There is only one state-designated scenic highway in Santa Clara County: SR 9 from the Santa Cruz County line to the Los Gatos City limit. Eligible state scenic highways (not officially designated) include: SR 17 from the Santa Cruz County line to SR 9, SR 35 from Santa Cruz County line to SR 9, I-280 from the San Mateo County line to SR 17, and the entire length of SR 152 within the County. The nearest officially state designated highway is the segment of I-280 in San Mateo County, which is approximately 6.7 miles west of the project site.[7]

Visual Character and Quality

The project site is developed in an area with low density, one to two-story buildings, consisting of industrial, commercial, and residential uses. The residential buildings are single-family with stucco exterior. The non-residential buildings are rectangular with stucco exterior. Most buildings in the area have minimalist façade. San Rafael Avenue, which is unstriped and provides access to the site and development north, east, and south of the site, is a two-lane roadway lined with mature trees. Trees on San Rafael provides screening between the site and adjacent development.

The site contains two, single-story buildings: an office and a warehouse. The office building is clad in stucco and a clay tile roof. The windows to the office building are boarded up. The existing warehouse is a sheet metal warehouse and is rectangular. Most of the site consists of a large, paved area for parking. There is minimal landscaping in front of the office building along the San Rafael Avenue site frontage. Views of the project site and surrounding area are shown below in Photos 1 through 4 below.

[5] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report.* SCH #2011012069. September 2012. Page 581.
[6] Ibid.
[7] California Department of Transportation. "California State Scenic Highway System Map." Accessed October 22, 2025. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.



Photo 1: View of the office building on-site looking west.



Photo 2: View of the warehouse building on-site looking west.

PHOTOS 1 & 2



Photo 3: View of a residence and office building across from the eastern site boundary.



Photo 4: View of the residence south of the site.

PHOTOS 3 & 4

Location within a Transit Priority Area

The project site is not located within 0.5 mile of a major transit stop; therefore, it is not located in a Transit Priority Area.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[8] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

The project site has limited views of scenic resources due to the site's location, surrounding development, and flat topography. The project does not propose development in Shoreline Park, city boundary edges, or other areas with open and expansive views. Views of the Santa Cruz Mountains are obstructed by existing development and landscaping. Based on the lack of scenic vistas visible from the site, implementation of the project would result in a less than significant impact to scenic vistas. **(Less than Significant Impact)**

[8] Public views are those that are experienced from publicly accessible vantage points.

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

The project site is not visible from the nearest segment of a state-designated scenic highway. Therefore, the development of the project would not have an adverse impact on the viewshed from a state scenic highway. **(No Impact)**

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project is in an urbanized area. As discussed in Section 3.1 Proposed Building Development, the project would require a General Plan Amendment to change the land use designation from General Industrial to Medium Density Residential and a rezone from General Industrial (MM) to Multiple-Family Residential (R3-2-2). The project would adhere to the regulations for the proposed land use designation of Medium Density Residential and zoning designation of Multiple-Family Residential (R3-2-2), except for the side setback, lot coverage, and density requirements. The proposed deviations from these select requirements is permitted as design waivers under the State Density Bonus law (which was previously discussed in Section 3.1 Proposed Building Development).

In addition, the project would be subject to the DRC review process. This process would ensure that the project would be designed to be compatible with the neighborhood character, minimize light and glare (see additional discussion below), and have height and setback transitions as appropriate from adjacent structures. For these reasons, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project is in an urbanized area that has various existing light sources including lighting from buildings, streetlights, and vehicles travelling on local roads. Sources of daytime glare include building windows and vehicles. The project would construct 36, three-story rowhouse units in five buildings.

The development of the project would add additional light sources by intensifying development on-site that would incrementally increase the amount of nighttime lighting compared to existing conditions. However, the project would be subject to the design review process to ensure that project lighting is directed downward and would not spillover onto adjacent properties or otherwise be highly visible, while still providing adequate lighting for safety. The proposed buildings would include stucco and asphalt shingles and do not contain reflective materials (e.g., large expansive glass) that would introduce new sources of substantial glare. For these reasons, the project would not create a new source of substantial light or glare. **(Less than Significant Impact)**

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[9]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[10]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[11] Programs such as CAL FIRE's Fire and Resource Assessment Program are used to identify whether forest land, timberland, or timberland production areas could be affected are located on or adjacent to a project site.[12]

[9] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed August 15, 2025. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[10] California Department of Conservation. "Williamson Act." Accessed August 15, 2025. http://www.conservation.ca.gov/dlrp/lca.
[11] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[12] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed August 15, 2025. http://frap.fire.ca.gov/.

4.2.1.2 *Existing Conditions*

The project site is classified as Urban and Built-Up land by the Santa Clara County Important Farmlands 2020 Map.[13] The project site is not zoned for agricultural use or forest land. The project site does not contain agricultural resources or timberland resources and is not under an existing Williamson Act contract.[14]

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in a loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

[13] California Department of Conservation. "California Important Farmland Finder." Accessed August 15, 2025. https://maps.conservation.ca.gov/DLRP/CIFF/.

[14] California Department of Conservation. "Williamson Act Enrollment Finder." Accessed August 15, 2025. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/.

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site is designated as "Urban and Built-Up land." Therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to nonagricultural uses as a result of project implementation. **(No Impact)**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project would require a rezoning from General Industrial to Multiple-Family Residential (R3-2-2). The project site is not zoned for agricultural and is not under a Williamson Act. Therefore, the project would not conflict with existing zoning for an agricultural use or a Williamson Act contract. **(No Impact)**

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

The project site or adjacent to land are not zoned for forest land, timberland, or Timberland Production. The project site is within a developed area of the City. For these reasons, the project would not conflict with zoning for forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?

The project site is currently developed with two commercial structures. Therefore, no forest land would be lost as a result of the project. **(No Impact)**

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The proposed development would occur in an urbanized, developed area of the City. No agricultural or forestry uses are on-site or adjacent to the project site. Therefore, the project would not result in impacts to agricultural lands or forest lands. **(No Impact)**

4.3 Air Quality

The following discussion is based in part upon an Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc., dated September 29, 2025. The Air Quality & Greenhouse Gas Assessment is attached as Appendix **A** to this Initial Study.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Criteria air pollutants are pollutants that have established federal or state standards for outdoor concentrations to protect public health. Pursuant with the federal and state Clean Air Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforced the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM_{10}), particulate matter with a diameter of 2.5 micros or less ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. The CAAQS also includes visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Unlike criteria air pollutants, which have a regional impact, TACs are highly localized and regulated at the individual emissions source level.

DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. DPM is comprised of diesel exhaust, which is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (i.e., areas most susceptible to injury).[15] Chemicals in diesel exhaust, such as benzene and formaldehyde, are also TACs identified by the CARB.

An overview of the sources of criteria pollutants and TACs, as well as their associated health effects, is provided in Table 4.3-1.

[15] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed September 9, 2025. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Table 4.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants

Pollutants	Description and Sources	Primary Effects
Ozone (O_3)	O_3 is a secondary criteria air pollutant that is the result of a photochemical (sunlight) reaction between reactive organic gases (ROG) and nitrogen oxides (NO_x). Pollutants emitted by motor vehicles, power plants, industrial boilers, refineries, and chemical plants are the common sources for this reaction. High O_3 levels are caused by the cumulative emissions of ROG and NO_X. These precursor or primary pollutants react under certain meteorological conditions to form high O_3 levels. Commons sources of ROG and NO_x are vehicles, industrial plants, and consumer products.	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	NO_2 is a reactive gas that combines with nitric oxide (NO) to form NO_x. NO_2 is the byproduct of fuel combustion, with common sources of NO_2 being emissions from cars, trucks, buses, power plants, and off-road equipment. Other sources of NO_2 include high temperature stationary combustion and atmospheric reactions.	• Aggravation of respiratory illness • Reduced visibility
Carbon Monoxide (CO)	CO is a colorless, odorless, and toxic gas that is the product of incomplete combustion of carbon-containing substances (e.g., when something is burned). Common outdoor sources of CO include mobile vehicles (passenger cars and trucks) and machinery that burn fossil fuels.	• Interferes with oxygen delivery to the body's organ due to binding with the hemoglobin in the blood • Fatigue, headaches, confusion, and dizziness
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Particulate Matter (PM) is any material that is emitted as liquid or solid particles or a gaseous material, such as dust, soot, aerosols, and fumes. PM_{10} and $PM_{2.5}$ are both small enough particulates to be inhaled into the human lungs, and $PM_{2.5}$ is small enough to deposit into the lungs, which poses an increased health risk compared to PM_{10}. Typical sources of PM include stationary combustion of solid fuels, construction activities, vehicles, industrial processes, and atmospheric chemical reactions.	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Sulfur Dioxide (SO_2)	SO_2 is a pungent and colorless gaseous pollutant. SO_2 is part of the sulfur oxides (SO_x) group and is the pollutant of greatest concern in the SO_x group. SO_x can react with other compounds in the atmosphere to form small particles. These particles contribute to pollution. SO_2 is primarily formed from fossil fuel combustion at power plants and other industrial facilities. Sources of SO_2 include motor vehicles, locomotives, ships, and off-road diesel equipment that are operated with fuels that contain high levels of sulfur. Industrial processes, such as natural gas and petroleum extraction, oil refining, and metal processing.	• Aggravation of respiratory illness • Respiratory irritation such as wheezing, shortness of breath and chest tightness • Increased incidence of pulmonary symptoms and disease, decreased pulmonary function

Pollutants	Description and Sources	Primary Effects
Lead	Lead is a naturally occurring element that can be found in all parts of the environment including the air, soil, and water. As an air pollutant, lead is present in small particles. The most common historic source of lead exposure was the past use of leaded gasoline in motor vehicles. The exhaust resulting from use of leaded gasoline would release lead emissions into the air. Now, major sources of lead in the air are from ore and metals processing plants and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters.	• Adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system
Toxic Air Contaminants (TACs)	TACs include certain air pollutants known to increase the risk of cancer and/or a range of other serious health effects. Sources of TAC include, but are not limited to, cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; and building materials and products.	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following groups who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

Worker Receptors

In addition to the sensitive receptors mentioned above, the Bay Area Air District (Air District) considers worker receptors when reviewing impacts from air pollution and TACs. Worker receptors are adults (16 years and older) that work indoors and/or outdoors at off-site locations zoned for commercial and industrial uses. Typical developments that include worker receptors are offices, retail shops, manufacturing uses, light industrial uses, or heavy industrial uses.[16]

[16] Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards*. 2022. Page E-14.

4.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the EPA is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants, discussed previously; PM, O_3, CO, SO_2, NO_2, and lead.[17]

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Diesel Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, this plan involves the application of emission control strategies to existing diesel vehicles and equipment to reduce DPM and other pollutants. Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment, including off-road equipment, will significantly reduce emissions of DPM and NO_X.

Regional

2017 Clean Air Plan

The Air District is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area, which includes the project area. Regional air quality management districts, such as the Air District, must prepare air quality plans specifying how federal and state air quality standards will be met. The Air District's most recently adopted plan is the Bay Area 2017 Clean Air Plan. The 2017 Clean Air Plan focuses on the following two related Air District goals and how to achieve them:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TAC; and

[17] NO_x is the group of nitrogen compounds (NO_2 and nitric oxide [NO]) that typically represents NO_2 emissions because NO_2 emissions contribute the majority of NO_x exhaust emissions emitted from fuel combustion.

- Protect the climate by reducing Bay Area greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2040 and 80 percent below 1990 levels by 2050.[18]

CEQA Air Quality Guidelines

The Air District CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by the Air District within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, Air District rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted on April 20, 2023 by the Air District's Board of Directors.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts to air quality. The following policies are applicable to the project.

Policy	Description
INC 20.7	**Protect sensitive receptors.** Protect the public from substantial pollutant concentrations.
INC 20.8	**Offensive odors.** Protect residents from offensive odors.
MOB 9.2	**Reduced vehicle miles traveled.** Support development and transportation improvements that help reduce greenhouse gas emissions by reducing per capita vehicle miles traveled.
INC 20.7	**Protect sensitive receptors.** Protect the public from substantial pollutant concentrations.

4.3.1.3 *Existing Conditions*

The San Francisco Bay Area (Bay Area) Air Basin is designated a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and for the state O_3, PM_{10}, and $PM_{2.5}$ standards.[19,20] The Bay Area is designated as an attainment area for both the NAAQS and CAAQS for CO, SO_2, and NO_2. The Air District is responsible for attaining the NAAQS and CAAQS for these pollutants within the Bay Area. As part of an effort to attain and maintain ambient air quality standards for O_3, PM_{10}, and $PM_{2.5}$, the Air District has established thresholds of significance for these air pollutants and their precursors that apply to both construction period and operational period impacts. Controlling the emissions of these precursor pollutants is the focus of the Air District attempts to reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys where temperatures are higher, there

[18] Bay Area Air Quality Management District. *Final 2017 Clean Air Plan.* April 19, 2017. Page 12.
[19] Bay Area Air Quality Management District. "Air Quality Standards and Attainment Status." Last Updated January 5, 2017. Accessed September 9, 2025. https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status.
[20] The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of SO2 or lead. These criteria pollutants are not discussed further.

is less wind circulation, and sources of the precursor pollutants (i.e., ROG and NO_x) are prominent. In the Bay Area, most particulate matter is generated from the following activities: combustion, factories, construction, grading, demolition, agriculture, and motor vehicles. Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of Mountain View has considered the air quality thresholds updated by the Air District in April 2023 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The Air District CEQA Air Quality thresholds for criteria air pollutants and fugitive dust used in this analysis are identified in Table 4.3-2. Table 4.3-3 below lists the Air District health risk and hazards thresholds for single-source and cumulative-sources.

Table 4.3-2: Air District Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG and NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 parts per million (ppm) (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	

Notes: ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide

* The Air District recommends for construction projects that require less than one year to complete, lead agencies should annualize impacts over the scope of actual days that peak impacts would occur rather than over the full year. Additionally, for phased projects that results in concurrent construction and operational emissions, construction-related exhaust emissions should be combined with operational emissions for all phases where construction and operations overlap.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

Table 4.3-3: Bay Area Air District Health Risks and Hazards Thresholds

Health Risk	Single Source	Combined Cumulative Sources
Cancer Risk	10 per one million	100 per one million
Non-Cancer Hazard Index	1.0	10.0
Annual $PM_{2.5}$ Concentration	0.3 µg/m^3	0.8 µg/m^3 (average)

Notes: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Thresholds are applicable to construction and operational activities.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

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

The Air District CEQA Air Quality Guidelines set forth criteria for determining consistency with the 2017 CAP. In general, a project is considered consistent if a) it supports the primary goals of the 2017 CAP; b) it includes relevant control measures; and c) it does not interfere with implementation of the 2017 CAP control measures. A discussion of the project's consistency with these criteria is provided

below and determined to be consistent with the implementation of the below identified City standard condition of approval and mitigation measure MM AIR-1.1.

Support of Primary 2017 Clean Air Plan Goals

As discussed in Section 4.3.1.2 Regulatory Framework, the CAP's goals include 1) protecting public health by progressing towards attaining air quality standards and eliminating health risk and 2) protecting the climate. If a project exceeds the Air District criteria air pollutants thresholds of significance, its emissions are considered to result in significant adverse air quality impacts to the region's existing air quality conditions. An analysis of the project's construction and operational air pollutant emissions, and community health risk, is provided below. The project's impact on climate in terms of greenhouse gas emissions is discussed in Section 4.8 Greenhouse Gas Emissions and found to be less than significant.

Criteria Air Pollutant Emissions

Construction Period Emissions

The proposed project would result in temporary emissions resulting from construction activities associated with development, including demolition, site grading, asphalt paving, building construction, and architectural coating. Emissions commonly associated with construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips. Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils.

PM_{10} and $PM_{2.5}$ emissions can also be generated by the demolition and construction of buildings. In addition to PM_{10} and $PM_{2.5}$ emissions, off-road construction equipment is often diesel-powered and can be a substantial source of NO_x emissions. Diesel exhaust from construction equipment poses both a health and nuisance impact to nearby receptors. Modeling was completed to estimate the project's construction period criteria air pollutant emissions. The results of the modeling are summarized in Table 4.3-4 below. Refer to Appendix A for details about the modeling and project-specific data inputs and assumptions.

Table 4.3-4: Average Daily Construction Period Criteria Pollutant Emissions

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Average Daily Construction Emissions (pounds/day)				
2026 (302 construction workdays)	4.92	10.01	0.35	0.32
Air District Significance Thresholds	*54*	*54*	*82*	*54*

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Exceed Threshold?	*No*	*No*	*No*	*No*

As shown in Table 4.3-4, the project's construction period emissions would not exceed the Air District's thresholds of significance. The Air District recommends all projects include a "basic" set of best management practices (BMPs) to manage fugitive dust and considers impacts from to be less than significant if BMPs are implemented to reduce these emissions. The City requires the BMPs as a standard condition of approval.

City Standard Condition of Approval

COA AIR-1: **Basic Air Quality Construction Measures.** The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Bay Area Air Quality District (Air District) to reduce fugitive dust emissions. Emission reduction measures shall include, at a minimum, the following measures:

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

With the implementation COA AIR-1, the project construction period emission would be reduced to a less than significant level by controlling dust, limiting equipment idling, and properly maintaining equipment. **(Less than Significant Impact)**

Operational Period Emissions

Operational emissions from the project would be generated primarily from vehicles driven by future residents. Additionally, the project does not propose any diesel stationary equipment, such as generators, that could emit substantial TACs. The project would include 36 rowhouse units, which is less than the Air District's screening level for potentially significant operational criteria air pollutants of 637 dwelling units. Therefore, no quantification or modeling of operational criteria air pollutant emissions is required and operational air quality impacts are presumed to be less than significant. **(Less than Significant Impact)**

Community Health Risk

Development of the proposed project can increase the health risk of existing sensitive receptors during construction. Temporary project construction activity, which generates dust and equipment exhaust, would affect nearby sensitive receptors. Community risk impacts were addressed by predicting increased cancer risk, the increase in annual $PM_{2.5}$ concentrations, and computing the Hazard Index (HI) for non-cancer health risks. To evaluate the increased cancer risks from the project, a 30-year exposure period was used, per Air District guidance, with the sensitive receptors being exposed to project construction emissions during this timeframe. Unlike the increased maximum cancer risk, the annual $PM_{2.5}$ concentration and HI values are not additive but based on the annual maximum values for the entirety of the project.

Construction Period Emissions

Table 4.3-5 summarizes the maximum cancer risks, $PM_{2.5}$ concentrations, and HI for project related construction activities affecting the maximally exposed individuals (MEI) for the residential uses and business uses. For residential uses, the cancer risk MEI was located on the first floor at an adjacent residence south of the project site, and the annual $PM_{2.5}$ concentration MEI was located on the first floor at another adjacent residence south of the site. For business uses, the MEI was located at the office building adjacent to the north of the site.

Table 4.3-5: Project Health Risk Impacts at the Off-Site MEIs

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Maximum Residential Risks			
Project Construction (Unmitigated)	**20.44**	0.24	0.02
Project Construction (Mitigated)	3.70	0.08	<0.01
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold? (Unmitigated)	***Yes***	*No*	*No*

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Exceed Threshold? (Mitigated)	*No*	*No*	*No*
Maximum Worker Impact - Maximum Annual $PM_{2.5}$ Concentration Impact			
Project Construction (Unmitigated)	0.11	0.05	<0.01
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold? (Unmitigated)	*No*	*No*	*No*
Bolded = exceed threshold			

As shown in the table above, the annual $PM_{2.5}$ concentration and HI from construction activities would be below the single-source significance thresholds with and without control measures. However, the unmitigated maximum cancer risks from construction activities at the cancer risk MEI would exceed the Air District's single-source significance threshold.

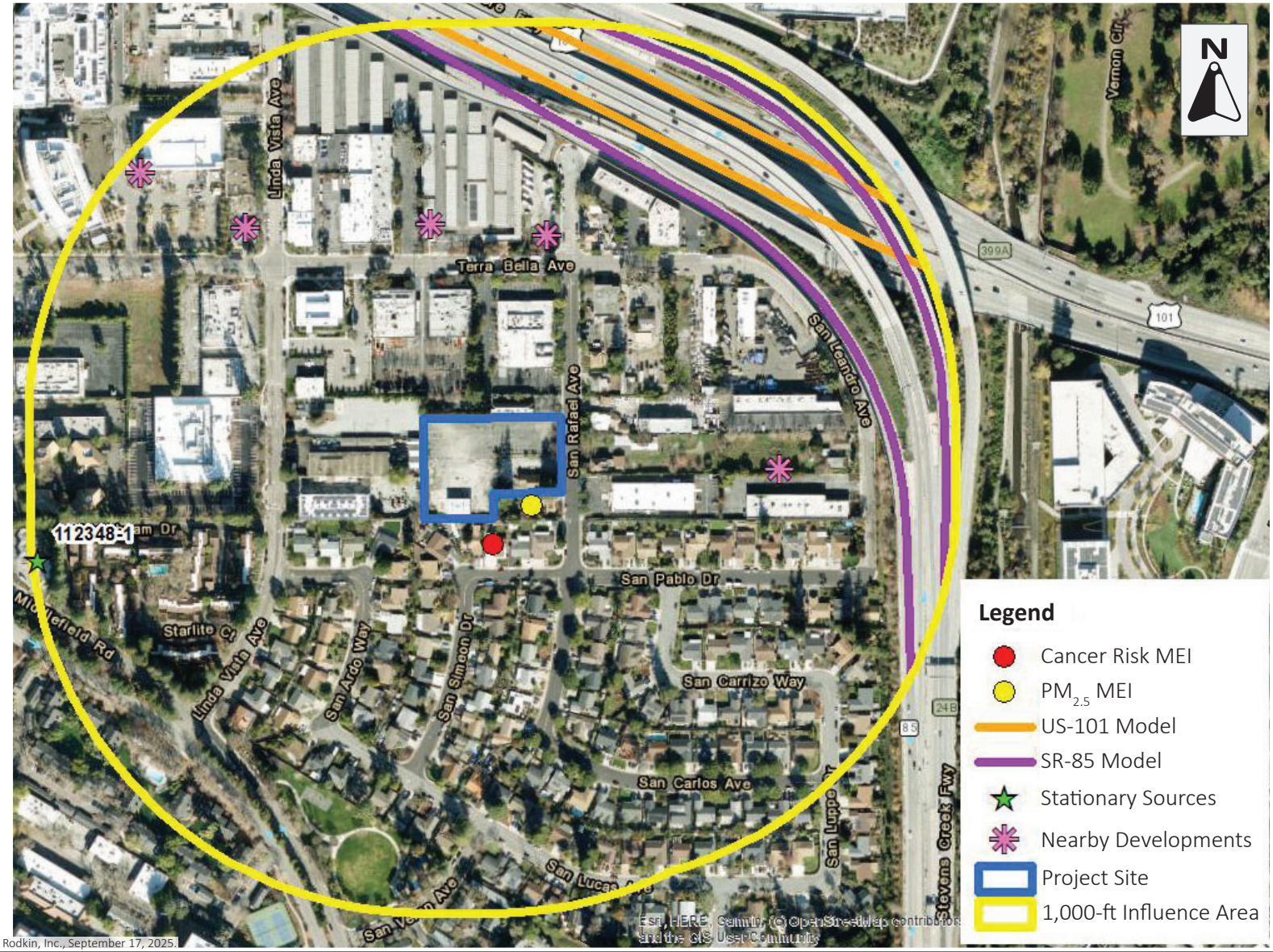
Impact AIR-1: Construction of the project would exceed the Bay Area Air District single-source threshold for incremental cancer risk. **(Significant Impact)**

Mitigation Measure

MM AIR-1.1: The project shall implement a feasible plan to reduce diesel particulate matter emissions by 60 percent such that increased cancer risk from construction would be reduced below the Bay Area Air District single-source threshold. The 60-percent reduction can be achieved in one of the following ways:

1. All construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 Final emission standards for PM (PM_{10} and $PM_{2.5}$).
2. A combination of some of the following measures to achieve a reduction in construction diesel particulate matter emissions by 60 percent or greater:
    - Use of equipment that meet U.S. EPA Tier 4 Final emissions standards (as stated above),
    - Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,
    - Use of electrically-powered equipment,
    - Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
    - Change in construction build-out plans to lengthen phases, and
    - Implementation of different building techniques that result in less diesel equipment usage.

Modeling was completed assuming the implementation of COA AIR-1 and MM AIR-1.1 above and the results show that the cancer risk would be below the Air District's significance threshold (refer to Table 4.3-5 above and Appendix A). **(Less than Significant Impact with Mitigation Incorporated)**



Source: Illingworth & Rodkin, Inc., September 17, 2025.

LOCATION OF PROJECT SITE, MEIs, AND NEARBY TAC AND $PM_{2.5}$ SOURCES | FIGURE 4.3-1

Cumulative Emissions

By its very nature, air pollution is largely a cumulative impact. The geographic area for cumulative impacts to sensitive receptors is within 1,000 feet of the project site. This distance is recommended by Air District because adverse effects are the greatest within this distance. At further distances, health risk diminishes. U.S. 101 and SR 85, and one stationary source (i.e., an emergency generator), are within the 1,000-foot influence area that could have cumulative health risk impacts at the MEIs. In addition, the construction emissions from the following development projects (within 1,000 feet of the project site) could contribute to the cumulative health risk:

- 1020 Terra Bella Avenue – This project is located approximately 415 feet north of the proposed project and 615 feet from the MEIs. This project is approved to develop a six story, 108-unit affordable rental housing building and a two-story above grade parking garage. The construction timeline for this project is unknown, as a result, construction of the 1020 Terra Bella Avenue project is conservatively assumed to possibly overlap with the proposed project's construction period.
- 1040 Terra Bella Avenue – This project is located approximately 525 feet north of the proposed project and 725 feet north of the MEIs. This project is approved to develop two personal storage buildings that are six- and four-stories in size. The construction timeline for this project is unknown, as a result, construction of the 1040 Terra Bella Avenue project is conservatively assumed to possibly overlap with the proposed project's construction period.
- 1110 Terra Bella Avenue & 1012 Linda Vista Avenue – This project is located approximately 600 feet northwest of the proposed project and 900 feet northwest of the MEIs. This project is under review to develop seven-story, 70-unit 100-percent affordable housing development. While the project is not approved, it is conservatively assumed construction of the 1110 Terra Bella Avenue & 1012 Linda Vista Avenue project could overlap with the proposed project's construction period.
- 922, 944, & 950 San Leandro Avenue – This project is located approximately 400 feet east of the proposed project and 450 feet east of the MEIs. This project is under review to develop a 38-unit rowhome housing development. While the project is not approved, it is conservatively assumed construction of the 922, 944, & 950 San Leandro Avenue project could overlap with the proposed project's construction period.
- 1001 N. Shoreline Boulevard – This project is located approximately 650 feet northwest of the proposed project and 950 feet northwest of the MEIs. This project is constructing a seven-story, 203 unit apartment building with two levels of podium parking, a seven-story, 100 unit building with two levels of podium parking, and a six-level parking structure. This project is currently under construction. As a result, the 1001 N. Shoreline Boulevard project is expected to be completed by the time this project begins construction, so it was not included in the cumulative analysis.

