Attachment 1

CITY OF MOUNTAIN VIEW
RESOLUTION NO.
SERIES 2019

A RESOLUTION CERTIFYING THE EAST WHISMAN PRECISE PLAN FINAL ENVIRONMENTAL IMPACT REPORT AND ADOPTING THE CEQA FINDINGS, INCLUDING STATEMENT OF OVERRIDING CONSIDERATIONS AND MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000, *et seq.*, the City has prepared an EIR for the East Whisman Precise Plan (hereinafter "Project"); and

WHEREAS, the City of Mountain View prepared and circulated a Draft EIR for the requisite 45-day public comment period, which ended on July 22, 2019, and gave all public notices in the manner and at the times required by law; and

WHEREAS, the response to comments and EIR text revisions, together with the Draft EIR, comprise the Final EIR and were made available to the public on September 20, 2019; and

WHEREAS, the Environmental Planning Commission held a public hearing on October 2, 2019 on said Project and recommended approval to the City Council subject to the required findings; and

WHEREAS, the City Council held a public hearing on November 5, 2019 on said Project and the Final EIR, and received and considered all evidence presented at said hearing, including all associated staff reports, meeting minutes, testimony, and evidence constituting the record of proceedings (as defined in the CEQA Findings) and the recommendation for approval from the Environmental Planning Commission; and

WHEREAS, the Final EIR identifies certain significant effects on the environment that would result from the implementation of the proposed Project; and

WHEREAS, the Final EIR identifies mitigation measures which, when implemented, will substantially lessen or avoid the significant effects on the environment caused by the proposed Project, with the exception of the significant unavoidable impacts to project-level and cumulative vehicle miles traveled and transit vehicle delay at intersections; and

WHEREAS, a Statement of Overriding Considerations has been prepared which finds that the benefits of the Project outweigh the significant unavoidable impacts to project-level and cumulative vehicle miles traveled and transit vehicle delay at intersections; and

WHEREAS, the Final EIR, Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program for the Project were presented to the City Council on November 5, 2019, and the City Council has reviewed the Final EIR and all associated staff reports, meeting minutes, testimony, and evidence constituting the record of proceedings; and

WHEREAS, the Final EIR identifies and analyzes a reasonable range of alternatives to the proposed Project; and

WHEREAS, the Mitigation Monitoring and Reporting Program has been prepared pursuant to CEQA to monitor the Project, which the lead agency has approved in conjunction with certification of the EIR in order to mitigate or avoid significant effects on the environment;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Mountain View:

1. Certifies that the Final EIR has been completed in compliance with CEQA, reflects the independent judgment and analysis of the City, and has been presented to the City Council, which reviewed and considered the information in it before approving the Project, attached hereto as Exhibit A; and

2. Adopts the CEQA findings and Statement of Overriding Considerations for the Project, attached hereto as Exhibit B; and

3. Adopts the Mitigation Monitoring and Reporting Program for the Project, attached hereto as Exhibit C; and

4. Adopts all of the feasible mitigation measures identified and described in the Final EIR and determines that the Project, as mitigated, will avoid or reduce all of the significant adverse impacts to a less-than-significant level, with the exception of the significant unavoidable impacts to project-level and cumulative vehicle miles traveled and transit vehicle delay at intersections, which significant unavoidable impacts are considered acceptable because these unavoidable adverse environmental effects are outweighed by the benefits of the Project as set forth in the Statement of Overriding Considerations; and

5. Finds that the no-project, increased housing, and reduced office alternatives identified and analyzed in the Final EIR cannot achieve the Project objectives to the same degree as the proposed Project, and that the location alternatives do not represent substantial environmental benefits over the proposed Project and are, therefore, rejected as infeasible, within the meaning of CEQA, in favor of the proposed Project.

TIME FOR JUDICIAL REVIEW:

The time within which judicial review of this document must be sought is governed by California Code of Procedure Section 1094.6 as established by Resolution No. 13850 adopted by the City Council on August 9, 1983.

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EA/2/RESO
899-11-05-19r-2

Exhibits:
A. Final EIR
B. Statement of Overriding Considerations
C. Mitigation Monitoring and Reporting Program

Exhibit A

Final Environmental Impact Report

East Whisman Precise Plan Project

SCH# 2017082051

Prepared by the

CITY OF MOUNTAIN VIEW

In Consultation with

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

September 2019

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Attachments

SECTION 1.0 INTRODUCTION

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the East Whisman Precise Plan Project.

1.1 PURPOSE OF THE FINAL EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of Mountain View in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the Final EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the Draft EIR by making written findings for each of those significant effects.

According to the State Public Resources Code Section 21081, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

1.2 CONTENTS OF THE FINAL EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

a) Comments and recommendations received on the Draft EIR either verbatim or in summary;
b) A list of persons, organizations, and public agencies commenting on the Draft EIR;
c) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
d) Any other information added by the Lead Agency.

1.3 PUBLIC REVIEW

The Final EIR and all documents referenced in the Final EIR are available for public review at City of Mountain View's Community Development Department, City Hall, 1st Floor, 500 Castro Street, Mountain View on weekdays during normal business hours. The Final EIR is also available for review on the City's website: https://www.mountainview.gov/depts/comdev/planning/activeprojects/eastwhisman.asp.

SECTION 2.0 CHANGES TO THE PRECISE PLAN

Since circulation of the East Whisman Precise Plan Draft EIR, the Mountain View City Council has requested several changes to the East Whisman Precise Plan (Precise Plan). The changes are summarized below, including the location of the change, description of the change, and an environmental conclusion regarding the change. Where relevant, text edits are included within Section 5.0 Draft EIR Text Revisions. The amended Precise Plan is included as Attachment A to this Final EIR.

As described below, the Precise Plan changes do not affect the environmental impact conclusions found in the Draft EIR. They do not result in "new information" defined by CEQA Guidelines Section 15162 that would necessitate recirculation of the EIR, in whole or in part. New information consists of changes in the project or the circumstances under which the project would occur that lead to 1) a new significant impact or 2) a substantial increase in the severity of the EIR's previously disclosed impacts.

1. ***TDR Bonus Alternative***: Employment Character Area (Section 3.5) and Bonus FAR Programs (Section 6.1)

The City Council identified the transfer of development rights (TDR) Bonus Alternative as the preferred office growth alternative with regard to the size of the FAR bonus allowed. This alternative includes the following elements:

- Development Reserve of 2,000,000 square feet
- Maximum FAR in the South Employment Area (along Bernardo and Ravendale Avenues) of 0.5 FAR
- Bonus FAR of up to 0.75 FAR in the South Employment Area when projects purchase TDR square footage from a School District
- Jobs-Housing Linkage Ratio of three units per 1,000 square feet, instead of 2.5 units per 1,000 square feet

Environmental Conclusion: No text edits to the Draft EIR are required for this change. This is a clarification regarding the terms of the TDR Bonus Alternative and does not change the development assumptions for the Precise Plan area (in terms of size, location, or intensity of uses) analyzed in the Draft EIR and, therefore, does not change the level of environmental impact described. No additional environmental analysis is necessary.

2. ***Jobs-Housing Linkage:*** Jobs Housing Linkage Program (Section 6.1.4) and Development Monitoring (section 6.4)

The following additions were made to the Precise Plan:

- Detailed timing requirements were removed and replaced with references to the Jobs-Housing Linkage Program Administrative Guidelines.

- The detailed list of potential Jobs-Housing Linkage strategies was removed to ensure Council has oversight of specific linkage proposals and applicants are not led to believe that certain linkage actions would automatically be approved.
- Explicit language regarding Council review was removed. Council will review Bonus FAR and other projects anyway.
- Additional language was added clarifying that transferred floor area does not count as net new office floor area and is not subject to community benefits or a school strategy requirement.

Environmental Conclusion: No text edits to the Draft EIR are required for this change, and there is no new information to disclose regarding new or more severe impacts. The changes represent primarily procedural clarifications to the Jobs-Housing Linkage requirement and do not alter the amount or location of development described in the Draft EIR and, therefore, do not change the level of environmental impacts. No additional environmental analysis is necessary.

3. ***Development Review Process:*** Development Review (Section 6.2)

The Environmental Planning Commission (EPC) is now the recommending body for Bonus FAR projects. In addition, the City Council requested analysis of a reasonable threshold for Base FAR projects that should be reviewed by the EPC and City Council.

Environmental Conclusion: No text edits to the Draft EIR are required for this change. This is a primarily procedural clarification regarding the project review process and does not substantively change the development assumptions for the Precise Plan. No additional environmental analysis is necessary.

4. ***Base FAR in Village Center:*** Village Center Character Area (Section 3.6)

The Base FAR for residential projects in the Village Center Character Area was raised from 0.9 to 1.0.

Environmental Conclusion: No text edits to the Draft EIR are required for this change. Base FAR changes do not affect the total amount, location, nature, or intensity of development allowed under the Precise Plan, rather they specify the FAR above which a project must provide community benefits and, therefore, do not change the level of environmental impacts described. No additional environmental analysis is necessary.

5. ***Vehicle Access across Light Rail and Public Street Flexibility:*** Figures 10 & 11 (et al) and Blocks and Streets (Section 3.7.1)

"Street C" (between Ellis and Logue, across the light-rail tracks) was removed from the Precise Plan based on Santa Clara Valley Transportation Authority (VTA) policies, project feasibility, and the determination that it was not necessary to eliminate level of service (LOS) deficiencies in the area (as described in Section 3.14 Transportation of the Draft EIR). For this reason, the Draft EIR identified a mitigation measure to remove Street C from the Plan. In its place is a grade-separated multi-use path inaccessible to vehicles. In addition, applicants may now request an alternative publicly accessible connection (i.e. multi-use path) instead of a full public street through a prescribed process.

Environmental Conclusion: No text edits to the Draft EIR are required for this change. This change reflects implementation of the requirements of MM TRA-3.1. No additional environmental analysis is necessary as this change was analyzed in the Draft EIR as part of the mitigation measure.

6. ***Parking FAR in Employment Character Area:*** General Floor Area and Floor Area Ratio Standards (Section 3.3.2)

Employment area FAR, inclusive of parking, was clarified to be limited to twice the allowed Non-Residential FAR.

Environmental Conclusion: This is a clarification regarding how FAR is counted. The location, nature, intensity and amount of square footage allowed for future development would not change and uses are still capped by height limits for each character area. No additional environmental analysis is necessary.

7. ***Office Character Area Targets:*** Character Area Strategy (Chapter 2)

Additional language was added to the Character Area Strategy to clarify that individual developments may be granted flexibility with regard to the specific square footage targets, provided the Precise Plan overall square footage growth caps are not exceeded. Further, the office character area targets were revised to accommodate additional growth in the Mixed-Use area near the light rail station, as described in the table below.

Character Area	Draft (net new sf)	Revised (net new sf)
Mixed-Use	250,000-500,000	600,000-1.2 million
Employment North	600,000-1 million	300,000-900,000
Employment South	800,000-1.35 million	600,000-1 million

Environmental Conclusion: Text edits have been included in Section 5.0 of this Final EIR for this change. Projects in all character areas are still subject to development regulations, including overall development square footage caps for the Precise Plan area. Additionally, the project VMT impact would not change in severity from what was identified within the Draft EIR (significant and unavoidable) as part of Impact TRA-5. The VMT analysis included the entire Precise Plan area and compared that VMT number to City and county averages. Shuffling the intensity of land uses within the project boundary among the three character areas would not affect the level of VMT impact because it was measured over the entire Precise Plan area.

With regard to the utilities and service systems, development in the Precise Plan area may create local deficiencies for certain water or sewer pipes (as stated within the Draft EIR under Impact UTL-1 and Impact C-UTL-1). This impact was analyzed at a general level for the larger Precise Plan area. Implementation of MM UTL-1.1 would ensure that large development projects in the Precise Plan area prepare a site-specific utility analysis at the time of development, taking into account then-current conditions, and pay appropriate impact fees under the nexus study to fund area City Capital Improvement Projects and other needed utility infrastructure improvements to address deficiencies.

For these reasons, no additional environmental analysis is necessary to address this change to the Precise Plan.

8. ***Residential Character Area Targets:*** Diverse Housing Strategy (Chapter 2)

The residential character area targets were revised to provide flexibility and acknowledge uncertainty. In the Character Area Targets, a range of units are now identified in the Village Center (50 to 200 units) and Mixed-Use (4,800 to 5,000 units) areas. The unit types targets (i.e., number of bedrooms) were removed from the Character Area strategy and put into the Affordable Housing Strategy, which was renamed "Diverse Housing". The revised unit types targets are shown below, expressed as ranges that were informed by the original targets.

Unit Type		**Draft**	**Revised**
Micro/Studio		10%	10-20%
1 Bedroom		30%	20-40%
2 Bedroom	40%	40-60%	
3+ Bedroom	20%		

Environmental Conclusion: No Draft EIR text edits are required, as bedroom count and affordable housing requirements are not discussed in the Draft EIR. The information is providing specificity for future development and would result in housing development consistent with the Draft EIR's evaluation, as the overall amount of residential development would not change. No additional environmental analysis is necessary.

9. ***Height Exceptions Near Middlefield Station:*** General Height Standards (Section 3.3.1)

Projects within 750 feet of the Middlefield Station, except within 200 feet of the Precise Plan boundary, may be allowed up to 135 feet with the following additional requirements:

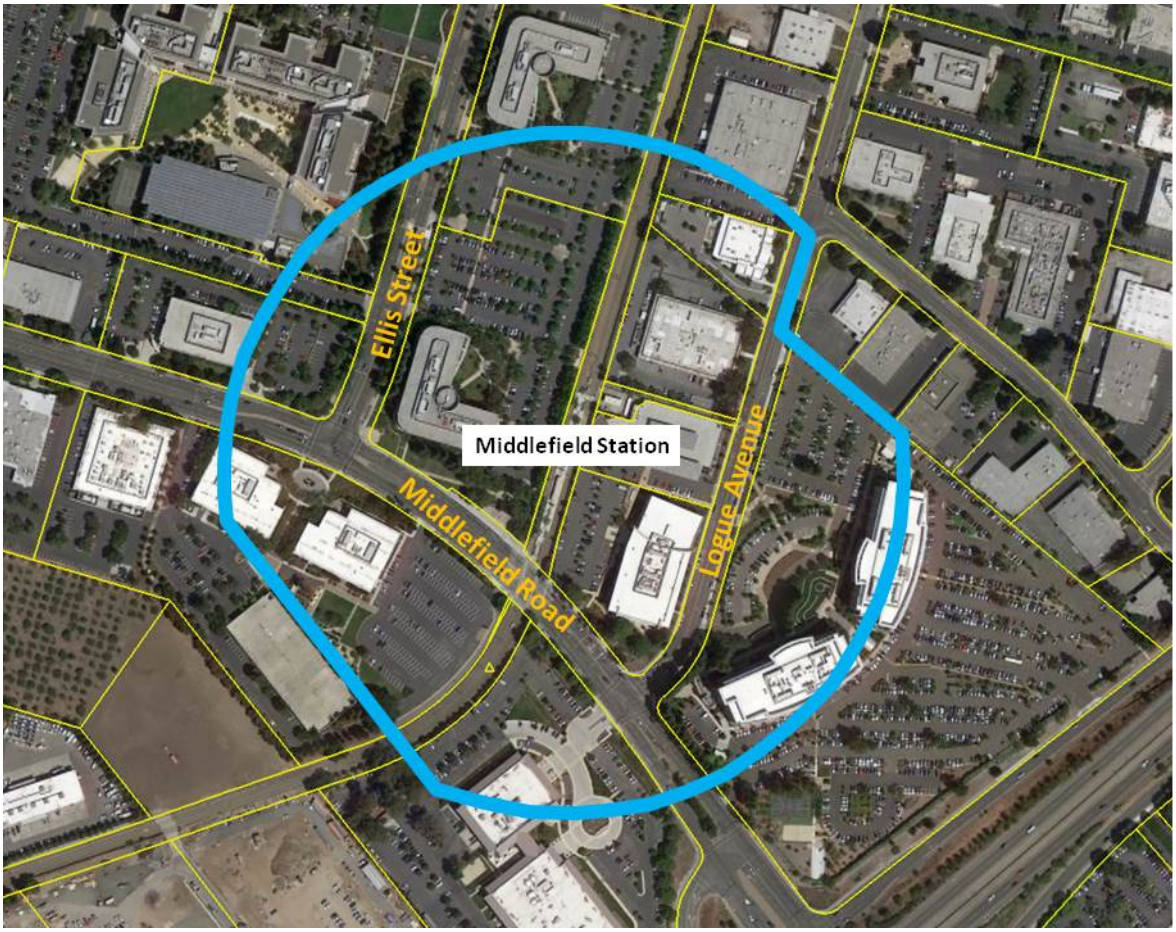
- Consistency with the Moffett Field Comprehensive Land Use Plan (CLUP)
- Buildings must include ground floor neighborhood commercial
- Projects must include high quality open areas
- A range of building heights must be provided
- Tall buildings must be separated by 100 feet
- Facades may not exceed 190 feet in length

Environmental Conclusion: Since the allowed height is increasing from 95 feet to 135 feet, text edits are included in Section 5.0 of this Final EIR to address this change. Projects would still be subject to overall areawide square footage caps and other development standards; therefore, no new or more severe environmental impacts would occur and no additional EIR analysis required beyond the additional text provided in Section 5.0.

10. ***Neighborhood Commercial Near Middlefield Station:*** Required Neighborhood Commercial Areas (Section 3.7.3)

The following Precise Plan changes are proposed:

- Increase minimum neighborhood commercial requirement near the Middlefield Light-rail Station (shown in the figure below) from 1,500 to 5,000 square feet.



- Require neighborhood commercial uses for the height exception near the Middlefield Light-rail Station, as described in the previous section.
- Require additional depth for neighborhood commercial spaces, which is needed to attract a range of commercial uses, including small grocery stores.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

11. ***Undergrounding Overhead Utilities:*** Community Benefits (Table 33 in Section 6.1.2)

Undergrounding utilities along Whisman Road between Middlefield Road and Fairchild Drive is a High Priority project. The Precise Plan was updated to include electric and telecommunications systems undergrounding.

Environmental Conclusion: No new environmental analysis or Draft EIR text edits are required. Any construction-related impacts from undergrounding electrical and telecommunications lines

would be similar to those discussed in the Draft EIR with regard to improvements for other City utilities, such as sewer and water lines.

12. ***Bird Safe Standards:*** Bird Safe Standards (Section 3.11)

New language was added that "additional design measures may be required based on analysis of a qualified biologist". A prohibition on landscaping behind glass was added to standard #5.

Environmental Conclusion: Text edits have been made to the Project Description and Biological Resources section, as described in Section 5.0 of this Final EIR. No new analysis or Draft EIR recirculation is required as the additional language strengthens and clarifies the bird-safe standards, which reduce potential impacts.

13. ***Public Art:*** Community Benefits list (Table 33 in Section 6.1.2) and Implementation Action list (Section 6.5)

The Community Benefits list in the Precise Plan was updated to include public art on public land. The Implementation Action list now includes an action to update the Precise Plan consistent with the Citywide Public Art Strategy.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

14. ***Active Frontage Setbacks:*** Mobility (Chapter 5)

Street sections were revised to show active and non-active building frontages.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

15. ***Community Benefits and Public Facilities:*** Community Benefits list (Table 33 in Section 6.1.2)

The Community Benefits list was updated to include land for community facilities.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

16. ***Monitoring Intersections:*** Development Monitoring (Section 6.4)

Direction to monitor additional intersections and roadway facilities was added.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

17. ***Other Council Direction*** – Land Uses (Section 3.2)

Cannabis storefront retail was removed as an allowed use. Emergency shelters and safe parking were added as provisional uses in the Employment Character Area.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

18. ***Office TDM Requirements:*** Transportation Demand Management Strategy (Chapter 2) and Non-Residential TDM Standards (Section 3.9.1)

The previous goal was that TDM programs would reduce 0.7 a.m. trips per 1,000 square feet for all new development. The revised goal is an average of 0.95 a.m. trips and 0.88 p.m. trips, including new development; as well as legacy office, R&D, and industrial development. Details related to the office TDM program were removed, such as specific monitoring requirements and methods, which may change over time.

Environmental Conclusion: Text edits are included in Section 5.0 of this Final EIR. This revised trip-cap goal is consistent with the Draft EIR analysis. It would result in the same number of trips generated by the Precise Plan area overall and, as such, would not result in more severe air quality impacts (less than significant with mitigation), operational noise (less than significant), or VMT impacts (significant and unavoidable). Thus, no additional environmental analysis is required.

19. ***Airport Land Use Commission:*** Figure 8, Dedication Requirements (Section 6.2.5)

The following changes were included in the Precise Plan at the request of the Airport Land Use Commission, who reviewed the Precise Plan for consistency with the Comprehensive Land Use Plan:

- The conceptual location for the Neighborhood Park was moved 500 feet west.
- Require dedication of an avigation easement for new buildings, when requested.