Table 4.3-6 depicts the health risk impacts from the cumulative sources to the MEIs and Figure 4.3-1 shows the location of the project site and nearby sources of TACs and $PM_{2.5}$. Refer to Appendix A for details regarding modeling, data inputs, and assumptions.

Table 4.3-6: Cumulative Health Risk Impacts at the Project MEIs

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction (Unmitigated)	**20.44**	0.24	0.02
Project Construction (Mitigated)*	3.70	0.08	<0.01
U.S. 101 – ADT 215,250	1.36	0.05	<0.01
S.R. 85 – ADT 70,350	0.44	0.02	<0.01
Shoreline Shell (Facility ID #112348-1, Gas Dispensing Facility)	0.56	-	0.02
1020 & 1040 Terra Bella Avenue (Mitigated)**	<3.52	<0.06	<0.01
1110 Terra Bella Avenue & 1012 Linda Vista Avenue (Mitigated)***	<5.00	<0.15	<0.50
922, 944, & 950 San Leandro Avenue (Mitigated)**	<3.33	<0.04	<0.01
Cumulative Total (Unmitigated)	<34.65	<0.56	<0.58
Cumulative Total (Mitigated)	<17.91	<0.40	<0.57
Air District Cumulative Source Threshold	*>100*	*>0.8*	*>10.0*
Exceed Threshold? (Unmitigated)	*No*	*No*	*No*
Exceed Threshold? (Unmitigated)	*No*	*No*	*No*

* Mitigated includes implementation of COA AIR-1 and MM AIR-1.1.

** Mitigated construction risk and hazard impact values for the 1020 & 1040 Terra Bella Avenue and the 922, 944, & 950 San Leandro Avenue projects were available from their air quality technical reports analyzed by Illingworth & Rodkin, Inc.

*** The air quality technical report for 1110 Terra Bella Avenue & 1012 Linda Vista Avenue project was not available at the time of this study, and the construction risks were assumed to be half of the Air District's single-source thresholds due to the distance and dispersion between the source and receptors.

The results of the modeling show that, with and without the implementation of COA AIR-1 and MM AIR-1, the cumulative cancer risk, Annual $PM_{2.5}$, and HI do not exceed the cumulative-source thresholds. **(Less than Significant Impact)**

Health Effects from Criteria Air Pollutants

In a 2018 decision (Sierra Club v. County of Fresno), the Supreme Court of California determined that CEQA requires that the potential for the project's emissions to affect human health in the air basin must be disclosed when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute considerably to a significant cumulative impact. Federal and state ambient air quality standards are health-based standards and exceedances of those standards result in continued unhealthy levels of air pollutants. As stated in the Air District's CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size to result

in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In developing thresholds of significance for air pollutants, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed not to have an adverse health effect.

As discussed above, the project's construction and operation criteria air pollutant emissions would be below the Air District's criteria air pollutant emissions thresholds, and the project would implement the City's standard condition of approval COA AIR-1, which requires implementation of Air District-recommended standard construction BMPs to control dust, limiting equipment idling, and properly maintain equipment. For these reasons, the project's criteria air pollutant emissions would not result in a significant health impact. **(Less than Significant Impact)**

Consistency with 2017 Clean Air Plan Control Measures

The project is not required to incorporate project-specific control measures listed in the 2017 CAP because the project would not exceed the Air District's impact thresholds for criteria air pollutant emissions as discussed above. Furthermore, implementation of the project would not inhibit the Air District or partner agencies from continuing progress toward attaining state and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP. For these reasons, the project would not conflict with 2017 CAP control measures. **(Less than Significant Impact)**

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

As previously discussed, the Bay Area is considered a non-attainment area for ground-level O_3 and $PM_{2.5}$ under both the federal and state Clean Air Act. The area is also considered a non-attainment area for PM_{10} under the state act, but not the federal act. The Bay Area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3, $PM_{2.5}$, and PM_{10}, the Air District has established thresholds of significance for these air pollutants and their precursors, refer to Table 4.3-2. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5,}$ and apply to both construction period and operational period impacts.

As discussed under checklist question a), the project would result in construction criteria air pollutant emissions below the significance thresholds and would implement COA AIR-1, which would require that the project implement basic construction BMPs recommended by the Air District. In addition, the project is below the Air District's established screening level and, therefore, considered to have less than significant operational criteria air pollutant emissions. The project's construction period and operational period criteria air pollutant emissions, therefore, would not result in a significant cumulative criteria pollutant impact. **(Less than Significant Impact)**

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

As discussed under checklist question a) above, the project would not exceed the Air District's single-source thresholds for HI or annual $PM_{2.5}$ at the project MEI. With the implementation of COA AIR-1 and MM AIR-1, the cancer risk at the MEIs from project construction would not exceed the Air District's significance threshold. The Air District's cumulative-source threshold for cancer risk, $PM_{2.5}$, and HI would not be exceeded by the project with or without the identified mitigation.

Since the project does not propose diesel stationary sources that could emit substantial TACs (e.g., emergency generators) and the project-generated trips from 36 rowhouse units would be minimal and made up of mostly light-duty gasoline-powered vehicles (e.g., passenger cars), it is assumed that the project would result in a less than significant operational health risk impact. **(Less than Significant Impact with Mitigation Incorporated)**

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

According to the Air District's CEQA Guidelines, an odor source with five or more confirmed complaints per year averaged over three years is considered to have a significant impact. Future construction activities on-site could result in odorous emissions from diesel exhaust associated with construction equipment. Because of the temporary nature of these emissions and highly diffusive properties of diesel exhaust, odorous exposure of sensitive receptors to these emissions would be limited and the impact is considered less than significant.

The Air District has identified a variety of land uses and types of operations that would produce emissions that may lead to odors. Land uses identified include wastewater treatment plants, sanitary landfills, food processing facilities, coffee roasters, composting facilities, and confined animal facility/feed lot/dairy facility. The project would construct residential uses on-site, which is not one of the identified uses by the Air District that would produce substantial odors. For this reason, the project would have a less than significant odor impact. **(Less than Significant Impact)**

4.3.3 Non-CEQA Effects

Per California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (BIA v. BAAQMD), effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Mountain View has policies (e.g., General Plan Policy INC 20.7) that address existing air quality conditions affecting a proposed project.

A health risk assessment was prepared to analyze the effect of existing TAC sources on the proposed project residents. The maximum impacts from the stationary source, roadway emissions associated with U.S. 101 and SR 85, and cumulative construction projects within 1,000 feet of the site would occur at second floor in the northeastern corner of the proposed development. The modeling results

of the assessment are summarized in Table 4.3-7 and show that the cumulative sources of TAC emissions do not exceed the Air District single-source or cumulative-source thresholds for cancer risk, annual $PM_{2.5}$ concentration, or HI.

Table 4.3-7: Impacts from Cumulative Sources to Project Site Receptors

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
U.S. 101 – ADT 215,250	2.69	0.08	<0.01
S.R. 85 – ADT 70,350	0.89	0.03	<0.01
Shoreline Shell (Facility ID #112348-1, Gas Dispensing Facility)	0.66	-	0.04
1020 & 1040 Terra Bella Avenue	<3.52	<0.06	<0.01
1110 Terra Bella Avenue & 1012 Linda Vista Avenue	<5.00	<0.15	<0.50
922, 944, & 950 San Leandro Avenue	<3.33	<0.04	<0.01
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>0.1*
Exceed Threshold?	*No*	*No*	*No*
Cumulative Total	<16.09	<0.36	<0.58
Air District Cumulative Source Threshold	*>100*	*>0.8*	*>10.0*
Exceed Threshold?	*No*	*No*	*No*

4.4 Biological Resources

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts to biological resources including, but not limited to, the following goals and policies, which are applicable to the project.

Policy	Description
INC 16.3	**Habitat.** Protect and enhance nesting, foraging and other habitat for special-status species and other wildlife.
POS 12.2	**Urban tree canopy.** Increase tree canopy coverage to expand shaded areas, enhance aesthetics and help reduce greenhouse gases.
POS 12.4	**Drought-tolerant landscaping.** Increase water-efficient, drought-tolerant and native landscaping where appropriate on public and private property.

City of Mountain View Tree Preservation Ordinance

The City's Tree Preservation Ordinance (Chapter 32, Article 2 of the City Code) protects all trees designated as Heritage trees. A "Heritage Tree" is defined as any one of the following:

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

A heritage tree removal permit is required from the City of Mountain View for the removal of Heritage trees.

4.4.1.2 *Existing Conditions*

The approximately 1.8-acre infill project site is located in an urbanized area of Mountain View and is surrounded by residential, commercial, office, and industrial uses. There are no special status species known to occur on-site and there is no suitable habitat for special status species as the site is fully

developed.[21] There are also no sensitive habitats such as wetlands or riparian habitat on-site or adjacent to the project site.[22] The nearest waterway is Stevens Creek, which is approximately 1,090 feet (0.2 mile) east of the project site and is separated by SR 85. The primary biological resources on-site are trees, which provide habitat and foraging opportunities for urban-adapted birds. As discussed in Section 3.0 Project Description, the project would result in the removal of 18 trees (17 on-site trees and one off-site tree) with two of the 18 trees being Heritage Trees.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

[21] United States Fish and Wildlife Service. "Final Critical Habitat Features." Last Edit Date August 7, 2025. Accessed August 16, 2025. https://www.arcgis.com/apps/mapviewer/index.html?url=https://services.arcgis.com/QVENGdaPbd4LUkLV/ArcGIS/rest/services/USFWS_Critical_Habitat/FeatureServer/0&source=sd

[22] United States Fish and Wildlife Service. "National Wetlands Inventory Surface Waters and Wetlands." Accessed August 16, 2025. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

As mentioned above in Section 4.4.1.2 Existing Conditions, given the urbanized nature of the project site and surrounding area, there are no sensitive habitats or special-status species on or adjacent to the project site. However, the trees, shrubs, and buildings on and adjacent to the project site could provide nesting habitat for birds, including migratory birds and raptors. Nesting birds are among the species protected under provisions of the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 2800.

Construction of the project, including removal of trees on-site, during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes abandonment and/or loss of reproductive effort is considered a taking by the CDFW. Any loss of fertile eggs, nesting birds/raptors, or any activities resulting in nest abandonment would constitute an impact. Construction activities, such as tree removal and site grading, that disturb a nesting bird or raptor on-site or immediately adjacent to the construction zone would also constitute an impact.

In compliance with the MBTA and the CDFW code, the proposed project shall implement the following City standard condition of approval, to reduce or avoid construction-related impacts to nesting raptors and their nests.

City Standard Condition of Approval

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

The applicant shall be responsible for the retention of a qualified biologist to conduct a survey of the project site and surrounding 500 feet for active nests—with particular emphasis on nests of migratory birds—if construction (including

site preparation) would begin during the bird nesting season, from February 1 through August 31. If active nests are observed on either the project site or the surrounding area, the applicant, in coordination with the appropriate City staff, shall establish no-disturbance buffer zones around the nests, with the size to be determined in consultation with the California Department of Fish and Wildlife (usually 100 feet for perching birds and 300 feet for raptors). The no-disturbance buffer shall remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes during the nesting season, an additional survey shall be necessary to avoid impacts on active bird nests that may be present.

With the implementation of the above City standard condition of approval COA BIO-1, the project would result in a less than significant impact to nesting birds because construction would be scheduled to avoid the nesting season and if it cannot, preconstruction surveys would be completed to ensure no nesting birds or nests are located on-site during construction and, if they are, buffer zones would be established around nests during construction. **(Less than Significant Impact)**

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

As mentioned above in Section 4.4.1.2 Existing Conditions, the project site is located in a developed, urban area of Mountain View. The site and surrounding properties are developed and do not contain such as riparian habitat or other sensitive habitat . Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(No Impact)**

c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?

As described in Section 4.4.1.2 Existing Conditions, there are no federally protected wetlands or other waterways on or adjacent to the project site. Therefore, the project would not impact state or federally protected wetlands. **(No Impact)**

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site is surrounded by built out urban land uses and major roadways, such as SR 85. The surrounding development and roadways act as barriers to movement for terrestrial species, thus eliminating connectivity between blocks of core habitat and constraining wildlife movement in the immediate vicinity of the project site. In addition, there are no streams or waterways adjacent or

near the project site. The closest creek to the project site is Stevens Creek located approximately 0.2 mile east of the project site. Furthermore, the project site is also not part of an established native or migratory wildlife corridor or nursery site. While there could potentially be nesting birds present on-site, the project would implement the City standard condition of approval COA BIO-1 to protect nesting birds. Therefore, the project would not interfere substantially with the movement of any native resident or migratory wildlife species. **(Less than Significant Impact)**

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

General Plan Policies

The General Plan contains policies (General Plan Policies POS 12.2 and POS 12.4) that protect the urban tree canopy and integrate biological resources to the built environment. The project would integrate native and drought-tolerant landscaping (consistent with General Plan Policy POS 12.4) and plant 48 replacement trees, which is beyond the 20 replacement trees required (as calculated below). In addition, the project would increase the number of trees on-site (consistent with General Plan Policy POS 12.2) compared to existing conditions. Based on this discussion, the project would be consistent with General Plan policies related to protecting biological resources. **(Less than Significant Impact)**

Zoning Ordinance

The project would remove a total of 18 trees, two of which are heritage trees. The project would plant 48 replacement trees in areas surrounding the proposed buildings and around the perimeter of the site. The City's Tree Preservation Ordinance requires a permit to remove any Heritage trees. The proposed project would implement the following City standard conditions of approval to comply with the City's Tree Preservation Ordinance.

City Standard Condition of Approval

COA BIO-2: **Replacement Trees.** The applicant shall offset the loss of each Heritage/street tree with a minimum of two new replacement trees, for a total of 4 replacement trees at a minimum. Each replacement tree shall be no smaller than a 24-inch box and shall be noted on the landscape plan as Heritage or street replacement trees.

With implementation of the above standard condition of approval, the proposed project would not conflict with the City's Zoning Ordinance. **(Less than Significant Impact)**

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not part of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, it would not conflict with any approved local, regional, or state habitat conservation plan. **(No Impact)**

4.5 Cultural Resources

The following discussion is based upon an Archaeological Sensitivity Assessment dated July 2025 and a Historical Resources Evaluation dated October 2025 prepared by Archaeological/Historical Consultants. A copy of the Archaeological Sensitivity Assessment, which is a confidential report, is on file at the City of Mountain View City Community Development Department and is available for review with the appropriate credentials. The Historical Resources Evaluation is attached to this report as Appendix B.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

The NRHP is the nation's master inventory of historic resources that are considered significant at the national, state, or local level. Properties are evaluated using established criteria, which generally include being at least 50 years old, retaining historic integrity, and demonstrating significance through associations with important events or people, distinctive design or construction, artistic value, or the potential to provide important historical or prehistoric information.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[23]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical

[23] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed August 27, 2025. https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Section 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Section 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts to cultural resources. The following policies are applicable to the project.

Policy	Description
LUD 11.1	**Historical preservation.** Support the preservation and restoration of structures and cultural resources listed in the Mountain View Register of Historic Resources, the California Register of Historic Places or National Register of Historic Places.
LUD 11.5	**Archaeological and paleontological site protection.** Require all new development to meet state codes regarding the identification and protection of archaeological and paleontological deposits.
LUD 11.6	**Human remains**. Require all new development to meet state codes regarding the identification and protection of human remains.

City of Mountain View Zoning Ordinance

The City's Zoning Ordinance is in Chapter 36 of the Municipal Code and consists of land use regulations, based on policies of the General Plan, that have been enacted in order to promote the public health, safety, morals, comfort and general welfare throughout the City of Mountain View.

Section 36.54.45 et seq. of the City's Zoning Ordinance, Designation and Preservation of Historic Resources, includes a process for recognizing, preserving, and protecting historical resources. Section 36.54.55 of the Municipal Code establishes the Mountain View Register of Historic Resources (Mountain View Register) as the City's official list of historically significant buildings, structures, objects, and sites that are considered during the development review process. The Mountain View Register has similar criteria for listing as the State of California Register and consists of historic resources that meet one or more of the following criteria (refer to Municipal Code Section 36.54.65):

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

4.5.1.2 *Existing Conditions*

Historic Resources

The site is located in a suburban neighborhood of almost entirely post-World War II buildings. The project site contains two commercial structures (an office and a warehouse), both were constructed

circa 1980. By 1993, the property was the office of El Camino Paving, an asphalt contractor. The office building is clad in stucco and has clay tiles, which could be considered a modern version of the Mediterranean Revival or Spanish Revival style. The existing warehouse is a typical sheet metal warehouse. This type of construction was built in large numbers after World War II and is common in industrial portions of the San Francisco Bay Area. According to the City of Mountain View Register of Historic Resources, California Historic Register, and the National Register of Historic Places, there are no listed resources on or adjacent to the site.[24, 25, 26]

To be considered a historic resource, a site must meet certain sets of criteria including relevance to local and regional history, its association with historic figures, and the distinctiveness of its architecture. The buildings on-site were evaluated against the criteria of the NRHP and CRHR in addition to the criteria established by the City of Mountain View Register of Historic Resources. The evaluation for the two buildings determined that they are not eligible for listing on the NRHP, CRHR, or the Mountain View Register of Historic Resources because of they do not have specific associations with important events in the area, do not have association with individual who have achieved significance in the history of the City, state, or nation, and are not notable examples of the building style. For additional information on the evaluation prepared for the on-site structures, see Appendix B.

Archaeological Resources

A records search at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) was conducted on July 18, 2025, to identify all recorded archaeological sites on and within one-quarter mile of the project site. No Native American resources were recorded on the project site and there are no previously recorded Native American archaeological sites within a quarter mile of the project area. Additionally, a Sacred Lands File search request was submitted to the to the NAHC for the project area. The results of the search were negative.

The project area is located approximately 500 feet west of the historic-era alignment of Stevens Creek and was historically a wetland and willow thicket. Despite the project site's proximity to a historic waterway, its historic environment as a wetland and willow thicket made it unattractive for settlement or other intensive uses. Therefore, the project site has low sensitivity for buried and surface Native American cultural resources.

A residence and shed were located on the project site, which is now 924 San Rafael Avenue, by 1931. The residence had multiple short-term occupants before 1950 and was demolished by 1980. It is unlikely that these occupants left artifact deposits with the potential to reveal information. Trash/refuse from after 1950 may be present on-site. However, artifacts from this period have a low potential to reveal information unless they can be associated with important individuals,

[24] City of Mountain View. "Mountain View Register of Historic Resources." September 28, 2022.
[25] California State Parks. "California Historical Resources." Accessed October 20, 2025. https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=mountain+view.
[26] National Park Service. "National Register of Historic Places." Accessed October 20, 2025. https://www.nps.gov/subjects/nationalregister/database-research.htm.

communities, or historical patterns. The archaeological sensitivity report did not uncover any such associations. Therefore, the project has low sensitivity for historic-era archaeological resources.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

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

As discussed above under Section 4.5.1.2 Existing Conditions, none of the buildings on-site are eligible for listing as historic resources under national, state, or local criteria. There are no resources adjacent to the site that are listed on or eligible for listing on the NRHP or the CRHP; nor do they contain any resources listed on the City of Mountain View Register of Historic Resources. As a result, implementation of the project would not impact historical resources pursuant to CEQA Guidelines Section 15064.5. **(No Impact)**

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

As discussed above under Section 4.5.1.2 Existing Conditions, the site has low sensitivity for buried Native American archaeological resources and for historic-era archaeological resources. Nonetheless, unknown archaeological resources could be discovered on-site during excavation. If any archaeological resources or human remains were discovered as a result of construction activities on-site, the project would be required to implement the following City standard conditions of approval.

<u>City Standard Condition of Approval</u>

COA CUL-1: **Discovery of Archaeological Resources.** If prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, all work within 100 feet of the find shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. Prehistoric materials might

include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative, shall develop a treatment plan that could include site avoidance, capping, or data recovery.

COA CUL-2 **Discovery of Human Remains.** In the event of the discovery of human remains during construction or demolition, there shall be no further excavation or disturbance of the site within a 50 foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to their authority, the Coroner shall notify the Native American Heritage Commission, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this state law (Public Resources Code Section 5097.98), then the landowner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. A final report shall be submitted to the City's Community Development Director prior to release of a Certificate of Occupancy. This report shall contain a description of the mitigation programs and its results, including a description of the monitoring and testing resources analysis methodology and conclusions, and a description of the disposition/curation of the resources. The report shall verify completion of the mitigation program to the satisfaction of the City's Community Development Director.

The implementation of the above standard conditions of approval would result in a less than significant impact to archaeological resources because the project would pause construction in the event unknown resources are discovered, evaluate the resources, and protect the resources accordingly. **(Less than Significant Impact)**

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

As discussed earlier under checklist question b), the project site has low sensitivity for archaeological resources. However, ground-disturbing activities during project construction could impact unknown underground resources, including human remains. With implementation of the City standard conditions of approval COA CUL-2 discussed under checklist question b), the project would reduce

impacts to human remains to a less than significant level by contacting the Santa Clara County Coroner to determine if the remains are Native American, initiating a formal process for final disposition of the remains, and requiring verification of the mitigation and monitoring process by the City's Community Development Director. **(Less than Significant Impact)**

4.6 Energy

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan, identify and recommend measures to achieve these policy goals, and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

California Building Standards Code

The California Building Standards Code (CBSC) is Title 24 of the California Code of Regulations. The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and was established in 1978 in response to a legislative mandate to reduce California's energy

consumption. The California Energy Code is overseen by the California Energy Commission (CEC) and includes design requirements to conserve energy in new residential and non-residential developments. The California Energy Code is enforced and verified by cities during the planning and building permit process. Title 24, Part 11 of the CBSC, also known as CALGreen, establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Title 24 is updated approximately every three years.[27,28] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[29]

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars II program in 2022 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2026 through 2035. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[30]

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to energy impacts. The following policy is applicable to the project.

Policy	Description
LUD 10.5	**Building energy efficiency**. Incorporate energy-efficient design features and materials into new and remodeled buildings.

City of Mountain View 2030 Greenhouse Gas Reduction Strategy

The City of Mountain View certified the General Plan Program EIR (SCH #2011012069) and adopted the Mountain View 2030 General Plan and Greenhouse Gas Reduction Program (GGRP) in July 2012. The GGRP is a separate but complementary document to the General Plan that implements the long-

[27] California Building Standards Commission. "California Building Standards Code." Accessed September 15, 2025. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[28] After passage of Assembly Bill 130, the residential building code is frozen until June 2031. This does not apply to nonresidential codes.
[29] California Energy Commission. "2022 Building Energy Efficiency Standards." Accessed September 15, 2025. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.
[30] California Air Resources Board. "Advanced Clean Cars II." Accessed December 29, 2025. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii

range GHG emissions reduction goals of the General Plan. The GGRP includes goals, policies, performance standards, and implementation measures for achieving GHG emissions reductions, to meet the requirements of AB 32. The program includes a goal to improve communitywide emissions efficiency by 15 to 20 percent over 2005 levels by 2020 and by 30 percent over 2005 levels by 2030.

Mountain View Green Building Code

The Mountain View Green Building Code (MVGBC) amends the state mandated CALGreen standards to include local green building standards and requirements for private development. The MVGBC does not require formal certification from a third-party organization but requires projects to be designed and constructed to meet the intent of a third-party rating system.[31] For residential projects proposing over five units, the MVGBC requires those buildings meet the intent of 70 GreenPoint Rated points from the Build it Green certification program, as well as compliance with mandatory CALGreen requirements.

In 2019, the Mountain View City Council approved amendments to Chapters 8, 14, and 24 of the MVGBC, referred to as Reach Code amendments. The Reach Code amendments are applicable to any project submitted after December 31, 2019.

On April 9, 2024, the Mountain View City Council suspended enforcement of all City of Mountain View local laws and regulations imposing all-electric requirements for new construction or otherwise prohibiting use or installation of gas appliances, including, but not limited to, City of Mountain View Code Sections 8.20.8, 8.20.9, 8.20.10, 8.20.12 and 8.20.14.

Mountain View Construction and Demolition Ordinance

According to the City's Construction and Demolition Ordinance, all new development projects are required to recycle and/or salvage for re-use a minimum of 65 percent of nonhazardous construction or demolition debris. Documentation of this diversion is required prior to scheduling a final building inspection.

4.6.1.2 *Existing Conditions*

Total energy usage in California is approximately 6,817 trillion British thermal units (Btu).[32] Out of the 50 states, California is ranked third in total energy consumption and 50th in energy consumption per capita.[33] The breakdown by sector is approximately 17 percent (1,167 trillion Btu) for residential uses, 17 percent (1,158 trillion Btu) for commercial uses, 22 percent (1,457 trillion Btu) for industrial uses, and 42 percent (3,036 trillion Btu) for transportation.[34] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

[31] City of Mountain View. "Mountain View Green Building Code." Accessed December 29, 2025. https://developmentpermits.mountainview.gov/about-permits/building-and-fire-codes/green-building-and-reach-codes.
[32] United States Energy Information Administration. "California State Energy Profile." Accessed December 29, 2025. https://www.eia.gov/state/print.php?sid=CA.
[33] Ibid.
[34] Ibid.

Electricity

Electricity in Santa Clara County is consumed primarily by the non-residential sector (76 percent), followed by the residential sector consuming 24 percent. In 2024, a total of approximately 17,794 gigawatt hours (GWh) of electricity was consumed in Santa Clara County.[35]

The community-owned Silicon Valley Clean Energy (SVCE) is the electricity provider for the City of Mountain View.[36] SVCE sources the electricity and the Pacific Gas and Electric Company (PG&E) delivers it to customers over their existing utility lines. Customers are automatically enrolled in the GreenStart plan and can upgrade to the GreenPrime plan. Both options are considered 100 percent GHG-emission free.

Natural Gas

PG&E provides natural gas services within the City of Mountain View. California's natural gas supply comes from a combination of in-state production and imported supplies from other western states and Canada.[37] In 2024, Santa Clara County used less than four percent of the state's total consumption of natural gas.[38]

Fuel for Motor Vehicles

In 2024, California produced 109 million barrels of crude oil and 13.4 billion gallons of gasoline were sold in California.[39, 40] The average fuel economy for new light-duty vehicles (motorcycles, cars, and light trucks/vans) in the United States has steadily increased from about 13 miles per gallon (mpg) in the mid-1970s to 28 mpg in 2024.[41] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.[42,43]

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[35] California Energy Commission. "Electricity Consumption by County." Accessed December 28, 2025. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0.

[36] Silicon Valley Clean Energy. "Frequently Asked Questions." December 29, 2025. https://www.svcleanenergy.org/faqs.

[37] California Gas and Electric Utilities. 2024 *California Gas Report.* Accessed December 29, 2025. https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf

[38] California Energy Commission. "Natural Gas Consumption by County." Accessed December 29, 2025. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1.

[39] United States Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." Accessed December 29, 2025. https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a

[40] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed December 29, 2025. https://cdtfa.ca.gov/taxes-and-fees/spftrpts.htm.

[41] United States Environmental Protection Agency. "50 Years of EPA's Automotive Trends Report." Accessed December 29, 2025. https://www.epa.gov/greenvehicles/50-years-epas-automotive-trends-report.

[42] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed December 29, 2025. http://www.afdc.energy.gov/laws/eisa.

[43] United States Department of Transportation. "USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed December 29, 2025. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026.

The buildings on-site are unoccupied and, therefore, use minimal (if any) energy.

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

Implementation of the project would require energy for the manufacture and transportation of building materials, preparation of the project site (e.g., demolition and grading), and the construction of the buildings. Construction processes are generally designed to be efficient in order to avoid excess monetary costs. Additionally, as noted in Section 4.3 Air Quality, the project would implement Air District BMPs (see City standard condition of approval COA AIR-1), which restricts equipment idling times and requires the applicant to post signs on the project site reminding workers to shut off idle equipment, thus reducing energy waste. The project would also comply with CALGreen to divert a minimum of 65 percent of nonhazardous construction and demolition waste from landfills, thus minimizing energy impacts from the creation of excessive waste. For these reasons, the proposed project would not use fuel or energy in a wasteful manner during construction activities. **(Less than Significant Impact)**

Operation

The operation of the project would consume energy for building heating and cooling, lighting, and appliance use. Vehicles used to travel to and from the project site by residents would use gasoline and electricity.

The project would be built in compliance with CALGreen requirements, Title 24 energy efficiency standards, and the MVGBC, all of which would improve the efficiency of the overall project. The project would incorporate green building features, including drought-tolerant landscaping, water-efficient fixtures, EV charging infrastructure, and high-efficiency appliances. The project is voluntarily proposing to be all-electric and include solar panels. In addition, the project would provide bicycle

parking spaces on-site. The project would also plant 50 trees, which would provide shade and further reduce energy use. Based on this discussion, the project would not result in the inefficient or wasteful use of energy or resources during operation. **(Less than Significant Impact)**

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would obtain electricity from SVCE, which provides 100 percent GHG-emission free energy from renewable and hydroelectric sources, consistent with the state's Renewables Portfolio Standard program and SB 350. In addition, the project would be consistent with the GGRP and designed per building standards and include features like on-site solar generation and energy efficient appliances for the buildings that meet or exceed state mandated Title 24 energy efficiency standards, CALGreen standards, and MVGBC standards. As discussed above, the project would plant trees throughout the project area. For these reasons, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

4.7 Geology and Soils

4.7.1 Environmental Setting

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The CBSC prescribes standards for constructing safe buildings. Part 2 of the CBSC contains the California Building Code (CBC), which contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to geology and soils impacts. The following policies are applicable to the project.

Policy	Description
PSA 4.2	**Natural disasters.** Minimize impacts of natural disasters.
PSA 5.1	**New development.** Ensure new development addresses seismically induced geologic hazards.
PSA 5.2	**Alquist-Priolo zones.** Development shall comply with the Alquist-Priolo Earthquake Fault Zoning Act.
PSA 5.4	**Utility design.** Ensure new underground facilities, particularly water and natural gas lines, are designed to meet current seismic standards.
INC 2.3	**Emergency-prepared infrastructure design.** Require the use of available technologies and earthquake-resistant materials in the design and construction of all infrastructure projects, whether constructed by the City or others.
PSA 4.2	**Natural disasters.** Minimize impacts of natural disasters.

Mountain View Municipal Code

The City of Mountain View has adopted the CBC, with amendments, as the reference building code for all projects in the City under Chapter 8 of the City's Municipal Code. The City's Building Inspection Division, which is part of the Community Development Department, is responsible for reviewing plans, issuing building permits, and conducting field inspections. Geotechnical investigation reports, as required by the CBC, would be reviewed by the City's Building Inspection Division prior to issuance of building permits to ensure compliance. Based on the CBC, Mountain View requires geotechnical reports as conditions of approval for projects in the City. Section 8.20.36 contains erosion and sediment control BMPs that projects are required to implement during construction activities.

4.7.1.1 *Existing Conditions*

Regional Geology

The project site is located in the Santa Clara Valley, an alluvial basin bounded by the Santa Cruz Mountains to the west, the Diablo Range to the east, and the San Francisco Bay to the north. The Valley was formed when sediments derived from both mountain ranges were exposed by tectonic uplift and regression of the inland sea which previously inundated the area. The Upper Quaternary sediments that comprise most of this basin consist of up to 1,000 feet of poorly sorted gravel, sand, and clay which were deposited in alluvial fan and deltaic depositional environments.

On-Site Geology

Soils

The soil on-site is identified as urbanland-hangerone complex, which mostly consist of disturbed and human-transported materials (urbanland) and alluvium derived from metamorphic and sedimentary rock and/or alluvium derived from metavolcanics (hangerone).[44] The typical profile of this soil type is clay from the surface to 35 inches below ground surface (bgs) and clay loam or gravelly loam at further depths.[45] The soil on-site from the surface to 17 inches bgs has high soil expansion characteristics, and very high soil expansion characteristics from 17 to 45 inches bgs.[46]

Site Topography

The project site is relatively flat and sits approximately 42 feet above mean sea level.[47] There are no hillsides or steep embankments on the project site.

Groundwater

The City of Mountain View is located within the Santa Clara Groundwater Basin (DWR Basin 2-9.02).[48] The subbasin extends from the northern border of Santa Clara County to the groundwater divide near the town of Morgan Hill, and has a surface area of approximately 225 square miles. Groundwater is estimated to be between seven to 11 feet bgs.[49]

[44] United States Department of Agriculture. "Custom Soil Resource Report for Santa Clara Area, California, Western Part." Accessed August 14, 2025. https://websoilsurvey.sc.egov.usda.gov/WssProduct/4hy4xz03dwcfrlb3bad2esxg/GN_00000/20250814_12244112489_1_Soil_Report.pdf.
[45] Ibid.
[46] Ibid.
[47] Geosyntec Consultants. *Phase I and Limited Phase II Environmental Site Assessment 918, 924 & 940 San Rafael Avenue Mountain View, California*. May 8, 2017. Page 7.
[48] City of Mountain View. *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report*. SCH NO. 2011012069. September 2012. Page 347.
[49] Citadel EHS. *Phase I Environmental Site Assessment Report 924 and 940 San Rafael Avenue*. December 2, 2025. Page 3.

Seismic and Seismic-Related Hazards

Earthquake Faults

The project site is located within the Bay Area, which is one of the most seismically active regions in the United States. The project site is approximately eight miles away from the San Andreas Fault and approximately 10.5 miles from the Hayward Fault. The project site is not located in an Alquist-Priolo special study zone on the California Geological Survey fault zone map.[50]

Geologic Hazards

The site is in a liquefaction hazard zone.[51] Soil liquefaction can be defined as ground failure or loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. This phenomenon is triggered by earthquakes or ground shaking that causes saturated or partially saturated soils to lose strength, potentially resulting in the soil's inability to support structures.

There are no open faces near the project site where lateral spreading could occur; therefore, the potential for lateral spreading on-site is low. The project site is not located within a Santa Clara County Geologic Hazard Zone for compressible soil or landslides.[52]

Paleontological Resources

Geologic units of Holocene age are generally not considered sensitive for paleontological resources, because biological remains younger than 10,000 years are not usually considered fossils. These sediments have low potential to yield fossil resources or to contain significant nonrenewable paleontological resources.[53] These recent sediments, however, may overlie older Pleistocene sediments with high potential to contain paleontological resources. Pleistocene sediments, often found at depths greater than 10 feet bgs, have yielded the fossil remains of plants and extinct terrestrial vertebrates. There have been no recorded fossils discovered within the City of Mountain View; however, two fossils have been discovered within two miles of the City's sphere of influence and the presence of geological formations known to contain fossils indicates some paleontological sensitivity.[54]

[50] Department of Conservation, California Geological Survey. "Earthquake Zones of Required Investigation." Accessed August 14, 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.
[51] Ibid.
[52] County of Santa Clara. "Geologic Hazard Zones." Accessed August 14, 2025. https://stgenpln.blob.core.windows.net/document/GEO_GeohazardATLAS.pdf.
[53] United States Department of the Interior. "Potential Fossil Yield Classification System." July 2016. Accessed August 14, 2025. https://www.blm.gov/sites/blm.gov/files/uploads/IM2016-124_att1.pdf
[54] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report.* SCH #2011012069. September 2012. Pages 470 and 473.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☐	☒
- Strong seismic ground shaking?	☐	☐	☒	☐
- Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
- Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Fault Rupture

As discussed under Section 4.7.1.2 Existing Conditions, the project site is not located in an Alquist-Priolo Earthquake Fault Zone and no known faults cross the site. While existing faults that are currently considered active are located within 10 miles of the site (i.e., the Hayward and San Andreas faults), the proposed project is located outside of their fault rupture zones. For these reasons, the project would not directly or indirectly cause potential substantial adverse effects from rupture of a known earthquake fault. **(No Impact)**

Seismic Ground Shaking

There are several major fault lines within approximately 10 miles of the project site that have the potential to produce a major earthquake during the lifespan of this project. During a major earthquake, this site is expected to experience very strong to severe ground shaking. The level of intensity of this ground shaking at the project site would depend on a variety of factors such as the magnitude, distance from the site to the fault source, and the site-specific soil conditions. The ground shaking could potentially damage structures and threaten the safety of occupants in the proposed development. However, with implementation of the City standard condition of approval, geologic hazards related to seismic ground shaking would be reduced to acceptable levels.

City Standard Condition of Approval

COA GEO-1: **Geotechnical Report.** The applicant shall have a design-level geotechnical investigation prepared which includes recommendations to address and mitigate geologic hazards in accordance with the specifications of California Geological Survey (CGS) Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards, and the requirements of the Seismic Hazards Mapping Act. The report shall be submitted to the City during building plan check, and the recommendations made in the geotechnical report shall be implemented as part of the project and included in building permit drawings and civil drawings as needed. Recommendations may include considerations for design of permanent below-grade walls to resist static lateral earth pressures, lateral pressures caused by seismic activity, and traffic loads; method for backdraining walls to prevent the build-up of hydrostatic pressure; considerations for design of excavation shoring system; excavation monitoring; and seismic design.

The project would be required to adhere to the current CBC and recommendations in the site-specific geotechnical report prepared for the project, as described in the above City standard condition of

approval COA GEO-1, to reduce seismic and seismic-related hazards (including ground shaking, liquefaction, and expansive soils) to a less than significant level by requiring the project be properly designed, engineered, and constructed. As such, the existing seismic hazards on the project would not be exacerbated by the project that it would impact (or worsen) off-site conditions. **(Less than Significant Impact)**

Liquefaction and Lateral Spreading

As discussed above in Section 4.7.1.1 Existing Conditions, the project site is located within a liquefaction hazard zone and groundwater is estimated at a depth of approximately seven to 11 feet bgs. The potential for liquefaction induced settlement of the proposed project would decrease significantly with the implementation of the recommended improvements identified in the geotechnical analysis required under City standard condition of approval COA GEO-1. Adherence to the current CBC and the recommendations in the site-specific geotechnical report would reduce the risk of liquefaction at the project site to a less than significant level.

There are no adjacent bodies of water, channels, or excavations in the vicinity of the site that would increase the potential for lateral spreading, therefore, the project would not exacerbate such conditions off-site. For these reasons, the project would not cause potential substantial adverse effects related to liquefaction and lateral spreading. **(Less than Significant Impact)**

Landslides

As discussed under Section 4.7.1.1 Existing Condition, the project site is not located in a designated landslide hazard zone. The project site is relatively flat and is not located in the vicinity of steep embankments that could increase the risk of landslides affecting the site. Construction of the project would not include substantial earthwork that would create unstable slopes that would exacerbate any existing landslide risks. **(No Impact)**

b) Would the project result in substantial soil erosion or the loss of topsoil?

Ground disturbance related to the demolition of the existing improvements on-site, excavation, and construction of the proposed buildings would occur on-site. These activities would increase the exposure of on-site soils to wind and water erosion. Transportation of construction materials and equipment to and from the project site could also result in disturbance of soils. These activities would increase exposure of soil to wind and water erosion and increase sedimentation.

As discussed in Section 4.10 Hydrology and Water Quality, the project would be required to obtain coverage under the State of California Construction General Permit prior to issuance of a demolition permit or a grading permit from the City. This would require preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would outline the erosion control and site stabilization BMPs to be implemented on-site. By implementing these BMPs and the recommendations of the site-specific geotechnical report, erosion and sedimentation impacts would be less than significant. **(Less than Significant Impact)**

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

As discussed in checklist question a) above, adherence to the current CBC and recommendations in the site-specific geotechnical report (as required under COA GEO-1 regarding improvements and construction methods) would reduce the risk of liquefaction at the project site to a less than significant level.

Project construction may require dewatering if groundwater is encountered during excavation activities. However, the dewatering would be temporary and not result in a substantial amount of groundwater being pumped. Valley Water actively monitors for land subsidence through surveying, groundwater elevation monitoring, and data from compaction wells. Valley Water reduces the potential for land subsidence throughout the Santa Clara Valley by recharging groundwater basins with local and imported surface water. The project would be connected to the City's water system and would not require permanent groundwater extraction wells on-site. For this reason, the project is expected to have a less than significant impact on subsidence.

As discussed under Section 4.7.1.1 Existing Conditions and checklist question a), the project site is not subject to landslide, lateral spreading, or other forms of ground failure. **(Less than Significant Impact)**

d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?

Soils on the project site were determined to have a high to very high expansion potential as described above in Section 4.7.1.1 Existing Conditions. Structures supported by this type of soil are exposed to cycles of heaving and settlement, which may result in damage if structures are not constructed with proper structural design. As stated under checklist question a), building design and construction at the site shall be completed in conformance with the recommendations of an approved geotechnical investigation (COA GEO-1). This would include constructing the project in such a manner as to reduce the effects of underlying expansive soils. Therefore, through compliance with standard measures established in the CBC and COA GEO-1, the proposed project would result in a less than significant impact associated with expansive soils. **(Less than Significant Impact)**

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The project would connect to the City's existing sanitary sewer system. Therefore, the project would not need to support septic tanks or alternative wastewater disposal systems on-site. **(No Impact)**

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

No paleontological resources have been identified in the City of Mountain View; however, construction and excavation could result in the disturbance of unknown resources. The project would implement the following City standard condition of approval to reduce impacts to unknown paleontological resources.

City Standard Condition of Approval

COA GEO-2: **Discovery Of Paleontological Resources.** In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist, in accordance with Society of Vertebrate Paleontology standards. The City shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant and if avoidance is not feasible, the paleontologist shall design and carry out a data recovery plan consistent with the Society of Vertebrate Paleontology standards.

With implementation of the above standard condition, the proposed project would result in less than significant impacts to paleontological resources by halting work if a fossil is discovered, examining the significance of the fossil, and avoiding the resource or implement a data recovery plan if avoidance is not feasible. **(Less than Significant Impact)**

4.8 Greenhouse Gas Emissions

The following discussion is based in part upon an Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc., dated September 15, 2025. The Air Quality & Greenhouse Gas Assessment is attached as Appendix A to this Initial Study.

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

Greenhouse gases (GHG) are gases that trap heat in the atmosphere and regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities (anthropogenic). Natural and anthropogenic sources of GHGs are generally as follows:

- CO_2 exchange between the atmosphere, ocean, and land surface
- CO_2, CH_4, and N_2O are emitted from wildfires and volcanic eruptions
- CO_2 and N_2O are byproducts of fossil fuel combustion
- N_2O is associated with agricultural operations such as fertilization of crops
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty
- HFCs are now used as a substitute for CFCs in refrigeration and cooling
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. Per the 2022 Scoping Plan from CARB, atmospheric concentrations of CO_2 have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year, which will result in increased global temperatures.[55] The climate within California is adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and loss of plant and animal species could

[55] California Air Resources Board. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 3.

also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, requiring CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to accelerate 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.[56] The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

Senate Bill 375 and Plan Bay Area 2050

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG

[56] California Air Resources Board. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 5.

reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), the Air District, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050.

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified priority development areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[57]

Play Bay Area 2050 includes a goal to increase the number of households that live within 0.5 mile of frequent transit by 2050. Plan Bay Area 2050 promotes strategies that support active and shared modes, combined with a transit-supportive land use patterns, which together are forecasted to lower the share of Bay Area residents that drive to work alone from 50 percent in 2015 to 33 percent in 2050, resulting in a decrease in GHG emissions. Plan Bay Area 2050 also provides a path to emissions reductions via goals to expand TDM initiatives that support and augment employers' commute programs.

SB 100

SB 100, known as The 100 Percent Clean Energy Act of 2018, was adopted on September 10, 2018. The overall goal is to have all retail electricity sold in California be procured from 100 percent renewable and zero-carbon resources by the year 2045. SB 100 also modified the renewables portfolio standard to 50 percent by 2025 and 60 percent by 2030.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that

[57] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

updates to the scoping plan identify and recommend measures to achieve these policy goals and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

Advanced Clean Cars II Regulation

To continue reducing air pollutants and GHG emissions in the transportation sector, CARB adopted the Advanced Clean Cars II Regulations (Resolution 22-12) on August 25, 2022. The new regulation requires that by 2035 all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles. This regulation bans the sale of new gasoline or diesel passenger cars, trucks, and SUVs in California from automakers. Beginning in 2026, 35 percent of new vehicle sales must be zero-emission vehicles and plug-in hybrid EV and that percentage will increase per year. By 2030, 70 percent of new vehicle sales will be zero-emissions vehicles and by the 2035 model year 100 percent of new vehicle sales will be zero-emissions. CARB will limit the use of plug-in hybrid EVs in the percentage requirements to keep the manufacturing of zero-emissions as the primary goal. Existing gasoline cars can continue to be driven and sold as used cars beyond 2035. CARB is required to track and report on the zero-emissions vehicle market development annually.

California Building Standards Code

The CALGreen Code is part of the California Building Standards Code under Title 24, Part 11.[58] The CALGreen Code encourages sustainable construction standards that incorporate planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2022 CALGreen Code) was effective as of January 1, 2023.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by cities during the planning and building permit process. The 2022 Energy Code replaced the 2019 Energy Code as of January 1, 2023. There are new 2022 standards for single-family residences, multi-family residences, and non-residential uses.[59,60,61] Major changes include electric-ready single-family and multi-family residence and solar photovoltaic systems and energy storage systems for residential and commercial developments.

[58] Refer to https://www.dgs.ca.gov/BSC/CALGreen. Accessed October 23, 2025.
[59] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Single-Family Residential." Revised July 15, 2022. Accessed October 23, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Single-family_Whats_New_Summary_ADA.pdf.
[60] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Multifamily." Revised August 4, 2022. Accessed October 23, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Multifamily_Whats_new_Summary_ADA.pdf.
[61] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Nonresidential." Revised August 4, 2022. Accessed October 23, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Nonresidential_Whats_New_Summary_ADA.pdf.

Requirements for EV charging infrastructure are set forth in Title 24 of the California Code of Regulations and are regularly updated on a three-year cycle. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The 2022 CALGreen standards require deployment of additional EV chargers in various building types, including multi-family residential, hotel, and non-residential land uses. They include requirements for both EV capable parking spaces and the installation of EV supply equipment for multi-family residential and nonresidential buildings. The 2022 CALGreen standards also include requirements for both EV readiness and the actual installation of EV chargers.

CALGreen also requires new construction and demolition projects to have a diversion of at least 65 percent of the construction waste generated.

Regional

2017 Clean Air Plan

To protect the climate, the 2017 Clean Air Plan prepared by the Air District includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Air District CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the Air District Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes the Air District's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds replace the GHG thresholds set forth in the May 2017 Air District CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to GHG emissions impacts. The following goals and policies are applicable to the project.

Policy	Description
INC 5.2	**Citywide water conservation.** Reduce water waste and implement water conservation and efficiency measures throughout the city.
INC 5.5	**Landscape efficiency.** Promote water-efficient landscaping including drought-tolerant and native plants, along with efficient landscape irrigation techniques.
LUD 3.1	**Land use and transportation.** Focus higher land use intensities and densities within half-mile of public transit service, and along major commute corridors**.**

City of Mountain View Green Building Code and Reach Code

The Mountain View Green Building Code (MVGBC) and Reach Code applies local green building requirements per building type and includes energy efficiency standards that exceed the current Building Energy Efficiency Standards for new developments in Mountain View. All projects submitted on or after January 1, 2023 are subject to the MVGBC and Reach Code. On September 9, 2025, the Mountain View City Council approved amendments to the 2025 California Building Standards Code to include local requirements, such as electric-readiness and more EV parking infrastructure.

The MVGBC does not require formal certification from a third-party organization but requires projects to be designed and constructed to meet the intent of a third-party rating system.[62] For residential projects proposing over five units, the MVGBC requires those buildings meet the intent of 70 GreenPoint Rated points from the Build it Green certification program, as well as compliance with mandatory CALGreen requirements.

In 2019, the Mountain View City Council approved amendments to Chapters 8, 14, and 24 of the MVGBC, referred to as Reach Code amendments. The Reach Code amendments are applicable to any project submitted after December 31, 2019.

On April 9, 2024, the Mountain View City Council suspended enforcement of all City of Mountain View local laws and regulations imposing all-electric requirements for new construction or otherwise prohibiting use or installation of gas appliances, including, but not limited to, City of Mountain View Code Sections 8.20.8, 8.20.9, 8.20.10, 8.20.12 and 8.20.14.

Mountain View Construction and Demolition Ordinance

According to the City's Construction and Demolition Ordinance, all new development projects are required to recycle and/or salvage for re-use a minimum of 65 percent of nonhazardous construction or demolition debris. Documentation of this diversion is required prior to scheduling a final building inspection.

City of Mountain View 2030 Greenhouse Gas Reduction Strategy

The City of Mountain View certified the General Plan Program EIR (SCH #2011012069) and adopted the Mountain View 2030 General Plan and GGRP in July 2012. The GGRP is a separate but complementary document to the General Plan that implements the long-range GHG emissions reduction goals of the General Plan and serves as a programmatic GHG reduction strategy for CEQA tiering purposes. The GGRP includes goals, policies, performance standards, and implementation measures for achieving GHG emissions reductions, to meet the requirements of AB 32. The program includes a goal to improve communitywide emissions efficiency by 15 to 20 percent over 2005 levels by 2020 and by 30 percent over 2005 levels by 2030. Since adoption of the GGRP, the state passed SB 32 which updated GHG emissions targets to be 40 percent below the 1990 level by 2030.

[62] City of Mountain View. "Mountain View Green Building and Reach Codes." Accessed October 23, 2025. https://developmentpermits.mountainview.gov/about-permits/building-and-fire-codes/green-building-and-reach-codes.

City of Mountain View Climate Protection Roadmap

The City's Climate Protection Roadmap (CPR), completed in 2015, presents a projection of GHG emissions through 2050 and several strategies that would help the City reduce absolute communitywide GHG emissions to 80 percent below 2005 levels by 2050.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns. The existing buildings on-site generate minimal (if any) GHG emissions since they are vacant.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☐	☒	☐

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

Construction

Construction of the project would generate GHG emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. GHG emissions associated with construction were computed at 347 metric tons (MT) of CO_2e for the total construction period.

Neither the City nor the Air District have an adopted threshold of significance for construction related GHG emissions. There is nothing atypical or unusual about the project's construction. In addition, the project would comply with CALGreen to divert a minimum of 65 percent of nonhazardous construction and demolition waste from landfills and would implement City standard condition of approval COA AIR-1 to restrict idling of construction equipment, which would in turn reduce GHG emissions. For these reasons, the project's construction GHG emissions are less than significant. **(Less than Significant Impact)**

Operation

The project would intensify development on-site; therefore, it would generate new GHG emissions from energy-related emissions, mobile emissions from vehicles traveling to and from the site, and emissions from solid waste generation and water usage. Promoting dense development in urban infill locations and energy efficiency is key to reducing GHG emissions.

Pursuant with the Air District, for land use projects to result in a less than significant GHG emissions impact, the land use project would need to comply with threshold A or B below (not both).

A. Projects must include, at a minimum, the following project design elements:
    1. Buildings
        a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
        b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    2. Transportation
        a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
            i. Residential projects: 15 percent below the existing VMT per capita
            ii. Office projects: 15 percent below the existing VMT per employee
            iii. Retail projects: no net increase in existing VMT
        a. Achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

The project would meet all the qualifications under Threshold A for a less than significant GHG impact, as follows:

- The project proposes to be all electric with no natural gas infrastructure
- The project would meet CALGreen , Title 24, and MVGBC requirements that are considered to be energy efficient standards and, therefore, avoid wasteful or inefficient use of electricity
- The project would include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance, specifically the project would meet the Tier 2 compliance standards as each residential unit garage would be equipped with one level 2 electric vehicle charging station, rated at 40 amperes minimum, and include one EV ready space conduit system

- The project meets the City's VMT map-based screening criteria and, therefore, would result in a less than significant VMT impact**.**

(Less than Significant Impact)

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

Plan Bay Area

The project site is not located within a PDA.[63] However, it would support the goals of Plan Bay Area 2050 because the project would comply with CALGreen and MVGBC by constructing housing units with the required bicycle parking spaces in an urbanized area serviced by public transit.[64] Additionally, the project would receive its energy from SVCE, who provides electricity generated from carbon free sources. **(Less than Significant Impact)**

CARB Scoping Plan

The project would be consistent with the Scoping Plan by receiving electricity from SVCE, complying with Title 24 Building Energy Efficiency Standards, complying with the current CALGreen off-street EV parking requirements, and developing a housing site on an infill location with access to public transportation which would reduce reliance on automobiles. Therefore, the project would be consistent with the most recent CARB Scoping Plan update. **(Less than Significant Impact)**

2017 Clean Air Plan

The Air District's 2017 CAP focuses on two goals: protecting public health and protecting the climate. The 2017 CAP includes air quality standards and control measures designed to reduce emissions of methane, carbon dioxide, and other super-GHGs. As discussed in Section 4.3 Air Quality under checklist question a), the project is consistent with the 2017 CAP because the project would not exceed Air District criteria air pollutant emissions thresholds during construction or operation and would implement COA AIR-1, which requires implementing Air District-recommended standard measures to restrict idling of equipment and properly maintaining and tuning construction equipment (thereby reducing GHG emissions). As discussed under checklist question a), the project would not have significant construction or operational GHG emissions. For these reasons, the project would not conflict with the 2017 CAP goal to reduce GHG emissions. **(Less than Significant Impact)**

[63] Metropolitan Transportation Commission. "Priority Development Areas (Plan Bay Area 2050 Plus)." Accessed October 23, 2025.https://opendata.mtc.ca.gov/datasets/5572ccb7bfe2426eae086c35931f1d0e_0/explore.