Environmental Conclusion: The neighborhood park was moved to the west about 500 feet (outside the airport noise contour) but is still within a defined Neighborhood Park Master Plan Area. This small movement of the potential park location (within a Neighborhood Park Master Plan Area) would not change the impact analysis within the Draft EIR, as the park was assume to occur within

the larger area, and this Plan change specifies where the park would not occur, within the larger area it had been assumed to occur. No additional environmental analysis is required

20. ***Open Area Standards***

The following changes are included:

- Lowering the minimum common usable and private open area standard in the High Intensity Mixed-Use area to a rate consistent with the North Bayshore Precise Plan and roughly equal to 30 percent of lot area for the highest densities. (Precise Plan Section 3.4 – Mixed-Use Character Area)

	Previous Standard	**New Standard**
Common Usable Open Area Minimum	100 square feet per unit	80 square feet per unit
Total Private and Common Usable Open Area Minimum	150 square feet per unit	120 square feet per unit

- Allowing flexibility for projects proposing a mix of residential and non-residential uses to combine the required open areas, subject to compatibility, accessibility and other considerations (Precise Plan Section 3.3.3 – General Open Area Standards)
- Clarifying flexibility in the open area calculations for emergency access areas and wider public paths that may have open area amenities (Precise Plan Section 3.3.3 – General Open Area Standards)
- A new standard specifically for hotels, so they are not required to provide open area based on their parking. (Precise Plan Sections 3.4 and 3.5 – Mixed Use and Employment Area Character Areas)

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

21. ***Greenway, Service Street, Multi-use Path, Paseo Setbacks:*** Development Standards (Chapter 3)

The Character Area standards were revised to remove the minimum setbacks for service streets, greenways, multi-use paths and paseos. Instead, the Mobility Chapter sets required building-to-building distances. This does not change the effect on site design and configuration but adds flexibility for the design of these specific connections. For example, a project may be better able to meander the path or place amenities (such as bicycle racks or benches) on one side or another.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development

as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

22. ***Building Height:*** Mixed-Use Character Area Standard (Section 3.4)

Table 7 in the Mixed-Use Character Area sets maximum heights based on the number of stories. An incorrect interpretation of this table would be that certain numbers of stories are not allowed, when the intent of the plan is to limit heights but allow flexibility in stories. The table was removed to better clarify the intent.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

23. ***Compliance with City-Wide BMR:*** Residential Bonus FAR Standards (Section 6.1.5)

Additional language was included to clarify that these projects must comply with Citywide Below-Market-Rate Requirements.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

24. ***Flynn Transition Area:*** Village Center Standards (Section 3.6)

Within the Flynn Avenue Transition Area, the revised Precise Plan references height standards from R2, the adjacent zoning district. This ensures consistency of interpretation between the two areas and supports on-going consistency even if the R2 district development standards are updated. The maximum height in R2 is 30 feet, which was the previous requirement.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

25. ***Update Multimodal Improvement Plan:*** Implementation Action List (Section 6.5)

The list was updated to add coordination with VTA about the Multimodal Improvement Plan, which may need to be updated based on the Precise Plan.

Environmental Conclusion: No text edits are required. The above Precise Plan clarifications do not change the location, nature, intensity and amount of square footage allowed for future development as evaluated in the EIR. No new environmental analysis is required because no additional or more severe environmental impacts would occur.

SECTION 3.0 DRAFT EIR RECIPIENTS

CEQA Guidelines Section 15086 requires that a local Lead Agency consult with and request comments on the Draft EIR from Responsible Agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. The following agencies, organizations and individuals received a copy of the Draft EIR from the City of Mountain View or via the State Clearinghouse:

Public Agencies

- Caltrans, District 4
- Regional Water Quality Control Board, Region 2
- California Air Resources Board
- Native American Heritage Commission
- Public Utilities Commission
- Association of Bay Area Governments
- Metropolitan Transportation Commission

Responsible Agencies

- U.S. Environmental Protection Agency
- Department of Toxic Substance Control
- County of Santa Clara Environmental Health

Other Agencies

- City of Sunnyvale
- NASA Ames Research
- Mountain View/Whisman School District
- Los Altos School District
- Santa Clara County Parks
- Santa Clara County Roads & Airports
- Santa Clara Valley Transportation Agency

SECTION 4.0 RESPONSES TO DRAFT EIR COMMENTS

The CEQA Guidelines Section 15088, states that the lead agency shall respond to comments raising significant environmental issues received during the noticed comment period (and any extensions) and may respond to late comments. A written proposed response must be provided to public agency comments at least 10 days prior to certifying an EIR.

Section 15088 further states that the written response shall describe the disposition of significant environmental issues raised. In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment.

Comments received on the East Whisman Precise Plan Draft EIR are organized below under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the actual letters and emails received by the City of Mountain View are included in their entirety in Section 6.0 of this document.

Comment Letter and Date **Page**

FEDERAL AND STATE AGENCIES

A. California Department of Transportation District 4 (dated July 8, 2019)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced plan. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Traveled (VMT) in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the June 2019 Draft EIR.

Project Understanding. The Plan would include up to 2.3 million net new square feet of office uses, 100,000 net new square feet of retail uses, 200 hotel rooms, and 5,000 multifamily residential units. Increased office intensities and new neighborhood commercial uses would be allowed throughout the Plan area, while housing would now be allowed in a central area of the Plan. The East Whisman Precise Plan would also include new parks, new pedestrian/bicycle paths, new public streets, and recreational facilities.

The East Whisman Precise Plan (Plan) area abuts the south side of US 101, extending to the south and east across State Route (SR) 237 at E. Middlefield Road, and south to E. Evelyn Avenue. The 403-acre Plan area is located on the eastern border of the City of Mountain View (City.) The Santa Clara Valley Transportation Authority (VTA) Light Rail Transit (LRT) line travels across the Plan area. The Plan area is generally bordered by US 101 and Moffett Federal Airfield/NASA Ames Research Center to the north, North Whisman Road to the west, Central Expressway to the south, and the City of Sunnyvale to the east, where a municipal golf course, office and residential uses currently exist.

> **Response A.1:** The comment is a statement of facts about Caltrans and the project. It does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.2: **Travel Demand Analysis.** Caltrans commends the City on the Travel Demand Analysis regarding impacts on VMT and alternatives to meet a 15% VMT reduction. Caltrans encourages the City to continue to explore options to mitigate further raising VMT, including contributions to VTA's Valley Transportation Plan, and to support the use of transit and active transportation modes.

> **Response A.2:** The Precise Plan includes Transportation Demand Management (TDM) requirements for both non-residential and residential developments, locates development near Light Rail Transit (LRT) stations to support transit use, and includes infrastructure improvements to support active transportation mode use. Projects within the Precise Plan area are required to implement TDM measures, such as the use of public transit and active transportation modes, to reduce their VMT consistent with the Precise Plan's goal of a 15 percent VMT reduction and associated trip cap (based on site-specific traffic analyses). Projects in close proximity to the LRT stations will be able to capitalize on the TDM

measure of subsidized transit fares. Plus the multi-use paths and other pedestrian and bicycle connections can encourage walking and biking instead of driving to reduce VMT.

Comment A.3: Caltrans requests verification of the following within Appendix H:
Page 2, Study Area-Intersections item #14 "East Middlefield Road and SR 237 Eastbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify if there is an on-ramp directly from East Middlefield Road to the eastbound of SR 237;

Response A.3: The south leg of this intersection is an off-ramp and the north leg is an unnamed collector-distributor road that connects to the SR 237 Eastbound On-Ramp. To clarify the ramp function at this intersection, the name of this intersection is revised to "East Middlefield Road and SR 237 Eastbound Off-Ramp" throughout the TA report and figures.

Comment A.4: Page 2- item #16 "Central Expressway and State Route (SR) 85 Southbound Ramp." Figures E-3, 7, 10, 13, 14, 15, 16, & 26- please verify if there is an on-ramp directly from Central Expressway to the southbound of SR 85. If this is for the on-ramp from Central Expressway. to the northbound of SR 85, verify its lane configurations;

Response A.4: To clarify the ramp function at this intersection, the name of this intersection is revised to "Central Expressway and SR 85 Southbound Off-Ramp" throughout the Transportation Analysis report and figures. See Attachment B to this Final EIR for the revised report.

Comment A.5: Page 3- item #24 "Moffett Boulevard and US-101 Northbound Ramps." Figures 7, 10, 13, 14, 15, and 16- please verify the name of the intersection. Should it be for both on-ramp and off-ramp? Caltrans suggests to use "24. Moffett Boulevard/ US-101 NB Ramps" instead of "24. Moffett Boulevard/ US-101 NB Off Ramp";

Response A.5: The Transportation Analysis used "Moffett Boulevard and US-101 NB Ramps" throughout the report. Therefore, no further response is needed.

Comment A.6: Page 3- item #31 "North Mathilda Avenue and SR- 237 Westbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify its lane configurations;

Response A.6: The figures in the Transportation Analysis showed an incorrect lane configuration. The figures are revised in the report, contained within Attachment B to this Final EIR. The correct lane configurations were assumed in the analysis, therefore no revision to the transportation analysis is needed.

Comment A.7: Page 3 - item #32 "North Mathilda Avenue and SR- 237 Eastbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify its lane configurations;

Response A.7: The figures in the Transportation Analysis showed an incorrect lane configuration. The figures are revised in the Transportation Analysis report in Attachment

B. The correct lane configurations were assumed in the analysis, therefore no revision to the transportation analysis is needed.

Comment A.8: Page 3 - item #39 "San Antonio Road between Southbound US 101 Ramps and Charleston Road." Figures E-3, 7, 10, 13, 14, 15, 16, and 26, please verify its lane configurations;

Response A.8: San Antonio Road between Southbound US 101 Ramps and Charleston Road is not one of the study intersections. Intersection #39 in this study is South Whisman Road and SR 237 Westbound Ramps. The eastbound approach at this intersection includes a channelized right turn lane, which under most conditions operates without delay from the queued left turn and through vehicles. To present the most conservative operations analysis, the eastbound approach was updated to include a shared eastbound left, through and right-turn instead of a dedicated right-turn lane. The revised text is included within this document in Section 5.0 Draft EIR Text Revisions and a revised Transportation Analysis is included in Attachment B.

Comment A.9: The 25 ramps and connectors listed in Attachment 1 may be impacted by this project. According to Caltrans Deputy Directive (DD) 35-R1, "Provisions for ramp metering shall be included in any project that proposes additional capacity, modification of an existing interchange, or construction of a new interchange, within the freeway corridors identified in the RMDP, regardless of funding source." These ramps are part of the Caltrans 2017 Ramp Meter Development Plan (RMDP.) Please provide the existing peak-hour traffic volume with and without the project for each on-ramp and connection listed above if it has not already been covered. In addition, the forecasted peak-hour traffic volume 20 years after completion of construction with and without the project for each of these on-ramps and connections are required for the geometric modifications of the on-ramps and connections, or their interchanges.

The provisions described in Caltrans 2016 Ramp Metering Design Manual: such as a High Occupancy Vehicle (HOV) preferential lane; a paved CHP Enforcement Area; a paved Maintenance Vehicle Pullouts (MVP) area; and advance warning devices, are required at each of the metered onramps. In addition, high visibility Activated Blank-Out (ABO) signs shall be installed for advanced warning purposes on metered freeway-to-freeway connectors. If any of these provisions cannot be provided, Fact Sheets for exception to ramp metering policies are needed. Concurrence with the proposed deviations from these policies shall be obtained from the Caltrans Headquarters Traffic Operations Liaison or the designated representative as early as possible in the project development process. For questions or comments, please contact Wichai Hanittinan (wichai.hanittinan@dot.ca.gov.)

Response A.9: This project is not proposing modification to existing interchange configurations, or construction of new interchanges within the freeway corridors identified in the RMDP; therefore, an expanded ramp analysis is not needed. The ramp analysis included in the transportation analysis are of the three interchanges that provide direct access to the Precise Plan area. These ramps were selected based on Caltrans' Comment #5 in the NOP letter dated September 15, 2017. The ramp analysis was conducted to assess increases in peak hour ramp queue lengths with the addition of project traffic and their effects on freeway and local street operations. Queuing is not considered an

environmental impact per CEQA. Thus, the results are provided for informational purposes for the City of Mountain View.

The proposed Precise Plan is a very large project that will take more than five years to build and occupy at full buildout, so conducting a ramp analysis at the listed locations would be premature. Furthermore, future development projects proposed under the Precise Plan will be subject to a Site Specific Transportation Assessment, which could evaluate queuing and other operational considerations at affected interchange ramps based on the size and location of the project.

Comment A.10: Transportation Impact Fees. We continue to encourage a sufficient allocation of fair share contributions toward mitigating the cumulative project impacts on freeway segments and ramps, and to provide multimodal and regional transit. We also continue to strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to continue to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Response A.10: The comment is acknowledged. The City of Mountain View would participate in development of a regional transportation impact fee program, should it be proposed by regional agencies, such as the VTA. In the event a regional transportation impact fee was established, future projects under the Precise Plan could be required to pay the fee to offset the incremental increase in traffic on regional facilities. A fee is not currently in place and is not required as a mitigation measure.

Comment A.11: Lead Agency. As the Lead Agency, the City of Mountain View is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Response A.11: This comment is acknowledged by the City. A Mitigation Monitoring and Reporting Program has been prepared for the project, which outlines mitigation measure timing and responsibilities. The City, as the lead agency, will oversee implementation of the project mitigation measures and conditions of approval.

Comment A.12: Encroachment Permit. Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit https://dot.ca.gov/programs/traffic-operations/ep/applications.

Response A.12: The project applicant will obtain encroachment permits as necessary for the project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

B. National Aeronautics and Space Administration (dated July 22, 2019)

Comment B.1: National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) prepared for the implementation of the City of Mountain View's East Whisman Precise Plan. As a neighboring federal agency with a main entrance adjacent to two of the Precise Plan's transportation "gateways," (Ellis St./Hwy 101 and Ellis St/Manila Ave) and a shared a transit station (VTA's Bayshore/NASA Station), ARC would be affected by development and increased use in the Precise Plan area. NASA personnel have reviewed the EIR and would like to provide the following general comments:

NASA Projects. Development at ARC has been guided by the NASA Ames Development Plan (NADP) completed in 2002. As required under the National Environmental Policy Act (NEPA), NASA published a Final Programmatic Environmental Impact Statement (EIS) that analyzed the effects of the alternatives under the NADP. In November 2002, NASA signed a Record of Decision, which adopted Mitigated Alternative 5 in the EIS. Currently, several projects identified in the NADP are underway and they will result in increases in population at ARC. Planetary Ventures is constructing approximately 1.2 million square feet of Office /R&D space on the northwest portion of ARC. NASA has partnered with a housing developer to construct between 1,930 and 2,078 housing units in the southern part of ARC. The housing project is currently in the planning stages and is designed to mitigate impacts to traffic and housing demand anticipated from development at ARC.

The analysis of cumulative effects in the EIR for the East Whisman Precise Plan should include development as described in the NADP and associated Programmatic EIS. These documents are available at: https://www.nasa.gov/centers/ames/researchpark/publicdocs.

> **Response B.1:** Land uses described in Mitigated Alternative 5 were included in the travel demand forecasting model that was used to prepare traffic projections for Cumulative conditions. Therefore, the effects of the NADP development is accounted for in the Draft EIR.

Comment B.2: Air Quality. NASA recognizes that the East Whisman Precise Plan would require projects undertaken in the plan area to conduct analysis considering the effects on sensitive receptors from air contamination. Please note that with the completion of planned housing in the southern portion of ARC new sensitive receptors will be located within 1,000 feet of Employment Area North. Effects to these sensitive receptors should be considered during project specific analysis.

> **Response B.2:** The comment is acknowledged. The Draft EIR requires future projects under the Precise Plan to meet standard conditions of approval and mitigation measure MM AQ-3.1 regarding construction period emissions (see page 50 to 51). Future projects would be required to model construction criteria pollutants and toxic air contaminants at nearby sensitive receptors and, if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds.

Comment B.3: Traffic. The East Whisman Precise Plan would result in significant unavoidable impacts to certain intersections that are either located on NASA property or in close proximity to

NASA property. NASA requests that the City of Mountain View coordinate closely with NASA to ensure that traffic impacts generated from the East Whisman Precise Plan are adequately addressed.

Response B.3: The comment is acknowledged. Transportation deficiencies and feasible improvements are addressed in Section 3.14 of the Draft EIR. The City will work with local, regional, state, and federal agencies to implement relevant improvements. Multiple projects are in design to improve bicycle facilities along Ellis Street and Manilla Drive to encourage increased mode shifts from cars to bikes. This includes opportunities for larger employers in the area to encourage bicycle use between sites in Mountain View and Sunnyvale.

Comment B.4: Cultural Resources. It should be noted that the Shenandoah Plaza Historic District is located within ARC and that views from Mountain View of several historic structures (Hangars 1, 2, and 3) have been considered important. Currently, the cultural resource section does not include information regarding this historic district or a consideration of how planned development may affect views of the district. Additional information regarding these historic resources can be found at NASA's website: https://historicproperties.arc.nasa.gov/shenandoah.html.

Response B.4: The Shenandoah Plaza Historic District is located 1,600 feet north of the Precise Plan area. The nearest historic hangar is located approximately 2,300 feet to the north. The Precise Plan area is separated from the NASA Ames Research Center and Moffett Federal Airfield (including the Shenandoah Plaza Historic District) by U.S. 101. The majority of U.S. 101 along the northern boundary of the Precise Plan area is elevated to allow Ellis Street and the VTA light-rail line to pass under the freeway. This raised roadway effectively blocks views of NASA and Moffett Federal Airfield (including Hangars 1, 2, and 3) from street level for the majority of the Precise Plan area. The Shenandoah Plaza Historic District consists of one and two-story structures that are only visible for a short span of distance looking to the north from the elevated stretch of U.S. 101.

Views of the large hangars and historic district would be possible from future multi-story buildings along the northern boundary of the Precise Plan, as implementation of the Precise Plan would increase the building heights along the northern boundary (see figure 2.3-2 of the Draft EIR). Upon completion of the projects under the Precise Plan, greater heights would be possible near the freeway. The distance of separation and location of the freeway as a barrier disrupt the existing view corridor such that an impact would not occur as a result of implementation of the Precise Plan.

REGIONAL AND LOCAL AGENCIES

C. City of Mountain View Environmental Planning Commission (dated June 19, 2019)

Comment C.1: 21. Page 31- 2.3.2.9 Transportation- the text references six "gateways"- the map figure 2.3-3 shows seven- please explain.

> **Response C.1:** This was a typographic error in the text and is corrected below in Section 5.0 Draft EIR Text Revisions.

Comment C.2: 22. Page 92- Natural gas production- first paragraph has two conflicting statements regarding the sources.

> **Response C.2:** This was a typographic error in the text and is corrected below in Section 5.0 Draft EIR Text Revisions.

Comment C.3: 30. Page 280- middle of first paragraph- several sentences need clarifying-perhaps a typo?

> **Response C.3:** This was a typographic error in the text and is corrected below in Section 5.0 Draft EIR Text Revisions.

D. Mountain View Whisman School District (dated July 22, 2019)

Comment D.1: The Mountain View Whisman School District and Mountain View-Los Altos Union High School District (collectively the "Districts") hereby submit their comments on the City of Mountain View's ("City") Draft East Whisman Precise Plan and Public Draft Environmental Impact Report East Whisman Precise Plan Project, dated June 2019 ("Draft EIR"). The Districts' comments concern the need to provide assurances that funding for new schools to serve the precise plan area will be in place and the unstudied traffic impacts of the project on the Districts' schools. As a result, the Draft EIR needs revision and recirculation to disclose the significant new information to the public and allow comment on the new information.

Although this letter is technical in nature due to the subject matter, the Districts wish to emphasize that their comments are meant to help the City fully evaluate and mitigate the potential impacts to the schools—not to be critical or confrontational. Instead, the Districts desire to continue cooperating and collaborating with the City to insure the continued high quality of life in the City and education in its schools.

> **Response D.1:** The comment describes generalized school funding and traffic impacts references from the Districts. It is unclear what the commenter is referring to as "unstudied traffic impacts" on schools. The Draft EIR includes a comprehensive transportation analysis that describes the effects of project traffic on 49 intersections in the area under Cumulative Conditions. This analysis considers residents living in the Precise Plan area traveling to nearby schools to drop-off and pick-up students as part of the resident's vehicle trip; therefore, it describes the effects of project traffic on schools located near these study intersections.

Comment D.2: **I. Draft East Whisman Precise Plan.** On page 163, section 2, School District Strategy, please amend the language as indicated in redline below[1]:

"All bonus FAR projects shall contribute to local schools and submit a ~~Local~~ School District Strategy to the school districts and the City, ~~intended~~ providing Developer's best efforts to support new local schools serving the East Whisman Precise Plan area. The School Districts and the Developer shall meet and confer in good faith to develop the School District Strategy to support new local schools. The School District Strategy shall be memorialized as a legally binding agreement. The strategy may include, but is not limited to, land dedication for new school development; additional funding for new school development; TDR strategies to benefit developer(s) that provide new school facilities, benefiting new school facilities; or other innovative strategies supporting schools."

This revised provision would require the Developer to do all it can to ensure adequate school facilities to support the precise plan area. Without these revisions, the provision requires very little commitment from the Developer to back new local schools.

> **Response D.2:** The comment is acknowledged but does not raise any issues related to the adequacy of the Draft EIR; therefore, no further response is required.

Comment D.3: **II. Draft EIR. A. Adequate School Facilities.** In similar fashion, edits to the Draft EIR concerning new school facilities are necessary to conform the Draft EIR with the Draft East Whisman Precise Plan. The following edits are needed. On page 191, section 3.13.2.4, School Impacts, first paragraph, please amend the language as indicated in redline below:

"As described in Section 2.0 Project Description, the Precise Plan includes a program by which development ~~can~~ will provide support for school facilities. Future development projects requesting Bonus FAR (both residential and non-residential) will be required to create a school strategy, including an agreement with the local school districts, that ~~can~~ will include funding or land above the amount required through standard school impact fees (described further below)."

On page 192, third paragraph from the top, please amend the language as indicated in redline below:

"Future residential development projects in the Precise Plan area are required to pay state-mandated school impact fees and the School District Strategy to offset impacts to local schools, such as Edith Landels and Vargas Elementary Schools and Mountain View High School. Payment of fees and the School District Strategy would reduce impacts to a less than significant level."

On page 192, Impact PSR-2, please amend the language as indicated in redline below:

[1] Note that the "redlines" referenced were not included in their entirety in the text of the comment letter provided. The Draft EIR text was compared to the comments provided in the letter and the "redlines" were inferred from the differences.

"The project would increase the demand for new school facilities in the City; however, payment of school impact fees and the School District Strategy would offset this increase in demand. **[Less than Significant Impact with Mitigation]**"

Further, the School District Strategy should be made into an enforceable mitigation measure to make certain that the Developer will use its best efforts to provide for and support new school facilities for the residences of the precise plan area.

> **Response D.3:** While the School Strategy is a key policy in the Precise Plan to create opportunities for City, School District and developer collaboration, for individual projects, the applicants would be required to pay a school impact fee. The impact fee provides the school district with funding for additional school facilities as needed to accommodate increased enrollment from new development. Under State Law (Government Code Section 65996), this is an acceptable method of offsetting a project's impact on school facilities. Payment of fees is not a mitigation measure under CEQA as fees are required by state law. Thus, the impact remains less than significant. Payment of school impact fees and compliance with the School District Strategy are enforceable through City and State regulations and do not require a specific EIR mitigation measure.