[64] There are Valley Transportation Authority (VTA) bus stops directly south of the North Shoreline Boulevard and Terra Bella Avenue intersection. MVgo, a free shuttle service provided by Mountain View Transportation Management Association, also has a route stop at this location. An additional free shuttle is provided by the Mountain View Community Shuttle program with stops along West Middlefield Road just south of Linda Vista Avenue and stops north of the West Middlefield Road and North Shoreline Boulevard intersection.

General Plan

The proposed project would be consistent with General Plan Policies INC 5.2, INC 5.5, and LUD 3.1 by complying with Title 24, CALGreen, MVGBC, and Reach Code by installing drought tolerant landscaping with high-efficiency irrigation and water efficient interior fixtures, and intensifying development on an infill within a quarter mile from bus stops served by existing public transit service and in proximity to major commute corridors (U.S. 101, SR 85, and Shoreline Boulevard). **(Less than Significant Impact)**

Greenhouse Gas Reduction Plan

The GGRP identifies a series of GHG emissions reduction measures to be implemented by development projects that would help the City achieve its GHG reduction goals. The project would comply with the applicable GGRP mandatory measures and would not be in conflict with the City's GHG reduction goals, as discussed in Table 4.8-1 below. Furthermore, as discussed under checklist question a), the project would result in a less than significant GHG emissions impact. For these reasons, the project would not be in conflict with the GGRP. **(Less than Significant Impact)**

Table 4.8-1: Greenhouse Gas Reduction Plan Consistency

Mandatory Measure	Consistency
Measure E-1.4: Residential Energy Star Appliances	**Consistent.** The proposed 36 residential rowhouse units would be constructed to meet Title 24, CALGreen, and MVGBC requirements. The new residences would be furnished with energy-efficient appliances.
Measure E-1.6: Exceed State Energy Standards in New Residential Development	**Consistent.** The proposed residential buildings would be constructed to meet MVGBC requirements, which exceed state standards.
Measure E-1.8: Building Shade Trees in Residential Development	**Consistent.** The project would include landscaping trees throughout the site and along San Rafael Avenue.
Measure E-2.3: Residential Solar Photovoltaic Systems	**Consistent.** The project would include solar photovoltaic panels on the rooftop of the buildings.
Measure W-1.1: Urban Water Management Plan Conservation Strategies	**Consistent.** The project would comply with City requirements by installing water efficient appliances and irrigation fixtures and planting drought tolerant landscaping.
Measure T-1.1: Transportation Demand Management	**Consistent.** As discussed in Section 4.17 Transportation, the project would have a less than significant VMT impact. The project encourages alternative modes of transportation by including bicycle parking in each garage, and the site is served by public transit options including VTA, MVgo, Mountain View Community Shuttle, and bicycle facilities along Stevens Creek, North Shoreline Boulevard and West Middlefield Road.

4.9 Hazards and Hazardous Materials

The following discussion is based on the following reports: Phase I and Limited Phase II Environmental Site Assessment completed by Geosyntec Consultants, dated May 8, 2017, Additional Sampling Investigation Report and Phase I Environmental Site Assessment Report completed by Citadel EHS, dated November 7, 2025 and December 2, 2025, respectively, and peer review letters completed by Cornerstone Earth Group dated July 30, 2025, December 2, 2025, and January 22, 2026. Copies of the reports are included as Appendix C through Appendix H of this Initial Study.

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

<u>Federal Aviation Regulations Part 77</u>

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[65]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective

[65] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed September 17, 2025. https://www.epa.gov/superfund/superfund-cercla-overview.

action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[66]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[67]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The Santa Clara County Department of Environmental Health's Hazardous Materials Compliance Division (HMCD) reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.[68] The EPA is currently considering a proposed ban on on-going use of

[66] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed September 17, 2025. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[67] California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. https://calepa.ca.gov/sitecleanup/corteselist/.
[68] United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed April 19, 2022. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos.

asbestos.[69] National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Regional and Local

Municipal Regional Permit Provision C.12.f

Polychlorinated biphenyls (PCBs) were produced in the United States between 1955 and 1978 and used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the EPA banned the production and use of PCBs due to their potential harmful health effects and persistence in the environment. PCBs can still be released to the environment today during demolition of buildings that contain legacy caulks, sealants, or other PCB-containing materials.

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.[70] Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

Moffett Federal Airfield Comprehensive Land Use Plan

The Moffett Federal Airfield Comprehensive Land Use Plan (CLUP), adopted by the Santa Clara County Airport Land Use Commission (ALUC), is intended to safeguard the general welfare of the inhabitants within the vicinity of the airport, as well as aircraft occupants.[71] The CLUP is also intended to ensure that surrounding new land uses do not affect airfield operations. The CLUP identifies the Airfield's Airport Influence Area (AIA). The AIA is a composite of areas surrounding the Airfield that are affected

[69] Ibid.
[70] California Regional Water Quality Control Board. *San Francisco Bay Region Municipal Regional Stormwater NPDES Permit.* November 2015.
[71] Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 2, 2012. Amended December 19, 2018 and November 18, 2020.

by noise, height, and safety considerations. Within the AIA, the CLUP establishes a (1) noise restriction area, (2) height restriction area, and (3) safety restriction area.

Santa Clara County Operational Area Hazard Mitigation Plan

The City's Hazard Mitigation Plan, an annex to Santa Clara County's Operational Area Hazard Mitigation Plan (2017), performs a full risk assessment on the nine hazards that present the greatest concern in Santa Clara County. The nine hazards focused on for this mitigation plan are climate change/sea-level rise, dam and levee failure, drought, earthquakes, floods, landslides, severe weather, tsunamis, and wildfires.

The City's annex, Chapter 11 of the document, provides a detailed overview of the City's response capabilities, the organizational structure of local authorities, risk rating scores that determine which hazards present the greatest risk to Mountain View, and a priority schedule for mitigation measures planned by local and regional agencies.

Certified Unified Program Agency

The routine management of hazardous materials in California is administered under the Unified Program. The CalEPA has granted responsibilities to the Santa Clara County Department of Environmental Health's HMCD for implementation and enforcement of hazardous material regulations under the Unified Program as a CUPA. Through a formal agreement with the HMCD, the Mountain View Fire Department (MVFD) implements hazardous materials programs for the City of Mountain View as a Participating Agency within the Unified Program. The MVFD coordinates with the HMCD to implement the Santa Clara County Hazardous Materials Management Plan and to ensure that commercial and residential activities involving classified hazardous substances are properly handled, contained, and disposed.

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to hazards and hazardous materials. The following goals and policies are applicable to the project.

Policy	Description
LUD 2.5	**Moffett Federal Airfield.** Encourage compatible land uses within the Airport Influence Area for Moffett Federal Airfield as part of Santa Clara County's Comprehensive Land Use Plan.
MOB 10.1	**Efficient automobile infrastructure.** Strive to maximize the efficiency of existing automobile infrastructure and manage major streets to discourage cut-through traffic on neighborhood streets.
MOB 10.4	**Emergency response.** Monitor emergency response times and review emergency response time standards.
PSA 3.1	**Minimized losses.** Minimize property damage, injuries and loss of life from fire.
PSA 3.2	**Protection from hazardous materials.** Prevent injuries and environmental contamination due to the uncontrolled release of hazardous materials through enforcement of fire and life safety codes and prevention.

Policy	Description
PSA 3.3	**Development review.** Implement development review procedures that encourage effective identification and remediation of contamination and protection of public and environmental health and safety.
PSA 3.4	**Oversight agencies.** Work with local, state and federal oversight agencies to encourage remediation of contamination and protection of public and environmental health and safety.
PSA 4.1	**Emergency response plan.** Maintain and update the City's emergency response plans.
INC 2.1	**Emergency preparedness.** Ensure that the City is well-prepared for natural and human-induced disasters and emergencies.
INC 18.1	**Contamination prevention.** Protect human and environmental health from environmental contamination.
INC 18.2	**Contamination clean-up.** Cooperate with local, state, and federal agencies that oversee environmental contamination and clean-up activities.

4.9.1.2 *Existing Conditions*

Site History

The project site was used as orchards and farmland as early as 1939, and later developed with residential structures by 1931. The residential structures were demolished by 1980 and developed with the existing buildings, and a storage shed that has since been removed. The buildings were occupied by a construction company until 1993, then by a paving company till 2014 when the buildings became vacant.

On-Site Contamination

Agricultural Use and Lead-Based Paint

Soil sampling was completed in October 2025 to evaluate shallow soil conditions across the site and adjacent to the former buildings and structures for the presence of pesticides and lead. The level of organochlorine pesticides and metals in the soil samples collected were below the residential and construction worker environmental screening levels (ESLs).

Underground Storage Tanks

The project site was identified in hazardous materials databases for a closed leaking underground storage tank (LUST) case related to the three former underground storage tanks (USTs) on-site that were removed in 1988. Investigation, monitoring, and remediation activities were conducted and Santa Clara Valley Water District (Valley Water) approved closure of the site in 2001. Investigations of the area where the former USTs were located, including testing of soil vapor, soil, and groundwater, were conducted in 2017 and 2025.

Soil and groundwater sampling were conducted in 2017. The soil samples collected did not contain contaminates above the current San Francisco Bay RWQCB residential ESLs. The groundwater

samples collected contained naphthalene in one sample and trichloroethylene in one sample exceeding the current San Francisco Bay RWQCB residential ESLs. Given these results, soil vapor was collected in 2025 to evaluate soil vapor conditions of the former USTs and near where the buildings are proposed. The concentration of volatile organic compounds (VOCs) in soil vapor collected in 2025 were below current San Francisco Bay RWQCB residential ESLs with the exception of benzene in two soil vapor samples with concentrations slightly above the residential ESL. However, the ESLs do not account for bioattenuation and can be overly conservative at sites where biodegradation is occurring. The oxygen concentrations in the soil vapor samples collected were between 18.1 and 20.2%, indicating a strong bioattenuation zone. Based on the presence of a strong bioattenuation zone at both soil vapor probe locations, the benzene concentrations in soil vapor will bioattenuate and are not considered to represent a vapor intrusion concern or warrant further investigation or remediation. The residual concentrations of petroleum hydrocarbon in the soil vapor collected, with the site's soil oxygen levels to biodegrade concentrations, are below current applicable residential ESLs, and do not warrant further investigation or remediation.

Former Hazardous Materials and Petroleum Product Storage

Soil sampling was completed in 2025 near the floor drains of the former storage shed where hazardous materials and petroleum products were stored. The concentrations of total petroleum hydrocarbons (TPHs) and VOCs were below the current applicable residential and construction worker ESLs, and do not warrant further investigation or remediation.

Current Hazardous Materials Storage

During the site reconnaissance completed in October 2025, two commercial sized containers of hydraulic and motor oil were observed on the asphalt west of the garage. No oil stains or leaking were observed. Two floor drains associated with the former storage shed were observed east of the garage structure. No hazardous substances or petroleum products were noted in the vicinity of the drains. A sump was observed on the north side of the garage building. No staining was observed by the sump. An oil water separator was observed along the western exterior of the garage building. No staining was observed by the oil water separator. Soil sampling was completed in 2025 around the sump and oil water separator. The concentrations of total petroleum hydrocarbons TPHs and VOCs were below the current applicable residential and construction worker ESLs, and do not warrant further investigation or remediation.

Building Materials

Given the age of the buildings on-site, it is possible that asbestos containing materials (ACMs), lead-based paint (LBP), and PCBs are present.

Cortese List

The project site (924 San Rafael Avenue) is listed on the Cortese List for its listing on the State Water Resources Control Board's GeoTracker database associated with the closed LUST case described above.

Off-Site Sources of Contamination

A review of nearby properties within a quarter mile radius of the project site shows there are no historical releases of petroleum products and upgradient of the project site. In addition, there are no historical gas stations or dry cleaners within 0.125-mile and upgradient from the site. No off-site sources of contamination with the potential to affect the project site were identified.

Airport Safety

The project site is approximately one mile east of the Moffett Federal Airfield and it is located within the Airfield's AIA. The site is not located within the Airfield's 65 dBA noise contour area or airport safety zones.[72] FAR Part 77 requires that the FAA be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height aboveground. The project site is located within the mapped Part 77 182-foot above mean sea level (amsl) horizontal surface. The site has an elevation of approximately 40 feet amsl; therefore, any structure exceeding 142 feet in height above grade would require submittal to the FAA for airspace safety review.

Wildland Fire Hazards

The site is not located in a state responsibility area and is not located in a very high fire hazard zone according to the California Department of Forestry and Fire Protection (CAL FIRE).[73] The site is not located within the Wildland Urban Interface (WUI).[74]

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

[72] Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 2, 2012. Amended December 19, 2018 and November 18, 2020.
[73] California Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Webmap. Accessed January 23, 2026. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.
[74] Santa Clara County FireSafe Council. "Wildland-Urban Interface." Webmap. Accessed January 23, 2026. https://sccfiresafe.org/resources/do-you-reside-in-santa-clara-countys-wildland-urban-interface-wui/.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed project would construct 36 three-story rowhouse units on-site. Unlike an industrial or manufacturing use that would routinely transport, use, or dispose large quantities of hazardous materials subject to regulatory oversight, the residential use associated with the project would only routinely use limited amounts of fuels, chemicals, and cleaning materials for landscaping and maintenance activities. The limited quantities used would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

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

Soil Vapor, Soil, and Groundwater Contamination

As discussed in Section 4.9.1.2 Existing Conditions, the project site was occupied by agricultural uses that used pesticides, then by commercial uses that used and stored hazardous materials and

petroleum products on-site. The project site went through remediation associated with the former USTs used by the commercial use on-site. The project would excavate soils to a maximum depth of 9.5 feet, which would require off haul of soils and would likely require dewatering of groundwater. While sampling completed did not identify levels of contaminants exceeding applicable residential and construction worker ESLs in soil, soil vapor, and groundwater, due to the site history, construction activities have the potential to encounter contaminated soil, soil vapor, and groundwater. The project would implement the City's standard conditions of approval, as described below, to plan for the handling of unexpected contamination on-site to ensure the project does not result in significant hazardous materials impacts from contaminants.

Conditions of Approval

COA HAZ-1: **Health And Safety Measures**. The permittee/contractor is responsible for preparing and implementing an appropriate health and safety plan to address the contamination and manage the operations in a safe manner and in compliance with the Cal/OSHA Construction Safety Orders and other State and Federal requirements. The plan shall also provide protocols for the removal of the oil-water separator, sump, and remnant floor drains associated with the former hazardous materials storage shed.

COA HAZ-2: **Discovery Of Contaminated Soils**. If contaminated soils, soil vapor, and/or groundwater (e.g., unusual discoloration or strong chemical or petroleum odors) are discovered, the applicant shall ensure the contractor employs engineering controls and Best Management Practices (BMPs) to minimize human exposure to potential contaminants. Engineering controls and construction BMPs shall include, but not be limited to, the following: (a) contractor employees working on-site shall be certified in OSHA's 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training; (b) the contractor shall stockpile soil during redevelopment activities to allow for proper characterization and evaluation of disposal options; (c) the contractor shall monitor area around construction site for fugitive vapor emissions with appropriate field screening instrumentation; (d) the contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks; (e) the contractor shall place any stockpiled soil in areas shielded from prevailing winds; and (f) the contractor shall cover the bottom of excavated areas with sheeting when work is not being performed.

With the implementation of the above conditions of approval, the project would not result in significant impacts if soil vapor, soil, and/or groundwater contamination is encountered during construction activities because they would be managed in a safe manner by employing engineering controls and BMPs in compliance with the Cal/OSHA Construction Safety Orders and other State and Federal requirements . **(Less than Significant Impact)**

ACMs, Lead-Based Paint, and PCBs

As discussed in Section 4.9.1.2 Existing Conditions, ACMs, lead-based paint, and PCBs may be present in building materials on-site. Building demolition could result in the release of these materials to the environment. The project would comply with the City's standard conditions of approval, as described below, to ensure the project does not result in significant hazardous materials impacts from on-site contamination during construction activities, if ACM, lead-based paint, and/or PCBs are present.

City Standard Conditions of Approval:

COA HAZ-3: **Hazardous Materials Contamination.** To reduce the potential for construction workers and adjacent uses to encounter hazardous materials contamination from asbestos-containing materials (ACM) and lead-based paint, the following measures are to be included in the project:

a) In conformance with local, State, and Federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition. The surveys shall be completed prior to demolition work beginning on the structures.
b) A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable ACMs, in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than 1% asbestos are also subject to Bay Area Air District regulations.

During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

COA HAZ-4: **Building Demolition PCB Control.** Nonwood-frame buildings constructed before 1981 that would be completely demolished are required to conduct representative sampling of priority building materials that may contain polychlorinated biphenyls (PCBs). If sample results of one or more priority building materials show PCBs concentrations ≥50 ppm, the applicant is required to follow applicable Federal and State notification and abatement requirements prior to demolition of the building. Submit a completed "Polychlorinated Biphenyls (PCBs) Screening Assessment Applicant Package" with the building

demolition plans for the project. A demolition permit shall not be issued until the completed "PCBs Screening Assessment Applicant Package" is submitted and approved by the City Fire and Environmental Protection Division (FEPD). Applicants are required to comply with applicable Federal and State regulations regarding notification and abatement of PCBs-containing materials. Contact the City's FEPD at 650-903-6378 to obtain a copy of the "PCBs Screening Assessment Applicant Package" and related guidance and information.

The project would implement COAs HAZ-1 and HAZ-2 to identify protocols to handle excavated soils and groundwater encountered during excavation. In addition, the project would implement COAs HAZ-3 and HAZ-4 to survey for ACMs, lead-based paint, and PCBs and dispose of them appropriately. Therefore, the project would not create significant hazard to the public, including construction workers, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact)**

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project is not within one-quarter mile of a school. The closest schools are the German International School of Silicon Valley and the Yew Chung International School of Silicon Valley, which both are approximately 0.45 miles to the southeast of the site. Therefore, the project would not emit hazardous emissions within one quarter mile of a school. **(No Impact)**

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As discussed in Section 4.9.1.2 Existing Conditions, the project site is located on the Cortese List for the closed LUST case associated with the former USTs. As discussed in checklist question b), the project would not create a significant hazard to the public or the environment due to the former USTs with the implementation of COAs HAZ-1 and HAZ-2 to implement a plan to establish appropriate management practices for handling impacted soil, soil vapor and/or groundwater if encountered during construction activities. **(Less than Significant Impact)**

e) If located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is not located within the Moffett Federal Airfield safety zones or 65 dB noise contour. The project site is located within the Airfield's AIA and mapped within the Part 77 182-foot amsl horizontal surface, which means any structures exceeding 142 feet in height above grade (given the project site's existing elevation of approximately 40 feet amsl) would require submittal to the FAA for airspace safety review. Since the maximum building height of the project would be approximately 41 feet one and three quarters inch, the project design would not require notification and review by the FAA to determine potential aviation hazard. In the event the project's construction equipment (i.e., cranes) would exceed 145 feet in height, the project applicant shall submit an FAA Form 7460-1, "Notice of Proposed Construction or Alteration" to the FAA prior to construction of the project and comply with all conditions from the FAA. **(Less than Significant Impact)**

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's Hazard Mitigation Plan outlines the City's emergency response procedures in the event of natural disasters. The proposed project would not alter evacuation routes and would not result in closure, rerouting, or substantial alteration of streets or property access points during or after construction. Construction would occur within the project site. The proposed project would not interfere with the City's adopted Hazard Mitigation Plan because the project would incorporate relevant fire code requirements and would not interfere with specified evacuation or emergency routes. Therefore, the project would have a less than significant impact on emergency response plans and emergency evacuation plans. **(Less than Significant Impact)**

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is within a developed area of the City. As discussed in Section 4.9.1.2 Existing Conditions, the project site is not located in a very high severity zone or the WUI. For these reasons, the project would not expose people or structures to wildland fires. **(No Impact)**

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the EPA and the SWRCB have been developed to fulfill the requirements of this legislation. EPA regulations include the NPDES permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the RWQCBs. The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website. [75]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

[75] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed July 31. 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the MRP in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara counties, and the cities of Fairfield, Suisun City, and Vallejo.[76] The MRP became effective on July 1, 2023. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID) based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flowcontrolled reservoir, or, in a catchment that drains to channels that are tidally influenced; or (3) the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).[77]

[76] California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022.

[77] The Hydromodification Applicability Maps developed the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.[78] Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

Water Resources Protection Ordinance

Valley Water operates as the flood protection agency for Santa Clara County. Valley Water also provides stream stewardship and is the wholesale water supplier throughout the county, which includes the groundwater recharge program.

2021 Groundwater Management Plan

The 2021 Groundwater Management Plan (GWMP) describes Valley Water's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management. The GWMP covers the Santa Clara and Llagas subbasins, which are located entirely in Santa Clara County. Valley Water manages a diverse water supply portfolio, with sources including groundwater, local surface water, imported water, and recycled water. About half of the county's water supply comes from local sources and the other half comes from imported sources. Imported water includes the District's State Water Project and Central Valley contract supplies and supplies delivered by the San Francisco Public Utilities Commission (SFPUC) to cities in northern Santa Clara County. Local sources include natural groundwater recharge and surface water supplies. A small portion of the county's water supply is recycled water.

Local groundwater resources make up the foundation of the county's water supply, but they need to be augmented by the District's comprehensive water supply management activities to reliably meet the county's needs. These include the managed recharge of imported and local surface water and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.[79]

City of Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to hydrology and water quality impacts. The following goals and policies are applicable to the project.

[78] California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022.
[79] Santa Clara Valley Water District. *2021 Groundwater Management Plan, Santa Clara and Llagas Subbasins* .November 2021.

Policy	Description
INC-8.2	**National Pollutant Discharge Elimination System Permit.** Comply with requirements in the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (MRP).
INC-8.4	**Runoff pollution prevention.** Reduce the amount of stormwater runoff and stormwater pollution entering creeks, water channels and the San Francisco Bay through participation in the Santa Clara Valley Urban Runoff Pollution Prevention Program.
INC-8.5	**Site-specific stormwater treatment.** Require post-construction stormwater treatment controls consistent with MRP requirements for both new development and redevelopment projects.
INC-8.7	**Stormwater quality.** Improve the water quality of stormwater and reduce flow quantities.

Mountain View Municipal Code

Chapter 8 (Buildings) of the Municipal Code includes the currently adopted Green Building Code, which details the stormwater management best management practices and regulations required by the City. Chapter 35 (Water, Sewage, and other Municipal Services) of the Municipal Code outlines the City policies surrounding water infrastructure, including requirements for the discharge of stormwater into the City's stormwater infrastructure.

4.10.1.2 *Existing Conditions*

Stormwater Drainage

The municipal storm drain system serving the project site consists of storm drain inlets, conveyance pipes, culverts, channels and retention basins operated by the City of Mountain View Public Works Department. The project site is located in the Permanente Creek Watershed.[80] Drainage into the City system generally flows south to north towards San Francisco Bay.

The existing project site consists of 80,284 square feet (or 98 percent) of impervious area which is comprised of primarily of asphalt with some rooftops and 1,279 square feet (or 2 percent) of pervious area which is comprised of landscaping and other permeable surfaces. Runoff from the site flows into a storm drain line in San Pablo Drive.

Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as nonpoint source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Urban stormwater runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, animal feces, etc.), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

[80] City of Mountain View. *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report*. SCH NO. 2011012069. September 2012. Figure IV.H-1.

There are no streams, creeks, ponds, or other surface water bodies located within the project site, The nearest body of water is Stevens Creek, which is located approximately 1,125 feet (or 0.2 mile) east of the project site. Stevens Creek is on the 2006 Clean Water Act Section 303(d) list due to diazinon pollution, total toxicity levels, the water temperature in the creek, and solid waste pollution.[81]

Groundwater

The City of Mountain View is located within the Santa Clara Groundwater Basin (DWR Basin 2-9.02).[82] The subbasin extends from the northern border of Santa Clara County to the groundwater divide near the town of Morgan Hill, and has a surface area of approximately 225 square miles. Hydrologically, the groundwater basin is separated into recharge and confined zones. Geological conditions in the recharge areas allow precipitation, stream flow, and water diverted into percolation areas to recharge the deeper aquifers. The confined zones include areas of the valley where low permeability clays and silts overlie the major groundwater aquifers which impedes the vertical flow of groundwater into the deeper aquifers. The City of Mountain View, including the project site, lies entirely within the area of the confined zone.[83]

Groundwater is estimated to be at a depth of seven to 11 feet bgs.[84]

Flooding

The project site is located within Flood Zone X, which is not a Special Flood Zone Hazard Area and has a reduced flood risk due to a levee.[85] Flood Zone X is an area determined to be outside the one percent and 0.2 percent annual chance floodplains, indicative of a minimal flood hazard.

Seiches and Tsunamis

A seiche is the oscillation of a body of water, typically caused by changes in atmospheric pressure, strong winds, earthquakes, tsunamis, or tidal movements. Seiches occur most frequently in enclosed or semi-enclosed basins such as lakes, bays, or harbors. There are no enclosed or semi-enclosed bodies of water near the project site or in Mountain View.[86]

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[81] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed July 31. 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

[82] City of Mountain View. *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report*. SCH NO. 2011012069. September 2012. Page 347.

[83] Santa Clara Valley Water District. *2021 Groundwater Management Plan*. November 2021. Figure 2-1.

[84] Citadel EHS. *Phase I Environmental Site Assessment Report 924 and 940 San Rafael Avenue*. December 2, 2025. Page 3.

[85] Federal Emergency Management Agency. "FEMA Flood Map Service Center: Search By Address." Accessed July 31, 2025. https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/jc8495e573825455186633efbedcc4705/scratch/FIRMETTE_7d627b02-000b-4024-9e11-65480f097b84.pdf.

[86] City of Mountain View. *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report*. SCH NO. 2011012069. September 2012. Page 361.

A tsunami is a sea wave generated by an earthquake, landslide, or other large displacement of water in the ocean. The project site is not close enough to San Francisco Bay to be affected in the event of a tsunami as it is within the developed portion of Mountain View.[87]

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
- result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
- create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
- impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

[87] Ibid. Page 361.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Construction of the proposed project would involve demolition, excavation, grading, and paving of the project site, which could result in temporary impacts to surface water quality. These construction activities could increase erosion and sedimentation once the disturbed soil is exposed to water and wind. When disturbance to underlying soil occurs, surface water that flows across the site may contain sediments may be dislodged and discharged to the storm drainage system.

The project would disturb approximately 1.9 acres, which exceeds the threshold of one acre and requires the project obtain a Construction General Permit associated with the NPDES. The project applicant is required to file a Notice of Intent with the SWRCB and prepare a SWPPP prior to commencement of construction to establish methods for controlling discharge associated with construction activities. Compliance with the General Construction Permit would ensure that all BMPs related to stormwater pollution prevention for construction projects are implemented.

The project is also required to comply with the MRP Provision C.12.f and submit a PCBs Screening Assessment Applicant Package consistent with the City's Environmental Protection requirements, which require applicants to screen the buildings proposed for demolition to determine whether it is appropriate to conduct additional testing on building materials (see COA HAZ-4).[88] The project would also implement the following City standard conditions of approval.

City Standard Conditions of Approval:

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

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

[88] City of Mountain View. "Environmental Protection." Accessed July 31, 2025. https://www.mountainview.gov/our-city/departments/fire/fire-and-environmental-protection-division/environmental-protection.

areas. The plan shall also include routine street sweeping and storm drain catch basin cleaning.

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

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

With implementation of COA HYD-1, the project would reduce construction impacts to a less than significant level by implementing a plan to minimize sediment runoff and erosion during storm events, implementing best management practices to prevent the release of hazardous materials, hazardous waste, polluted water, and sediments to the storm drain system, and implementing measures to limit erosion from storage areas during project construction. **(Less than Significant Impact)**

Post-Construction

Construction of the project would result in the replacement of more than 5,000 square feet of impervious surface at the project site. Therefore, the project would be required to comply with Provision C.3 of the MRP. This requires the project to incorporate site design, source control and runoff treatment controls to reduce the rates, volumes and pollutant loads of runoff from the project. The MRP requires all post-construction stormwater runoff to be treated by numerically sized LID treatment controls, such as biotreatment facilities, unless the project is granted Special Project LID Reduction Credits, which would allow the project to implement non-LID measures for all or a portion of the site depending on the project characteristics

In addition, the project would be required to implement the following City standard conditions of approval, consistent with RWQCB requirements, to reduce stormwater runoff impacts from project implementation.

City Standard Condition of Approval

COA HYD-2: **Stormwater Treatment (C.3).** This project would create or replace more than five thousand (5,000) square feet of impervious surface; therefore, stormwater runoff shall be directed to approved permanent treatment controls as described in the City's guidance document entitled, "Stormwater Quality Guidelines for

Development Projects." Runoff from portions of the public right of way (e.g., sidewalks, curb extensions, pavement replacement, and curb and gutter replacement in the street frontage) that are constructed or reconstructed as part of Regulated Projects shall also need be treated using Low-Impact Development (LID) measures. The City's guidelines also describe the requirement to select LID types of stormwater treatment controls; the types of projects that are exempt from this requirement; and the Infeasibility and Special Projects exemptions from the LID requirement.

The "Stormwater Quality Guidelines for Development Projects" document requires applicants to submit a Stormwater Management Plan, including information such as the type, location, and sizing calculations of the treatment controls that shall be installed. Include three stamped and signed copies of the Final Stormwater Management Plan with the building plan submittal. The Stormwater Management Plan must include a stamped and signed certification by a qualified Engineer, stating that the Stormwater Management Plan complies with the City's guidelines and the State NPDES Permit. Stormwater treatment controls required under this condition may be required to enter into a formal recorded Maintenance Agreement with the City.

Landscape Design. Landscape design shall minimize runoff and promote surface filtration. Examples include: (a) No steep slopes exceeding 10 percent; (b) Using mulches in planter areas without ground cover to avoid sedimentation runoff; (c) Installing plants with low water requirements; and (d) Installing appropriate plants for the location in accordance with appropriate climate zones. Identify which practices shall be used in the building plan submittal.

Efficient Irrigation. Common areas shall employ efficient irrigation to avoid excess irrigation runoff. Examples include: (a) Setting irrigation timers to avoid runoff by splitting irrigations into several short cycles; (b) Employing multi-programmable irrigation controllers; (c) Employing rain shutoff devices to prevent irrigation after significant precipitation; (d) Use of drip irrigations for all planter areas which have a shrub density that would cause excessive spray interference of an overhead system; and (e) Use of flow reducers to mitigate broken heads next to sidewalks, streets and driveways. Identify which practices shall be used in the building plan submittal.

With the implementation of the City standard conditions of approval, which are based on RWQCB requirements, the project's post-construction water quality impacts would be less than significant by treating surface runoff. **(Less than Significant Impact)**

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As discussed above in Section 4.10.1.2 Existing Conditions, the proposed project site is located within the Santa Clara Subbasin. The Santa Clara Subbasin has not been identified as a groundwater basin in a state of overdraft. The project site is located within a groundwater recharge area.[89] Although the project would increase the demand for water within the City, this increase would be marginal, would not require the installation of new well(s) to serve the future project population, and would not result in the overdraft of any groundwater basins (refer to Section 4.19 Utilities and Service Systems for a discussion of the project's water demand).

While dewatering may be necessary during project construction, it would be temporary and not result in a substantial amount of groundwater being pumped. Therefore, construction activities proposed by the project would not substantially decrease groundwater supplies or interfere with groundwater recharge.

For these reasons, implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. **(Less than Significant Impact)**

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

As discussed above in Section 4.10.1.2 Existing Conditions, there are no streams, rivers, or bodies of water on-site. Therefore, the project would not affect the existing drainage pattern of any streams or rivers. Furthermore, the project would result in a reduction in impervious surface area on-site as shown in Table 4.10-1 and be designed with LID-based stormwater treatment controls to ensure runoff from the site would be treated via flow-through planters and an unlined bioretention basin prior to being discharge into the City's stormwater infrastructure. As a result, the project would not result in substantial erosion or siltation, flooding, or additional sources of polluted runoff.

[89] Santa Clara Valley Water District. *2021 Groundwater Management Plan for the Santa Clara and Llagas Subbasins*. November 2021. Figure 2-1.

Table 4.10-1: Approximate Existing and Proposed Impervious/Pervious Surfaces

Surface Area	Existing		Proposed	
	Square footage	Percent of site	Square footage	Percent of site
Impervious Area	80,284	98	60,290	74
Pervious Area	1,279	2	21,273	26
Toal Area	81,563	100	81,563	100

With adherence to the requirements of Provision C.3 of the MRP and the City's Standard Permit Conditions (refer to COA HYD-1 and COA HYD-2), the project would not create substantial new sources of polluted runoff. For these reasons, the project would not substantially increase erosion or increase the rate or amount of stormwater runoff. **(Less than Significant Impact)**

d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

The proposed residential project would not use or store substantial quantities of hazardous materials on-site (only limited amounts of fuels, chemicals, and cleaning supplies for landscaping and maintenance activities). The project site is not located within a 100-year flood hazard area or located in an area that is subject to flood risks associated with tsunamis or seiches, as discussed in Section 4.10.1.2 Existing Conditions. For these reasons, the project would not risk release of substantial pollutants due to inundation. **(Less than Significant Impact)**

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The San Francisco Basin Plan provides a framework for state and local governments to meet water quality objectives and criteria to protect the beneficial uses of local aquifers, streams, marshes, and San Francisco Bay. Consistent with the San Francisco Basin Plan, the proposed project would comply with the MRP requirement to install LID treatment controls to treat stormwater runoff. The project would also implement the City standard conditions of approval COA HYD-1 and COA HYD-2. Additionally, the project would not substantially deplete groundwater supplies as discussed under checklist question b). Therefore, the project would not conflict with water quality control plans or sustainable groundwater management plans. **(Less than Significant Impact)**

4.11 Land Use and Planning

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Regional and Local

Moffett Federal Airfield Comprehensive Land Use Plan

The Moffett Federal Airfield CLUP, adopted by the Santa Clara County ALUC, is intended to safeguard the general welfare of the inhabitants within the vicinity of the airport, as well as aircraft occupants.[90] The CLUP is also intended to ensure that surrounding new land uses do not affect airfield operations. The CLUP identifies the Airfield's AIA. The AIA is a composite of areas surrounding the Airfield that are affected by noise, height, and safety considerations. Within the AIA, the CLUP establishes a (1) noise restriction area, (2) height restriction area, and (3) safety restriction area.

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to land use and planning impacts. The following goals and policies are applicable to the project.

Policy	Description
LUD 3.1	**Land use and transportation.** Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.
LUD 3.2	**Mix of land uses.** Encourage a mix of land uses, housing types, retail and public amenities and public neighborhood open spaces accessible to the community.
LUD 3.4	**Land use conflict.** Minimize conflicts between different land uses.

Mountain View Municipal Code

Chapter 36 of the Municipal Code is the Zoning Ordinance, which serves as an implementing tool for the General Plan by establishing detailed, parcel-specific development regulations and standards in each area of the City. Although the General Plan and Zoning Ordinance are distinct documents, the General Plan and Zoning Ordinance are closely related, and state law mandates that zoning regulations be consistent with the General Plan maps and policies.

[90]Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 2, 2012. Amended December 19, 2018 and November 18, 2020.

4.11.1.2 *Existing Conditions*

The General Plan land use designation for the site is General Industrial, which allows for industrial uses including manufacturing and storage, R&D, administrative offices, and ancillary commercial.[91] The project site currently is zoned as MM – General Industrial.[92] The MM zone allows for manufacturing and processing, transportation and communication (e.g., public utility services), and services (e.g., data centers, storage, and warehousing) land uses.

The project site is comprised of one parcel with two existing (vacant) commercial structures, totaling approximately 4,100 square feet. Most of the project site consists of paved surface parking.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad tracks) or the removal of a means of access (such as a local roadway or bridge) that would impair mobility within an existing community or between communities.

As proposed, the project would demolish the existing commercial structures on-site and develop 36, three-story rowhouse units within an urbanized area of Mountain View. The project, which is an infill development on a 1.8-acre site, does not include any features that would physically divide the community (e.g., roadway, railway, or highway) or restrict movement within the surrounding community. For these reasons, the project would not physically divide an established community. **(Less than Significant Impact)**

[91] City of Mountain View. "GPLU Viewer." Accessed August 1, 2025. https://experience.arcgis.com/experience/77b8b058a3444958a92e10f73b0bd81c#data_s=id%3AdataSource_2-18a71f52304-layer-6-0%3A68.

[92] City of Mountain View. "Zoning Districts." Accessed August 1, 2025. https://experience.arcgis.com/experience/db020ef23f454589968354884ce43c1d#data_s=id%3AdataSource_1-1874c4120f7-layer-4%3A751.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

General Plan and Zoning Ordinance

The proposed residential use would not be consistent with the existing General Plan designation or zoning district regulations. The project is requesting a General Plan Amendment to change the land use designation to Medium Density Residential and a rezoning to a Multiple-Family Residential zoning district with a R3-2.2 base zone. A Medium Density Residential land use allows for a mix of single- and multi-family housing with a residential character appropriate to a range of densities and a broad mix of housing types (e.g., single-family residents, duplex residents, and multi-family residents). This land use allows a density of 13 to 25 du/ac and a height of up to three stories. The Multiple-Family Residential zoning district is intended for high-density residential development and include specific development standards (such as minimum lot sizes, allowed building heights, and other land use design limitations).

While the project is inconsistent with (and not allowed by) the current land use designation and zoning district, this inconsistency would not lead to significant environmental impacts as disclosed throughout this Initial Study. The project would comply with all applicable City's Standard Conditions of Approval, regulatory requirements, and mitigation measures for purposes of reducing or avoiding the environmental effects associated with the development. Furthermore, the project would be consistent with applicable General Plan land use policies as identified above in Section 4.11.1.1 Regulatory Framework by intensifying development within half a mile of public transit service[93] and including a residential project that is compatible with the mix of existing and proposed residents within the project area. Therefore, the proposed project would not result in a significant impact due to a conflict with a land use plan, policy, or regulation related to an environmental effect. **(Less than Significant Impact)**

Moffett Field CLUP

As discussed in Section 4.9 Hazards and Hazardous Materials, the project site is not located within the Moffett Federal Airfield safety zones or 65 decibel (dB) noise contour. However, the project site is located within the Airfield's AIA and mapped within the Part 77 182-foot amsl horizontal surface, which means any structures exceeding 142 feet in height above grade (given the project site's existing elevation of approximately 40 feet amsl) would require submittal to the FAA for airspace safety review. Since the maximum building height of the project would be approximately 41 feet one and three quarters inch, the project design would not require notification and review by the FAA to determine potential aviation hazard. In the event the project's construction equipment (e.g., cranes)

[93] There are Valley Transportation Authority (VTA) bus stops directly south of the North Shoreline Boulevard and Terra Bella Avenue intersection. MVgo, a free shuttle service provided by Mountain View Transportation Management Association, also has a route stop at this location. An additional free shuttle is provided by the Mountain View Community Shuttle program with stops along West Middlefield Road just south of Linda Vista Avenue and stops north of the West Middlefield Road and North Shoreline Boulevard intersection.

would exceed 145 feet in height, the project applicant shall submit an FAA Form 7460-1, “Notice of Proposed Construction or Alteration” to the FAA prior to construction of the project and comply with all conditions from the FAA.

For these reasons, the project would not conflict with airport operations at Moffett Federal Airfield and would be consistent with the adopted CLUP. **(Less than Significant Impact)**

4.12 Mineral Resources

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

4.12.1.2 *Existing Conditions*

A portion of the City, along the southern boundary of Mountain View along Stevens Creek, is classified as MRZ-3.[94,95] The City of Mountain View does not have minerals or aggregate resources of statewide importance.[96]

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

[94] MRZ-3: Areas containing mineral deposits the significance of which cannot be evaluated from available data.
[95] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report*. SCH #2011012069. September 2012. Page 331.
[96] Ibid.

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

There are no known mineral resources on-site. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the residents in the state or region.**(No Impact)**

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

The project site is not identified in the General Plan (or any other land use plan) as containing any locally important mineral resources and no known mineral resources have previously been discovered on-site. The project, therefore, would not result in impacts to locally important mineral resource recovery sites. **(Less than Significant Impact)**

4.13 Noise

The following discussion is based, in part, upon a Noise Assessment prepared by Illingworth & Rodkin, Inc., dated September 29, 2025. The Noise Assessment is attached as Appendix I to this Initial Study.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, L_{dn}, or CNEL.[97] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

[97] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (L_{dn}) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and L_{dn} are typically within two dBA of the peak-hour L_{eq}.

4.13.1.2 *Regulatory Framework*

Federal

California Department of Transportation Vibration Limits

The California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, which typically consist of buildings constructed since the 1990s. A conservative vibration limit of 0.3 in/sec PPV is used for buildings that are found to be structurally sound but where structural damage is a major concern. For historical buildings or some older buildings, a vibration limit of 0.25 in/sec PPV would apply. Vibration levels exceeding these thresholds would be capable of cosmetically damaging adjacent buildings. Cosmetic damage (also known as threshold damage) is defined as hairline cracking in plaster, the opening of old cracks, the loosening of paint, or the dislodging of loose objects. Minor damage is defined as hairline cracking in masonry or the loosening of plaster. Major structural damage is defined as wide cracking or the shifting of foundation or bearing walls.

State and Local

California Building Standards Code

The CBSC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA L_{dn} noise contour for a freeway or expressway, railroad, or industrial source.

Moffett Federal Airfield Comprehensive Land Use Plan

The Moffett Federal Airfield CLUP is intended to safeguard the general welfare of the inhabitants within the vicinity of the airport, as well as aircraft occupants.[98] The CLUP includes noise exposure maps and guidelines intended to minimize the public's exposure to excessive noise and safety hazards. The CLUP identifies the AIA. The AIA is a composite of areas surrounding the Airfield that are affected by noise, height, and safety considerations. Within the AIA, the CLUP establishes a (1) noise restriction area, (2) height restriction area, and (3) safety restriction area. The Santa Clara County ALUC has jurisdiction over new land uses in the vicinity of airports, and establishes 65 dBA CNEL as the maximum allowable noise level considered compatible with residential uses. Recommendations made by the ALUC are advisory in nature to the local jurisdictions, not mandatory.

[98] Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 2, 2012. Amended December 19, 2018 and November 18, 2020.

Local

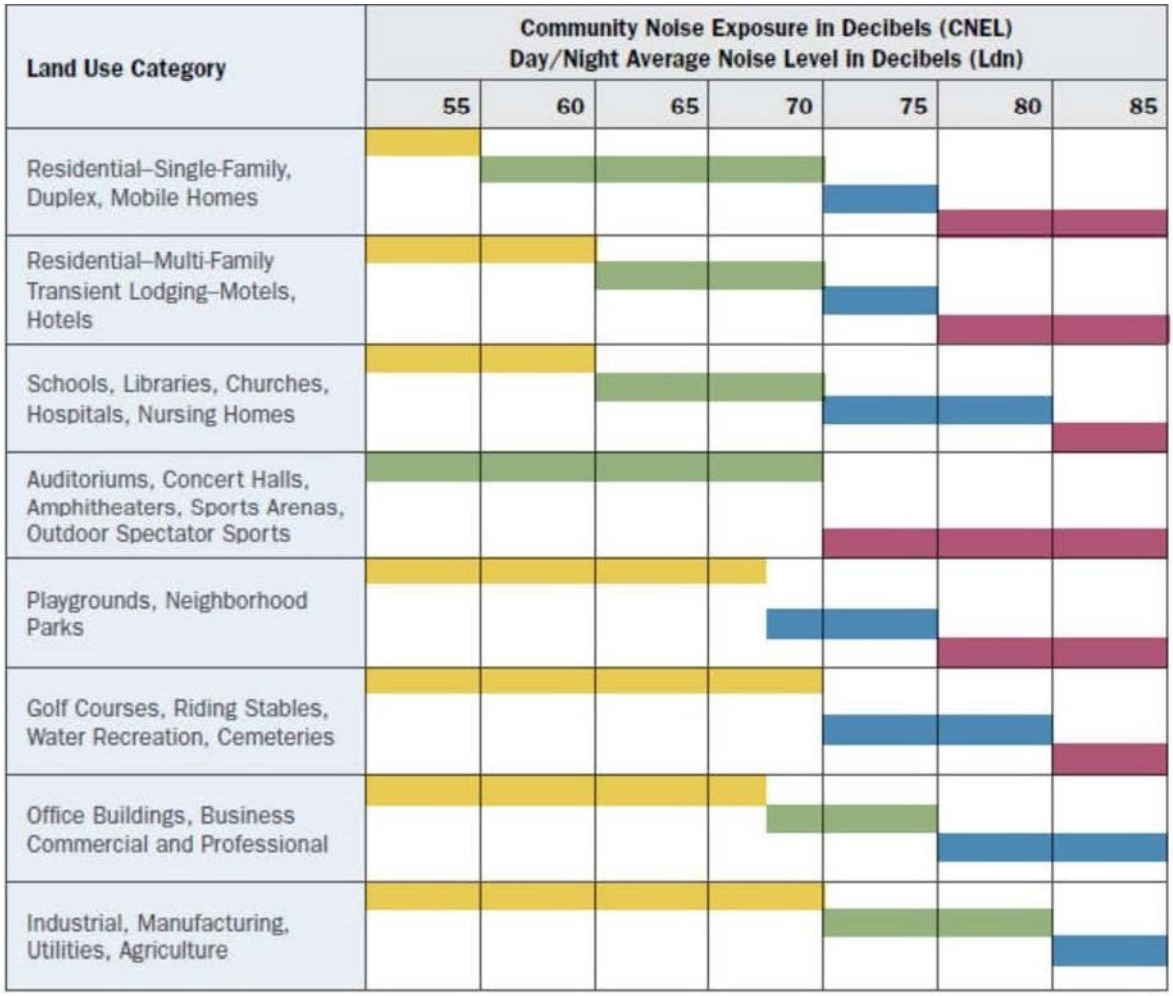
Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to noise. The following policies are applicable to the project.

Policy	Description
NOI 1.1	**Land Use Compatibility.** Use the Outdoor Noise Acceptability Guidelines as a guide for planning and development decisions.
NOI 1.2	**Noise-sensitive land uses.** Require new development of noise-sensitive land uses to incorporate measures into the project design to reduce interior and exterior noise levels to the following acceptable levels: • New single-family developments shall maintain a standard of 65 dBA L_{dn} for exterior noise in private outdoor active use areas. • New multi-family residential developments shall maintain a standard of 65 dBA L_{dn} for private and community outdoor recreation use areas. Noise standards do not apply to private decks and balconies in multi-family residential developments. • Interior noise levels shall not exceed 45 dBA L_{dn} in all new single-family and multi-family residential units. Where new single-family and multi-family residential units would be exposed to intermittent noise from major transportation sources such as train or airport operations, new construction shall achieve an interior noise level of 65 dBA through measures such as site design or special construction materials. This standard shall apply to areas exposed to four or more major transportation noise events such as passing trains or aircraft flyovers per day.
NOI 1.3	**Exceeding acceptable noise thresholds.** If noise levels in the area of a proposed project would exceed normally acceptable thresholds, the City shall require a detailed analysis of proposed noise reduction measures to determine whether the proposed use is compatible. As needed, noise insulation features shall be included in the design of such projects to reduce exterior noise levels to meet acceptable thresholds, or for uses with no active outdoor use areas, to ensure acceptable interior noise levels.
NOI 1.4	**Site planning.** Use site planning and project design strategies to achieve the noise level standards in NOI 1.1 (Land Use Compatibility) and in NOI 1.2 (Noise Sensitive Land Uses). The use of noise barriers shall be considered after all practical design-related noise measures have been integrated into the project design.
NOI 1.5	**Major roadways.** Reduce the noise impacts from major arterials and freeways.
NOI 1.6	**Sensitive uses.** Minimize noise impacts on noise-sensitive land uses, such as residential uses, schools, hospitals and child-care facilities.
NOI 1.7	**Stationary sources**. Restrict noise levels from stationary sources through enforcement of the Noise Ordinance.

The Outdoor Noise Acceptability Guidelines referenced in General Plan Policy NOI 1.1 are shown in Table 4.13-1 below.

Table 4.13-1: General Plan Outdoor Noise Acceptability Guidelines



NORMALLY ACCEPTABLE
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

CONDITIONALLY ACCEPTABLE
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

NORMALLY UNACCEPTABLE
New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CLEARLY UNACCEPTABLE
New construction or development clearly should not be undertaken.

Source: State of California General Plan Guidelines, 2003.

Mountain View Municipal Code

The City of Mountain View addresses noise regulations and goals in the Zoning Ordinance of the Municipal Code. These regulations help protect the community from exposure to excessive noise and also specify how noise is measured and regulated. Noise is also regulated through project conditions of approval. The Mountain View Police Department and City Attorney's office enforce noise violations.

Construction noise impacts primarily occur when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses (e.g., residences), and/or when construction duration lasts over an extended period of time. Section 8.70 of the Municipal Code restricts the hours of construction activity to 7:00 AM to 6:00 PM, Monday through Friday. No construction activity is permitted on Saturday, Sunday, or holidays without written approval from the City. Construction activities are defined to include any physical activity on the construction site or in the project's staging area, including the delivery of materials.

The City of Mountain View also identifies limits on noise from stationary equipment (such as heating, ventilation, and air conditioning mechanical systems, delivery truck idling, loading/unloading activities, recreation activities, and parking lot operations) in Section 21.26 of the Code. The maximum allowable noise level is 55 dBA during the day and 50 dBA at night (10:00 PM to 7:00 AM), unless it has been demonstrated that such operation will not be detrimental to the health, safety, peace, morals, comfort or general welfare of residents subjected to such noise, and the use has been granted a permit by the Zoning Administrator.

4.13.1.3 *Existing Conditions*

The existing noise environment at the site is primarily results from vehicular traffic along the U.S. 101/SR 85 interchange. Additionally, local traffic along San Rafael Avenue and operational noise from the adjoining office and commercial uses contribute to secondary noise sources. Moffett Airfield also affects the noise environment due to noise associated with occasional overhead aircrafts; however, the project site is located outside the 65 dBA CNEL noise contour for the Moffett Federal Airfield.

A summary of long-term and short-term noise measurements are shown in Table 4.13-2 and Table 4.13-3 below. The noise measurement locations are shown on Figure 4.13-1 below.

Table 4.13-2: Summary of Long-Term Noise Measurement Data (dBA)

Noise Measurement Location	Daytime L_{eq} Range	Nighttime L_{eq} Range	Average Noise Level (L_{dn})
LT-1: ~40 feet west of the San Rafael Avenue centerline	52 to 60	45 to 54	58
LT-2: ~ 375 feet west of the San Rafael Avenue centerline	50 to 58	43 to 53	57

Source: Illingworth & Rodkin, Inc. *918, 924, & 940 San Rafael Avenue Noise and Vibration Assessment*. September 10, 2025.



NOISE MEASUREMENT LOCATIONS | FIGURE 4.13-1

Table 4.13-3: Summary of Short-Term Noise Measurement Data (dBA)

Noise Measurement Location	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	L_{eq}
ST-1: Rear yard equivalent of 790 San Pablo Drive	65	59	53	49	47	51
ST-2: Front of 879 San Simeon Drive	85	74	61	49	46	62
	69	65	56	47	44	54

Note: Two consecutive 10-minute measurements were made at ST-2 because a trash truck came by to collect trash and generated noise levels above typical conditions during the first 10-minute period. A second measurement was made to observe typical noise sources in the vicinity.

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

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

Construction Noise

Project Construction

Noise impacts from project construction depend on a variety of factors such as the noise generated by different pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise sensitive times of the day

(e.g., early morning, evening, or nighttime hours), the construction occurs in areas adjacent to noise-sensitive land uses, or when construction is done over extended periods of time.

Construction phases of the project would include demolition, site preparation, excavation, grading, building construction, architectural coating, and paving. It is estimated that project construction would take 14 months to complete. Construction activities would take place between 7:00 AM and 6:00 PM Monday through Friday in accordance with the City's Municipal Code, and follow standard conditions of approval.

City Standard Condition of Approval

COA NOI-1: **Work Hours/Construction Site Signage.** No work shall commence on the job site prior to 7:00 AM nor continue later than 6:00 PM, Monday through Friday, nor shall any work be permitted on Saturday or Sunday or any holiday unless prior approval is granted by the Chief Building Official. The general contractor, applicant, developer, or property owner shall erect a sign at all construction site entrances/exits to advise subcontractors and material suppliers of the working hours (see job card for specifics) and contact information, including an after-hours contact. Violation of this condition of approval may be subject to the penalties outlined in Section 8.70 of the Municipal Code and/or suspension of building permits.

Notice of Construction. The applicant shall notify neighbors within 500 feet of the project site of the construction schedule in writing, prior to construction. For multi-phased construction, separate notices may be required for each phase of construction. A copy of the notice and the mailing list shall be submitted for review prior to issuance of building permits.

Disturbance Coordinator. The applicant shall designate a "disturbance coordinator" who shall be responsible for responding to any local complaints regarding construction noise. The coordinator (who may be an employee of the general contractor) shall determine the cause of the complaint and require that reasonable measures warranted to correct the problem be implemented. A telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site fence and on the notification sent to neighbors adjacent to the site. The sign must also list an emergency after-hours contact number for emergency personnel.