Comment D.4: **B. Transportation.** Even though the precise plan and the Draft EIR identify a School District Strategy to set up a loose framework for Developer to provide sufficient school facilities, the Draft EIR notes there are no proposed schools. Until there is a proposed school, the project will be served by the Districts' existing schools. However, the Draft EIR is silent on the potential traffic impacts of the project on the Districts' schools, where, during student drop-off and pick-up, the streets along the Districts' schools are very congested. There is apparently no Level Of Service, street capacity, or queueing delay analysis in the Draft EIR on the project's added trips to and from the Districts' schools. Adding the project's students to project-serving schools must be analyzed to either demonstrate that the project's traffic impacts are less than significant or to acknowledge the impacts would be significant or cumulatively considerable and to provide adequate traffic mitigation to lessen those impacts. This traffic congestion problem is further evident given that the City of Mountain View 2030 General Plan ("General Plan") has a mobility policy, MOB 1.6 to "[p]rovide traffic calming, especially in neighborhoods and around schools, parks and gathering places." (Draft EIR, p. 196.) Without including traffic calming measures around the Districts' serving schools, the project would likely cause a significant or cumulatively considerable traffic impact and would be inconsistent with the General Plan.

Further, the Draft EIR's Vehicle Miles Traveled ("VMT") analysis does not appear to include either existing or estimated trips from a project area residence's home or place of work to drop off or pick up a student from his or her school. Without this data and analysis, the VMT is understated, does not reflect real-world conditions, and makes the project appear less environmentally damaging than it may be.

> **Response D.4:** See Response D.1. School vehicle trips were included in the Transportation Analysis. Area schools and their student pick-up drop-off areas are designed to accommodate student enrollment at each school. It is estimated that the proposed project would generate 648 elementary school students, 403 middle school students, and 500 high school students. Because the residents of EWPP were assumed to

generate school vehicle trips, there is not a need to add students to the transportation analysis. With the construction of additional housing, more students may live closer to their school, which may reduce the per-capita VMT. Since the project is proposing to enhance the pedestrian and bicycle network, the results could be a reduction in vehicle trips to local schools, which also may reduce the per-capita VMT. Regardless, each new development in the Precise Plan area will have supplementary environmental analyses where school impacts based on enrollment and traffic levels can more accurately be assessed.

Comment D.5: **III. Conclusion.** The Districts desire that the project's potential significant and cumulative impacts to the students, parents, faculty, and staff of the Districts' schools are fully analyzed and mitigated. Given the lack of required traffic analyses in the Draft EIR, the Districts respectfully request that the Draft EIR be revised to include those required analyses and mitigation measures, as set forth herein and recirculated per the requirements of the California Environmental Quality Act.

Thank you for the opportunity to participate in the review process and for your consideration of the above, and please include this letter in the project's record of proceedings. Please provide us with a copy of any future notices issued pursuant to Public Resources Code sections 21080.4, 21083.9, 21092, 21108, or 21152 for this project. Additionally, please provide us with a copy of any future notices pursuant to Government Code sections 65090 or 65091 for the project.

Response D.5: The vehicle trip estimates include all trips generated by the Precise Plan uses including trips to and from project area residences and places of work to pick up and drop off students at school.

E. City of Sunnyvale (dated July 22, 2019)

Comment E.1: Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed East Whisman Precise Plan (project or Precise Plan) in Mountain View. This letter includes all City of Sunnyvale comments.

General Questions and Comments:
1. We request that the City of Mountain View provide outreach to Sunnyvale residents, and that the notice area be expanded if the traffic impacts show potential significant impacts to the nearby Sunnyvale neighborhoods.

Response E.1: The comment is acknowledged but does not raise any issues about the adequacy of the Draft EIR. The City has been and will continue noticing City of Sunnyvale property owners within 750 feet of the project boundary, as is required by our code and previous practice. The City is open to cooperative arrangements to support reciprocal outreach.

Comment E.2: **Traffic and Transportation:** If you have questions on the following transportation and traffic comments, please contact Lillian Tsang, Principal Transportation Engineer, Department of Public Works, at ltsang@sunnyvale.ca.gov or (408) 730-7556.

In the Transportation Impact Analysis Report:
2. Intersection #20 Central Expressway/Mary Avenue should be under the jurisdiction of SC/CMP, instead of Sunnyvale. Please change it on page iv and all other relevant sections.

3. Intersections #31 and 32 should be under the jurisdiction of Caltrans/CMP. Please change it on page iv and all other relevant sections.

4. Intersection #48 and 49 should be under the jurisdiction of Caltrans, instead of Sunnyvale. Please change it on page iv and all other relevant sections.

5. Table 7, the LOS standard for all intersections along Mathilda Avenue shall be E, instead of D. This applies to Intersection #30, 35, 48 and 49. Please change them in all relevant tables.

Response E.2: The comment is acknowledged and the revised text is included within this document in Section 5.0 Draft EIR Text Revisions. Changing the LOS standard to E removes the deficiency at Intersection #30 under Background with Project Conditions.

Comment E.3: 6. Page 64, it is noted that there are no planned transportation improvements within the study area that would affect the geometries at the study intersections. However, the Mathilda Avenue/US 101/SR 237 is scheduled to be completed by the end of 2020. Intersection configurations would change for Intersections 30, 31, 32, 48 and 49 for both the Background scenario and Cumulative Scenario. Intersections 31 and 32 would be eliminated under both the Background and Cumulative scenarios. Intersections 48 and 49 should be included under both the Background and Cumulative scenarios and they shall be signalized intersections (Table 20 listed them as unsignalized intersections). Intersection #30 will become Mathilda Avenue and West Moffett Park Drive/SR 237 WB Off-Ramp under both the Background and Cumulative scenarios; the lane geometry assumed under both the Background and Cumulative conditions are not correct. The traffic assumed for Intersections 30, 31, 32 shall be adjusted with the closure of the Moffett Park Drive between Mathilda Avenue and Bordeaux Drive as part of the Mathilda Avenue/US 101/SR 237 Interchange Improvement project. Please re-evaluate these intersections as appropriate.

Response E.3: The study assumed that the Mathilda Avenue/US 101/SR 237 improvements are complete under Cumulative Conditions. This analysis was completed prior to the construction schedule of the Mathilda Improvements was finalized (due to the Measure B funding delay); therefore, this study does not include the Mathilda Avenue/US 101/SR 237 improvements under Background Conditions. Under Cumulative Conditions, traffic forecasts were developed using the City of Mountain View's Travel Demand Model with the closure of Moffett Park Drive between Mathilda Avenue and Bordeaux Drive. Intersection configurations match the final design plans developed for the Mathilda Avenue/US 101/SR 237 improvements project. With these improvements, Intersections 30 and 49 would operate at LOS F under Cumulative with Project Conditions. The project is not considered to cause cumulative deficiencies at these intersections because the Precise Plan traffic is estimated to contribute less than two percent of the total traffic at the intersections. Intersections 48 and 49 are listed as unsignalized intersections under Existing Conditions in Table 20 and in the Draft EIR. No revisions were required to be made to the environmental document.

Comment E.4: 7. In addition, the intersection of East Maude Avenue and Wolfe Road (#43) will be signalized by 2020; this change would affect the assumptions and the analysis under Background scenario and Cumulative scenario.

Response E.4: The comment is acknowledged and the revised text is included within this document in Section 5.0 Draft EIR Text Revisions. The Transportation Analysis has also been updated and is contained within Attachment B. With signalization, this intersection is expected to operate at LOS C or better under Background and Cumulative Conditions.

Comment E.5: 8. Page 75, move SR237/Mathilda Avenue and US 101 Mathilda Avenue Interchange Improvements to Background scenario.

Response E.5: See Response E.3.

Comment E.6: 9. For Cumulative conditions at Intersection 30 (North Mathilda Avenue and West Moffett Park Drive/SR237 WB off-ramp), the results in Table 20 shows that the LOS would degrade to having deficiency with the addition of the project for both AM and PM peak hours, however, results are not highlighted and the text did not include a discussion on it.

Response E.6: The deficiency threshold on Page 93 of the Traffic Analysis states that "The EWPP project traffic is considered to have a cumulative deficiency if the EWPP project volume is more than two percent of the total volume at the cumulatively unacceptable intersection". Intersection 30 would operate unacceptably at LOS F in the PM peak hour under Cumulative with Project Conditions; however, the project would only contribute 1.1 percent of the total traffic at this intersection, which is less than the two percent threshold. Therefore, no revisions were made to the Transportation Analysis report or Draft EIR.

Comment E.7: 10. For Cumulative Conditions, pending projects within Sunnyvale and the application of an 1.5% annual growth rate need to be incorporated in the Cumulative traffic volume estimates in order to reflect the growth in both the local and regional traffic. The use of 2007 ABAG Projections seem to be outdated.

Response E.7: The traffic volume forecasts were developed using City of Mountain View's Travel Demand Model. The Cumulative (No Project) traffic volume estimates for Sunnyvale intersections are 50 to 60 percent higher than existing volumes, which is equivalent to an approximate four to five percent annual growth rate at these intersections. Compared to traffic volume forecasts for Background Conditions, which were developed using the approved project lists, the Cumulative traffic volume estimates are approximately 30 percent higher. As a result, the use of the Mountain View travel model yields higher forecasted volumes than using a 1.5 percent annual growth rate. No changes to the forecasts or level of service analysis were made.

Comment E.8: 11. Intersection 5, SR 237 Ramps/Maude Avenue, the westbound approach should be two left turn lanes, one through lane, and one right turn lane, instead of one left turn lane, two

through lanes, and one right turn lane. Please make changes in all figures as well as in the analysis for all scenario, as appropriate.

Response E.8: This was a typographic error in the figures. These figures have been revised in the Transportation Analysis included as Attachment B to this Final EIR. The correct lane configurations were assumed in the analysis, therefore no revision to the transportation analysis is needed.

Comment E.9: 12. Intersection 8, Mathilda Avenue/Maude Avenue, the northbound approach should be two left turn lanes, two through lanes, and one through/right shared lane. The southbound approach should be two left turn lanes, four though lanes, and one right turn lane. Please make changes in all figures as well as in the analysis for all scenario, as appropriate.

Response E.9: This was a typographic error in the figures and the figures are revised in the Transportation Analysis. The correct lane configurations were assumed in the analysis; therefore, no text or table revisions are needed.

Comment E.10: 13. Page 96, Sunnyvale's impact criteria for Unsignalized Intersections are as follows:

Project impacts at City's unsignalized intersections would be considered significant if one of the following criteria is met:

a. If an intersection operates at an acceptable LOS (i.e. D or better) without the project and degrades to an unacceptable LOS (i.e. LOS E or F) with the addition of project traffic, then it is a significant impact.
b. If an unsignalized intersection operates at an unacceptable LOS (i.e. LOS E or F) without the project and the addition of project traffic increases:
    i. the average intersection delay by four (4) seconds or more, and the volume-to-capacity (v/c) value by 0.01 or more for all-way stop controlled intersections; or
    ii. the worst movement delay by four (4) seconds or more, and the critical volume-to-capacity (v/c) value by 0.01 or more for side-street stop-controlled intersections.
c. Intersection meets the warrant(s) for installation of a traffic signal as per the latest edition of California Manual on Uniform Traffic Control Devices.

Therefore, Intersection 43 would consider "deficient" even if the intersection did not meet the signal warrant.

Response E.10: Based on Comment E.4, this intersection will be signalized in 2020. By adding a traffic signal under Background and Cumulative Conditions, this intersection would operate acceptably at LOS C or better. Under the Existing with Project Conditions, the addition of project traffic would degrade this unsignalized intersection from LOS D to E in the AM peak hour and exacerbate the LOS F operations in the PM peak hour. Using the Sunnyvale criteria listed above this would be considered a deficiency. The Existing with Project Conditions analysis in the Transportation Analysis was updated to use the Sunnyvale deficiency criteria for unsignalized locations.

Comment E.11: 14. For all Sunnyvale intersections with a deficiency, the project shall pay a fair-share payment contribution based on City of Sunnyvale's traffic impact fee schedule.

> **Response E.11:** The City of Mountain View will continue to work with our neighbor Sunnyvale to address the impacts of projects within all of Mountain View on Sunnyvale intersections. Coordination between the two cities will continue for large projects with impacts in the adjacent city. Future discussions between the two cities will include how and if the cities could require payment of each city's TIF or how to allocate TIFs between the two cities.

F. Santa Clara Valley Transportation Authority (dated July 22, 2019)

Comment F.1: Thank you for the opportunity to review and comment on the Draft East Whisman Precise Plan and Draft Environmental Impact Report (DEIR). VTA appreciates our multi-year, ongoing involvement in the East Whisman planning process, including multiple consultation meetings with City of Mountain View staff ("City staff"). The East Whisman plan area represents a prime opportunity to implement shared City-VTA goals to improve transit options and encourage the use of transit. VTA is supports by the proposed land use intensification in the plan area, specifically adjacent to VTA's light rail network, including Middlefield Light Rail Station.

VTA has reviewed the Draft East Whisman Precise Plan ("Plan") and the Plan DEIR for consistency with VTA Board-adopted policies, specifically the VTA Land Use & Development Review Policy (see https://www.vta.org/programs/land-use-transportation-luti-program), as recommended by City staff. The VTA Land Use & Development Review Policy establishes a framework for VTA's involvement in local comprehensive planning and development review processes. VTA believes that the Plan embodies VTA's guiding principles that support sustainable transit-oriented communities. VTA has the following comments:

> **Response F.1:** The comment is a statement of facts about VTA and the project. It does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment F.2: **Consistency with VTA Land Use & Development Review Policy.** The following comments are organized using the VTA Land Use & Development Review Policy's principles (underlined), and includes detailed comments regarding the implementation of these principles.

1. Build Effective Partnerships
   a) VTA appreciates the ongoing staff coordination between the City and VTA, specifically with regards to the Street C crossing identified in the Plan. City staff has welcomed VTA to apply its own policies (including the Land Use and Development Review policy, Station Access policy and Fast Transit Program) and goals alongside this plan to strengthen its effectiveness.
   b) VTA commends the City for identifying that Street C would create significant impacts to VTA operations if built as an at-grade facility. This change in perspective is confirmed by VTA's Land Use & Development Review policy which does not support new at-grade crossings of light rail. VTA views this change of direction from previous plan iterations as the result of our ongoing coordination and partnership.

Response F.2: The comment is a statement of facts about coordination between VTA and the City. It does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment F.3: 2. Support Fast, Frequent Safe and Reliable Transit

a) VTA supports the street design standards in Section 5.2.2 that include provisions for bus boarding islands, where appropriate.
b) To accommodate transit safety for in-lane stopping, VTA recommends an 11-foot minimum lane width for transit vehicles. VTA notes that several cross sections within the DEIR document include only 10-foot minimums. Please refer to VTA's Design Guidance for Bike Lanes and Cycle Tracks at Bus Stops (Attachment A) for in-lane stopping and cycle track configurations at bus stops. This document is in a final draft form and VTA's best guidance to date.
c) As part of the VTA Board-adopted 2019 New Transit Service Plan, Route 21 will run on Middlefield Road, Louge (sic) Avenue and Maude Avenues. This new route is expected to become active during late 2019/early 2020.
d) Section 5.5.1 references the transfer of passengers between private shuttles and public transit vehicles at a public bus stop. The use of public bus stops is intended for public transit vehicles because they are maintained and operated by VTA or its contractors. Any private operators requesting access to a public bus stop must coordinate with VTA in advance.
e) VTA supports bus boarding island dedication where appropriate and transit signal priority guidelines listed in Section 5.5.2.
    - VTA recommends bus boarding islands on Middlefield Road, Louge (sic) Avenue and Maude Avenue if cycle tracks will be present. These will support a Fast Frequent and Reliable bus network.
    - VTA also recommends that all signals along Middlefield Road, Louge (sic) Avenue and Maude Avenue all be upgraded with transit signal priority. To fully support VTA policies, VTA recommends the Plan language be revised from, "Transit signal prioritization (TSP) must be used…" to "should be used…"

Response F.3: All streets have 11-foot minimum lane widths for vehicle lanes and are consistent with VTA design guidance. All projects within the Precise Plan will be required to adhere to current VTA Design Guidance including bus stops and bike lanes. As future projects are developed within the Precise Plan there may be improvements required to bus stops and bus boarding islands. When these are required, the City will coordinate with VTA during project review.

Comment F.4: 3. Transit-Supportive Development in Close Proximity to Transit

a) VTA supports the Plan's Character Areas in Section 3.1 that intensify land uses surrounding the Middlefield Light Rail Station. VTA strongly supports Design Guideline 5.3.2, which defines visibility surround Middlefield Light Rail Station. Clear view corridors and sense of place surrounding transit station entrances allows for better navigation.
b) VTA commends the Plan for managing block sizes, creating flexible zones for future travel technologies, supporting VTA transit services and establishing clear TDM and parking polices. These strategies support limiting VMT by creating more options for alternative modes.

c) VTA also supports the comprehensive walking and biking network of greenways and paths throughout the Plan area. VTA recommends close ongoing coordination for the paths identified along or near VTA's LRT right of way.

Response F.4: The comment is a statement of facts about coordination between VTA and the City and their support of the Precise Plan It does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.5: **Impacts to Transit Travel – DEIR.** VTA commends the City for removing Street C from the Plan as part of Mitigation Measure TRA-4.1 in the Plan DEIR. As stated in our letter dated September 17, 2018 and as communicated with City staff between 2017 and 2018, VTA does not support new at-grade crossings of light rail for the purpose of safeguarding the travelling public and maintaining efficient operations. VTA has experienced pedestrian/train accidents at at-grade crossings that have resulted in significant and sometimes fatal injuries. By removing this crossing and mitigating it with a grade separated multi-use path, this strategy supports the VTA Board-adopted Land Use and Development Review Policy, which states VTA's stance on new at-grade crossings.

VTA also supports the City for identifying in Impact TRA-3, identifying that the Plan will have significant and unavoidable effects on transit vehicle operations, particularly at intersections with deficient Level-of-Service. By identifying these impacts, the final Plan should locate appropriate intersections for transit signal priority deployment, particularly along Middlefield Road, Louge Avenue and Maude Avenues where planned transit services are expected for the next 10 years as guided by the 2019 New Transit Service Plan. Transit signal priority is most effective when installed along a corridor. All intersections that have existing light rail crossings should also be considered, at a minimum, for transit signal priority, or full transit vehicle preemption. VTA would support preemption for LRT as this provides the most reliable strategy for vehicle movement through intersections. VTA requests a meeting with staff to discuss potential locations for transit signal priority and transit vehicle preemption in the future to help offset the impacts identified in the Plan.

Response F.5: The comment is a statement of facts and support for the Precise Plan and Draft EIR. It does not raise any issues about the adequacy of the Draft EIR itself; therefore, no further response is required.

Comment F.6: **Bus Stop Improvements.** Within the Plan area, VTA serves 15 transit locations. Four of the stops will be discontinued and two are proposed stops planned for future service expected to start late 2019/early 2020 in coordination with the start of BART Silicon Valley service to Santa Clara County. Per the Plan's 5.5.1 Standards, VTA recommends the following improvements:

1. Westbound Middlefield west of Whisman
    - Install new VTA metal bench
2. Eastbound Middlefield east of Whisman
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new 10'x55' new PCC bus pad.
    - Install a new VTA metal bench.
3. Westbound Middlefield west of Ellis
    - Install a new VTA metal bench
4. Northbound Ellis north of Middlefield

- Install a new VTA metal bench

5. Eastbound Middlefield east of Ellis
    - Install a new VTA metal bench
6. Westbound Middlefield east of Ellis
    - No improvements needed
7. Eastbound Middlefield east of Logue (discontinued in future service)
8. Westbound Middlefield east of Logue (discontinued in future service)
9. Northbound Logue north of Middlefield (future stop)
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
10. Eastbound Maude west of Clyde (future stop)
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
    - Complete sidewalk network on this block
11. Westbound Maude west of Clyde
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
12. Northbound Middlefield north of Bernardo (discontinued stop)
13. Southbound Middlefield south of Bernardo (discontinued stop)
14. Eastbound Clyde west of Clyde Court
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
15. Northbound Ellis south of Fairchild
    - Install a new VTA metal bench

The recommendations listed are the minimum improvements for each location, VTA would like the opportunity to review updated site plans as developments and new streets within the Plan area when they are constructed to ensure transit improvements are made to complement new developments and their uses. VTA's Transit Passenger Environment Plan provides design guidelines for bus stops. This document can be downloaded at http://www.vta.org/tpep. VTA has a Bus Stop Placement, Closures and Relocations Policy. Prior to any construction or bus stop impact, please contact bus.stop@vta.org.

Response F.6: The comment is acknowledged by the City. As future projects are developed within the Precise Plan area and bus stops are improved, the City will coordinate with VTA during project review.

ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

G. Albert Jeans (dated July 1, 2019)

Comment G.1: I am very concerned that little attention seems to have been paid to traffic in the East Whisman Precise Plan aside from a discussion about local streets within the project area and TDM measures. There is no mention of the major thoroughfares and highways in the vicinity which currently operate near capacity during peak commute times. It's obvious that full implementation of the Precise Plan will adversely impact traffic in the area, and the Draft EIR describes this in greater detail, although it is itself a summary of the 1861- page Transportation Analysis (TA) for East Whisman Precise Plan written by Fehr and Peers. I would like to highlight some points which are contained in the Draft EIR and TA which may not be evident from staff's Study Session Memo.

First, some 17 intersections will degrade to LOS E or F under Cumulative+Project Conditions (TA, p. 105). All but two these can be mitigated by capital improvements such as adding turn lanes and signals although the total cost will be substantial (hundreds of millions of dollars?) However, due to other constraints such as lack of jurisdiction, right-of-ways, and funding, only 6 intersections are deemed by the city likely to receive improvements, leaving 11 intersections which will be impacted. I have listed these in the attached spreadsheet, along with other Deficiencies and Impacts listed in the Draft EIR.