Construction Noise Reduction. The following noise reduction measures shall be incorporated into construction plans and contractor specifications to reduce the impact of temporary construction-related noise on nearby properties: (a) Comply with manufacturer's muffler requirements on all construction equipment engines; (b) Turn off construction equipment when not in use, where applicable; (c) Locate stationary equipment as far as practical from receiving properties; (d)

Use temporary sound barriers or sound curtains around loud stationary equipment if the other noise reduction methods are not effective or possible; and (e) Shroud or shield impact tools and use electric-powered rather than diesel-powered construction equipment.

With the implementation of the conditions of approval above, construction noise levels would be reduced to a less than significant level by working within the allowed construction hours, notifying neighbors of the project construction schedule, designating a disturbance coordinator, and implementing noise reduction measures. **(Less than Significant Impact)**

Operational Noise

Traffic Noise

A significant noise impact would occur if traffic generated by the project would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if the noise level increase is three dBA L_{dn} or greater, as existing noise levels at the nearby residences in the area would exceed 60 dBA L_{dn}. Generally, traffic volumes need to double to result in a perceptible (three dB) noise increase. The project is estimated to result in approximately 196 daily trips and approximately 20 trips per hour as discussed in Section 4.17 Transportation. The main source of traffic noise at the project site is from traffic along U.S. 101 and SR 85, and the number of trips generated by the project would not double traffic volumes traveling on surrounding local streets or U.S. 101 and SR 85.

Therefore, the project-generated traffic would not increase ambient noise levels by three dBA L_{dn} or more. For this reason, the project-generated traffic noise would result in a less than significant impact. **(Less than Significant Impact)**

Mechanical Equipment Noise

The proposed residential buildings would include mechanical systems such as air conditioning (AC) condensers on the ground level in front of the rowhomes. Residential AC condensers units typically cycle on and off continuously throughout a 24-hour period so, at any given time, multiple units could be operating. The proposed six-foot fences surrounding the site along the north, west, and south boundaries would provide partial shielding for the surrounding receptors. The attenuation at the receiving properties to the north and to the south would be nine and eight dBA, respectively. Table 4.13-4 below shows the operational noise levels for the ground-level AC condensers at nearby receptors.

Table 4.13-4: Operational Noise Levels for the Ground-Level AC Condensers

Receptor	Distance from Equipment (feet)	Hourly Leq (dBA)	L_{dn} (dBA)	Noise Level Increase (dBA L_{dn})
North Offices	30	34[a]	37[a]	0
East Residences & Offices	65	36	40	0
South Residences	50	31[b]	34[b]	0

[a] The proposed six-foot fence would provide a minimum of 9 dBA of attenuation.

[b] The proposed six-foot fence would provide a minimum of 8 dBA of attenuation.

As shown in Table 4.13-4, the noise from the AC condensers would not exceed the City's existing ambient conditions or the City's Municipal Code noise limits of 55 dBA during the day and 50 dBA at night (10:00 PM to 7:00 AM) at the surrounding receptors, and the noise resulting from the AC condensers would not result in a measurable or detectable noise level increase. **(Less than Significant Impact)**

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities associated with the project may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. The proposed project would not require pile driving, which can cause excessive vibration.

There are not any historic buildings within 1,000 feet of the project site; therefore, the 0.25 in/sec PPV threshold does not apply. However, there are buildings that are constructed prior to the 1990's. Therefore, groundborne vibration levels exceeding the conservative 0.3 in/sec PPV limit at the surrounding buildings would have the potential to result in a significant vibration impact.

Table 4.13-5 shows the typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Project construction activities may generate substantial vibration in the immediate vicinity.

Table 4.13-5: Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 feet., in/sec	Minimum Distance to Meet the 0.3 in/sec PPV Threshold, feet
Clam shovel drop	0.202	18
Hydromill (slurry wall) in soil	0.008	1
Hydromill (slurry wall) in rock	0.017	2
Vibratory Roller	0.210	19
Hoe Ram	0.089	9

Equipment	PPV at 25 feet., in/sec	Minimum Distance to Meet the 0.3 in/sec PPV Threshold, feet
Large bulldozer	0.089	9
Caisson drilling	0.089	9
Loaded trucks	0.076	8
Jackhammer	0.035	4
Small bulldozer	0.003	<1

Existing structures to the north, to the east, and to the west of the project site would be 65 to 85 feet from the nearest project boundaries. At these distances, vibration levels would be at or below 0.07 in/sec PPV, which would not exceed the 0.3 in/sec PPV threshold. The nearest residences south of the project site would be about 15 feet from the southern boundary. Table 4.13-6 summarizes the vibration levels expected at the nearest south residences, assuming each piece of equipment operates along the shared property lines.

Table 4.13-6: Construction Vibration Levels Estimated at the Nearest Southern Residential Façade Adjoining the Project Site

Phase	Equipment	PPV at 25 feet, in/sec	Vibration at Nearest Residential Façade South of the Project Site (15 feet)
Demolition	Concrete/Industrial Saw	0.035	0.061
	Rubber-Tired Dozer	0.089	0.156
	Tractor/Loader/Backhoe	0.003	0.005
Site Preparation	Grader	0.089	0.156
	Tractor/Loader/Backhoe	0.003	0.005
	Scraper	0.089	0.156
Grading/ Excavation	Grader	0.089	0.156
	Rubber-Tired Dozer	0.089	0.156
	Tractor/Loader/Backhoe	0.003	0.005
Trenching/ Foundation	Excavator	0.089	0.156
	Tractor/Loader/Backhoe	0.003	0.005
Building – Exterior	Crane	0.003	0.005
	Forklift	0.003	0.005
	Generator	0.003	0.005
	Welder	0.003	0.005
	Tractor/Loader/Backhoe	0.003	0.005
Building – Interior/ Architectural Coating	Air Compressor	0.003	0.005

Phase	Equipment	PPV at 25 feet, in/sec	Vibration at Nearest Residential Façade South of the Project Site (15 feet)
Paving	Cement & Mortar Mixer	0.003	0.005
	Paver	0.003	0.005
	Paving Equipment	0.003	0.005
	Roller	0.21	**0.368**
	Tractor/Loader/Backhoe	0.003	0.005
Bolded = exceeds threshold			

As shown in the table above, project construction could generate vibration levels up to 0.4 in/sec PPV at the nearest residential structures south of the project site which would exceed the 0.3 in/PPV threshold. The project would implement the below standard condition of approval as applicable to reduce construction vibration impacts.

City Standard Condition of Approval

COA NOI-2: Vibration Best Management Practices Construction Measures.

- Avoid using vibration rollers and tampers near sensitive areas. Specifically, the use of large vibratory rollers would be avoided within 19 feet of adjacent buildings. Alternatively, small vibratory rollers could be used along the southern boundary of the project site or static rollers could be used instead of vibratory rollers.

In accordance with the condition of approval above, the use of large vibratory rollers would be avoided within 19 feet of adjacent buildings. Alternatively, small vibratory rollers could be used along the southern boundary of the project site or static rollers could be used instead of vibratory rollers. This would reduce vibration levels to below 0.3 in/sec PPV at the adjoining buildings south of the project site and reduce impacts to less than significant. **(Less than Significant Impact)**

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

The proposed project is located more than 1.3 miles northeast from the Moffett Federal Airfield and over seven miles southeast from the San José Mineta International Airport. The project site is outside the 65 dBA CNEL/L_{dn} contour line for the Moffett Federal Airfield (as well as San José Mineta International Airport). Therefore, the project would not expose people residing or working in the

project area to excessive noise level. For these reasons, the proposed project would not expose people to excessive aircraft noise. **(Less than Significant Impact)**

4.13.3 Non-CEQA Effects

Per California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (BIA v. BAAQMD), effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City Mountain View has policies that address existing noise conditions affecting a proposed project.

Future Exterior Noise Environment

Exterior noise environments at private and community outdoor recreation use areas should be maintained at or below 65 dBA L_{dn} to be considered acceptable by the City of Mountain View pursuant to General Plan Policies NOI 1.2, NOI 1.3, NOI 1.4, and NOI 1.6. The project would include a courtyard area along the northern boundary of the project site that would have setbacks of 45 to 200 feet from San Rafael Avenue. Without attenuation (i.e., shielding by buildings or fences), future exterior noise levels at the proposed outdoor area would be 59 dBA L_{dn}, which would be below the City's acceptable exterior noise level.

Future Interior Noise Level

The interior noise level standard of 45 dBA L_{dn} set forth by the City of Mountain View in General Plan Policy NOI 1.2 and CALGreen would apply to the project. Interior noise levels would vary depending upon the design of the buildings and the selected construction materials and methods.

The closest building to San Rafael Avenue is Building 5, which is set back from the road's centerline by 40 to 80 feet. Exterior facing rooms with a direct line of sight to Rafael Avenue would be exposed to future exterior noise levels at or below 60 dBA L_{dn}, assuming no attenuation. Assuming that windows are partially open, the future interior noise levels at Building 5 would be at or below 45 dBA L_{dn}.[99]

The other buildings on the project site would have further setbacks from the roadway and would be partially shielded by Building 5. The exterior facing rooms in Buildings 1 through 4 would be exposed to future exterior noise levels at or below 60 dBA L_{dn}.[100] At Buildings 1 through 4 future interior noise levels would be at or below 45 dBA L_{dn}, assuming that windows are partially open. The use of standard construction materials would meet the interior noise threshold of 45 dBA L_{dn}. Nonetheless, it is recommended all units include fresh air mechanical ventilation systems so occupants can keep the windows closed to further control noise.

[99] Standard residential construction, assuming windows to be partially open, reduces noise by approximately 15 dBA. With closed windows, standard residential construction typically provides 20 to 25 dBA of noise reduction in interior spaces.
[100] Where exterior noise levels range from 60 to 65 dBA L_{dn}, the inclusion of adequate forced-air mechanical ventilation is often the method selected to reduce interior noise levels to acceptable levels by closing the windows to control noise.

4.14 Population and Housing

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[101]

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[102]

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

City of Mountain View 6th Cycle Housing Element 2023-2031

The Housing Element is one of the seven required elements of the City's General Plan. The City adopted its most recent update to the Housing Element on April 11, 2023. The Housing Element

[101] California Department of Housing and Community Development. "Housing Elements." Accessed August 1, 2025. https://www.hcd.ca.gov/planning-and-community-development/housing-elements.
[102] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

identifies the City's current housing conditions and future housing needs while outlining initiatives to improve available housing for populations with various income levels within the City. The Housing Element includes a Housing Element Site Inventory, which is a summary of residential capacity to meet the City's RHNA requirements.

4.14.1.2 *Existing Conditions*

As of January 2025, the City of Mountain View has an approximate population of 86,513 persons with an average rate of 2.30 persons per household.[103] The City adopted an update to its Housing Element in April 2023. With the adoption of the Housing Element, the buildout of the General Plan would result in 70,100 dwelling units, 148,200 residents, and 133,000 jobs in Mountain View by 2040.[104]

The project site includes two vacant commercial buildings with no residents or employees on-site.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

A project can induce substantial population growth by (1) proposing new housing beyond projected or planned development levels, (2) generating demand for housing as a result of new businesses, (3) extending roads or other infrastructure to previously undeveloped areas, or (4) removing obstacles to population growth (e.g., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

[103] California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025." May 2025. Accessed August 1, 2025. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/.

[104] City of Mountain View. *City of Mountain View Housing Element Update Responses to Comments/Final Environmental Impact Report.* SCH# 2022020129. November 2022. Page 4-7.

The proposed project would result in the construction of 36 rowhouse units. Assuming an occupancy rate of 2.30 persons per household, the project would generate approximately 83 new residents.[105] The addition of 83 residents is beyond the growth the General Plan anticipated for this site since the existing site is designated General Industrial, which is a land use that does not allow residential development.

As stated in Section 4.14.1.2 Existing Conditions, the City's Housing Element assumed a building of 70,100 dwelling units and approximately 148,200 residents by 2040. The addition of 36 dwelling units would increase the number of projected dwelling units by 0.05 percent and projected resident population by 0.06 percent. Although there would be an increase in dwelling units and residents, the increase generated by the proposed project would not represent a substantial change in the amount of planned housing or population for the City of Mountain View as the percent increase is minor. Additionally, as discussed in Section 4.17 Transportation, the project would not require extension of roadway infrastructure. As discussed in Section 3.0 Project Description, the project proposes a 15-inch storm drain extension approximately 248 feet in length from San Pablo Drive to the project site. The extension would not terminate at an undeveloped area that could be further extended and used by unplanned growth. For these reasons, the proposed project would not induce substantial unplanned population growth in the city and would have a less than significant impact. **(Less than Significant Impact)**

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Since the existing uses on-site are not residential and the project would increase the amount of housing on the site, the construction of replacement housing is not required for the project nor proposed. For these reasons, the project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. **(Less than Significant Impact)**

[105] 36 rowhouse units * 2.30 persons per household = 83 persons or residents per household. Source: California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025." May 2025. Accessed August 1, 2025. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to public services impacts. The following goals and policies are applicable to the project.

Policy	Description
PSA 1.1	**Adequate staffing.** Maintain adequate police and fire staffing, performance levels and facilities to serve the needs for the community.
PSA 1.2	**Design for safety.** Support and promote crime prevention and fire safety strategies in the design of new developments.

PSA 2.7	**Police service levels and facilities.** Ensure Mountain View Police Department service levels and facilities meet demands from new growth and development.
PSA 3.1	**Minimized losses.** Minimize property damage, injuries and loss of life from fire.
POS 1.1	**Additional parkland.** Expand park and open space resources to meet current City standards for open acreage and population in each neighborhood.
POS 1.2	**Recreation facilities in new residential developments.** Require new development to provide park and recreation facilities.
POS 7.5	**Library services.** Provide high-quality library services and resources that address community needs and goals.
MOB 10.4	**Emergency response.** Monitor emergency response times and where necessary consider appropriate measures to maintain emergency response time standards. Measures to ensure provisions of adequate response times may include the expanded use of emergency vehicle signal preemption, evacuation route modifications, or the construction of new facilities (e.g., fire stations).

Mountain View Municipal Code

Chapter 41 of the Municipal Code contains a Park Land Dedication Ordinance, which sets requirements for park land dedication or in-lieu fees. The City requires developers to dedicate at least three acres of park land for each 1,000 persons who will live in a new housing project (owned or rented), or to pay an in-lieu fee that would be used to offset the increased demands on park facilities. The City also allows developers to propose, for City Council consideration, a Publicly Accessible Open Space within a residential development site for park land credit, reducing the land or in-lieu fee obligation generated by the development. Section 41.11 of the Municipal Code exempts affordable housing units from being counted towards the total number of dwelling units used to calculate the park land dedication requirement.

4.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection in the City is provided by the MVFD. The MVFD serves a current population of approximately 86,513 and an area of 12 square miles. The MVFD provides a number of services including fire suppression, rescue response, hazard prevention and education, and disaster preparedness services. The City of Mountain View also participates in a mutual aid program with neighboring cities, including Palo Alto, Los Altos, and Sunnyvale. Through this program, one or more of the mutual aid cities would provide assistance to Mountain View in whatever capacity was needed. The MVFD has an established response time of six minutes for "Medical Code Three" calls (i.e., those requiring expedited transport).[106] In the 2023-2024 fiscal year, the MVFD responded to 10,653 emergency incident and other calls for service.[107]

[106] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report.* SCH #2011012069. September 2012. Page 477.
[107] Mountain View Fire Department. *City of Mountain View Fire Department Annual Report Fiscal Year 2023-24*. Page 1.

The closest fire station is Mountain View Fire Station No. 1 located at 251 South Shoreline Boulevard. This fire station is approximately 1.7 miles south of the project site (based on driving distance). Mountain View Fire Stations No. 3 (301 North Rengstorff Avenue) and No.4 (229 North Whisman Road) are also in proximity to the site at a driving distance of approximately 1.9 miles. To ensure compliance with the current fire codes, the MVFD reviews applications for new development projects during the application process.

Police Protection Services

Police protection in the project area is provided by the City of Mountain View Police Department (MVPD). The MVPD operates out of one police station, located at 1000 Villa Street, approximately 1.5 driving miles south of the project site. MVPD has a mutual aid agreement with the surrounding jurisdictions, under which the other agencies would assist the MVPD in responding to calls when needed. The MVPD has a goal to respond to Priority E and Priority 1 calls in less than four minutes at least 55 percent of the time. Priority E and Priority 1 calls are considered the highest priority calls and signal emergency dispatch from the MVPD. Compared to Priority 1 calls, which are for life-threatening and time-critical emergencies, Priority E calls are of higher importance because they are often associated with violent crime incidents.[108] In 2024, the MVPD responded to 103,082 calls with 35,840 of those calls being for emergencies.[109] The average response time for Priority 1 events was five minutes or less 64.5 percent of the time.[110]

Schools

The project site is located within Mountain View Whisman School District (MVWSD) and Mountain View-Los Altos Union High School District (MVLASD). MVWSD serves grades kindergarten through eighth grade and MVLAS services high-school age students. Students in the project site area are assigned to Theuerkauf Elementary School located at 1625 San Luis Ave (approximately 0.5 mile southwest from the project site), Crittenden Middle School located at 1701 Rock Street (approximately 0.6 miles northwest from the project site), [111] and Mountain View High School located at 3535 Truman Avenue (approximately three miles south from the project site).[112] The existing capacity and enrollment of the local schools is shown in Table 4.15-1 below.

[108] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report.* SCH #2011012069. September 2012. Page 483 and 484.
[109] Mountain View Police Department. *2024 Annual Report*. 2025. Page 12.
[110] Ibid. Page 13.
[111] PowerSchool. "Mountain View Whisman School District." Accessed August 1, 2025. https://locator.pea.powerschool.com/?StudyID=214830.
[112] PowerSchool. "Mountain View-Los Altos Union High School District." Accessed August 1, 2025. https://locator.pea.powerschool.com/?StudyID=187720

Table 4.15-1: School Enrollment and Existing Capacity

School	Capacity	2024 to 2025 Enrollment[3]	Remaining Capacity [4]
Theuerkauf Elementary School	673[1]	308	365
Crittenden Middle School	1,008[1]	616	392
Mountain View High School	2,694[2]	2,187	507

Sources:

[1] Mountain View Whisman School District. Level I Developer Fee Study. Appendix E. May 5, 2022.

[2] De La Cruz, Daisy. Assistant to the Associate Superintendent-Business Services, Mountain View Los Altos High School District. Personal Communication. January 16, 2025.

[3] California Department of Education. "Data Quest." Accessed January 2, 2025. https://www.cde.ca.gov/ds/ad/dataquest.asp.

[4] Capacity – Enrollment = Remaining Capacity

Parks and Open Space

The City of Mountain View currently owns or manages approximately 993 acres of parks and open space facilities, including 22 urban parks and the Stevens Creek Trail. The urban parks are divided among 18 mini-parks, 13 neighborhood/school parks (under joint-use agreements with local school districts), five neighborhood parks not associated with school sites, two community parks, and one regional park (Shoreline at Mountain View).[113] The City also maintains 10 parks under joint-use agreements with local school districts.[114]

The nearest public park to the project site is San Vernon Park located approximately 0.2 mile southwest of the site. Amenities at San Veron Park including a basketball court, open lawn space, walking paths, and playground equipment.[115] Other nearby park facilities include Stevenson Park approximately one mile southwest of the site and Whisman Park approximately 0.5 mile southeast of the site. The nearest community park to the project site is Rengstorff Park, approximately two miles southwest of the project site. Rengstorff Park is 16.92 acres in size and includes the City's Community Center and a number of sports fields and other facilities.[116]

Libraries

The Mountain View Public Library, located at 585 Franklin Street, is the City's only library. It is located approximately 1.3 miles south of the project site.

[113] City of Mountain View. *City of Mountain View Parks and Open Space Plan*. 2014 Page 2.
[114] Ibid. Page 22.
[115] City of Mountain View. "City Parks." Accessed August 1, 2025. https://www.mountainview.gov/our-city/departments/community-services/parks-and-trails/parks/city-parks/-npage-2.
[116] City of Mountain View. *City of Mountain View Parks and Open Space Plan*. 2014 Page 67.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other Public Facilities?	☐	☐	☒	☐

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?

The project would generate about 83 new residents, which would increase the demand for fire protection in Mountain View. While the housing growth on the project site would be beyond what is anticipated by the General Plan, the project site is already served by the MVFD. Moreover, the project site is an infill project located within an urbanized part of Mountain View and within less than two miles of three different fire stations (No. 1, 3, and 4) as described above in Section 4.15.1.3 Existing Conditions. Additionally, the proposed project would be constructed to meet the City's municipal and fire codes, which would ensure the project has adequate fire safety and prevention measures. For these reasons, the incremental increase in demand for fire protection services by the proposed project residents would not be substantial enough to warrant modification of existing or construction of new fire service facilities. For these reasons, the project would not require the construction of new or expanded fire facilities and impacts would be less than significant. **(Less than Significant Impact)**

b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?

As discussed under checklist question a) above, the project would generate new residents, which would increase the demand for police protection services. The increase in residents on this site was not accounted for in the General Plan. While the residential growth resulting from the project goes beyond what the General Plan anticipated, the incremental increase in police protection services from the project residents would be minor as the proposed rowhouses would be located within an urban area of Mountain View that is already served by the MVPD. In addition, the project would include nighttime security lighting to minimize and deter the opportunity for criminal activity. The City's General Plan policies (PSA 1.1 and PSA 2.7) ensure that the City maintains adequate police staffing and performance levels while continually exploring ways to improve police effectiveness. Based on this discussion, the project would not result in the need to expand any existing or construct any new police protection facilities in the City. **(Less than Significant Impact)**

c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?

The project would generate additional students in the MVWSD and MVLASD due to the proposed housing units on-site. Based on student generation rates from the school districts, the project would generate six elementary/middle school students within the MVWSD[117] and three high school students[118] for a total of nine new students. The small number of students anticipated from the project would not significantly increase the needs for schools in these jurisdictions and would not result in a need for new or physically altered school facilities because the capacity of the existing schools (a shown above in Table 4.15-1) would be adequate to maintain service ratios and performance objectives for schools in the project area.

Also, per California Government Code Section 65996, certain construction projects require payment of a development fee to the school district associated with the project location. The project applicant would be responsible for the payment of development fees to the districts to offset the demand

[117] MVWSD Students: (27 market rate rowhouse dwelling units * 0.049 students per market rate rowhouse dwelling unit) + (9 below market rate rowhouse dwelling units * 0.555 students per below market rate rowhouse dwelling unit) = 6 MVWSD students. Source for student generation rates: Mountain View Whisman School District. *Level I Developer Fee Study for Mountain View Whisman School District*. May 5, 2022. Page 10.

[118] MVLASD Students: (27 market rate rowhouse dwelling units * 0.018 students per market rate rowhouse dwelling unit) + (9 below market rate rowhouse dwelling units * 0.312 students per below market rate rowhouse dwelling unit) = 3 MVLASD students. Source for student generation rates: Mountain View-Los Altos Union High School District. *Level I Developer Fee Study for Mountain View-Los Altos Union High School District.* July 27, 2020. Page 9.

placed on school facilities by the project. According to Government Code Section 65996 (3)(h), payment of such fees constitutes full mitigation of any school impacts under CEQA. Therefore, impacts from the increase in school enrollment would be offset by the required payment of development fees. Pursuant to state law, the project would have a less than significant impact on school facilities or services and would not, by itself, require new school facilities to be constructed**. (Less than Significant Impact)**

d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?

The addition of approximately 83 new residents on-site would result in an incremental increase in the use of existing park facilities. This demand would be partially offset by the private open space proposed for each unit and 4,125 square feet of common open space that would be available to residents on-site. In addition, the project would also pay parkland fees to offset increased use of existing parks and recreational facilities and contribute toward the City's development of new parks and open spaces in the project area, consistent with state law (Quimby Act) and City Code.

City Standard Condition of Approval

COA PS-1: **Park Land Dedication Fee.** Pay the Park Land Dedication Fee for each new residential unit in accordance with Chapter 41 of the Municipal Code prior to the issuance of the building permit. No credit against the Park Land Dedication Fee shall be allowed for private open space and recreational facilities. Provide the most current appraisal or escrow closing statement of the property with the following information to assist the City in determining the current market value of the land: (1) a brief description of the existing use of the property; (2) square footage of the lot; and (3) size and type of each building located on the property at the time the property was acquired. Prior to the issuance of the building permit, the applicant shall either: (1) pay the Park Land Dedication Fee; or (2) sign an agreement to defer the payment of the fee in accordance with Section 66007.a of the Government Code and submit a certificate of deposit made payable to the City as security guaranteeing payment of the fee. Guidelines for certificates of deposit are available from the Public Works Department.

Therefore, potential impacts to parks that would result from the project would be reduced to a less than significant level. **(Less than Significant Impact)**

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?

Implementation of the proposed project would contribute to an incremental increase in demand for other public facilities, such as libraries, because it would add new residents in Mountain View. The single library in the City currently serves the existing population of 86,513. The addition of the approximately 83 project residents would result in a potential increase in patrons of approximately 0.1 percent. This incremental increase in demand would not require the construction or expansion of new library facilities. **(Less than Significant Impact)**

4.16 Recreation

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Local

Countywide Trails Master Plan

The Santa Clara County Trails Master Plan Update is a regional trails plan approved by the Santa Clara County Board of Supervisors. It provides a framework for implementing the County's vision of providing a contiguous trail network that connects cities to one another, cities to the county's regional open space resources, County parks to other County parks, and the northern and southern urbanized regions of the County. The plan identifies regional trail routes, sub-regional trail routes, connector trail routes, and historic trails.

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to recreation impacts. The following goals and policies are applicable to the project.

Policy	Description
POS 1.1	**Additional parkland.** Expand park and open space resources to meet current City standards for open acreage and population in each neighborhood.
POS 1.2	**Recreation facilities in new residential developments.** Require new development to provide park and recreation facilities.

Mountain View City Code

Chapter 41 of the City Code contains a Parks Land Dedication Ordinance, which sets requirements for park land dedication or in-lieu fees. The City requires developers to dedicate at least three acres of park land for each 1,000 persons who will live in a new housing project (owned or rented), or to pay an in-lieu fee that would be used to offset the increased demands on park facilities. The City also

allows developers to propose, for City Council consideration, a POPA space within a residential development site for park land credit, reducing the land or in-lieu fee obligation generated by the development. Section 41.11 of the City Code exempts affordable housing units from being counted towards the total number of dwelling units used to calculate the park land dedication requirement.