LOS ratings by themselves don't tell the whole story. The LOS rating for an intersection is based on the average delay for all movements through the intersection, and since commute traffic tends to be heavily biased in one direction, the actual delays experienced in the heavily traveled direction can be much higher. In addition, LOS F is used for any delay greater than 80 seconds, but actual delays can be much higher. I have personally measured the delay for vehicles on the 101 NB off-ramp to Shoreline Blvd. at 800 seconds or more! The attached graphic shows in practice what the various LOS ratings mean. Fehr and Peers conducted a micro simulation of the Ellis-101-Fairchild intersections (TA Ch. 9, p. 118) and found that eastbound cars on Fairchild would experience delays of over 1000 seconds just under the Existing+Project scenario (TA, Appendix L). Fortunately most of the other delays were not that high, but there were still significant delays (3-4 minutes) on the freeway off-ramps which could cause queues to extend onto 101. This is especially of concern because Ellis St. is considered to be one of the "gateways" of the East Whisman Area.

The attached spreadsheet also lists roadway segments which will be impacted under the 2030 Cumulative+Project scenario which were not listed in the General Plan EIR. What's distressing is that most of the segments will experience traffic volumes over 50% higher than current volumes. On already congested streets such as Shoreline Blvd. this is hard to imagine.

Traffic is a regional problem, and a lot of the future congestion would occur regardless of whether the East Whisman Precise Plan is implemented. Still, it seems shortsighted not to plan how future residents will be able to move about without having to spend hours sitting in traffic. Without a comprehensive transportation plan, that is almost certainly what will happen.

During the EPC Study Session there was no discussion at all of the traffic impacts of the project. I hope that you can at least acknowledge that traffic will be a problem and suggest additions to the Precise Plan to start to deal with it.

Summary of Draft EIR Traffic Study

Compiled by Albert Jeans

Cumulative with Project, Unfeasible Intersection Improvements

Unavoidable Deficiencies

Intersection	Location	LOS, AM/PM
2	US 101 NB Ramps/Ellis St	F/F
4	Fairchild Dr/Ellis St	F/F
5	Maude Ave/SR 237 Ramps	E/D
7	Maude Ave/N Mary Ave	D/E
8	Maude Ave/N Mathilda Ave	E/F
20	Central Expwy/N Mary Ave	E+/F
22	W Evelyn Ave/N Mary Ave	F/E
29	Moffett Blvd/Central Expwy	F/F
36	N Mathilda Ave/Indio Ave	F/C
40	E Evelyn Ave/S Bernardo Ave	E/E+
46	E Arques Ave/Fair Oaks Ave	F/F

Deficiency C-TRA-3: Implementation of the Precise Plan would result in unacceptable cumulative operations at local and regional intersections.

Deficiency C-TRA-4: Implementation of the Precise Plan would result in unacceptable cumulative operations at freeway segments.

Impact TRA-3: Implementation of the Precise Plan would have a significant and unavoidable effect on transit vehicle operations, in particular at those intersections with a deficient LOS.

Impact TRA-4: Street C would result in increased light rail vehicle delay due to the slower train speeds through the crossing, disrupting the existing facility.

Impact TRA-5: The Precise Plan would result in a project-level and cumulative VMT impact due to project generated VMT on both a citywide and countywide level.

Road Segment	Location	Daily Traffic Volume Existing	2030 w/Project	% Increase	LOS
8	Central Expwy: Bernardo Ave/Middlefield Rd	31,000	45,800	48%	F
21	Evelyn Ave: SR 237/Bernardo Ave	17,300	47,000	172%	F
38	San Antonio Rd: Bayshore Pkwy/NB US 101 Ramps	12,700	23,200	83%	F
39	Shoreline Blvd: SB US 101 Ramps/Middlefield Rd	30,200	46,000	52%	F
46	Springer Rd: El Monte Ave/Cuesta Dr	7,700	14,200	84%	E
47	Whisman Rd: Middlefield Rd/Central Expwy	27,200	35,000	29%	F

Deficiency GP-TRA-5: Implementation of the East Whisman Precise Plan would result in deficient roadway segment levels of service at six additional segments not identified in the General Plan EIR.

Deficiency GP-TRA-6: Implementation of the East Whisman Precise Plan would result in increased vehicle traffic on multiple deficient freeway segments, but would not create deficiencies at freeway segments not identified in the General Plan EIR.

Deficiency GP-TRA-7: Implementation of the East Whisman Precise Plan would result in increased vehicle traffic in Los Altos, Palo Alto and Sunnyvale, but would not create additional deficiencies in jurisdictions not identified in the General Plan EIR.

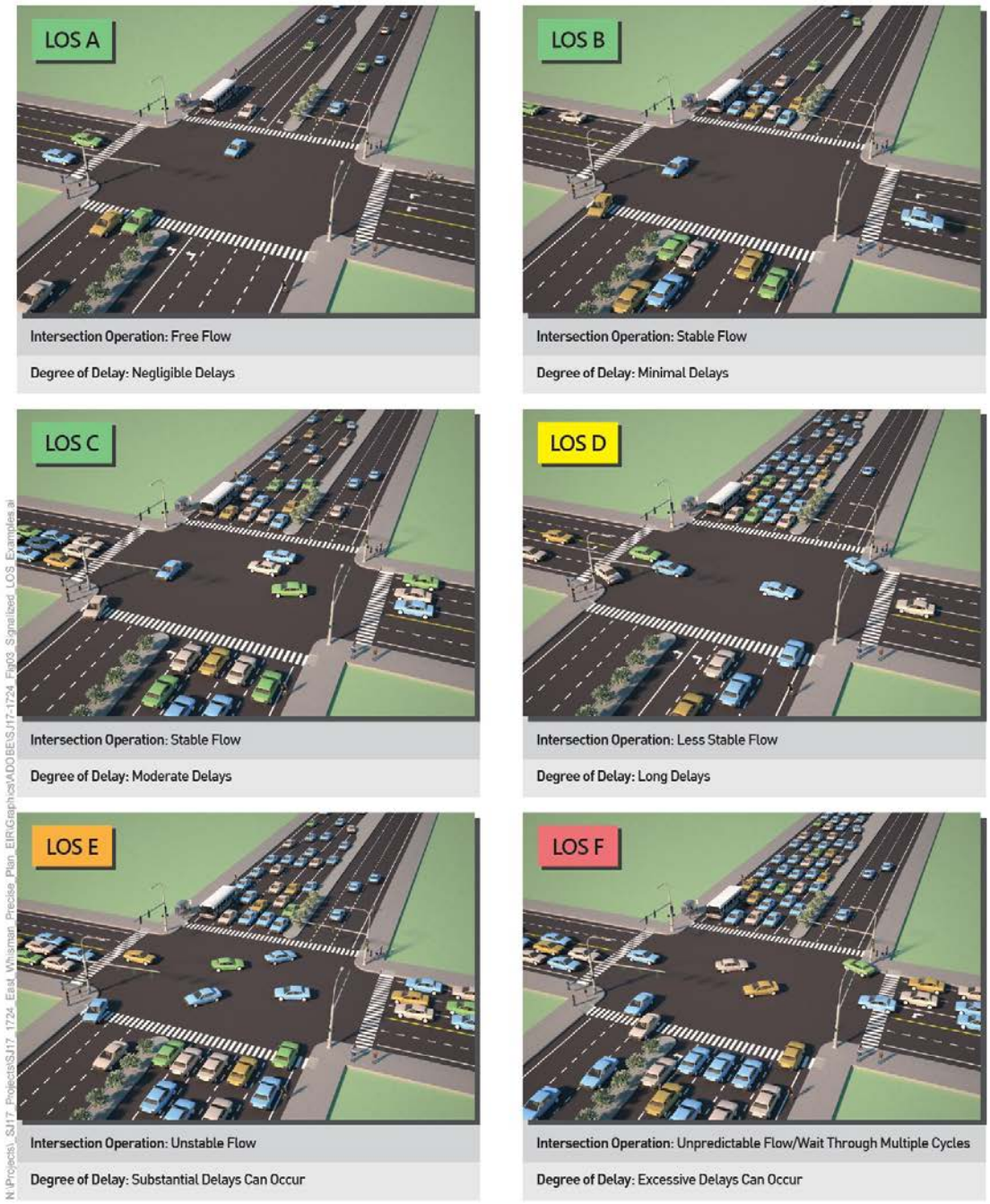


Figure 3
Signalized Intersection Level of Service Examples

Response G.1: As discussed in Section 3.14 Transportation of the Draft EIR, Senate Bill (SB) 743 introduces vehicle miles traveled (VMT) as the new metric for measuring transportation-related environmental impacts, and removes level of service (LOS) from being considered a significant impact under CEQA. The City of Mountain View evaluated VMT impacts from the Precise Plan Project based on the City's travel demand model and City- and county-wide VMT thresholds. LOS deficiencies are not identified as CEQA impacts (per SB 743) and are included for informational purposes only. Impacts as a result of proposed roadway improvements to address LOS deficiencies are discussed as environmental issues. Thus, the Draft EIR adequately addresses transportation and traffic impacts.

H. Google (dated July 22, 2019)

Comment H.1: Google is pleased to submit the following comments regarding the City of Mountain View's ("City") East Whisman Precise Plan ("EWPP") Draft Environmental Impact Report ("DEIR"). Our comments below are organized by section and/or exhibit number in the DEIR.

Section 2.3

- We commend and support the City's effort to provide up to 5,000 new units of housing, along with new office, parks and open space and community amenities in the EWPP area. However the stated jobs-housing ratio of 3 units/1,000 square feet of new office referenced in this section would produce total residential development in the Project area that exceeds the 5,000 units contemplated in the EWPP and DEIR Project Description, necessitating additional environmental analysis and potentially requiring new mitigation measures. Please confirm that the EWPP and the DEIR will allow/study up to 5,000 residential units.
    - We recommend being precise and clarifying in the DEIR that the jobs-housing ratio is 2.61 units/1,000 s.f. new office. At the June 25th Study Session, the City Council directed City staff to remove 200,000 s.f. of office use from the Employment South Character Area. As a result, to continue to achieve the EWPP's goal to produce 5,000 new homes, the jobs housing ratio increased from 2.5 to 2.61 units/1,000 s.f. City staff appears to have rounded this total up to 3/1,000 s.f. However, a 3/1,000 ratio ultimately produces 5,700 new units at full buildout—700 more residential units than the 5,000 units studied in the DEIR's analysis.
    - Calculation: A required jobs-housing ratio of 3/1,000 s.f. (for 1.8M s.f. of "standard" Development Reserve plus 1.5/1,000 s.f. for the 200,000 s.f. Affordable Housing Development Reserve) would yield 5,700 new units-a 14 percent exceedance of the 5,000 new residential units studied in the DEIR.

Response H.1: The Draft EIR evaluated a maximum of 5,000 residential units within the Precise Plan area, consistent with the maximum development assumptions in the Precise Plan itself. If additional housing is built, updated environmental analysis will be performed. The calculation provided does not address the 700 East Middlefield Road project, which drew down the development reserve by 612,000 square feet. This means that, if no housing is built without the jobs-housing linkage strategy, the ultimate number of units will be 3,864.

Comment H.2:

- Please confirm the total EWPP buildout was analyzed in the DEIR at the precise plan level and not at the Character Area level.
    - Strictly limiting new office development by Character Area may ultimately impede the large mixed-use development contemplated in the EWPP. Setting office development targets and square footage allocations at a precise plan level, rather than at the Character Area level, is more likely to provide the flexibility project applicants need to achieve the City's mixed-use development targets.
    - The DEIR should allow for flexible development parameters rather than set explicit targets for each Character Area e.g. residential units, unit mix, neighborhood commercial, and open space. City staff and the City Council previously recognized and supported this position verbally at the June 25th Study Session.
    - Confirming that the DEIR analyzed the EWPP's total buildout at the precise plan level would not require additional environmental review or modifications to the DEIR because the EWPP implies but does not state explicitly that, the buildout analysis was conducted at the precise plan level.
    - We further note that precise plan level allocations are consistent with the DEIR's objectives to facilitate streamlined environmental review of subsequent projects within the scope of the program EIR. (DEIR, pp. 15-16.)

Response H.2: The Draft EIR evaluated overall development impacts at a Precise Plan level. Future projects within the Precise Plan area would be controlled by the Character Area/zoning requirements, which are intended to guide growth in the Precise Plan area. Character Area targets are provided to help inform the City's future policy as implementation of the Precise Plan progresses. Individual projects may be required to conduct site-specific environmental analyses, to confirm that project level impacts are within the scope of those already studied.

Comment H.3: Section 2.3.2.3

- The school impact analysis should assume a "mix" of rental and ownership units when calculating projected future school requirements for the Mountain View-Whisman School District and Mountain View Los Altos High School District. The EWPP intends to create "a mixed-income community with a balance of renters and owners", as reflected in the Character Area development targets.
- The DEIR does not include or clarify the underlying assumptions regarding the "mix" of rental and ownership units used in the school impact analysis. However, our understanding is that the DEIR may have assumed 100% rental units in order to assess school impacts. We seek confirmation that the DEIR included some combination of rental and ownership units to calculate student generation rates and projected changes in school demands. If only rental units were assumed, the final EIR should clarify that impacts may be reduced based on a composition of rental and ownership units.
- These Section 3.2.3.6 comments also apply to sections 3.13 and 3.13.2.4

Response H.3: The Draft EIR conservatively evaluated school impacts based on rental units only since the actual percentage of ownership units at full buildout is unknown. Actual school impact fees and project-specific School Strategies would be determined on a

project by project basis, and would take into account the proposed mix between rental and ownership units.

Comment H.4: Section 3.8

- Please confirm that the DEIR used the vapor intrusion screening levels as of the date of evaluation. Because Environmental Screening Levels ("ESLs") are updated periodically, the DEIR should clarify that vapor intrusion risk should be evaluated using screening levels (e.g. Regional Water Quality Control Board ("RWQCB") ESLs) that are current at the time of evaluation, not those that are established at the time of DEIR publication. This will ensure that the most current ESLs are used to evaluate vapor intrusion potential.
- Please clarify the potential for environmental conditions to change in the future. The DEIR should clarify that if environmental conditions related to the Middlefield-Ellis-Whisman ("MEW") groundwater plume change, for example due to future remediation activities, then the requirements for future development within the MEW Study Area may be updated as necessary.
    - These Section 3.8 comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.

Response H.4: The Draft EIR recognizes that environmental conditions will change over the lifetime of the Precise Plan. All future projects within the Precise Plan area will be required to implement MM HAZ-3.1, which requires the completion of a Phase I Environmental Site Assessment (ESA) to determine environmental conditions at the time of the project application. Further mitigation measures will be determined based on the results of the Phase I ESA or other related studies.

Comment H.5: Section 3.8.1.4

- Please confirm that, subject to applicable approvals (or amendment prior to the finalization of the EWPP), buildings in certain areas of the EWPP--in particular in proximity to the VTA station--could be built higher than 8-stories and up to the FAA-imposed height limit.

Response H.5: The Draft EIR evaluated the maximum height allowed by the Precise Plan, which is 95 feet in some Character Areas. Future projects seeking exception to these standards will be required to show compliance with the Moffett Field Comprehensive Land Use Plan and will be reviewed by the City and Airport Land Use Commission on a project-by-project basis.

Comment H.6: Section 3.8.2.3

- Please modify the timing of the Vapor Intrusion Response Action Completion Report submittal. Page 130 states “Prior to commencing any construction activities within the MEW Study Area, future project developers will be required to provide a Vapor Intrusion Response Action Completion Report to the EPA for review and approval, and to the City for review. The report will document installation of the vapor control measures identified in the Vapor Intrusion Mitigation Plan, including plans and specifications, and will include a long-term operations, maintenance and monitoring plan.” A Completion Report documenting installation of vapor intrusion control measures cannot be prepared prior to commencing construction activities.

- We therefore suggest modifying this requirement to note that the Completion Report must be submitted within 90 days of completion of installation of the vapor intrusion control measures, and clarifying that the "Vapor Intrusion Mitigation Plan" will be submitted prior to commencing any construction activities.

Response H.6: The City acknowledges the comment and agrees with the suggested language modifications, which add clarity to the measure. See Section 5.0 Draft EIR Text Revisions for the corrected text.

Comment H.7:

- Please update the vapor intrusion control system requirements for properties within the MEW study area. Page 129 states "At properties within the MEW Study Area, future developers will be required to submit the following plans and controls to EPA for review and approval…A Vapor Intrusion Mitigation Plan must be prepared...At a minimum, this design would include incorporation of vapor barrier and provisions of space to accommodate active ventilation equipment…" We note that Table 7 of the Record of Decision (ROD) Amendment for the Vapor Intrusion Pathway specifies that for future buildings on properties where lines of evidence indicate there is no potential for vapor intrusion into the building exceeding EPA's indoor air cleanup levels, it may be appropriate to only perform air sampling after the building is constructed to confirm there is no potential vapor intrusion risk.
  - Accordingly, we suggest clarifying that air sampling may be an acceptable approach for future buildings within the MEW Study Area.
  - The above two comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.
- Also note that on Page 129 (last Paragraph), item #2 is repeated twice with different text.

Response H.7: The comment is acknowledged. The description of the requirements within the EPA's ROD have been clarified in Section 5.0 Draft EIR Text Revisions.

Comment H.8: Please adjust the scope of the Air Monitoring Plan requirement. Page 129 indicates that the scope of the Air Monitoring Plan requirement appears to capture the same information in a typical Site Management Plan (SMP). Accordingly, if accurate, indicate that these requirements may be met through completion of the SMP.

Response H.8: A SMP would not always be required for future development at sites that are within the MEW Study Area, rather the EPA-approved measures would be implemented (which do not include a SMP). Thus, the description of the required plans remains the same.

Comment H.9: Please clarify the Site Management Plan Development requirement. MM-HAZ-3.1 states that "At properties identified as being impacted or potentially impacted by Recognized Environmental Conditions as part of the property-specific Phase I ESA or subsequent studies, a SMP shall be prepared…" This requirement is overly broad because it could necessitate preparation of unnecessary SMPs. For example: if a Phase I ESA Report identifies vapor intrusion as a potential concern for a site, but subsequent soil vapor sampling shows concentrations are below applicable screening levels, an SMP would likely not be required by a regulatory oversight agency (assuming no

other environmental impacts are present necessitating an SMP); additionally, not all Recognized Environmental Conditions ("RECs") relate to subsurface contamination, and those that do not, may not warrant an SMP. Accordingly, we suggest revising to clarify the following:

- Only RECs pertaining to significant contaminated soil, soil vapor and/or groundwater at a property should prompt an SMP.
- Amend MM-HAZ-3.1 to allow for a more flexible SMP requirement based on the professional judgement of the environmental professional and/or determination by the City based on the available site-specific environmental information.
- These two comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.

Response H.9: The City agrees to the clarification and the change to MM HAZ-3.1 has been included in Section 5.0 Text Amendments.

Comment H.10:

- Please revise and specify the requirements for approval of a SMP. MM-HAZ-3.1 requires that every SMP be submitted and approved by a regulatory agency. However, even if the REC is significant enough to require an SMP, regulatory agencies often decline to be involved in redevelopment projects.
  - We suggest revising this mitigation measure to clarify that the developer would need to obtain either agency approval of the SMP or documentation of a regulatory agency's decision declining involvement in the project.
  - MM-HAZ-3.1 also requires that the City review and approve every SMP, even after a regulatory agency has overseen cleanup and reviewed and approved the SMP. This may significantly burden and unnecessarily delay the permitting process for development.

Response H.10: City agrees to the clarification and the change to MM HAZ-3.1 has been included in Section 5.0 Text Amendments.

Comment H.11: Section 3.10.2.3. Please confirm the proposed East Whisman Mixed Use Zone reflects the ultimate development potential allowed under EWPP. Specifically, amend to state "Intensity (residential); 1.0 FAR (approximately 40 DU/ac or 40-80 residents per acre); intensities up to 1.85, 2.0, 2.5 or 3.5 FAR (and corresponding increase in DU/ac density) may be permitted with measures for highly sustainable development, public benefit and/or mixed use as specified within zoning ordinances or precise plan standards."

Response H.11: The draft General Plan language has been carefully constructed to allow City flexibility in reviewing residential bonus FAR, and would allow intensity consistent with the Precise Plan standards.

Comment H.12: Section 3.14-9

- Please confirm that the VMT calculations in Table 3.14-9 and Impacts TRA-5 and 6 incorporated applicable CEQA Guidelines provisions. Specifically, the DEIR provides that ad-hoc VMT significance thresholds were used for the analysis. (DEIR, pp. 218-19.) However, CEQA Guidelines § 15064.3(b)(1) provide that, generally, projects within a half-

mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Additionally, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

- Thus, did the VMT analysis account for the fact that significant portions of the EWPP are located within a half-mile of major transit stops and existing high quality transit corridors? Did the VMT analysis determine if the project would result in a decrease in VMT as compared to existing conditions?
- Pursuant to CEQA Guidelines § 15064.3(b)(1), which areas in the EWPP were presumed to have a less than significant transportation impact? A map or figure in the DEIR would be helpful to illustrate these areas within East Whisman.

Response H.12: The vehicle trip generation estimates used in the VMT estimates did account for the level of transit service in the area. Even with these reductions, significant VMT impacts were identified. Furthermore, trip generation data collected at existing developments in the project area do not support the presumption that projects within a half-mile of an LRT station or the LRT corridor decrease VMT in the project area compared to existing conditions. For these reasons, the Draft EIR disclosed a project-level and cumulative-level VMT impact due to project generated VMT on both a citywide and countywide basis. No areas were assumed to have a less than significant VMT impact.

Comment H.13: Appendix H. Please explain how a long-term trip cap of 0.7 is achievable. We are concerned that the ultimate objective of a 0.7 trip cap ratio is a potentially unachievable outcome (based on the detail of the analysis included in the DEIR), and therefore may not be representative of actual potential impacts.

Response H.13: To accommodate the additional land development in the Precise Plan area and manage congestion at the Precise Plan gateways and nearby local streets, future office development will need to implement a trip target rate between 0.7 vehicle trips per 1,000 square feet (ksf) and 1.0 vehicle trips per ksf. The future office space target is dependent upon the prevailing office trip rate. The East Whisman Precise Plan area has a prevailing office trip rate between 0.74 vehicle trips per 1,000 square feet (ksf) and 1.12 vehicle trips per ksf. The 0.7 vehicle trip rate is an aggressive trip rate that would require highly effective transportation demand management programs and an effective regional transportation system. These trip rates are to incentivize a creative response to reducing vehicle trips in the Precise Plan area including new technologies to revolutionize ridesharing.

The Draft Precise Plan is being updated, consistent with the analysis in the EIR, to mandate an average area-wide trip target rate of 0.95vehicle trips per ksf during the morning peak hour and 0.88 vehicle trips per ksf during the evening peak hour. This allows development the opportunity to have a higher rate if they apply it across a larger amount of office/R&D floor area.

Comment H.14: Please resolve trip cap discrepancies in the EWPP DEIR analysis and Transportation Impact Analysis ("TIA"). The EWPP mentions a short-term trip cap of 1.1 and a long-term trip cap of 0.7, but the TIA mentions a short-term trip cap of 1.0. (see Table 43 among others).

Please confirm which is correct, and which should be relied upon for determining threshold triggers for the trip cap.

Response H.14: The EWPP presents the 1.1 vehicle trips per 1,000 square feet (ksf) as a baseline summary of the prevailing average office rate in the Precise Plan area. The commenter is incorrect in assuming this office rate is a near-term office target rate. In Table 43 of the Transportation Analysis, "future office tenants will be required to achieve a driveway measured vehicle trip generation less than 1.0 vehicle trips per ksf during the morning and evening peak hours. As with any development review, the future office target trip rate will be established at the time of the review using available data about the prevailing existing office trip rate and new office trip rates (from monitoring reports).

Comment H.15: Please clarify how trip caps will be implemented, enforced, and monitored: Having a short-term and long-term trip cap can be confusing for developers planning a phased build out.

- Please confirm that trip cap monitoring and enforcement will be on a project-specific basis. Such confirmation would allow developers to meet their single-occupancy vehicle targets.
- Please explain how and when the City plans to transition from the short-term to long-term ratios and how the ratios will be enforced.
- We suggest tying the transition to long-term trip cap to specific actions, such as VTA Light Rail Transit improvements, or other transit-related improvements.

Response H.15: Draft Precise Plan language identifies specific actions that would trigger modifications to development project's trip caps. They include the following:

- the ultimate area-wide requirement above, as adjusted by any capacity-increasing improvements,
- changes to the East Whisman area that may demonstrably result in fewer vehicle trips, such as the construction of new housing, and
- the peak hour vehicle trip rate of office, R&D and industrial sites without TDM programs.

Trip cap monitoring and enforcement will be on a specific project-by-project basis, as determined by conditions of approval and specific TDM agreements.

Comment H.16: Clarification: In regards to VMT impact, page 147 of the Appendix H says the following: "To reduce the potential project generated VMT impact would involve changes to the project description, or to previously adopted policies (see Chapter 12 for additional discussion of the potential modifications to reduce VMT impacts)." Given this statement mentions potential changes to the project description, please clarify what the potential modifications to reduce VMT impacts would involve and produce, and which "previously adopted policies" apply to this issue. Such a clarification would allow developers to plan their build out while complying with the EWPP and avoiding project delays.

Response H.16: Most of the VMT from the Precise Plan area is associated with office development. Reducing office and adding more housing would reduce the VMT impact.

Comment H.17: Please include a summary of the assumptions used in the trip generation rates. These assumptions should include an explanation of the trip generation methodology, whether ITE

trip generation rates were used, what land use categories were used as inputs, and mode split used, among others. Such a summary would clarify how the trip caps were established and what actions developers plan for to comply with those trip caps.

Response H.17: This information is available within Appendices E, F, and N of the Transportation Analysis. These appendices provide additional details about the trip generation, travel model, and additional travel characteristics data

Comment H.18: Miscellaneous Corrections. Table 2.3-1: EWPP Growth shows that the EWPP adds 99 single family homes in the Village Center Character Area. Although the EWPP includes 100 units in this Character Area, such new units will be multi-family or townhouses/rowhouses, not single-family, as per Table 4 of the EWPP.

Response H.18: The table is correct. The City considers townhouses and rowhouses to be attached single-family residences. The Precise Plan has been updated to address the fact that multifamily residences are also allowed.

Comment H.19: Section 2.3.1: There are four character areas not three.

Response H.19: The identified typographic error has been corrected in Section 5.0 Draft EIR Text Revisions.

Comment H.20: Section 2.3.3.2: Transportation Demand Management - Non-Residential Standards. Clarify intended uses of "will" and "may." This section has conflicting statements. The bullet list of actions that will be included in the TDM program identifies "monetary incentives such as transit passes for employees" and "parking cash out or parking fees." But the following statement indicates that parking cash-out and paid parking may be included (implying it is not required).

- Please clarify if parking cash out and/or parking fees must be included in the TDM program.

Response H.20: This comment does not specifically address the environmental analysis in the Draft EIR. It is noted, however, for the decision makers. To clarify the intent of the standard: some monetary incentive is required, but an applicant may identify which incentive serves their residents or employees best.

Comment H.21: Section 3.8.2.3: Page 128, change "TCEMEW" to "MEW."

Response H.21: The identified typographic error has been corrected in Section 5.0 Draft EIR Text Revisions.

Comment H.22: Section 3.10.2.3: TDM Measures should be referenced consistently: The DEIR provides that the "precise plan includes Transportation Demand Management (TDM) measures for future development," but there is no mention of TDM in the Transportation and Traffic section (3.14).

Response H.22: The TDM requirements are described in Section 2.3.3.2 Transportation Demand Management of the Draft EIR and are detailed extensively in Section 3.9 Transportation Demand Management in the Precise Plan.

- Section 3.13.2.5: Clarify that land dedications, in lieu fees, or some combination of both may be used to satisfy Quimby Act park dedication requirements.

Response H.22: This information is specifically included in Section 3.13.1.1 and 3.13.2.5 of the Draft EIR.

SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the East Whisman Precise Plan Draft EIR. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page and Section	Text Revisions	
Page ix; Executive Summary	**Impact AQ-4:** Health risks associated with exposure to TACs during temporary construction activities associated with development under the Precise Plan could significantly impact sensitive receptors.	Implementation of City standard conditions of approval for fugitive dust and exhaust control and MM AQ-3.1 during development of future projects under the Precise Plan would reduce TAC-related health impacts at sensitive receptors to a less than significant level.

Page 14; Section 2.3.1

Table 2.3-2: Character Area Development Summary

Character Area	General Land Use	FAR	Building Height	Open Space	Block Pattern and Circulation
Mixed Use Area	4,900 multi-family residential units, ~~250,000 to 500,000~~ 600,000 to 1.2 million square feet of office, 40,000 to 60,000 square feet of neighborhood commercial	Varies from 0.40 to 1.0 for non-residential uses, 1.0 to 3.5 for residential and mixed-use projects, and 2.0 for hotels	Varies from 45 feet (Whisman Road Transition Area) to 95 feet with 135 feet allowed within 750 feet of the Middlefield Light-rail Station, except within 200 feet of the Precise Plan boundary	Target of 14 to 20 acres	400-foot average block lengths, with transit crossings, and new streets connecting Fairchild Drive to East Middlefield Road and connecting North Whisman Road to Logue Avenue
Village Center	100 residential units, 10,000 square feet of office, 20,000 to 40,000 square feet of neighborhood commercial	Varies from 0.40 for non-residential uses, 0.9 to 1.35 for residential and mixed-use projects	Varies from 30 feet (within 100 feet of Flynn Avenue) to 50 feet	Target 0.50-acre	250-foot average block lengths with new multimodal connections
Employment Area North	~~600,000 to 1,000,000~~ 300,000 to 900,000 square feet of	Varies from 0.40 to 1.0 for non-residential uses, and 1.0	Varies from 45 feet (for the Whisman Road Transition	Target of two to four acres	500-foot average block lengths with new crossings of the SFPUC

Page and Section	Text Revisions					
		offices, 200 hotel rooms, 10,000 square feet of neighborhood commercial	to 2.5 for mixed-use hotels	Area) to 100 feet		right-of-way and Clyde Court connected to Logue Avenue
	Employment Area South	~~800,000 to 1,350,000~~ 600,000 to 1.0 million square feet of office, 10,000 square feet of neighborhood commercial			Target of four to six acres	600-foot average block lengths

Page 25; Section 2.3.1 Precise Plan Land Use and Design

The proposed Precise Plan area includes ~~three~~ four zones (known as Character Areas), as shown in Figure 2.3-1. Character Areas establish numerical targets to facilitate a mix of land uses, activities, public open spaces, and amenities.

Page 31; Section 2.3.2.9 Transportation Demand Management

2.3.2.9 *Transportation Demand Management*

Development in the East Whisman area as envisioned in the Precise Plan has the potential to cause traffic impacts. To reduce potential impacts, the Precise Plan includes a long-term ~~trip-reduction target~~ average trip-reduction target of 0.95 a.m. trips and 0.88 p.m. trips per 1,000 square feet of floor area, including new development, as well as legacy office, R&D, and industrial development ~~for new office and R&D uses of 0.7 peak-hour trips per 1,000 square feet of floor area~~ in order to reduce congestion at ~~six~~ seven major "gateways" to the East Whisman area (shown in Figure 2.3-3). This number of trips is lower than the current rate of 1.1 trips per 1,000 square feet of floor area. Vehicle trips into the East Whisman area would be reduced through enforcement of project-specific peak-hour trip caps for new Precise Plan includes priority transportation improvements that focus on ways to enhance walking and bicycling, transit usage, and local street circulation, in order to support TDM targets within the Precise Plan Area.

Page 33; Section 2.3.3.2 Transportation Demand Management

2.3.3.2 *Transportation Demand Management*

Non-Residential Standards

As specified within the Precise Plan, office and R&D projects with at least 10,000 square feet of new building area and all other non-residential projects with 20,000 square feet of new building area will be required to prepare and implement a TDM plan to reduce vehicle trips. Annual TDM monitoring ~~(based on driveway counts)~~ will be required ~~conducted with a report submitted to the City~~. Non-residential TDM plans will include the following measures:

- Priority parking for carpools and vanpools
- Bicycle parking and shower and changing facilities
- Parking maximums and carshare parking

Page and Section	Text Revisions
	• Site design that supports alternative transportation modes, such as orienting building entrances toward sidewalks, transit stops, and bicycle routes • TDM coordination, marketing and events • Transportation Management Agency (TMA) membership • Monetary incentives, such as subsidized transit passes for employees • Parking cash out or parking fees. The TDM plan may also include shared bicycles if a bikeshare service is not already available nearby, parking cash-out, or paid parking program, guaranteed ride program, telecommute support, and alternative work schedules. The ~~long-term trip cap requirement~~ average trip-reduction target of 0.95 a.m. trips and 0.88 p.m. trips per 1,000 square feet of floor area ~~will be 0.7 peak-hour trips per 1,000 square feet, which~~ may be increased based on capacity-increasing improvements at the gateways identified in Figure 2.3-3.
Page 37; Section 2.3.3.4 Bird Safe Building Standards and Page 79; Section 3.3.2.3 Bird Strike Hazards	1. **Façade Treatments.** No more than 10 percent of the surface area of a building's total exterior façade shall have bird-friendly glazing between the ground and 60 feet above ground. Examples of bird-friendly glazing treatments include opaque glass, covering of clear glass surface with patterns, use of paned glass with fenestration patterns, and use of external screens over non-reflective glass. 2. **Occupancy Sensors.** For non-residential development, occupancy sensors or other switch control devices shall be installed on non-emergency lights. These lights should be programmed to shut off during non-work hours and between 10:00 p.m. and sunrise. 3. **Funneling of Flight Paths.** New construction shall avoid funneling of flight paths along buildings or trees towards a building façade. 4. **Skyways, Walkways, or Glass Walls.** New construction and building additions shall avoid building glass skyways or walkways, freestanding glass walls, and transparent building corners. New construction and building additions should minimize the use of glass at tops of buildings, especially when incorporating a green roof into the design. Placement of landscaping behind glass is prohibited. 5. **Exceptions to the Bird Safe Design Requirements.** The City may waive or reduce any of this chapter's bird safe design requirements based on analysis by a qualified biologist indicating that proposed construction will not pose a collision hazard to birds. Additional design measures may be required based on analysis of a qualified biologist.
Page 92, Section 3.5.1.1 Regulatory Framework	**Natural Gas** Energy usage is typically quantified using the British thermal unit (Btu). PG&E provides natural gas services within the City of Mountain View. In 2017, approximately ~~10~~ 13 percent of California's natural gas supply came from in-state production, while ~~90 percent was imported from other western states and Canada.[18] In 2017, approximately 1.4 percent of California's natural gas supply~~

Page and Section	Text Revisions
	~~came from instate production.~~ the remaining supply was imported from other western states and Canada.
	New residential projects will also prepare and implement TDM plans per the Precise Plan, including TMA membership, parking maximums, carshare parking, and bicycle parking, provision of shared workspace for residential projects over 100 units, and site design to orient building entrances toward sidewalks, transit stops, and bicycle routes. ~~Annual~~ TDM plan monitoring will be required~~. with a summary report submitted to the City for review.~~
Page 128; Section 3.8.2.3 Hazardous Materials Release	To ensure impacts do not occur within the MEW Study Area due to identified ~~TCE~~MEW contamination, such as TCE, as part of the Superfund site, project developers will be required to coordinate work activities with the EPA and MEW Responsible Parties (including identifying conditions that could affect the implementation and monitoring of the vapor intrusion remedy and on-going remedial efforts).
Page 129 and 130; Section 3.8.2.3 Hazardous Materials Release	At properties within the MEW Study Area, EPA's ROD Amendment for the Vapor Intrusion Pathway, MEW Superfund Study Area (EPA 2010) and the Statement of Work Remedial Design and Remedial Action to Address the Vapor Intrusion Pathway, MEW Superfund Study Area (EPA 2011) specify the selected remedy for future/new buildings as follows: ~~future project developers will be required to submit the following plans and controls to EPA for review and approval and will be required to implement the EPA-approved measures. Additionally, some properties are subject to activity and use limitations, such as institutional and engineering controls (a.k.a., deed restrictions). Institutional controls (ICs) are legal or regulatory restrictions on a property's use, while engineering controls are physical mechanisms that restrict property access or use.~~ • For future/new buildings on property where lines of evidence indicate that there is the potential for vapor intrusion into the new building above EPA's indoor air cleanup levels, the remedy shall consist of 1) passive sub-slab ventilation with a vapor barrier (and with the ability to convert the system from passive to active ventilation), 2) monitoring to ensure the long-term effectiveness, and 3) the implementation of Institutional Controls. • For future/new buildings on properties where multiple lines of evidence indicate there is no potential for vapor intrusion into the building exceeding EPA's indoor air cleanup levels, indoor air sampling shall be performed after the building is constructed to confirm that there is no potential vapor intrusion risk and EPA's indoor air cleanup levels are met; if approved by the EPA, no further vapor mitigation actions are required. • At properties where a vapor intrusion remedy is determined to be required, future project developers will be required to submit the following plans and controls to EPA for review and approval and will be required to implement the EPA-approved measures.

- The Air Monitoring Plan assesses the exposure of construction workers and neighboring occupants adjoining the property to VOCs as part of the Air Monitoring Plan; this plan shall specify measures to be implemented if VOCs exceed regulatory threshold values.
- The Vapor Intrusion Control System Remedial Design describes the measures to be implemented to help prevent exposure of property occupants to VOCs in indoor air as a result of vapor intrusion. A Vapor Intrusion Mitigation Plan must be prepared, which requires future project developers to design the proposed occupied spaces with appropriate structural and engineering features to reduce risk of vapor intrusion into buildings. At a minimum, this design would include incorporation of vapor barrier and provisions of space to accommodate active ventilation equipment to help prevent indoor air contaminant concentrations exceeding EPA's indoor air cleanup levels. Future project developers will be required to submit the vapor intrusion remedial design (including the Vapor Intrusion Mitigation Plan) to the EPA for review and approval.

- The ROD Amendment for the Vapor Intrusion Pathway, MEW Superfund Study Area(EPA 2010) and the Statement of Work Remedial Design and Remedial Action to Address the Vapor Intrusion Pathway, MEW Superfund Study Area (EPA 2011)specify the selected remedy for all future buildings as 1) passive sub-slab ventilation with a vapor barrier (and with the ability to convert the system from passive to active ventilation), 2) monitoring to ensure the long-term effectiveness) except where multiple lines of evidence show that there is no potential for vapor intrusion into a particular building exceeding indoor air cleanup levels, 2) monitoring to ensure the long-term effectiveness of the remedy, and 3) the implementation of Institutional controls. Although active sub-slab/sub-membrane ventilation is considered to have a better long-term effectiveness than passive sub-slab ventilation systems, areas with lower groundwater VOC concentrations are considered to have a lower potential for vapor intrusion at levels exceeding indoor air cleanup levels. Because areas overlying higher VOC groundwater concentrations are considered to have a greater potential for vapor intrusion at levels exceeding indoor air cleanup levels, implementing an active sub-slab/sub-membrane ventilation system is acceptable because of its high rating in long-term effectiveness. Other design requirements would be subject to the EPA's determination of necessary measures based upon its Response Action Tiering System for future buildings.
    - The Long-Term Operations, Maintenance, and Monitoring Plan describes actions to be taken following construction to maintain

Page and Section	Text Revisions
	and monitor the vapor intrusion mitigation system as well as a contingency plan should the vapor system fail. o The IC Implementation Plan describes non-engineered instruments of control, such as administrative and legal controls that help to minimize the potential for human exposure to contamination and/or protect the integrity of the response action. ICs will be implemented through the City's planning and permitting procedures which will ensure that the appropriate remedy is applied to particular building construction. o The Financial Assurance provides proof that adequate funds are available for long-term maintenance and monitoring of the vapor intrusion mitigation system.
Page 130; Section 3.8.2.3 Hazardous Materials Release	Following the installation of vapor intrusion control measures, ~~Prior to commencing any construction activities within the MEW Study Area,~~ future project developers will be required to provide a Vapor Intrusion Response Action Completion Report to the EPA for review and approval, and to the City for review. The report will document installation of the vapor control measures identified in the Vapor Intrusion Mitigation Plan, including plans and specifications, and will include a long-term operations, maintenance and monitoring plan. The Completion Report must be submitted within 90 days of completion of installation of the vapor intrusion control measures and approved by the EPA prior to building occupancy.
Page 131; Section 3.8.2.3 Hazardous Materials Release	**MM HAZ-3.1:** Prior to the start of any redevelopment activity, a property-specific Phase I ESA shall be completed in accordance with ASTM Standard Designation E 1527-13 (or the standard that is effective at the time the Phase I ESA is conducted) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor, and/or groundwater quality studies shall subsequently be conducted, if warranted based on the findings of the property-specific Phase I ESAs, to evaluate if mitigation measures are needed to protect the health and safety of construction workers, the environment, and area residents.

Page and Section	Text Revisions
	At properties identified as being impacted or potentially impacted by Recognized Environmental Conditions pertaining to contaminated soil, soil vapor and/or groundwater (based on the professional judgement of the environmental professional and/or determination by the City based on the property-specific Phase I ESA or subsequent studies), a Site Management Plan (SMP) shall be prepared prior to development activities to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction activities. The SMP shall be prepared by an Environmental Professional and submitted to the overseeing regulatory agency (e.g., EPA, RWQCB and/or County Department of Environmental Health) for review and approval prior to commencing construction activities. Management of site risks during earthwork activities in areas where impacted soil, soil vapor, and/or groundwater are present or suspected, shall be described. Worker training requirements and health and safety ~~measures and soil handling procedures~~ shall be described. The SMP shall ~~also~~ be submitted to the City of Mountain View Planning Division for review. The project developer shall also submit to the City agency approval of the SMP or provide documentation of a regulatory agency's decision declining involvement in the project.
Page 192; Section 3.13.2.4 Parks and Recreation Impacts	Areas identified within the Precise Plan for additional park space would require new development on those sites to address the open space requirement by dedicating land, consistent with the City's Park Land Dedication Ordinance (Chapter 41 of the Mountain View Municipal Code). Dedication of land, ~~P~~payment of fees, or a combination of both would reduce impacts to a less than significant level.

Page 229 to 231; Table 3.14-7

19	Central Expressway and Bernardo Avenue	AM PM	7.5 13.3	A B	7.4 **64.3**	A **E**	0.260 **0.210**	1.7 **107.0**	10.7% **10.0%**
30	North Mathilda Avenue and West Moffett Park Drive	AM PM	45.7 **73.1**	D **E**	**61.6** **83.6**	**E** **F**	**0.264** **0.436**	**49.5** **77.0**	**1.4%** **1.1%**
34	North Mathilda Avenue and Ahwanee Avenue	AM PM	49.9 37.6	D D+	**65.8** 39.0	**E** D+	**0.494** 0.317	**59.3** 13.2	**3.6%** 2.3%
49	North Mathilda Avenue and US 101 Southbound Ramps*	AM PM	27.8 **69.4**	C **E**	28.1 **89.1**	C **F**	N/A **N/A**	N/A **N/A**	1.5% **0.6%**

Page 231; Section 3.14.2.3 Transportation System Plan, Ordinance or Policy	The peak hour warrant was examined for ~~both~~ the unsignalized intersections ~~(1 and 43)~~ as it ~~they~~ would operate at LOS F under Cumulative with Project Conditions. The intersection ~~at East Maude Avenue and North Wolfe Road (Intersection 43)~~ would not meet the warrant ~~and the intersection at Ellis Street and Manila Drive (Intersection 1) would meet the signal warrant~~ requirements.