4.16.1.2 *Existing Conditions*

As discussed under Section 4.15 Public Servies, the City of Mountain View currently owns or manages approximately 993 acres of parks and open space facilities, including 22 urban parks and the Stevens Creek Trail. The urban parks are divided among 18 mini-parks, 13 neighborhood/school parks (under joint-use agreements with local school districts), five neighborhood parks not associated with school sites, two community parks, and one regional park (Shoreline at Mountain View).[119] The City also maintains 10 parks under joint-use agreements with local school districts.[120]

The nearest public parks to the project site include San Vernon Park located approximately 0.2 mile southwest of the site, Stevenson Park approximately one mile southwest of the site, Whisman Park approximately 0.5 mile southeast of the site, and Rengstorff Park approximately two miles southwest of the project site. Rengstorff Park is 16.92 acres in size and includes the City's Community Center and a number of sports fields and other facilities.[121] The nearest public swimming pool to the project site is the Eagle Park Pool Aquatics Center located approximately 1.3 miles south of the site

4.16.2 Impact Discussion

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☒	☐
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

[119] City of Mountain View. *City of Mountain View Parks and Open Space Plan*. 2014 Page 2.
[120] Ibid. Page 22.
[121] City of Mountain View. *City of Mountain View Parks and Open Space Plan*. 2014 Page 67.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As discussed in Section 4.15 Public Services, the proposed residential units would result in approximately 83 new residents on-site which would result in an incremental increase in the use of existing recreational (including park) facilities. This demand would partially offset by the private open space proposed for each unit and 4,125 square feet of common open space that would be available to residents on-site (as shown in Figure 3.5-1), and payment of parkland fees to offset the project's incremental demand on existing recreational facilities. Therefore, the project would not substantially increase the deterioration of existing recreational facilities and would result in a less than significant impact to recreational facilities. **(Less than Significant Impact)**

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project would include 4,125 square feet of common open space that would be available to residents on-site. The common open space would be comprised primarily of landscaped areas and a central courtyard with seating areas with gardening plots. The construction impacts of the common open space are evaluated throughout this document and found not to result in significant impacts with the implementation of identified conditions of approval and mitigation measures. As discussed under checklist question a), the inclusion of common open space and payment of fees per COA PS-1 would offset the project's incremental increase in demand for park and recreation facilities to a less than significant level. For these reasons, the project would not require the expansion of existing recreational facilities. **(Less than Significant Impact)**

4.17 Transportation

The following discussion is based in part upon a Multimodal Transportation Analysis (MTA) Checklist prepared for the project. The MTA checklist is attached as Appendix J to this Initial Study.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a VMT metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by the Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

California Fire Code

The California Fire Code is a set of regulations addressing fire safety and fire prevention in buildings and structures throughout the state. The California Fire Code includes design standards for emergency vehicle access.

Regional and Local

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Congestion Management Program

Valley Transportation Authority (VTA) oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that urbanized

counties in California prepare a CMP in order to obtain each county's share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and transportation demand management plan, a land use impact analysis program, and a capital improvement element. VTA has review responsibility for proposed development projects that are expected to affect CMP-designated intersections.

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to transportation impacts. The following goals and policies are applicable to the project.

Policy	Description
MOB 3.2	**Pedestrian connections.** Increase connectivity through direct and safe pedestrian connections to public amenities, neighborhoods, village centers, and other destinations.
MOB 3.3	**Pedestrian and bicycle crossings.** Enhance pedestrian and bicycle crossings at key locations across physical barriers.
MOB 3.4	**Avoiding street widening.** Preserve and enhance citywide pedestrian connectivity by limiting street widening as a means of improving traffic.
MOB 4.1	**Bicycle network.** Improve facilities and eliminate gaps along the bicycle network to connect destinations across the City.
MOB 4.4	**Bicycle parking standards.** Maintain bicycle parking standards and guidelines for well-sited bicycle parking and storage in private developments to enhance the bicycle network.
MOB 5.5	**Access to transit services.** Support right-of-way design and amenities consistent with local transit goals to facilitate access to transit services and improve transit as a viable alternative to driving.
MOB 7.1	**Parking codes.** Maintain efficient parking standards that consider reduced demand due to development conditions such as transit accessibility.
MOB 7.2	**Off-street parking.** Ensure new off-street parking is properly designed and efficiently used.
MOB 10.3	**Avoiding street widening.** Limit widening of streets as a means of improving traffic and focus instead on operational improvements to preserve community character.

2030 General Plan Action Item MOB 8.1.3

General Plan Action Item MOB 8.1.3 established interim LOS standards for the City to use based on the LOS standards from the 1992 General Plan. These standards include a target peak hour LOS policy of LOS D for all intersections and roadway segments, except for intersections and street segments within the Downtown Core and San Antonio areas and intersections and street segments on CMP designated roadways in Mountain View, which have a target of LOS E.

Mountain View VMT Policy

The Mountain View City Council adopted a Vehicle Miles Traveled Policy on June 30, 2020, which replaces LOS with VMT as the metric for determining a significant transportation impact under CEQA, consistent with SB 743. The City's VMT Policy includes screening criteria for projects which are presumed to have a less than significant transportation impact. Specifically, the City's VMT Policy

states that projects would have a less than significant VMT impact and do not require further project-specific VMT analysis if the project meets the screening criteria for small project screening, map-based screening, transit screening, or affordable housing screening.

Mountain View Comprehensive Modal Plan

The City identifies the level of comfort for pedestrians on any given roadway using the Pedestrian Quality of Service (PQOS) metric. The Mountain View Comprehensive Modal Plan (AccessMV) identifies the continuity or gaps in the City's pedestrian facilities and identifies PQOS scoring ranging from 1 to 5. A higher PQOS score indicates a low quality of service. The PQOS metric covers the following factors:

- Proximity to a variety of destinations and amenities
- Street connectivity and directness of routes to destinations
- Presence of a continuous network of pedestrian facilities
- Motor vehicle traffic speed; and
- Street width and intersection conditions

The City also identifies the perceived comfort and safety of existing roads and bikeway facilities from the perspective of cyclists using the Bicycle Level of Traffic Stress (BLTS) metric. AccessMV identifies the BLTS scoring ranging from 1 to 4. A higher BLTS score indicates that the bikeway is comfortable for a more confident adult. A BLTS score of 1 is comfortable for all ages and abilities, a BLTS score of 2 is comfortable for an average adult, while a BLTS score of 4 indicates that the streets are comfortable only for highly confident riders. The metric (ranging from 1 to 4) in the AccessMV document covers the following factors:

- Number of through lanes or street width
- Posted speed limit or prevailing vehicle speed
- Presence and type of bicycle facilities
- Presence of traffic signals

Shoreline Boulevard Transportation Corridor Study

In November 2014, the Mountain View City Council approved the Shoreline Boulevard Transportation Corridor Study which determined the feasibility of, and developed a conceptual design for, integrated transit, bicycle, and pedestrian facilities in the Shoreline Boulevard Corridor from the Downtown Transit Center to North Bayshore. The Corridor Study provided a phasing program for the transportation improvements to achieve the North Bayshore commute mode-share goals and identified recommended Shoreline Boulevard bus lane and utility improvements.

2015 Bicycle Transportation Plan

The 2015 Bicycle Transportation Plan (BTP) provides a vision, strategies, and actions for improving and encouraging bicycle travel in and through the City. The 2015 BTP also expands on the City's 2030

General Plan mobility goals by more specifically addressing bicycle-related needs of the community. The 2015 BTP proposes Class II bike lanes along Castro Street and new bicycle facilities along El Camino Real.

Safe Routes to School Program

In 2011, the City launched a Safe Routes to School (SRTS) program to promote walking and bicycling to school for Mountain View students and families by identifying suggested routes to schools that are located along streets with improved bicycle and pedestrian facilities.

4.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by U.S. 101 and SR 85. Local access to the project site is provided via North Shoreline Boulevard, West Middlefield Road, Moffett Boulevard, Terra Bella Avenue, Linda Vista Avenue, and San Rafael Avenue. These roadways are briefly described below.

- U.S. 101 is an eight-lane highway with three mixed-flow lanes and one high-occupancy vehicle (HOV) lane in each direction in the vicinity of the project site. U.S. 101 provides access to the study area via a full interchange at Shoreline Boulevard.
- SR 85 is a freeway that begins at U.S. 101, east of North Shoreline Boulevard, extends south towards San José, and terminates at U.S. 101 east of the Silicon Valley Boulevard and Bernal Road interchange. SR 85 is six lanes wide (two mixed-flow lanes and one HOV lane in each direction) in the vicinity of the project site. SR 85 provides access to the project site via an interchange at Moffett Boulevard.
- Shoreline Boulevard is a north-south, four-lane arterial road in the vicinity of the project site. It begins near Shoreline Lake in the north and extends to El Camino Real in the south, where it becomes Miramonte Avenue. Shoreline Boulevard has left-turn pockets at intersections. Access to the project site from Shoreline Boulevard is provided via Terra Bella Avenue.
- Middlefield Road is an east-west, four-lane arterial road that runs parallel to U.S. 101. It begins at the intersection of Central Expressway in Mountain View and traverses westward through Redwood City. Middlefield Road has landscaped medians with left-turn pockets at signalized intersections. Access to the project site from Middlefield Road is via Linda Vista Avenue and Terra Bella Avenue.
- Moffett Boulevard is a north-south, four-lane arterial that begins from R T Jones Road in the north and extends to Central Expressway in the south, where it becomes Castro Street. Moffett Boulevard has landscaped medians with left-turn pockets at signalized intersections. Access to the project site from Moffett Boulevard is via Middlefield Road.
- Terra Bella Avenue is a two-lane, east-west roadway that turns into San Leandro Avenue north of the project site.
- Linda Vista Avenue is a two-lane dead end, north-south roadway. Linda Vista Avenue provides access to the project site from San Leandro Avenue via Terra Bella Avenue.

- San Rafel Avenue is a north-south roadway with a dead end at the most northern point of the roadway. The southern segment of San Rafael Avenue turns into San Carlos Avenue after the roadway intersects with San Pablo Drive. San Rafael Avenue provides direct access to the project site from Terra Bella Avenue.

While the project site is currently vacant, if occupied, the existing buildings on-site would generate approximately three AM peak hour trips and three PM peak hour trips.[122]

Existing Transit Facilities

Existing transit services in the area are provided by the VTA and the Mountain View Transportation Management Association (MVTMA). The closest bus stops serviced by the VTA and the MVTMA are located along North Shoreline Boulevard and West Middlefield Road, approximately 0.5 feet west and southwest[123], respectively, of the project site. The VTA operates bus and light rail transit services in Santa Clara County, and the MVTMA provides free MVgo shuttle service between the Mountain View Transit Center (MVTC) and corporate campuses in the North Bayshore and East Whisman areas.

VTA Bus Service

VTA Local Route 40 serves the project vicinity with bus stops in each direction on Shoreline Boulevard. Local Route 40 runs between Foothill College and the MVTC. The MVTC provides connections to Caltrain, VTA light rail transit, several VTA bus routes (21, 40, and 52), MV community shuttle, and MVgo shuttle routes.

Mountain View Transportation Management Association Shuttles

The MVTMA operates the MVgo shuttle system. This shuttle system is provided through the collection of TMA member dues. MVgo operates four shuttle routes that provide service to employment areas from the MVTC. Three routes serve the North Bayshore area, and one route serves the East Whisman area. MVgo shuttle Routes B, C, and D provide service to the project area, with two bus stops (northbound and southbound) within the vicinity of the project site at the intersection of North Shoreline Boulevard and Terra Bella Avenue.

Mountain View Community Shuttle

The Mountain View Community Shuttle is a free shuttle service operated by the City with 50 stops within Mountain View during the weekdays from 7:00 AM to 7:00 PM and on weekends and holidays between 10:00 AM and 6:00 PM The shuttles have weekday peak period headways of 30 minutes. The nearest stop to the project site is located north of the intersection of North Shoreline Boulevard and West Middlefield Road.

[122] The AM and PM peak hour trips were calculating using trip generation rates of 0.17 AM peak hour trips per 1,000 square feet and 0.18 PM peak hour trips per 1,000 square feet for light industrial building. See Appendix J for details.
[123] Distance is based on walking distance.

Existing Bicycle Facilities

The bicycle facilities proximate to the project site consist of a multi-use trail (Class I bikeway) along Stevens Creek and striped bike lanes (Class II bikeways) along North Shoreline Boulevard and West Middlefield Road.[124] There are no existing bicycle facilities immediately adjacent to the project site.

Based on the BLTS map[125], the following streets in the project vicinity have a BLTS greater than 2, which is undesirable:

- Shoreline Boulevard (BLTS 3)
- Middlefield Road (BLTS 3)
- Moffett Boulevard (BLTS 4)

Existing Pedestrian Facilities

Pedestrian facilities near the project site consist of sidewalks along both sides of San Rafael Avenue, and sidewalks on both sides of surrounding streets, including along San Pablo Drive and Terra Bella Avenue. Crosswalks and pedestrian signal heads are present at the following intersections:

- West leg of the Shoreline Boulevard and U.S. 101 Southbound Ramps intersection; and
- All legs of the Shoreline Boulevard and Terra Bella Avenue intersection.

Based on the PQOS map[126], the following streets in the project vicinity have a PQOS greater than 2:

- San Rafael Avenue (PQOS 4)
- Terra Bella Avenue (PQOS 3)
- Middlefield Road (between Shoreline Boulevard and Moffett Boulevard) (PQOS 4 & 5)
- Shoreline Boulevard (north of Middlefield Road (PQOS 5)

[124] Class I bikeways are shared between pedestrians and bicyclists and are separated from motor vehicle traffic. Class II bikeways are lanes on roadways designated for use by bicycles with special lane markings, pavement legends, and signage.
[125] City of Mountain View. *AccessMV Mountain View's Comprehensive Modal Plan*. May 2021. Figure 3-10.
[126] Ibid. Figure 3-5.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

Roadway System

Per 2030 General Plan Action Item MOB 8.1.3, the City's interim standard for signalized intersections is LOS D. The City does not have an adopted level of service standard for unsignalized intersections; however, the City strives to maintain LOS D for unsignalized intersections. Compared to existing conditions, the project is estimated to generate a net increase of 11 AM peak hour vehicle trips and 19 PM peak hour vehicle trips.[127] Based on the screening criteria outlined in the City's MTA Handbook, projects that generate less than 20 net new peak-hour trips do not require preparation of an MTA as they are presumed to result in less than significant transportation impacts. Because the project would not generate more than 20 net new peak-hour trips, an MTA was not prepared, and the project would not result in any significant impacts at the surrounding signalized or unsignalized intersections. **(Less than Significant Impact)**

Transit Facilities

As described in Section 4.17.1.2 Existing Conditions, the project site is currently served several public transit options including VTA, MVgo, and Mountain View Community Shuttle. These public transit options provide access to Caltrain and VTA light rail, which connect Mountain View to other parts of the Bay Area. Future residents may utilize these public transit services. The additional incremental transit trips generated from the project would not exceed the capacity of these services and the existing transit services would be able to accommodate the additional riders. The City identified

[127] The AM and PM peak hour trips were calculating using trip generation rates of 0.38 AM peak hour trips per unit and 0.61 PM peak hour trips per unit for condominiums. See Appendix J for details.

Shoreline Boulevard bus lane and utility improvements in the Shoreline Boulevard Transportation Corridor Study that would construct several improvements at the intersection of Terra Bella Avenue and North Shoreline Boulevard, including bus stops and a transit lane for bus travel in each direction. Implementation of the project would not interfere with these planned improvements. Therefore, the project would not conflict with a program, plan, ordinance or policy addressing transit. **(Less than Significant Impact)**

Bicycle Facilities

The project site is in proximity to several existing bicycle facilities including a Class I bikeway along Stevens Creek and Class II bikeways along North Shoreline Boulevard and West Middlefield Road. The City's 2015 BTP and AccessMV propose Class IV cycle tracks along Shoreline Boulevard and Moffett Boulevard and a Class II full time bike lane along Middlefield Road. In addition, the City's Shoreline Boulevard Bus Lane and Utility Improvements project, currently in implementation, would upgrade the bicycle facilities along Shoreline Boulevard, between U.S. 101 and Montecito Avenue with protected bike lanes. These planned improvements by the City of Mountain View would increase bicyclist comfort and safety and improve the BLTS, and are consistent with the guidelines described in the City's Comprehensive Modal Plan. While the project would generate an incremental increase in bicyclist demand on the existing roadways, the project would not interfere with any of aforementioned identified improvements or result in the need for additional improvements.

The project would provide one bicycle parking space in each garage for a total of 36 long-term bicycle parking spaces on-site. The amount of bicycle parking spaces provided would comply with City requirements. For these reasons, the project would not conflict with any programs, plans, ordinances, or policies addressing bicycle facilities. **(Less than Significant Impact)**

Pedestrian Facilities

As described in Section 4.17.1.2 Existing Conditions, existing pedestrian facilities in proximity to the project site include sidewalks on the surrounding street network and crosswalks and/or pedestrian signal heads at select intersections. Based on the City's PQOS map, San Rafael Avenue, Terra Bella Avenue, and Middlefield Road and Shoreline Boulevard have a PQOS score of 3 or more. While the project would add pedestrian demand to these roadways, the project's incremental increase in demand would not interfere or change the PQOS scoring of these pedestrian facilities. Additionally, the project would include the construction of a new five-foot sidewalk fronting the site, which would provide continuous sidewalk from San Rafael Avenue to the other roadways within the project area. For these reasons, the project would not conflict with a program, plan, ordinance, or policy addressing the pedestrian circulation system. **(Less than Significant Impact)**

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

The City of Mountain View's VMT policy includes screening criteria (including small project, map-based, transit and affordable housing screening criteria) for projects which are presumed to have a

less than significant VMT impact. The proposed project would meet the screening criteria for Map-Based Screening in the City's VMT Policy as the project would be located in an area of low VMT that is 25 percent below the established baseline, which is greater than the VMT threshold of 15 percent below the County regional reference average VMT.[128] Therefore, the project would meet the City's screening criteria for VMT and VMT impacts would be less than significant. **(Less than Significant Impact)**

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Site Access and Driveway Design

The project would construct one, 20-foot two-way driveway on the southeast corner of the site that would be accessed via San Rafael Avenue. The driveway would provide access to the internal streets/drive aisles along with the private garages on the ground floor of each unit. These internal streets would also provide access for solid waste and recycling collection trucks to the two trash enclosures at the northwestern and southeastern corners of the site. The driveway width would meet the required width of 18 feet for a two-way driveway, as stipulated in the City of Mountain View's Zoning Ordinance. Based on this discussion, the project would not substantially increase hazards due to a geometric design feature, and impacts would be less than significant. **(Less than Significant Impact)**

Land Use Compatibility

The proposed residential land use would be consistent with the existing residential land uses to the south and east of the project site. The project, therefore, does not propose a use that is incompatible in the project area or propose a use that would bring unusual equipment on the roadways (e.g., farm equipment). For this reason, the project would not result in a significant impact due to incompatible uses. **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

Access to the project site for emergency vehicles would be provided via the new two-way driveway on San Rafael Avenue on the southeast corner of the site. The project would be designed to provide adequate turning area and circulation for a MVFD fire truck to enter and exit the project site. Additionally, the project would comply with all City policies set forth in the General Plan (Policy PSA 1.2) and the California Fire Code standards to ensure the project includes the appropriate fire building safety design features and adequate emergency access. As a result, the project would not result in inadequate emergency access. **(Less than Significant Impact)**

[128] City of Mountain View. "Senate Bill 743: CEQA Transportation Analysis." May 20, 2020. Exhibit 4 – Heat Map 1 – Var. From Nine-County Reg. Avg. VMT per Cap. Accessed August 19, 2025. https://mountainview.legistar.com/LegislationDetail.aspx?ID=4538471&GUID=3DBEE8EF-7A3B-4398-8518-1D29418CD700

4.18 Tribal Cultural Resources

The following discussion is based, in part, upon an Archaeological Sensitivity Assessment dated July 2025. A copy of the report, which is a confidential report, is on file at the City of Mountain View City Community Development Department and is available to review with appropriate credentials.

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a TCR, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a TCR or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the CRHR, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

4.18.1.2 *Existing Conditions*

As discussed previously in Section 4.5 Cultural Resources, a records search at the NWIC of CHRIS was conducted on July 18, 2025 to identify all recorded archaeological sites on and within one-quarter mile of the project site. No Native American resources were recorded on the project site and there are no previously recorded Native American archaeological sites within a quarter mile of the project area. Additionally, a Sacred Lands File search request was submitted to the to the NAHC for the project area. The results of the search were negative and there are no known TCRs on-site.

As discussed in Section 4.5 Cultural Resources, while the project area is located approximately 500 feet west of the historic-era alignment of Stevens Creek, it was historically a wetland and willow thicket, which made it unattractive for settlement or other intensive uses and site is considered to have low sensitivity for buried and surface Native American cultural resources.

On November 4, 2025, the City of Mountain View mailed certified letters to 23 tribal representatives to begin the consultation process. Two tribes, the Muwekma Ohlone Tribe of the San Francisco Bay

Area and the Indian Canyon Band of Costanoan Ohlone People, responded to the City's request for consultation.

A meeting was held on December 1, 2025 between the City and representatives of the Muwekma Ohlone Tribe of the San Francisco Bay Area. During the consultation meeting, the Tribe did not identify any known resources located on the project site but recommended the project conduct cultural sensitivity training and tribal monitoring due to its proximity to the Bayshore and the present riparian corridor of Stevens Creek. During the meeting, the Tribe also requested a copy of the Archaeological Sensitivity Assessment. As a follow-up to the meeting, the City provided a copy of the Archaeological Sensitivity Assessment and City's standard conditions of approval language regarding cultural sensitivity training and tribal monitoring. On December 2, 2025, the tribe confirmed the City's standard conditions of approval address the Tribe's request regarding cultural sensitivity training and tribal monitoring, which are described below as COA TCR-1 and COA TCR-2, and consultation was concluded.

A meeting was held on January 29, 2026 between the City and representatives of the Indian Canyon Band of Costanoan Ohlone People. During the consultation meeting, the Tribe did not identify any known resources located on the project site but expressed concerns for ground disturbing activities. The Tribe offered a post-discovery awareness briefing if resources are found, and recommended that any discovered resources or artifacts be reburied or relocated locally within Santa Clara County. The City acknowledged these recommendations and went over the City's standard conditions of approval language regarding tribal monitoring and protocols if archaeological resources are unearthed during ground-disturbing activities, including having a Native American representative to assess the significance of the find. These conditions of approval are described in Section 4.5 Cultural Resources as COA CUL-1 and COA CUL-2, and below as COA TCR-2, and consultation was concluded.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

As discussed above, there are no known TCRs on site; however, redevelopment of the site could disturb unknown archaeological resources, including TCRs. The project would implement COAs TCR-1 and TCR-2 below to reduce potential impacts to TCRs to a less than significant level by conducting cultural sensitivity training for all construction crews prior to construction to become familiar with the indigenous history, and having a Native American archaeological monitor during ground-disturbing activities throughout the construction process.

City Standard Conditions of Approval:

COA TCR-1: **Cultural Sensitivity Training.** As requested during the Tribal Consultation process for the project, Cultural Sensitivity Training shall be provided to the construction crews at the beginning of the project to aid those involved in the project to become more familiar with the indigenous history of peoples in the vicinity of the project site.

COA TCR-2: **Native American Archaeological Monitor.** A Native American archaeological monitor shall be present for all ground-disturbing activities throughout the project construction process.

In addition, the project would implement COA CUL-1 identified in Section 4.5 Cultural Resources, which would ensure that any objects encountered during ground-disturbing activities are appropriately evaluated for cultural significance and protected if significant, and if human remains are found, determine if the remains are Native American. Based on this discussion, the project would not cause a substantial adverse change in the significance of TCRs. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Please refer to the discussion under checklist question a) above. **(Less than Significant Impact)**

4.19 Utilities and Service Systems

The following is based, in part, on a Utility Impact Study prepared by Schaaf & Wheeler Consulting Civil Engineers dated September 29, 2025. This report is attached as Appendix K to this Initial Study.

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of Mountain View adopted its most recent UWMP in June 2021.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the California Integrated Waste Management Board (CIWMB), required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels) by 2000 and thereafter. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle released an analysis titled “Analysis of the

Progress Toward the SB 1383 Organic Wase Reduction Goals" in August 2020 (revised November 2020), which recommended maintaining the disposal reduction targets set forth in SB 1383.[129]

California Building Standards Code

CALGreen establishes mandatory green building standards for all buildings in California. The code is updated every three years.[130] CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Local

Mountain View 2030 General Plan

The General Plan contains goals and policies to avoid significant impacts due to utilities impacts. The following goals and policies are applicable to the project.

Policy	Description
INC 1.3	**Utilities for new development.** Ensure adequate utility service levels before approving new development.
INC 1.4	**Existing capital facilities.** Maintain and enhance existing capital facilities in conjunction with capital expansion.
INC 4.1	**Water supply.** Maintain a reliable water supply.
INC 5.2	**Citywide water conservation.** Reduce water waste and implement water conservation and efficiency measures throughout the city.
INC 8.2	**National Pollutant Discharge Elimination System Permit.** Comply with requirements in the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (MRP).
INC 8.4	**Runoff pollution prevention.** Reduce the amount of stormwater runoff and stormwater pollution entering creeks, water channels and the San Francisco Bay through participation in the Santa Clara Valley Urban Runoff Pollution Prevention Program.

[129] CalRecycle. "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals (DRRR-2020-1693)." Accessed August 1, 2025. https://www2.calrecycle.ca.gov/Publications/Details/1693.
[130] California Building Standards Commission. "California Building Standards Code." Accessed August 1, 2025. https://www.dgs.ca.gov/bsc/codes.

Policy	Description
INC 8.5	**Site-specific stormwater treatment.** Require post-construction stormwater treatment controls consistent with MRP requirements for both new development and redevelopment projects.
INC 8.7	**Stormwater quality.** Improve the water quality of stormwater and reduce flow quantities.
INC 11.1	**Waste diversion and reduction.** Meet or exceed all federal, state and local laws and regulations concerning solid waste diversion and implementation of recycling and source reduction programs.
INC 11.2	**Recycling.** Maintain and expand recycling programs.
INC 11.3	**Composting.** Provide productive reuse or composting services or both for all discarded organic materials in the city, including all food and green waste.
INC 11.4	**Solid waste.** Ensure all municipal solid waste generated within the city is collected, transported and disposed of in a manner that protects public health and safety.
PSA 3.5	**Peak water supply.** Ensure sufficient peak-load water supply to address fire and emergency response needs when approving new development.

2022 Water Master Plan

The City prepared a Water Master Plan (WMP) in August 2022 in order to review and update the City's hydraulic model, evaluate the City's water storage and supply, develop a Capital Improvement Plan (CIP) and time schedule to address system deficiencies and support system reliability, evaluate the City's water distribution system, and evaluate the City's water distribution system under water shortage conditions. The WMP contains a prioritized list of CIPs that are designed to ensure the continued reliability of the City's water system.

2022 Sewer Master Plan

The 2022 Sewer Master Plan is the City's effort to periodically evaluate the ability of the City's sanitary sewer collection system to serve the City's residents, and identifies a capital improvements needed to serve existing and planned growth.