Page and Section	Text Revisions
Conflict – LOS Analysis	
Page 232; Section 3.14.2.3 Transportation System Plan, Ordinance or Policy Conflict – LOS Analysis	• Int. 1. Ellis Street and Manila Drive (AM and PM Peak Hour) • Int. 2. US 101 Northbound Ramps and Ellis Street (PM Peak Hour) • Int. 4. Fairchild Drive and Ellis Street (PM Peak Hour) • Int. 5. Maude Avenue and SR 237 Ramps (AM Peak Hour) • Int. 7. Maude Avenue and North Mary Avenue (PM Peak Hour) • Int. 8. Maude Avenue and North Mathilda Avenue (AM and PM Peak Hour) • Int. 9. East Middlefield Road and North Whisman Road (PM Peak Hour) • Int. 10. East Middlefield Road and Ellis Street (AM Peak Hour) • Int. 16. Central Expressway and SR 85 Southbound Ramp (PM Peak Hour) • Int. 19 Central Expressway and Bernardo Avenue (PM Peak Hour) • Int. 20. Central Expressway and North Mary Avenue (AM and PM Peak Hour) • Int. 21. El Camino Real and Grant Road-SR 237 (AM and PM Peak Hour) • Int. 22. West Evelyn Avenue and North Mary Avenue (AM and PM Peak Hour) • Int. 27. Moffett Boulevard and West Middlefield Road (AM and PM Peak Hour) • Int. 29. Moffett Boulevard and Central Expressway (AM and PM Peak Hour) • Int. 30. North Mathilda Avenue and West Moffett Park Drive (~~AM and~~ PM Peak Hour) • Int. 34. North Mathilda Avenue and Ahwanee Avenue (AM Peak Hour) • Int. 36. North Mathilda Avenue and West Moffett Park Drive (AM Peak Hour) • Int. 39. South Whisman Road and SR- 237 Westbound Ramps (PM Peak Hour) • Int. 40. East Evelyn Avenue and South Bernardo Avenue (AM and PM Peak Hour) • Int. 43. East Maude Avenue and North Wolfe Road (AM and PM Peak Hour) • Int. 46. East Arques Avenue and Fair Oaks Avenue (AM and PM Peak Hour) • Int. 49. North Mathilda Avenue and US 101 Southbound Ramps (PM Peak Hour)
Page 246; Section 3.14.2.6 Vehicle Miles Traveled—CEQA	**Impact TRA-5:** The Precise Plan would result in a project-level and cumulative VMT impact due to project generated VMT on both a citywide and countywide level. **[Significant Impact]**

Page and Section	Text Revisions
Guidelines Section 15064.3(b)	East Whisman is currently an employment-centric area with a higher jobs-to-residents ratio today, at 7.55 as compared to City of Mountain View's average of 0.97 and Santa Clara County's average of 0.53. TDM and land use changes would be needed to achieve at least a 15 percent reduction in the Precise Plan VMT per capita below countywide thresholds. To reduce the potential project generated VMT impact ~~to below the countywide threshold~~ on both a project-level and cumulative basis, the following actions could be taken: increase the TDM effectiveness requirements, or modify the project size and/or land use mix ~~an additional 15 percent TDM requirement (above the Precise Plan required 30 percent TDM) or providing an additional 2,500 housing units (above the 5,000 proposed as part of the Precise Plan) and allowing no net new office development~~. Given the feasibility of increasing TDM requirements ~~at that level~~ even greater than what is required in the Precise Plan and ~~would be required. Given~~ the land use changes proposed as part of the Precise Plan, neither an increased ~~45 percent~~ TDM effectiveness requirement, or additional housing is feasible mitigation; therefore, the VMT impact remains significant and unavoidable. **[Significant, Unavoidable Impact]**
Page 280; Section 3.16.2.6 Cumulative Utilities Impact	These additional improvements, and the CIPs already identified by the City, would sufficiently reduce cumulative impacts to the City sewer system. Future development under the Precise Plan would be required to prepare site-specific utility analyses and pay nexus study impact fees to fund identified infrastructure projects. The proposed project, together with projects built as part of the 2030 General Plan, would not result in significant cumulative utilities impacts~~.~~ with improvements to the sanitary sewer system, which would address sewer pipe deficiencies in the cumulative condition. By preparing a site-specific utility analysis and paying a City-determined impact fee for additional CIPs that were not included in the GPUUIS, the project would have a less than significant cumulative impact on the sewer system.
Page 290; Section 6.4.2.2 Additional Housing Alternative	**Description** East Whisman is currently an employment-centric area with a higher jobs-to-residents ratio today, at 7.60 as compared to the City of Mountain View's average of 0.96 and Santa Clara County's average of 0.50. The proposed addition of 5,000 units in East Whisman would bring the Precise Plan ratio closer to the City and County average. The Additional Housing Alternative evaluates the additional residential development needed to achieve at least a 15 percent reduction in shared VMT accounting per capita below Existing Conditions. This alternative assumes: • 7,500 housing units (2,500 more than the proposed Precise Plan) • 2.2 million square feet of existing R&D and industrial space rebuilt/re-occupied as office space (no net new office space, whereas the Precise Plan proposes 2.3 million square feet)

Page and Section	Text Revisions
	• 100,000 square feet of retail and restaurant uses (same as the proposed Precise Plan) • 200 hotel rooms (same as the proposed Precise Plan) **Comparison of Environmental Impacts** The following Table 6.4-1 presents a summary of the shared accounting VMT (similar to but not the same as the project generated VMT analysis) results for Cumulative with Project conditions and the Additional Housing Alternative. Under Cumulative with Project Conditions, the estimated East Whisman VMT per capita is 18.1, which is five percent lower than under Existing Conditions. VMT per capita for the Additional Housing Alternative would be 15 percent lower than Existing Conditions. The Additional Housing Alternative would generate seven percent fewer daily vehicle trips and 13 percent lower VMT than under Cumulative with Project Conditions, which is a result of shorter average trip distances by residential trips than office trips. The average trip length of City of Mountain View employees is 70 percent longer than the average trip length of City of Mountain View residents.
Appendix H; Page vii Table ES-4, Page ix, Page 2 and 3, Page 36, 37 and 38 Table 7, Page 48-51 Table 9, Page 65 - 68 Table 15, Page 76 to 80 Table 20, Page 105 Table 28, Page 111 Table 29 Draft EIR Page 221; Table 3.14-6, and Page 228 Table 3.14-7	13. East Middlefield Road and SR 237 Westbound On-Ramps (MV) 14. East Middlefield Road and SR 237 Eastbound Off-Ramps (MV) 16. Central Expressway and SR 85 Southbound Off-Ramps (~~MV~~ SCC) 31. North Mathilda Avenue and SR-237 Westbound Ramps (~~S~~ Caltrans/CMP) 32. North Mathilda Avenue and SR-237 Eastbound Ramps (~~S~~ Caltrans/CMP) 48. North Mathilda Avenue and US-101 Northbound Ramps (~~S~~ Caltrans)* 49. North Mathilda Avenue and US-101 Southbound Ramps (~~S~~ Caltrans)*

Appendix H Page 37 and 38, Table 7

Intersection	Count Date	LOS Standard	Control	Peak Hour	Delay	LOS
30. North Mathilda Avenue and West Moffett Park Drive (S)	June 16, 2018	LOS ~~D~~ E	Signal	AM PM	27.5 34.1	C C-

Page and Section	Text Revisions						
	35. North Mathilda Avenue and San Aleso Avenue (S)	June 16, 2018	LOS ~~D~~ E	Signal	AM PM	10.9 11.3	B+ B+
	39. South Whisman Road and SR- 237 Westbound Ramps (MV)	June 16, 2018	LOS D	Signal	AM PM	32.1~~3~~ 32.9~~3~~	C- C-
	48. North Mathilda Avenue and US 101 Northbound Ramps (~~S~~ Caltrans)	June 16, 2018	LOS ~~D~~ E	Future	AM PM	N/A N/A	N/A N/A
	49. North Mathilda Avenue and US 101 Southbound Ramps (~~S~~ Caltrans)	June 16, 2018	LOS ~~D~~ E	Future	AM PM	N/A N/A	N/A N/A
Appendix H; Page 38, Table 7 footnote #2; Page 52, Table 9 footnote #5, Page 80 Table 20 footnote #5	For side-street stop-controlled intersections total delay for the worst movement ~~approach~~ is reported.						
Appendix H; Page 48, Existing with Project Intersection Level of Service Analysis Draft EIR Page 220, Section 3.14.2.3 Transportation System Plan, Ordinance or Policy Conflict – LOS Analysis	Int. 43. East Maude Avenue and North Wolfe Road (AM and PM Peak Hour)						

Page and Section	Text Revisions

Appendix H; Page 50 and 51, Table 9

Draft EIR Page 220; Table 3.14-6

ID	Intersection	Jurisdiction/ CMP[1]	LOS Threshold[2]	Peak Hour[3]	Existing Conditions[4]		Existing with Project Conditions			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
30	North Mathilda Avenue and West Moffett Park Drive	Sunnyvale	LOS E ~~D~~	AM PM	27.5 34.1	C C-	29.2 36.0	C D+	0.042 0.093	2.1 3.5
31	North Mathilda Avenue and SR- 237 Westbound Ramps	Caltrans/ CMP ~~Santa Clara County (CMP)~~	LOS E	AM PM	13.8 18.1	B B-	19.4 18.8	B- B-	0.063 0.108	2.5 0.6
32	North Mathilda Avenue and SR- 237 Eastbound Ramps	Caltrans/ CMP ~~Santa Clara County (CMP)~~	LOS E	AM PM	17.5 15.0	B B	18.1 17.2	B- B	0.042 0.087	1.4 5.0
35	North Mathilda Avenue and San Aleso Avenue	Sunnyvale	LOS E ~~D~~	AM PM	10.9 11.3	B+ B+	7.9 7.8	A A	0.098 0.058	0.2 -3.9
39	South Whisman Road and SR-237 Westbound Ramps	Mountain View	LOS D	AM PM	32.1 ~~32.3~~ 32.9 ~~32.3~~	C- C-	34.5 ~~34.0~~ 42.5 ~~40.2~~	C- D	0.119 ~~0.106~~ 0.171 ~~0.159~~	3.4 ~~2.8~~ 21.1 ~~14.1~~
43	East Maude Avenue and North Wolfe Road*	Sunnyvale	LOS D	AM PM	29.5 **105.1**	D **F**	**46.5** **>120.0**	**E** **F**	**N/A** **N/A**	**N/A** **N/A**
48	North Mathilda Avenue and US 101 Northbound Ramps	Caltrans ~~Sunnyvale~~	LOS E ~~D~~	AM PM	Future Signalized Intersection					
49	North Mathilda Avenue and US 101 Southbound Ramps	Caltrans ~~Sunnyvale~~	LOS E ~~D~~	AM PM	Future Signalized Intersection					

Page and Section	Text Revisions
Appendix H; Page 57 Table 11	US 101 Southbound On-Ramps~~s~~ US 101 Southbound On-Ramps~~s~~
Appendix H; Page 59, Table 12, Page 73 Table 18, Page 91 Table 23	US 101 Northbound Off-Ramps~~s~~ US 101 Southbound Off-Ramps~~s~~ SR 237 Westbound Off-Ramps~~s~~ SR 237 Eastbound Off-Ramps~~s~~
Appendix H; Page 65, Background Intersection Analysis	~~Int. 30. North Mathilda Avenue and West Moffett Park Drive (AM Peak Hour)~~ ~~Int. 43. East Maude Avenue and North Wolfe Road (AM and PM Peak Hour)~~

Appendix H; Page 67 and 68 Table 15

ID	Intersection	Jurisdiction/ CMP[1]	LOS Thres-hold[2]	Peak Hour[3]	Background Conditions		Background with Project Conditions			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
30	North Mathilda Avenue and West Moffett Park Drive	Sunnyvale	LOS E ~~D~~	AM PM	43.2 37.6	D D+	57.7 50.4	E+ D	0.048 0.094	13.3 17.4
31	North Mathilda Avenue and SR-237 Westbound Ramps	Caltrans/ CMP ~~Santa Clara County (CMP)~~	LOS E	AM PM	22.7 18.3	C+ B-	29.7 20.8	C C+	0.095 0.110	7.8 2.7
32	North Mathilda Avenue and SR-237 Eastbound Ramps	Caltrans/ CMP ~~Santa Clara County (CMP)~~	LOS E	AM PM	19.3 31.5	B- C	20.5 42.2	C+ D	0.041 0.087	2.5 31.1
35	North Mathilda Avenue and San Aleso Avenue	Sunnyvale	LOS E ~~D~~	AM PM	11.4 11.9	B+ B+	8.8 7.6	A A	0.097 0.058	0.2 -5.1
39	South Whisman Road and SR-237 Westbound Ramps	Mountain View	LOS D	AM PM	32.7 ~~32.6~~ 32.7 ~~32.1~~	C- C-	35.2 ~~34.4~~ 42.1 ~~40.1~~	C- D	0.118 ~~0.105~~ 0.170 ~~0.159~~	3.3 ~~2.8~~ 20.4 ~~14.0~~
43	East Maude Avenue and North Wolfe Road~~*~~ [9]	Sunnyvale	LOS D	AM PM	18.9 **~~60.6~~** 25.5 **~~>120~~**	B- **~~F~~** C **~~F~~**	19.6 **~~>120~~** 24.9 **~~>120~~**	B- **~~F~~** C **~~F~~**	0.068 **~~N/A~~** 0.022 **~~N/A~~**	0.7 **~~N/A~~** 0.8 **~~N/A~~**

Page and Section	Text Revisions

	48	North Mathilda Avenue and US 101 Northbound Ramps	Caltrans ~~Sunnyvale~~	LOS E ~~D~~	AM PM	Future Signalized Intersection
	49	North Mathilda Avenue and US 101 Southbound Ramps	Caltrans ~~Sunnyvale~~	LOS E ~~D~~	AM PM	Future Signalized Intersection

Notes:

9. The intersection at East Maude Avenue and North Wolfe Road will be signalized in 2020, per City of Sunnyvale. Therefore, it is analyzed as a signalized intersection under Background and Cumulative Conditions.

Appendix H; Page 71, Signal Warrant Analysis

The peak hour warrant was examined for the unsignalized intersection~~s Int.1 and Int.43 as shown in~~ at Ellis Street and Manila Drive (Int. 1) operating at LOS F under Background with Project Condition, as shown in **Table 15.** The results presented in **Appendix G** indicate that ~~the~~ this intersection ~~at East Maude Avenue and North Wolfe Road (In.43)~~ does not meet~~s~~ the warrant ~~and the intersection at Ellis Street and Manila Drive (Int. 1) does.~~

Appendix H; Page 71, Table 16, Page 89 Table 21

US 101 Northbound On-Ramp~~s~~
SR 237 Eastbound On-Ramp~~s~~
SR 237 Westbound On-Ramp~~s~~

Appendix H; Page 76, Cumulative Intersection Level of Service Analysis

Int. 30. North Mathilda Avenue and West Moffett Park Drive (~~AM and~~ PM Peak Hour)

~~Int. 43. East Maude Avenue and North Wolfe Road (AM and PM Peak Hour)~~

Appendix H; Page 78, 79, and 80 Table 20

Draft EIR Page 228; Table 3.14-7

Intersection			Peak Hour[2]	Existing Conditions		Cumulative Conditions		Cumulative with Project Conditions				
				Delay[3]	LOS[4]	Delay[3]	LOS[4]	Delay[3]	LOS[4]	Δ in Crit. V/C	Δ in Crit. Delay	Project Contribution (%)
1	Ellis Street and Manila Drive*		AM	21.1	C	**>120.0**	**F**	**>120.0**	**F**	**0.841**	**N/A**	**N/A**
			PM	15.2	C	**>120.0**	**F**	**>120.0**	**F**	**1.059**	**N/A**	**N/A**
30	North Mathilda Avenue and West Moffett Park Drive		AM	27.5	C	45.7	D	61.6	E	0.264	49.5	1.4%
			PM	34.1	C-	73.1	E	**~~61.6~~**	**~~E~~**	**~~0.264~~**	**~~49.5~~**	**~~1.4%~~**
						~~73.1~~	**~~E~~**	**83.6**	**F**	**0.436**	**77.0**	**1.1%**

Page and Section	Text Revisions

31	North Mathilda Avenue and SR- 237 Westbound Ramps*	AM PM	13.8 18.1	B B-	~~13.8~~ ~~18.1~~ N/A	~~B~~ ~~B-~~ N/A	~~0.6~~ ~~1.4~~ N/A	~~A~~ ~~A~~ N/A	~~0.6~~ ~~1.5~~ N/A	~~A~~ ~~A~~ N/A	~~-0.081~~ ~~0.264~~ N/A
39	South Whisman Road and SR- 237 Westbound Ramps	AM PM	32.3 32.3	C- C-	**70.3** ~~**63.0**~~ **101.1** ~~**95.0**~~	**E** **F**	53.1 ~~48.7~~ **118.5** ~~**113.4**~~	D- D ~~**F**~~	0.465 ~~0.448~~ **0.460** ~~**0.45**~~	47.2 ~~33.3~~ **114.6** ~~**97.5**~~	14.9% **12.2%**
43	East Maude Avenue and North Wolfe Road[9]	AM PM	29.5 **105.1**	D **F**	17.7 ~~**>120**~~ 23.6 ~~**>120**~~	B ~~**F**~~ C ~~**F**~~	21.2 ~~**>120**~~ 21.0 ~~**>120**~~	C+ ~~**F**~~ C+ ~~**F**~~	N/A N/A	N/A N/A	3.1% 1.4%
49	North Mathilda Avenue and US 101 Southbound Ramps	AM PM	Un-signalized Intersection		27.8 69.4 ~~**69.4**~~	C E ~~**E**~~	28.1 **89.1**	C **F**	N/A **N/A**	N/A **N/A**	1.5% **0.6%**

Notes:

9. The intersection at East Maude Avenue and North Wolfe Road will be signalized in 2020, per City of Sunnyvale. Therefore, it is analyzed as a signalized intersection under Background and Cumulative Conditions.

Appendix H; Page 81, Signal Warrant Analysis

The peak hour warrant was examined for ~~both~~ the unsignalized intersection~~s (#1 and #43)~~ at Ellis Street and Manila Drive (Int. 1) as it ~~they~~ would operate at LOS F under Cumulative with Project Condition. The results presented in **Appendix G** indicate that the intersection ~~at East Maude Avenue and North Wolfe Road (In.43) would not meet the warrant and the intersection at Ellis Street and Manila Drive (Int. 1)~~ would meet the warrant.

Appendix H; Page 96, Unsignalized Intersections

Draft EIR Page 217; Section 3.14.2.1 LOS Deficiency Policy

City of Mountain View

Based on previous studies, deficiencies are said to occur when the addition of project traffic causes the average intersection delay for an all-way stop-controlled intersection, or the worst movement/approach for a side-street stop-controlled intersection, to degrade to LOS F and the intersection satisfies the peak hour traffic signal warrant from the *California Manual of Uniform Traffic Control Devices* (MUTCD) (2014).[2]

City of Sunnyvale

Deficiencies at unsignalized local City of Sunnyvale intersections are defined to occur when the addition of Project traffic causes one of the following:

[2] The peak-hour signal warrant analysis should not serve as the only basis for deciding whether and when to install a traffic signal. To reach such a decision, the full set of warrants should be investigated based on a thorough study of traffic and roadway conditions by an experienced engineer. The decision to install a signal should not be based solely upon the warrants, since the installation of signals can lead to certain types of collisions. The responsible state or local agency should undertake regular monitoring of actual traffic conditions and accident data and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization.

Page and Section	Text Revisions
Consistency Criteria	• If an intersection operates at an acceptable LOS (i.e. D or better) without the project and degrades to an unacceptable LOS (i.e. LOS E or F) with the addition of project traffic; • If an unsignalized intersection operates at an unacceptable LOS (i.e. LOS E or F) without the project and the addition of project traffic increases: o the average intersection delay by four (4) seconds or more, and the volume-to-capacity (v/c) value by 0.01 or more for all-way stop controlled intersections; or o the worst movement delay by four (4) seconds or more, and the critical volume-to-capacity (v/c) value by 0.01 or more for side-street stop-controlled intersections; • Intersection meets the warrant(s) for installation of a traffic signal as per the latest edition of California Manual on Uniform Traffic Control Devices.
Appendix H; Page 99, Existing with Project Conditions	Int. 43. East Maude Avenue and North Wolfe Road (S): The addition of project traffic would degrade intersection operations from an acceptable LOS D to unacceptable LOS E conditions in the AM peak hour; and cause the worst movement delay to increase by more than four seconds and the critical volume-to-capacity (v/c) value by more than 0.01 in the PM peak hour.
Appendix H; Page 99, Table 25 Draft EIR Page 232; Table 3.14-8	

Intersection		Improvement[3]	Peak Hour[1]	Intersection Operations			
				Without Improvement		With Improvement	
				Delay	LOS[2]	Delay	LOS[3]
20	Central Expressway and North Mary Avenue (SSC/ CMP)	Add WBL, WBT, and EBT lanes	AM PM	52.4 **87.4**	D- **F**	49.4 63.9	D E
43	East Maude Avenue and North Wolfe Road (S)	Signalize intersection	AM PM	**46.5** **>120.0**	**E** **F**	16.8 24.4	B C

Appendix H; Page 100, Existing with Project Conditions Draft EIR Page 238; Section 3.14.2.3 Transportation	**Intersection 43: East Maude Avenue and North Wolfe Road (S)** – The eastbound and westbound approaches of this side-street-stopped intersection would operate unacceptably under Existing with Project Conditions. City of Sunnyvale has plans to signalize this intersection by 2020. With signalization, the operations at this intersection would improve to an acceptable LOS condition under Existing with Project Conditions. Because this improvement is the responsibility of another jurisdiction, this deficiency would still occur under Existing with Project Conditions

Page and Section	Text Revisions
System Plan, Ordinance or Policy Conflict – LOS Analysis	The bicycle QOS would remain at 4 with these improvements. The pedestrian QOS score is at 4, without the improvements. If the intersection was signalized, the pedestrian QOS score would improve to a 1 as the signals would include pedestrian signals and phasings to accommodate pedestrian crossings across Wolfe Road.
Appendix H; Page 101, Background with Project Conditions	~~Int. 30. North Mathilda Avenue and West Moffett Park Drive (Sunnyvale): The addition of project traffic would degrade intersection operations from acceptable LOS D to unacceptable LOS E during the AM peak hour.~~

Appendix H; Page 101, Table 26

~~30~~	~~North Mathilda Avenue and West Moffett Park Drive (S)~~	~~Add WBT lane~~	~~AM~~ ~~PM~~	~~57.7~~ ~~50.4~~	~~E+~~ ~~D~~	~~33.9~~ ~~50.4~~	~~C-~~ ~~D~~

Appendix H; Page 102 and 103 Background with Project Conditions

~~**Intersection 30: North Mathilda Avenue / West Moffett Park Drive (Sunnyvale):** To improve operations and improve queuing in the westbound and southbound directions, a westbound through lane could be added; which would improve intersection operations to an acceptable level of service. While roadway widening would reduce levels of service deficiency at this intersection, the City cannot be certain at this time that such improvements would be implemented since this intersection is under the jurisdiction of Sunnyvale and no other feasible improvements have been identified. Because this improvement would be the responsibility of another jurisdiction, this deficiency would still occur under Existing with Project Conditions.~~

~~The improvements would not change or worsen the bicycle QOS; it would remain at QOS 4. The pedestrian QOS score would not change or worsen, and remain at a 4, both without and with the improvements. Adding a westbound through lane would increase the distance for pedestrians crossing Mathilda Avenue.~~

Appendix H; Page 103, Table 27

~~30~~	~~North Mathilda Avenue and West Moffett Park Drive (S)~~	~~Add WBT lane~~	~~4~~	~~4~~	~~4~~	~~4~~

Appendix H; Page 106, Table 28

39	South Whisman Road and SR- 237 Westbound Ramps (MV)	Add dedicated SBL and WBR lanes	AM PM	53.1 ~~48.7~~ **118.5** **~~113.4~~**	D- ~~D~~ **F**	34.7 ~~33.3~~ 50.5 ~~47.6~~	C- D

SECTION 6.0 DRAFT EIR COMMENT LETTERS

The original comment letters received on the Draft EIR are provided in the following pages.

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
www.dot.ca.gov

Making Conservation a California Way of Life.

July 8, 2019

SCH #2017082051
GTS #04-SCL-2017-00595
GTS ID #7639
PM: SCL-101-47 & SCL-237-1.5

Eric Anderson
Senior Planner
City of Mountain View
500 Castro Street
Mountain View, CA 94039

Project – East Whisman Precise Plan- Draft EIR

Dear Eric:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced plan. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the June 2019 Draft EIR.

Project Understanding

The Plan would include up to 2.3 million net new square feet of office uses, 100,000 net new square feet of retail uses, 200 hotel rooms, and 5,000 multi-family residential units. Increased office intensities and new neighborhood commercial uses would be allowed throughout the Plan area, while housing would now be allowed in a central area of the Plan. The East Whisman Precise Plan would also include new parks, new pedestrian/bicycle paths, new public streets, and recreational facilities.

The East Whisman Precise Plan (Plan) area abuts the south side of US 101, extending to the south and east across State Route (SR) 237 at E. Middlefield Road, and south to E. Evelyn Avenue. The 403-acre Plan area is located on the eastern border of the City of Mountain View (City.) The Santa Clara Valley Transportation Authority (VTA) Light Rail Transit (LRT) line travels across the Plan

area. The Plan area is generally bordered by US 101 and Moffett Federal Airfield/NASA Ames Research Center to the north, North Whisman Road to the west, Central Expressway to the south, and the City of Sunnyvale to the east, where a municipal golf course, office and residential uses currently exist.

Travel Demand Analysis

Caltrans commends the City on the Travel Demand Analysis regarding impacts on VMT and alternatives to meet a 15% VMT reduction. Caltrans encourages the City to continue to explore options to mitigate further raising VMT, including contributions to VTA's Valley Transportation Plan, and to support the use of transit and active transportation modes.

Caltrans requests verification of the following within Appendix H:

- Page 2, Study Area-Intersections- item #14 "East Middlefield Road and SR 237 Eastbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify if there is an on-ramp directly from East Middlefield Rd. to the eastbound of SR 237;

- Page 2- item #16 "Central Expressway and State Route (SR) 85 Southbound Ramp." Figures E-3, 7, 10, 13, 14, 15, 16, & 26- please verify if there is an on-ramp directly from Central Expy to the southbound of SR 85. If this is for the on-ramp from Central Expy. to the northbound of SR 85, verify its lane configurations;

- Page 3- item #24 "Moffett Boulevard and US-101 Northbound Ramps." Figures 7, 10, 13, 14, 15, and 16- please verify the name of the intersection. Should it be for both on-ramp and off-ramp? Caltrans suggests to use "24. Moffett Blvd/ US-101 NB Ramps" instead of "24. Moffett Blvd/ US-101 NB Off Ramp";

- Page 3- item #31 "North Mathilda Avenue and SR- 237 Westbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify its lane configurations;

- Page 3 - item #32 "North Mathilda Avenue and SR- 237 Eastbound Ramps." Figures 7, 10, 13, 14, 15, & 16- please verify its lane configurations;

- Page 3 - item #39 "San Antonio Road between Southbound US 101 Ramps and Charleston Road." Figures E-3, 7, 10, 13, 14, 15, 16, and 26, please verify its lane configurations;

- The 25 ramps and connectors listed in Attachment 1 may be impacted by this project. According to Caltrans Deputy Directive (DD) 35-R1, "Provisions for ramp metering shall be included in any project that proposes additional capacity, modification of an existing interchange, or construction of a new interchange, within the freeway corridors identified in the RMDP, regardless of funding source." These ramps are part of the Caltrans 2017 Ramp Meter Development Plan (RMDP.) Please provide the existing peak-hour traffic volume with and without the project for each on-ramp and connection listed above if it has not already been covered. In addition, the forecasted peak-hour traffic volume 20 years after completion of construction with and without the project for each of these on-ramps and connections are required for the geometric modifications of the on-ramps and connections, or their interchanges.

  The provisions described in Caltrans 2016 Ramp Metering Design Manual: such as a High Occupancy Vehicle (HOV) preferential lane; a paved CHP Enforcement Area; a paved Maintenance Vehicle Pullouts (MVP) area; and advance warning devices, are required at each of the metered on-ramps. In addition, high visibility Activated Blank-Out (ABO) signs shall be installed for advanced warning purposes on metered freeway-to-freeway connectors. If any of these provisions cannot be provided, Fact Sheets for exception to ramp metering policies are needed. Concurrence with the proposed deviations from these policies shall be obtained from the Caltrans Headquarters Traffic Operations Liaison or the designated representative as early as possible in the project development process. For questions or comments, please contact Wichai Hanittinan (wichai.hanittinan@dot.ca.gov.)

Transportation Impact Fees

We continue to encourage a sufficient allocation of fair share contributions toward mitigating the cumulative project impacts on freeway segments and ramps, and to provide multimodal and regional transit. We also continue to strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to continue to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Lead Agency
As the Lead Agency, the City of Mountain View is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit
Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit https://dot.ca.gov/programs/traffic-operations/ep/applications.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mark Leong at 510-286-1644 or Mark.Leong@dot.ca.gov.

Sincerely,

for

WAHIDA RASHID
Acting District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

ATTACHMENT 1

#	Co	Rte	Dir	PM	Interchange	Ramp Type	# Lanes	RM Status	HOV Bypass
1	SCL	85	NB	22.13	EB Rte 237	connector	1	Operational	No
2	SCL	85	NB	23.01	Central Expy / Easy St	diagonal	1	Operational	No
3	SCL	85	SB	22.2	WB Rte 237	connector	1	Planned	No
4	SCL	85	SB	22.49	W Evelyn Ave	diagonal	1	Operational	No
5	SCL	85	SB	23.39	Moffett Blvd	loop	1	Operational	No
6	SCL	85	SB	23.66	SB Rte 101 for HOV	connector	1	Planned	Yes
7	SCL	85	SB	23.867	SB Rte 101	connector	2	Planned	No
8	SCL	101	NB	46.254	WB Rte 237 / W Moffett Park Dr	diagonal	1	Planned	No
9	SCL	101	NB	47.274	Ellis St	diagonal	2	Non-Operational	Yes
10	SCL	101	NB	47.854	Moffett Blvd	loop	2	Non-Operational	No
11	SCL	101	NB	48.301	NB Rte 85	connector	2	Non-Operational	No
12	SCL	101	NB	48.36	NB Rte 85 for HOV	connector	1	Planned	Yes
13	SCL	101	SB	45.631	NB N Mathilda Ave	diagonal	2	Operational	Yes
14	SCL	101	SB	45.721	SB N Mathilda Ave	loop	2	Operational	Yes
15	SCL	101	SB	46.024	EB Rte 237	connector	1	Operational	No
16	SCL	101	SB	46.811	Ellis St	diagonal	2	Operational	Yes
17	SCL	101	SB	47.781	Moffett Blvd	diagonal	2	Operational	Yes
18	SCL	237	EB	0.49	NB Rte 85	connector	1	Planned	No
19	SCL	237	EB	0.87	Sylvan Way / Moorpark Way	diagonal	1	Planned	No
20	SCL	237	EB	2.06	W Maude Ave	diagonal	1	Partially Constructed	No
21	SCL	237	EB	2.423	SB Rte 101	connector	1	Planned	No
22	SCL	237	WB	0.26	SB Rte 85	connector	1	Planned	No
23	SCL	237	WB	0.65	S Whisman Rd / E Dana St	diagonal	1	Planned	No
24	SCL	237	WB	1.37	E Middlefield Rd / W Maude Ave	diagonal	1	Partially Constructed	No
25	SCL	237	WB	2.537	NB Rte 101	connector	1	Planned	No

National Aeronautics and
Space Administration

Ames Research Center
Moffett Field, CA 94035-1000

July 22, 2019

Reply to Attn of: JQ: 204-15

Eric Anderson
Senior Planner
Mountain View Community Development Department
500 Castro St.
PO Box 7540
Mountain View, California 94039

Subject: Comments on the Draft Environmental Impact Report (EIR) for the East Whisman Precise Plan Project, SCH #2017082051

Dear Mr. Anderson;

National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) prepared for the implementation of the City of Mountain View's East Whisman Precise Plan. As a neighboring federal agency with a main entrance adjacent to two of the Precise Plan's transportation "gateways," (Ellis St./Hwy 101 and Ellis St./Manila Ave) and a shared a transit station (VTA's Bayshore/NASA Station), ARC would be affected by development and increased use in the Precise Plan area. NASA personnel have reviewed the EIR and would like to provide the following general comments:

NASA Projects

Development at ARC has been guided by the NASA Ames Development Plan (NADP) completed in 2002. As required under the National Environmental Policy Act (NEPA), NASA published a Final Programmatic Environmental Impact Statement (EIS) that analyzed the effects of the alternatives under the NADP. In November 2002, NASA signed a Record of Decision, which adopted Mitigated Alternative 5 in the EIS. Currently, several projects identified in the NADP are underway and they will result in increases in population at ARC. Planetary Ventures is constructing approximately 1.2 million square feet of Office/R&D space on the northwest portion of ARC. NASA has partnered with a housing developer to construct between 1,930 and 2,078 housing units in the southern part of ARC. The housing project is currently in the planning stages and is designed to mitigate impacts to traffic and housing demand anticipated from development at ARC.

The analysis of cumulative effects in the EIR for the East Whisman Precise Plan should include development as described in the NADP and associated Programmatic EIS. These documents are available at: https://www.nasa.gov/centers/ames/researchpark/publicdocs.

Air Quality

NASA recognizes that the East Whisman Precise Plan would require projects undertaken in the plan area to conduct analysis considering the effects on sensitive receptors from air contamination. Please note that with the completion of planned housing in the southern portion of ARC new sensitive receptors will be located within 1,000 feet of Employment Area North. Effects to these sensitive receptors should be considered during project specific analysis.

Traffic

The East Whisman Precise Plan would result in significant unavoidable impacts to certain intersections that are either located on NASA property or in close proximity to NASA property. NASA requests that the City of Mountain View coordinate closely with NASA to ensure that traffic impacts generated from the East Whisman Precise Plan are adequately addressed.

Cultural Resources

It should be noted that the Shenandoah Plaza Historic District is located within ARC and that views from Mountain View of several historic structures (Hangars 1, 2, and 3) have been considered important. Currently, the cultural resource section does not include information regarding this historic district or a consideration of how planned development may affect views of the district. Additional information regarding these historic resources can be found at NASA's website: https://historicproperties.arc.nasa.gov/shenandoah.html.

Thank you for notification of the draft EIR review period and opportunity to provide comments. NASA is committed to continued coordination with the City of Mountain View's Community Development Department. Should you have questions or wish to have further discussion regarding NASA's comments please reach out to me using my contact information below or Andrés Estrada, Center NEPA Manager, at (650) 604-5609 | andres.v.estrada@nasa.gov.

Sincerely,

Donald M. Chuck
Chief, Environmental Management Division
NASA Ames Research Center
(650) 604-0237
donald.m.chuck@nasa.gov

Enclosure

cc: (electronically)
DT/204-2/A. Encarnacion
JQ/205-15/A. Estrada
DL/202A-114B/L. Ladwig

EPC Questions – June 19, 2019

Item 5.1 – East Whisman Precise Plan

1. **Under the TDR Bonus Option, which Character Area's target office growth would be reduced?**

   Staff will need to study the character area targets more. It may depend on direction from the EPC and Council on the topic, and the extent of developable land in each of the character areas. Staff will return in the Fall with a recommendation for Character Area targets, which could have greater or reduced flexibility.

2. **As written, if a developer(s) wanted to transfer density from one area to another, would this be permitted or would it require a gate keeper?**

   a. **Build High Intensity in a Medium Character Area and build Medium in a High**

   Medium Intensity (eg, 0.75 office FAR or 2.5 residential FAR) is always allowed in the High Intensity areas (up to 1.0 office FAR or up to 3.5 residential FAR), since intensity is a maximum standard.

   Higher intensities than the maximum (eg, 1.0 office FAR in a 0.75 office FAR area) are allowed only when a project or Master Plan area spans multiple subareas, the average intensity across the project complies with the average maximum, and all parts of the development are consistent with the purpose and intent of other standards, such as height, setbacks and open area (this standard is #5 on page 60 of the Plan). Intensities higher than that would need a Gatekeeper (including a Transfer of Development Rights from outside the Precise Plan).

   b. **Build Mixed Use in an Employment Character Area and Employment in a Mixed Use Area?**

   Office is a permitted use in the Mixed-Use Character Area, so a standalone office building can be built there. Some Employment uses are not permitted and cannot be built in the Mixed-Use Character Area, such as manufacturing and warehousing.

   Residential is not a permitted use and cannot be built in the Employment Character Areas. See pages 54-56 of the Precise Plan for the list of permitted uses.

3. **The discussion of the Character Area feedback from Council is vague. Assuming it is the targets in Table one of the EWPP Draft, is it office only? Residential? Retail? Any concern about the mix? Can their question/concern be stated more specifically?**

The City Council did not specifically comment on the Character Area targets (Table 1 of the EWPP draft). They only stated that they were interested in more discussion on that topic. Letters from Google and others focused on the office targets in the Mixed-Use Character Area, stating that they are too low and restrictive.

4. **Based on current state law, if mixed use area was moved to a non-residential area after the plan is approved, would that be considered a down zoning under state laws. (ie. No Net Loss)**

   "No Net Loss" applies to sites zoned for housing, consistent with the City's adopted Housing Element. For example, if the City identified a developable site for 40 units of housing capacity in its Housing Element, but fewer units are approved for development (for example, if an office building is constructed there instead), then the City has to identify a different developable site zoned for those 40 units. This doesn't currently apply to East Whisman, since no sites in East Whisman are identified for housing in the Housing Element.

   If the Precise Plan is amended to allow residential in a non-residential area, that would be an up-zoning, and would be allowed under State law. If the Precise Plan is amended to stop allowing residential in a mixed-use area, the amendment would only be affected by State law if the down-zoned sites are identified in the Housing Element.

5. **Purple pipe improvement suggested by developers, is this already encompassed within the district utility improvements in table 33 ?**

   Yes, a portion of the improvements suggested in item 2 in the developers' letter are the same as the recycled water systems improvements included in Table 33. The improvements suggested by developers also include projects to connect East Whisman to the existing recycled water system in North Bayshore.

6. **Developer letter suggests that publicly accessible improvement on private land are not counted toward open space/park requirements. Is this accurate?**

   Park requirements are set by the City Code's Parkland Dedication requirements. They are generally fulfilled with fees or dedication of land to the City. Paseos, greenways and multi-use paths, provided pursuant to public mobility and block standards are not considered parkland.

   The Precise Plan also includes "common usable open area" requirements. These areas are intended for passive and active outdoor recreation by project residents, rather than buffer landscaping or public mobility. The Precise Plan does not allow fitness spaces or other interior amenity spaces to count to this standard. It also does not allow public paseos,

multi-use paths and greenways to count, if they are provided pursuant to public mobility and block standards.

7. **Active frontages - pg 109 of the EWPP shows a Gallery frontage that seems to go over the sidewalk area. Would this be permitted? In San Antonio Merlone Geier property has some of this any it actually chokes off the area.**

   The intent of the guideline (#4 on page 108) is that the colonnade be behind the setback line. Therefore it would be outside the public sidewalk. Staff recognizes that the image may be misleading, and will modify or remove it.

8. **Active frontages - Table 5 lists a 75' max wall height in High Intensity Mixed use area while design guidelines seem to suggest that a design with a 75' wall would not be allowed to occur. Could a 75' sheer wall result on an active frontage just 5' from a sidewalk? Please compare what would be allowed in East Whisman to the Carmel Apartments frontage on San Antonio Road.**

   Yes, a building wall located 5' from the back of sidewalk could be 75' high. Based on the design guidelines, that wall would have horizontal and vertical articulation to add variation and interest, and to reduce the building's apparent mass. In addition, with those smaller setbacks, the ground floor would have to have transparency, entrances, awnings, and other features to focus interest and attention to the ground floor.

   The following is an image of the Carmel Apartments frontage:

   It is about 70' high at the sidewalk. The streetscape dimensions are compared to East Middlefield Road in the Table below. The Precise Plan would result in wider sidewalks

and possible wider setbacks, especially if the project does not have doors, storefront and other active façade elements.

	Carmel Apartments	*East Middlefield Road*
Building to public sidewalk (setback)	*5′*	*5′ / 10′ (Active / Non-Active)*
Public sidewalk width	*5′*	*8′*
Planter width	*6′*	*6′*
Total curb-to-building distance	*16′*	*19′ / 24′*

9. **Seven topics were listed where staff is "Seeking Confirmation" however these specific questions were not listed at the end of the staff report. Can these be listed on a slide during the meeting to facilitate Commissioner feedback on each of these topics?**

   Yes, staff will provide such a slide.

10. **p.5: "No statement of overriding considerations is required for this under CEQA because these are not identified as impacts." It means that because VMT replaces LOS as the official CEQA metric that LOS deficiencies do not require a statement of overriding considerations. Right?**

    Yes.

11. **p. 8: Is the intent that generated VMT and VMT effect should BOTH be evaluated for significant impacts? It isn't a matter of choosing on or the other, right?**

    The EIR is evaluating both thresholds and methodologies, and an impact could result from either one.

12. **p. 8: Is the mandated new state CEQA metric total VMT or VMT per service population? What is meant by "the threshold and methodology for VMT impacts have not been specifically adopted by the city"? What is needed to make this happen? Does the city adopt its own standards and methodology, or use one dictated by the state?**

    Cities are required to adopt new CEQA transportation thresholds in 2020. The State does not dictate standards or methodology, but has published guidelines recommending issues to consider when adopting thresholds. Those guidelines generally recommend a "per service population" approach.

Staff has begun the necessary analysis to adopt thresholds, including looking at what other cities are adopting, reviewing past projects and their effect on VMT, discussions with VTA, and developing goals and objectives for the city's transportation analysis.

13. p. 15: The note at the bottom of the page says, "If the council wishes to count LinkedIn, the ratios would be 3.5, 4.0, and 6.0" This does not make any sense to me, as the numbers should go down if you add in office space without adding housing units. Can you check your calculations here?

The "Not Counting LinkedIn" scenarios do not subtract LinkedIn, while the "Counting LinkedIn" scenarios do subtract LinkedIn. Here are the calculations:

	Draft Precise Plan		***TDR Bonus***		***Reduced Office***	
	Not Counting LinkedIn	*Counting LinkedIn*	*Not Counting LinkedIn*	*Counting LinkedIn*	*Not Counting LinkedIn*	*Counting LinkedIn*
Office Floor Area (square feet)	*2.2 mil.*	*1.588 mil.*	*2.0 mil.*	*1.388 mil.*	*1.6 mil.*	*988,000*
Minus Aff. Housing Set-Aside =200k (p. 162)	*2 mil.*	*1.388 mil.*	*1.8 mil.*	*1.188 mil.*	*1.4 mil.*	*788,000*
Removing Affordable Set-Aside Units from Total	*5,000 – 300 = 4,700*					
Exact Ratio: 4,700 units/office area (in thousands)	*4,700/2,000 = 2.35*	*4,700/1,388 = 3.39*	*4,700/1,800 = 2.61*	*4,700/1,188 = 3.96*	*4,700/1,400 = 3.36*	*4,700/788 = 5.96*
"Round up" Ratio	*2.5*	*3.5*	*3.0*	*4.0*	*3.5*	*6.0*

14. p. 19: Why does staff believe that rowhouses are more likely that stacked flats for the Village Center Area?

While rowhouses may be more likely based on the higher return (they are less expensive to construct and have a higher sales price than condominiums), that is not the purpose of the comparison. The comparison is based on a known from and character that is already prevalent in the city's multifamily districts and results in feasible development. They are a likely housing type due to the height constraints within the Village Center (45/50') and the Flynn Avenue Transition Area (30'), and the close proximity to other existing low-scale development.

15. p. 23: What exactly is a "grade-separated multi-use path"? Does this mean that it is bike/ped only and closed to auto traffic?

Yes, a multi-use path is bike/ped only that either goes above or below the light rail tracks, and is defined on page 144 of the draft Precise Plan.

16. p. 27: Can you remind me what "character area targets" refers to? Is this about the amount of retail and other public amenities in the EWPP area?

The Character Area targets are guidelines for the mix of land uses and public open spaces that should be in each Character Area. More detail about how the targets will be used can be found on page 175 of the Draft Precise Plan (#2). The targets themselves can be found on page 30-31 and 174.

17. Comment: page 11, section Relationships to Other Plans should also include the Community Tree Master Plan.

Comment received. Thank you.

18. The developer/owner letter mentions a city-wide plan/guidance for school strategy. Could you please provide more details?

The last section of the staff report contains the current status and details of the School Strategy. The project team will continue studying the issue over the summer, and will present the strategy to Council in the Fall.

19. The developer/owner letter mentions a privately-owned public open space (POPOS) credit for North Bayshore. Please provide more details. Does this credit make sense for East Whisman?