4.19.1.2 *Existing Conditions*

While the project site is developed with an office building and a warehouse, the buildings are currently vacant. As a result, the project site has minimal (if any) water demand, sewage generation, and solid waste generation. The project site is serviced by existing water and sewer lines in San Rafael Avenue and a storm drain line in San Pablo Drive.

Water Supply and Demand

The City of Mountain View provides water service to the project site. The City is the water retailer for the area and purchases water from two wholesale water suppliers, the SFPUC and Valley Water. In 2020, the City's water supply production was 84 percent SFPUC, 10 percent Valley Water, two percent groundwater, and four percent recycled water. As of 2020, the City's existing water supply is 10,456

acre-feet per year (AFY) and the City's water demand is 9,856 AFY.[131, 132] When accounting for recent updates to the plumbing code, the UWMP has a projected citywide water demand of 12,058 AFY in 2025 and 14,163 AFY in 2045.[133] According to the City's model, the project site is modeled to have an existing water demand of 1,338 gallons per day (gpd), assuming the site is occupied.[134] The site's potable water demand is served by an eight-inch water main along San Rafael Avenue. Recycled water service is not provided to the project area.

Water System

Hydraulic Conveyance

The water system must meet minimum allowable pressure levels under the Peak Hour Demand (PHD) scenario. The minimum allowable pressure for the PHD scenario is 40 pound-force per square inch (psi). Mountain View is split into different pressure zones, and project site is in Pressure Zone 1. Under existing conditions, the pressure near the project site meets the performance criteria of 40 psi under the PHD scenario.

Fire Flow

The required fire flow at the project site in the 2022 WMP is 2,500 gallons per minute (gpm). The eight-inch pipe in San Rafael Avenue serving the project site has an available fire flow of 4,964 gpm. While there are multiple existing deficiencies to the north, east, and west of the project site, the water system within the immediate vicinity of the project site has sufficient capacity to support the water demands and required fire flows of the existing development.

Wastewater Treatment and Sanitary Sewer System

Wastewater Treatment

The City of Mountain View maintains its own wastewater collection system. Sanitary drains in the City are operated and maintained by the Wastewater Section of the Public Works Department. The City pumps its wastewater to the Palo Alto Regional Water Quality Control Plant (PARWQCP) for treatment. The PARWQCP has an overall 39 million gallons per day (mgd) average annual treatment capacity.[135] The City has an average annual flow treatment allocation of 15.1 mgd at the PARWQCP.[136] In 2020, approximately 6.9 mgd of wastewater from the City of Mountain View was collected and treated by the PARWQCP.[137]

[131] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. Page 34.
[132] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. Page 14.
[133] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. ES-5.
[134] Schaaf & Wheeler Consulting Civil Engineers. *924-940 San Rafael Avenue – Utility Impact Study.* September 29, 2025.
[135] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. Page 31.
[136] City of Palo Alto. *Long Range Facilities Plan for the Regional Water Quality Control Plant.* October 2012. Page 2-5.
[137] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. Page 31.

Sanitary Sewer System

There is an existing eight-inch sewer main within San Rafael Avenue. According to the City's model, the project site is modeled to have an existing sewer flow of 1,280 gpd, assuming the site is occupied.[138]

The performance criteria of the sanitary sewer system is calculated by dividing the maximum flow depth of the sewage by the diameter of the pipe (d/D). Based on the City's standard design guidelines, for pipes with a diameter equal to or less than 12 inches, a d/D performance criteria ratio of 0.50 or less is considered adequate, and any ratio higher than that would be considered deficient. Pipes with a diameter greater than 12 inches would have to meet a d/D performance criteria ratio of 0.75 or lower to be considered adequate, and any ratio higher than that would be considered deficient. There are no existing deficiencies along the project conveyance pathway.

Stormwater Drainage

The storm drainage system that serves the project site is owned and maintained by the City of Mountain View Public Works Department. The project site currently consists of approximately 80,284 square feet of impervious area. The remaining 1,279 square feet of the site consists of pervious area, which is comprised of landscaping and other permeable surfaces. Storm water runoff from the project site is collected by a municipal storm drain system consisting of storm drain inlets, conveyance pipes, culverts, channels and retention basins. Drainage into the City system generally flows north towards the San Francisco Bay. Stormwater runoff from the site drains into the storm drain line in San Pablo Drive south of the project site.

Solid Waste

Solid waste collection and recycling services for residents and businesses in Mountain View are provided by Recology Mountain View. Once collected, solid waste and recyclables are transported to the SMaRT Station® in Sunnyvale for sorting, and commercial compostables are transported to a composting facility in Vernalis, California. Non-recyclable waste is transported and landfilled at Kirby Canyon Sanitary Landfill in south San José. Kirby Canyon Landfill has an estimated remaining capacity of approximately 16.2 million cubic yards and a closing date of 2059.[139]

Electric Power and Telecommunications Systems

The project site is served by existing telecommunications systems and electrical services.

[138] Schaaf & Wheeler Consulting Civil Engineers. *924-940 San Rafael Avenue – Utility Impact Study*. September 29, 2025.
[139] Azevedo, Becky. Environmental Protection Manager, Waste Management. Personal Communications. March 26, 2025.

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water System

Hydraulic Conveyance

The proposed project's impact on the utility system for hydraulic conveyance was analyzed under existing and cumulative conditions. The existing conditions scenario models the project's impact on the existing condition and configuration of the utility system. The future cumulative condition scenario determines any impacts on the project would have on the City's utility systems with future planned infrastructure and future planned land use and growth.

The analysis in the Utility Impact Study prepared for the project concluded that under existing conditions and future cumulative conditions, the performance criteria under the PHD scenario is met system-wide in both the pre- and post-project scenarios (refer to Appendix K for additional details about the modeling and results). Therefore, the project would not result in any deficiencies and impacts to hydraulic conveyance would be less than significant. **(Less than Significant Impact)**

Fire Flow

The project's required fire flow is 1,875 gpm based on building size and construction type as defined in the CBC. As discussed above, the available fire flow is 4,964 gpm at the eight-inch pipe in San Rafael Avenue. There are multiple existing deficiencies to the north, east, and west of the project. The project would not impact these deficiencies. In addition, within the immediate vicinity of the project, the water system has sufficient capacity to support the proposed project's water demands and required fire flows. Refer to Appendix K for additional details about the modeling and results).

In the future cumulative condition, with future planned infrastructure and future planned land use and growth, pre- and post-project available fire flow is 4,973 gpm at the eight-inch pipe in San Rafael Avenue. As mentioned above, there are existing deficiencies to the north, east, and west of the project pre- and post-project. However, the proposed project would not contribute to any of these existing deficiencies in the future cumulative condition. In addition, the water system has sufficient capacity to serve the proposed project's water demands and required fire flows within the immediate vicinity in addition to cumulative demands. Refer to Appendix K for additional details about the modeling and results). **(Less than Significant Impact)**

Sanitary Sewer Infrastructure

The project would make new lateral connections to the existing eight-inch sewer main within San Rafael Avenue. The estimated sewer flow for the project is 7,200 gpd, which is an increase of 5,920 gpd compared to the existing sewer flow of 1,280 gpd. Under the future cumulative condition, which assumes growth of the site allowed under the existing General Plan, the sewer flow would be 1,829 gpd. Therefore, under the future cumulative condition, the project would increase sewer flow by 5,371 gpd.

Existing Plus Project Impacts

Under existing conditions, the sewer system would meet the City's d/D performance criteria along the project flow path in both pre and post project scenarios. There would be no pipes with deficiencies downstream of the project site under either scenario.[140]

[140] Schaaf & Wheeler Consulting Civil Engineers. *924-940 San Rafael Avenue Utility Impact Study*. September 29, 2025. Pages 5-6.

Future Cumulative Plus Project Impacts

Under the future cumulative condition, the sewer system would meet the City's d/D performance criteria along the project flow path in both pre and post project scenarios.[141]

The future cumulative condition for both pre- and post-project would not have any deficiencies along the project pathway under the assumption the two CIPs outlined in the 2022 Sewer Master Plan (2022 SMP), CIP 5 and CIP 6, are constructed. CIP 5 and CIP 6 were identified in the 2022 SMP for non-capacity related improvements downstream of the site. The 2022 SMP does not recommend that any pipes downstream along the project sewer flow path be upsized. Based on this discussion, the project would not result in any new deficiencies to the sanitary sewer system that would require the construction of new infrastructure. **(Less than Significant Impact)**

Stormwater Drainage Infrastructure

As discussed in Section 4.19.1.2 Existing Conditions, the project site consists of approximately 80,284 square feet of impervious area and 1,279 square feet of pervious area. The project would decrease the amount of impervious area to 62,184 square feet and increase the amount of pervious area to 18,100 square feet. Therefore, the amount of stormwater runoff from the site would decrease. To control stormwater on-site, the project would include 13 DMAs on-site with runoff treated via flow-through planters and one unlined bioretention basin. To control stormwater from the new public sidewalk along the project frontage, the project would include landscaping and one flow-through planter next to the sidewalk as two DMAs to treat stormwater runoff.

The project would construct a new storm drain main line that would be 15-inches in diameter and would be approximately 248 feet long. It would extend from the project site, in the San Rafael Avenue right-of-way to the existing storm drain line in San Pablo Drive south of the project site. The construction-related impacts from this improvement would be less than significant with implementation of COAs and mitigation measures, and compliance with existing regulations, as described throughout this document. **(Less than Significant Impact)**

Electrical Power and Telecommunications Facilities

Existing electricity and telecommunications utility infrastructure currently serve the project site. The project would make lateral connections to the exiting utility lines located in San Rafael. The construction-related impacts from these improvements would be less than significant with implementation of COAs and mitigation measures, and compliance with existing regulations, as described throughout this document. **(Less than Significant Impact)**

[141] Ibid.

b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As described in Section 4.19.1.2 Existing Conditions, the City's existing water supply is 10,456 AFY (or approximately 9.3 mgd) and the City's water demand is 9,856 AFY (or approximately 8.8 mgd). With implementation of the project, demand for potable water on-site would be 8,100 gpd, which is an increase of approximately 6,767 gpd from existing conditions (approximately 8.7 AFY or 0.007 mgd). This increase would account for approximately 0.08 percent of the overall water supply in the City. The project would result in an incremental increase in demand for water in the City; however, Mountain View has sufficient supply to accommodate the small increase in demand during normal years.

To maintain adequate water supply during dry and multiple dry years where there may be shortfalls in supply, the City would institute mandatory conservation measures, with escalating levels of conservation requirements as the shortages in water supply increase. These measures include limiting outdoor water use, encouraging further conservation through outreach programs, and requiring the rapid repair of leaks. The entire City, including the proposed project, would be subject to these measures during dry and multiple dry years. Compliance with mandatory conservation measures in the City would ensure that sufficient water supply is maintained in dry and multiple dry years. **(Less than Significant Impact)**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Existing Plus Project Impacts

As discussed above in Section 4.19.1.2 Existing Conditions, the PARWQCP treats wastewater from the City and has an overall average annual treatment capacity of 39 mgd. The City has an average annual flow treatment allocation of 15.1 mgd at the PARWQCP. In 2020, approximately 6.9 mgd of wastewater from Mountain View was sent to the PARWQCP for treatment.[142] This results in approximately 8.2 mgd of available treatment capacity for the City at the PARWQCP. As discussed under checklist question a) above, the project would generate approximately 7,200 gpd of wastewater. Based on this information, the PARWQCP would have adequate capacity to treat the existing demand in addition to the increase in wastewater resulting from the proposed project. **(Less than Significant Impact)**

Cumulative Plus Project Impacts

Under future cumulative conditions, it is estimated that the City would generate approximately 14.15 mgd of wastewater, which would result in a remaining available treatment capacity of 0.95 mgd for the City at the PARWQCP. Based on the project's wastewater generation of 7,200 mgd (or 0.0072

[142] City of Mountain View. *2020 Urban Water Management Plan*. June 2021. Page 31.

mgd), the PARWQCP would have adequate capacity to treat the cumulative demand in addition to the increase in wastewater resulting from the proposed project.

Under the Basic Agreement between the City, Palo Alto, and Los Altos, an engineering study to redefine the anticipated future needs of the treatment plant is required once each respective service area reaches 80 percent of their contractual capacity rights. Based on this agreement, the City would be required to conduct this engineering study once the average annual flow to the PARWQCP increases to 12.08 mgd during the buildout of the General Plan. Any recommendations regarding physical improvements to the PARWQCP resulting from this engineering study would be subject to separate environmental review. Although the project would contribute to the increased generation of wastewater associated with the buildout of the General Plan, it would only account for less than one-tenth of one percent of the overall capacity need in the City. Based on this discussion, the project's contribution would be considered less than significant. **(Less than Significant Impact)**

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The project would comply with CALGreen requirements by recycling and/or salvaging for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris resulting from construction activities. The proposed project would also limit the amount of operational waste disposed of through the provision of on-site recycling collection as required by AB 341 and by providing on-site composting collection as required by SB 1383. Solid waste generated during operation of the project would be diverted and disposed of in accordance with the state requirements and General Plan Policies INC 11.1 to INC 11.4 (refer to Section 4.19.1.1 Regulatory Framework).

As discussed earlier, Kirby Canyon Landfill has an estimated remaining capacity of approximately 16.2 million cubic yards and a closing date of 2059.[143] It is estimated that the residential uses on-site would generate 26.7 tons of solid waste (or approximately 28.9 cubic yards) per year.[144, 145] Based on the remaining capacity at Kirby Canyon Landfill and the estimated amount of waste generated by the project, the landfill would have sufficient capacity to serve the project. Since the project can be served by a landfill with capacity and would comply with existing local and state programs and regulations, the project's impacts related to solid waste and landfill capacity and attainment of solid reduction goals would be less than significant. **(Less than Significant Impact)**

[143] Azevedo, Becky. Environmental Protection Manager, Waste Management. Personal Communications. March 26, 2025.
[144] Illingworth & Rodkin, Inc. *924-940 San Rafael Avenue Air Quality & Greenhouse Gas Assessment*. September 17, 2025.
[145] Cubic yards based on a compaction rate of 1,850 pounds per cubic yard.

e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

The proposed project would comply with state and local regulations related to solid waste reduction. The project would comply with CALGreen standards for construction waste recycling and divert at least 65 percent of construction waste resulting from construction activities on-site. The proposed project would comply with AB 341 by utilizing the City's solid waste collection service, which commercially sorts recyclable material at the SMaRT Station. Furthermore, as discussed under checklist question d), solid waste from the project site would be disposed of at the Kirby Canyon Landfill in San José. The project would not result in a substantial increase in waste landfilled at Kirby Canyon, nor would it be served by a landfill without sufficient capacity. In compliance with the City Code and General Plan policies, the project would not conflict with state and federal solid waste regulations and statutes. **(Less than Significant Impact)**

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Existing Conditions*

The site is not located in a state responsibility area and is not located in a very high fire hazard zone according to the California Department of Forestry and Fire Protection (CAL FIRE).[146] The site is not located within the Wildland Urban Interface (WUI).[147]

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts. **(No Impact)**

[146] California Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Webmap. Accessed January 23, 2026. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.
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4.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

As discussed in Section 4.0 of this Initial Study, the proposed project would not degrade the quality of the environment with implementation of City standard conditions of approval and the identified mitigation measures. As discussed in Section 4.4 Biological Resources, the project would not impact sensitive habitats or special-status species. The project would implement City standard condition of approval COA BIO-1 to reduce impacts to nesting birds to a less than significant level. As discussed in Sections 4.5 Cultural Resources and 4.18 Tribal Cultural Resources, there are no known pre-historic, historic, or tribal cultural resources on-site. The project would implement City standard conditions of approval COA CUL-1, COA CUL-2, COA TCR-1, and COA TCR-2 to reduce potential impacts to unknown resources (if encountered on-site during construction) to a less than significant level. **(Less than Significant Impact)**

b) Does the project have impacts that are individually limited, but cumulatively considerable?

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

As discussed in Sections 4.2, 4.12, and 4.20, the project would not impact agricultural or forestry resources, mineral resources, or wildfire. Therefore, the project would not contribute to a cumulative impact to these resources.

The project's impacts to cultural resources and TCRs are specific to the site and, as discussed in Sections 4.5 and 4.18, implementation of City standard condition of approval COA CUL-1, COA CUL-2, COA TCR-1, and COA TCR-2 would reduce those impacts to a less than significant level.

The geographic area for cumulative aesthetic, biological resource, geology and soils, hazards and hazardous materials, hydrology and water quality, and noise impacts is generally the immediate vicinity of the project site because it would affect common resources and impacts would be limited to the immediate vicinity. While there are no cumulative projects immediately adjacent to the project, there are two projects located within 500 feet from the project: 1) a six story, 108-unit affordable rental housing building and a two-story above grade parking garage at 1020 Terra Bella Avenue, and 2) a 38-unit rowhome housing development at 922, 944, & 950 San Leandro Avenue.

These cumulative projects would not result in a significant cumulative aesthetics impact because the cumulative projects are required to undergo the same DRC review process to ensure compliance with General Plan policies and City Code regulations regarding view preservation, minimization of light and glare, and neighborhood compatibility. Cumulative projects are subject to the same existing state, regional, and local regulations including the MBTA, Fish and Game Code, City Tree Preservation Ordinance, CBC, MRP provisions, PCB/ACM/lead-based paint regulatory screening requirements, NPDES permit requirements, General Plan policies, and City Code regulations identified in Sections 4.4, 4.7, 4.9, and 4.10. Compliance with these regulations, in addition to implementation of City standard conditions of approval (such as COAs BIO-1, GEO-1, GEO-2, HAZ-1, HAZ-2, HAZ-3, HYD- 1, and HYD-2) would ensure significant individual and cumulative impacts to biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality, are reduced to a less than significant level. Cumulative projects within 500 feet of the project site have the ability to contribute to a cumulative noise or vibration impact with the project. As discussed above, there are cumulative projects within 500 feet that could have construction periods that overlap with the project. However, the cumulative projects would be subject to the same measures listed in COAs NOI-1 and NOI-2 to reduce construction noise impacts to a less than significant impact.

In general, an individual project's impact on broader resources including air quality, energy, GHGs, and VMT are evaluated at a cumulative level. That is, if a project results in a significant impact to air quality (specifically criteria air pollutants), energy, GHGs, and VMT, the project would be considered to have a significant cumulative impact to those resources. As discussed in Sections 4.3, 4.6, 4.8, and 4.17, the project would not result in significant (individual, and therefore cumulative) impacts to those resource areas with the implementation of the identified City standard condition of approval (COA AIR-1). Cumulative projects within 1,000 feet of the project site has the ability to contribute to cumulative health risk impacts with the project. As discussed in Section 4.3.2, in addition to the projects described above, there are three other projects located within 1,000 feet from the project: 1) two personal storage buildings at 1040 Terra Bella Avenue, 2) a 70-unit affordable housing development at 1110 Terra Bella Avenue and 1012 Linda Vista Avenue, and 3) a 203-unit apartment building at 1001 North Shoreline Boulevard. As discussed in Section 4.3.2, the cumulative health risk impacts of these projects, and other stationary sources combined, are found to be less than significant. In addition, the project would implementation mitigation measure MM AIR-1 to reduce its health risk contribution.

Other than 100 percent affordable housing projects, any cumulative residential developments are required to pay park land dedication fees required by the City. Cumulative residential projects are also required to pay school impact fees in accordance with California Government Code Section 65996, which would mitigate their impact on schools, and comply with General Plan Policy MOB 10.4, which would ensure adequate emergency response times. For these reasons, cumulative projects would not contribute to a cumulative significant recreation or public services impact.

Land uses in the City are regulated through the General Plan, Zoning Ordinance, and depending on the location of the site, the Moffett Federal Airfield CLUP. The project requires a General Plan amendment and rezoning to allow for construction of residential uses at the proposed density on-site. As discussed in Section 4.11, the project would not conflict with the Moffett Federal Airfield CLUP because the structures would not exceed the established maximum heights allowed in the Moffett Federal Airfield CLUP, and would comply with any FAA conditions for use of construction equipment that exceeds the maximum height. Cumulative projects in the area would comply with the same requirements.

As discussed in Section 4.14, the proposed project would result in up to 36 residential units (and approximately 83 new residents) that were not accounted for in the 2030 General Plan buildout or the Housing Element Update that was adopted in April 2023. The project's number of residential units and estimated residents represents an approximate increase of 0.06 percent compared to the estimated 2040 buildout. Given this incremental increase and the projected City growth, the project would not result in a cumulatively considerable significant cumulative population and housing impact.

As discussed in Section 4.19, a Utility Impact Study was prepared which evaluated the project's potential contribution to cumulative utility impacts on the water and sanitary sewer system in the City. This cumulative analysis determined that the project would have a less than significant impact on the water and sanitary sewer system under future cumulative conditions. Future cumulative

projects would be required to confirm sufficient water supply, wastewater treatment capacity, and solid waste disposal capacity. Therefore, cumulative projects would not result in a significant cumulative utility and service impact.

Given the above considerations, the proposed project would not result in a cumulatively considerable contribution to significant cumulative impacts. **(Less than Significant Impact with Mitigation Incorporated)**

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environmental that might otherwise by minor must be treated as significant if it would cause substantial adverse effects to humans, either directly or indirectly. This factor relates to adverse changes to the environment of human beings generally, and not effects on particular individuals.

The potential for the proposed project to result in changes to the environment that could directly or indirectly affect human beings is evaluated in each section of this Initial Study using the CEQA Checklist. In particular, the resource areas that could directly affect human beings include air quality, geology and soils, hazards and hazardous materials, and noise, which are discussed in Sections 4.3, 4.7, 4.9, and 4.13, respectively. The analysis in these sections conclude that impacts would all be reduced to a less than significant level with adherence to existing regulations, implementation of City standard conditions of approval (COAs AIR- 1, GEO-1, HAZ-1, HAZ-2, HAZ-3, NOI-1, and NOI-2), and implementation of mitigation measure MM AIR-1. No other direct or indirect adverse effects of the project on human beings have been identified. **(Less than Significant Impact with Mitigation Incorporated)**

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 7.0 Acronyms and Abbreviations

2022 SMP	2022 Sewer Master Plan
AB	Assembly Bill
ABAG	Association of Bay Area Governments
AC	air conditioning
AccessMV	Mountain View Comprehensive Modal Plan
ACM	asbestos-containing material
AFY	acre-feet per year
AIA	Airport Influence Area
Air District	Bay Area Air Quality Management District
ALUC	Airport Land Use Commission
amsl	above mean sea level
APN	Assessor's Parcel Number
ATCM	air toxic control measure
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bay Area	San Francisco Bay Area
bgs	below ground surface
BLTS	Bicycle Level of Traffic Stress
BMP	best management practices
BMR	Below market rate
BTP	2015 Bicycle Transportation Plan
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
California Energy Code	California Building Energy Efficiency Standards
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards

Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Standards Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CIP	Capital Improvement Plan
CIWMB	California Integrated Waste Management Board
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
CPR	Climate Protection Roadmap
CRHR	California Register of Historical Resources
CRHIS	California Historical Resources Information System
CUPA	Certified Unified Program Agency
dB	decibel
dBA	A-weighted decibel
DMA	Drainage management area
DPM	diesel particulate matter
DRC	Development Review Committee
DTSC	Department of Toxic Substances Control

d/D	maximum flow depth of the sewage divided by the diameter of the pipe
du/ac	dwelling units per acre
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
EPC	Environmental Planning Commission
ESA	Environmental Site Assessment
ESLs	environmental screening levels
EV	Electric vehicle
EVCS	Electric vehicle charging station
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FAR Part 77	Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace
FEMA	Federal Emergency Management Agency
FEPD	Fire and Environmental Protection Division
FHSZ	Fire Hazard Severity Zone
FIRMs	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
General Plan	Mountain View 2030 General Plan
GGRP	Greenhouse Gas Reduction Program
GHG	greenhouse gas
GHGRS	Greenhouse Gas Reduction Strategy
gpd	gallons per day
gpm	gallons per minute
GWh	gigawatt hour
GWMP	2021 Groundwater Management Plan
GWP	Global Warming Potential
HEU EIR	2023 – 2031 Housing Element Update Environmental Impact Report
HFCs	hydrofluorocarbons
HI	Hazard Index

HMCD	Hazardous Materials Compliance Division
HOV	high-occupancy vehicle
HSP	Health and Safety Plan
HSWA	Hazardous and Solid Waste Amendments
ibid	Same source as previous footnote
in/sec	inches/second
LBP	lead-based paint
L_{dn}	Day/Night Average Sound Level
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
LID	Low Impact Development
L_{max}	Maximum A-weighted noise level during a measurement period
LOS	Level of Service
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individuals
µg/m^3	micrograms per cubic meter
$MTCO_2e$ per year	metric tons of carbon dioxide equivalent per year
MND	Mitigated Negative Declaration
mpg	miles per gallon
MRP	San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit
MSL	mean sea level
MT	metric tons
MTA	Multimodal Transportation Analysis
MTC	Metropolitan Transportation Commission
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MVFD	City of Mountain View Fire Department
MVGBC	Mountain View Green Building Code
MVLASD	Mountain View-Los Altos Union High School District
MVPD	City Mountain View Police Department
MVTC	Mountain View Transit Center

MVTMA	Mountain View Transportation Management Association
MVWSD	Mountain View Whisman School District
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act of 1966
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NO	nitric oxide
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOD	Notice of Determination
NOI	Notice of Intent
NO_x	nitrogen oxides
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O_3	ozone
OITC	Outdoor-Indoor Transmission Class
OPR	Office of Planning and Research
PARWQCP	Palo Alto Regional Water Quality Control Plant
PCB	polychlorinated biphenyls
PDA	Priority Development Areas
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric Company
PHD	Peak Hour Demand
PM	particulate matter
PM_{10}	particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
ppm	parts per million

PPV	Peak Particle Velocity
PQOS	Pedestrian Quality of Service
psi	pound-force per square inch
R&D	Research and Development
R3-2.2	Multiple-Family Residential
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Need Allocation
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
Valley Water	Santa Clara Valley Water District
SF_6	sulfur hexafluoride
SFHAs	Special Flood Hazard Areas
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board
SMP	Site Management Plan
2022 SMP	2022 Sewer Management Plan
SO_2	sulfur dioxide
SO_x	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SRTS	Safe Routes to School
STC	Sound Transmission Class
SVCE	Silicon Valley Clean Energy
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board

TACs	Toxic Air Contaminants
TCRs	Tribal Cultural Resources
Title 24	Title 24, Part 6 of the California Code of Regulations
TPHs	total petroleum hydrocarbons
TMDLs	total maximum daily loads
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USTs	underground storage tanks
UWMP	urban water management plan
VDECS	Verified Diesel Emission Control Strategy
VMT	vehicle miles traveled
VOCs	volatile organic compounds
VTA	Valley Transportation Authority
Williamson Act	California Land Conservation Act
WMP	Water Master Plan
WUI	wildland-urban interface
ZNE	zero net carbon emission