The parkland dedication requirement is reduced based on the provision of privately-owned public open space with the following characteristics:

- *at least 1 acre,*
- *shape and location conducive for public use,*
- *including at least 3 of the following:*
  - *turfed playing field*
  - *landscaped, park-like quiet area*
  - *family picnic area*
  - *game court area*
  - *children's playground*

One rationale for the open space credit in North Bayshore is based on the relatively large amount of public parkland in that part of the City. The East Whisman area does not have a similar abundance.

20. Page 30- 2.3.2.4 Neighborhood commercial- how would "developers to receive credit towards community benefits by supporting local business"- what would that entail?

Page 163 and 164 of the Precise Plan detail the community benefit expectations for projects. If a development requests Bonus FAR, they are expected to provide community benefits (funding, construction or programs that benefit the community, but that aren't directly related to development requirements or impacts they cause). Among these community benefits, which are listed on page 164, is support for small local businesses, including providing new building space, dedicating an existing building space, or providing relocation assistance.

21. Page 31- 2.3.2.9 Transportation- the text references six "gateways"- the map figure 2.3-3 shows seven- please explain

That was a typo in the text. The figure is correct.

22. Page 92- Natural gas production- first paragraph has two conflicting statements regarding the sources.

That is also a typo. It will be corrected in the Final EIR. In 2017, approximately 13 percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada. [1]

23. Page 221- intersection #19 pm goes from "A" to "D+"- really significant difference (perhaps the largest change)- is this correct?

Yes, that is the largest change (the Cumulative case at this intersection goes from B to E).

24. Page 233- some intersections show very little reduction of travel delays- even with improvements- how will the decisions be made in the future to spend money on these?

Upon adoption of the Precise Plan, the City will conduct a nexus study to calculate the total cost of improvements necessitated by the Plan. These costs will be divided up among all the proposed development in the Plan and the City will adopt a new fee on development to fund the improvements. The City will then prioritize and schedule those improvements based on the funds that come in as part of the existing CIP review.

[1] California Gas and Electric Utilities. *2018 California Gas Report.* https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

25. Page 245 VMT Impact Analysis- can you explain this a different way?

*The Project Generated VMT is the average travel distance of vehicle trips starting and ending in East Whisman. It is intended to measure the average burden each resident and employee puts on the roadway system. For example, if 80% of employees in East Whisman drive to work, and their average drive distance is 24 miles, the average VMT over two trips a day is (0.8 * 24 * 2) = 38.4 miles. This can be lowered through TDM (for example, only allowing 70% of employees to drive), or by creating supportive land uses that allow employees to live closer. The State recommends a reduction of 15% from existing, but allows cities to determine whether the reduction should be from regional, City or project-area existing.*

The Project Effect on VMT is the average travel distance of vehicle trips starting and ending outside the Precise Plan. It is intended to measure the effect of land use change on the distribution of existing trips. For example, if the Precise Plan causes congestion on 101, and people start driving out of their way to take Central Expressway instead, that additional VMT can be attributed to the project. The state recommends a threshold of no net new VMT Effect.

26. Page 253-Intersection # 25 shows an increase of 255% but no LOS change

Staff will forward this question to our traffic modeler, and will be prepared with an answer at the meeting.

27. Page 254- #30 shows a 374% increase or additional 25,500 cars daily- that's huge- what is happening in that area to cause this increase?

That increase is from Existing to implementation of the 2030 General Plan (without the Precise Plan). In other words, it is looking at the effect of San Antonio, El Camino Real and North Bayshore growth, rather than East Whisman growth. The purpose of the table is to compare Scenarios 2 and 3 (planned growth with and without East Whisman).

28. Several pages- please clarify scenario 1, 2 & 3

- *Scenario 1 is existing-- the observed conditions today.*
- *Scenario 2 is with implementation of the 2030 General Plan, without the East Whsiman Precise Plan, but including San Antonio, El Camino Real, North Bayshore growth, plus other growth in the City consistent with the General Plan.*
- *Scenario 3 updates the General Plan, adding growth from the East Whisman Precise Plan.*

29. Page 274-What's the schedule for CIPs noted in first & fourth paragraph?

Once the Precise Plan and its EIR are adopted staff will incorporate the required utility improvements into the annual review of the Capital Improvement Program. As the area redevelops staff reviews the utility impacts of the project and may revise the CIP or require the developer to construct the utility improvements with City reimbursement.

30. Page 280- middle of first paragraph- several sentences need clarifying-perhaps a typo?

Yes, a typo. The language will be corrected with the Final EIR. The sentence should read:

The proposed project, together with projects built as part of the 2030 General Plan, would not result in significant cumulative utilities impacts~~.~~ with improvements to the sanitary sewer system, which would address sewer pipe deficiencies in the cumulative condition.

31. Staff report –page 17- Under the reduced office option-can you please explain further why the Plan could be impaired?

A critical mass of new office development may be necessary to provide a range of community benefits, fund infrastructure/mobility improvements, and to subsidize residential development through the jobs-housing linkage strategy. If less office development is allowed, these improvements and subsidies will fall disproportionately on the remaining office projects. Therefore, if the requirements are set too high, office developers may decide not to build.

32. Staff report page 16 – Explain "Consideration of TDR floor area in EIR".

The EIR considers the TDR floor area separately from the Precise Plan. It is included as part of the Cumulative scenarios, but not part of the Precise Plan. This means individual TDR projects may be required to study and mitigate impacts due to the TDR growth separately from the impacts due to the Precise Plan.

At the last Council meeting, the City Council directed staff to identify the Development Reserve quantity that would be consistent with an assumption of TDR growth within the Precise Plan.

The total Office TDR is about 250,000 square feet. If the growth studied in the EIR incorporated this amount, the Development Reserve would be limited to about 1.95 million square feet, a reduction of 250,000 square feet. The total residential TDR is about 82,000 square feet. Total residential growth is not limited in the Precise Plan, so there is no analogous reduction. 5,000 units were studied, but future residential growth above that may be allowed with some analysis of consistency with the previous impact analysis.

The table below provides a summary of the TDR projects:

Location	**Applicant**	**Status**	**TDR SF**	**Total Proposed Units or SF**
465 Fairchild	Sobrato	Application submitted.	80,000	274,000 SF
303 Ravendale	Sand Hill	Application submitted.	45,000	181,000 SF
189 N. Bernardo	Sand Hill	Application submitted.	28,000	144,500 SF
355 E. Middlefield	SummerHill	Application submitted.	10,000	464 units
400 Logue	Miramar	Application submitted.	72,000	367 units
291-339 N. Bernardo	Vanni	Council allowed applicant up to 5 years from MOU to submit Gatekeeper application.	100,000	613,000 SF
Blue = office/comm. project & Orange = high-intensity res. project		**Total Office TDR SF**:	**253,000**	
		Total Residential TDR SF:	**82,000**	

33. What is the difference between the EIR alternatives and the staff report alternatives?

Under CEQA, the City is required to identify ways that impacts could be eliminated by changing the project. These are analyzed on pages 289 – 294 of the EIR. Some of these alternatives, such as the No Project Alternative and the Increased Housing Alternative, could only be implemented with significant changes (or denial) of the Precise Plan, and have additional issues of infeasibility and inconsistency with other city goals.

The City Council directed staff to study the Reduced Office Alternative in April 2017, and to report back on different impacts from changing the amount of office growth. Since both the Draft Precise Plan and Reduced Office alternatives were studied in the EIR, the City can also adopt an intermediate alternative, which may not be identified specifically in the EIR. Staff has developed the TDR Bonus Alternative as a way to address issues with both the Draft Precise Plan and the Reduced Office Alternatives. It is less office area than the Draft Precise Plan, but more office area than the Reduced Office Alternative.

34. What is the timing of future path connections to the Bernardo area?

City of Mountain View Public Works staff is work with City of Sunnyvale staff as they are the lead on the proposed undercrossing of Central Expressway and the tracks along Bernardo Avenue. We will provide an update on the timing project at the meeting.

35. Would it be appropriate to enhance the Green Building Standards (section 3.10) with more climate mitigation/adaptation policies in the following areas?

- **Building electrification - switch from gas to electricity use for heating (space & water), drying, cooking, etc. to reduce green house gas emissions**
- **Green infrastructure - promote green stormwater infrastructure, urban trees, and sustainable landscaping to improve water & air quality and reduce energy use**
- **Zero waste - ensure effective food scrap collection and recycle**

The plan requires non-residential bonus FAR projects to meet LEED BD+C Platinum, which means a minimum energy reduction of 5% over ASHRAE 90.1-2010. Many projects would achieve greater energy reductions in the pursuit of the necessary score for Platinum. It may be preferable to give projects a very high performance target to meet (Platinum) and allow them to decide on the compliance pathway, rather than being prescriptive about something specific such as building electrification.

The Plan addresses stormwater treatment, urban trees, and sustainable landscaping on Page 118 of the Design Guidelines chapter (4.3.3.). Section 3.10 focuses on buildings only.

Programs proposed in the City's Zero Waste Plan, which is to be completed in Fall 2019, would apply to existing and new development, City-wide.

36. Page 35 Affordable Housing: Is "Development Reserve Set-Aside" defined somewhere?

Yes, on Page 162 of the Precise Plan.

37. Attachment Exhibit 6: What do the dotted lines mean in the graphs, e.g. along hwy 880 in the AM Peak Hour Mixed-flow lanes?

The dotted lines show that the facility is outside the County.

38. Why do existing office developments have minimal or nonexistent TDM programs? What programs or regulations, if any, does the City have to help legacy offices cut down on their VMT?

Most TDM programs are required as conditions of approval. Prior to the late 1990's TDM programs were not required from new development. Most buildings in East Whisman were built before this time. In addition, even recent developments with TDM programs are not required to reach the trip reduction levels expected under the Precise Plan.

Possible ways the City could encourage VMT reduction from legacy developments include:

- *Requiring TDM plans from small additions and building rehabilitations (see page 90 of the Precise Plan).*
- *Encouraging new office development to partner with existing buildings, or otherwise incorporate them into their TDM strategy.*
- *Providing compatible land uses, such as residential and neighborhood commercial.*

39. If it's easy, could staff add a "no project" column to tables 2 and 3 in the staff report?

Those columns would be "0" by definition. The deficiencies are based on a comparison with "no project". For example, there are many cases where both the "project" and "no project" scenarios are LOS F, but it's not a deficiency (and not counted in the tables) because the project is not contributing enough traffic to the facility for the project to be affecting the deficiency.

40. Why is the discussion focused on the South Employment Area and not much is talked about the North Employment Area?

The City Council directed staff to study alternatives in the South Employment Area, not the North Employment Area.

41. Footnote 14: this footnote talks about FAR, but should it be the job-housing linkage ratio?

Correct. That was a typo.

42. Would it be helpful to have a summary of TDR projects that are approved/being reviewed, with their respective units/sq ft? Also, why is 291-399 Bernardo Avenue project discussed but not the other TDR projects?

See question 32.

43. Are there any other developers that are in the pipeline to take advantage of the TDR?

The TDR Program includes a "secondary market" to allow other sites/developers to purchase any unutilized TDR square footage over the 10 year life of the TDR Program. Staff understands that LASD has at least two to three developers interested in secondary market square footage, and will continue to cultivate a list of interested parties.

44. Is there a specific timeline/cutoff to close the contract with Federal Realty?

The LASD Board of Trustees has a special meeting scheduled for tonight (June 19th) to consider approval of the final Purchase and Sale Agreement with Federal Realty for the proposed school site in San Antonio Center.

Item 5.2 – 355-415 East Middlefield Road

1. **Who can explain the TDR Program? Is there a staff member who is responsible for this? If the EPC has no ability to modify or recommend then perhaps we don't need additional information/ instruction regarding the TDR Program.**

   The City Council approved the TDR Program for the proposed Los Altos School District (LASD) school site on January 16, 2018, and has entered into a Memorandum of Understanding (MOU) to implement the approved Program. As part of the TDR process, SummerHill has executed a Letter of Intent (LOI) with the Los Altos School District (LASD) to purchase 10,000 square feet of TDR's for this project. A link to the January 16, 2018 Council report was provided in the EPC staff report as background information. Staff can answer additional questions, as needed, at the EPC meeting.

2. **Page 3 of Staff Report- Does the applicant still pay the 3% for the ownership component for the BMR? The CC staff report for October 16, 2018 shows no payment for Ownership- Table I on page 3. Please verify what is due for ownership.**

   The applicant does not propose to pay the 3% BMR In-Lieu Fee or provide 10% affordable units, the requirements currently in effect. Instead, they are providing 10% of the apartments at Low Income levels and 15% of the apartments at Moderate Income levels. This is consistent with the proposal reviewed and approved by Council at the project study session in October 2018.

   The City is nearing completion on updates to the BMR Ordinance. At a BMR Ordinance study session on May 14th Council provided direction regarding exemptions from the new BMR requirements for active Gatekeeper projects. Based on that input, staff developed the following draft exemption language, in summary: Gatekeeper projects deemed ready for a public hearing by December 20, 2019 will be exempt from the new BMR requirements.

   If Council adopts this exemption language as part of the final BMR updates (scheduled for June 18, 2019) and the project meets the exemption provision, the project would be eligible to move forward with the alternate mitigation.

3. **Page 5 of Staff Report- when would an EIR for this project be deemed necessary?**

   As discussed in the staff report, this project's environmental review is connected to the EWPP EIR. The EWPP EIR analyzes residential development in the Mixed Use Character Area (not including TDR square footage). Staff is currently working with an environmental consultant to prepare a Compliance Checklist under CEQA, to evaluate if the project would exceed or cause new/different impacts than the development analyzed in the EWPP EIR. Based on that analysis, a determination will be made regarding whether

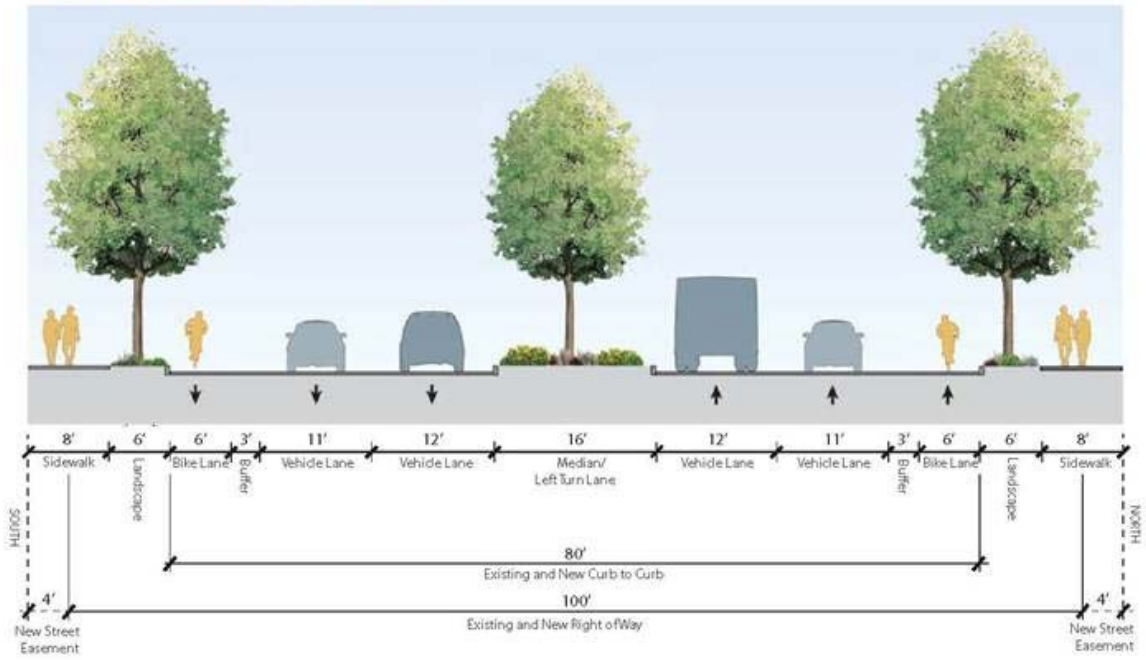
the project can receive environmental clearance under CEQA based on the EWPP EIR or if other environmental documentation is needed, such as an Addendum to the EWPP EIR. This analysis will be complete before the project returns to the EPC for a recommendation to the City Council.

4. **When I met with the developer, I was told the existing trees on Middlefield would all need to be removed because of the way the new sidewalk will be built. Can you please provide more details about how the new sidewalk will affect these existing street trees? Can the loss of trees be mitigated in any way?**

The current sidewalk is a "monolithic" sidewalk, located immediately next to the street/curb line. The existing street trees are generally located close to the back of the existing sidewalk. The project will construct the draft EWPP street design standards for Middlefield Road (see below), which are intended to improve walking and biking conditions. Many of the existing trees conflict with the new sidewalk and public utility easement areas. City staff has closely reviewed options to preserve existing trees. As part of that review, the City Arborist analyzed the condition of the existing trees along Middlefield Road and determined it would be better to remove the existing trees and install new trees. The project will include replacement tree plantings.

Figure 25

Middlefield Road (looking west)



5. **The developer indicated if the service street on the east side was expanded from 55- to 66-feet, they would have to reduce the number of units. Similarly if the service road on the south side was expanded, units will be lost. How many units does staff think could potentially be lost due to these two modifications?**

   Staff cannot provide an estimate of how many units could potentially be lost in order to comply with the draft EWPP service street standards. The stacked flats on the western portion of the site are relatively low intensity, as compared to what is allowed, which places pressure on the larger apartment and condominium buildings to provide units. In addition, the two larger buildings include two levels of aboveground parking, which limits redesign options. It is possible that different unit mixes, different parking configurations, and/or changes to how vehicle access is provided could provide greater flexibility to achieve design objectives and reduce unit loss, but – as noted in the EPC report – this would require potentially substantial additional design work with the applicant to evaluate and a definitive answer cannot be provided by staff at this time. EPC input on street design exceptions will inform how much and what staff works on with the applicant.

6. **The developer indicated that abiding by the precise plan's requirements is not reasonable because they will lose an entire row of seven story homes out of each of the two larger buildings and that the garage plan will not work because of insufficient turn radius. Does staff agree that this many apartments/condos will be lost, and that it is not possible to come up with a feasible garage plan that meets staff's requirements? How many units will need to be eliminated from the project to meet staff's goals?**

   See answer (above) to question number five.

7. **In order to provide a safe ped/bike experience, which service road (east or south) has higher priority for conformance to the precise plan?**

   The westerly segment of the "U-shaped" service street (between the larger condominium building and the future public park/stacked flats) and the southerly segment of the service road (between the project site and the adjacent Francia property) are the segments coinciding with required public access under the draft EWPP.

   There is no public access required along the easterly-leg of the service street (between the larger condominium and apartment buildings). In addition to contributing to the pedestrian/bicyclist experience, the service street provides landscaped separation between project buildings.

Other Questions

What are upcoming items the EPC will be discussing?

In the fall, the EPC will likely be discussing the following projects and plans:

- *Safe Parking Ordinance*
- *EPC work Plan*
- *Terra Bella Visioning (Public Hearing)*
- *East Whisman Precise Plan (Public Hearing)*
- *North Bayshore Gateway Master Plan*
- *Gatekeeper projects at*
    - *360 South Shoreline Boulevard*
    - *2645 Fayette Drive*
    - *1001 North Shoreline Boulevard*

Mountain View
Whisman
School District

District Office
T 650.526.3500
1400 Montecito Avenue
Mountain View, CA 94043

July 22, 2019
VIA EMAIL (eric.anderson2@mountainview.gov**) & U.S. MAIL**

Eric Anderson, Senior Planner
City of Mountain View
Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94039

Re: School Districts' Comments on the Proposed Draft East Whisman Precise Plan and Public Draft Environmental Impact Report for the East Whisman Precise Plan Project

Dear Mr. Anderson:

The Mountain View Whisman School District and Mountain View-Los Altos Union High School District (collectively the "Districts") hereby submit their comments on the City of Mountain View's ("City") Draft East Whisman Precise Plan and Public Draft Environmental Impact Report East Whisman Precise Plan Project, dated June 2019 ("Draft EIR"). The Districts' comments concern the need to provide assurances that funding for new schools to serve the precise plan area will be in place and the unstudied traffic impacts of the project on the Districts' schools. As a result, the Draft EIR needs revision and recirculation to disclose the significant new information to the public and allow comment on the new information.

Although this letter is technical in nature due to the subject matter, the Districts wish to emphasize that their comments are meant to help the City fully evaluate and mitigate the potential impacts to the schools—not to be critical or confrontational. Instead, the Districts desire to continue cooperating and collaborating with the City to insure the continued high quality of life in the City and education in its schools.

I. DRAFT EAST WHISMAN PRECISE PLAN

On page 163, section 2, School District Strategy, please amend the language as indicated in redline below:

> "All bonus FAR projects shall contribute to local schools and submit a ~~Local~~ School District Strategy to the school districts and the City, providing Developer's best efforts to support new local schools serving the East Whisman Precise Plan area. The

> School Districts and the Developer shall meet and confer in good faith to develop the School District Strategy to support new local schools. The School District Strategy shall be memorialized as a legally binding agreement. The strategy may include, but is not limited to, land dedication for new school development; additional funding for new school development; TDR strategies to benefit developer(s) that provide new school facilities, benefiting new school facilities; or other innovative strategies supporting schools."

This revised provision would require the Developer to do all it can to ensure adequate school facilities to support the precise plan area. Without these revisions, the provision requires very little commitment from the Developer to back new local schools.

II. DRAFT EIR

A. Adequate School Facilities

In similar fashion, edits to the Draft EIR concerning new school facilities are necessary to conform the Draft EIR with the Draft East Whisman Precise Plan. The following edits are needed. On page 191, section 3.13.2.4, School Impacts, first paragraph, please amend the language as indicated in redline below:

> "As described in Section 2.0 Project Description, the Precise Plan includes a program by which development will provide support for school facilities. Future development projects requesting Bonus FAR (both residential and non-residential) will be required to create a school strategy, including an agreement with the local school districts, that will include funding or land above the amount required through standard school impact fees (described further below)."

On page 192, third paragraph from the top, please amend the language as indicated in redline below:

> "Future residential development projects in the Precise Plan area are required to pay state-mandated school impact fees to offset impacts to local schools, such as Edith Landels and Vargas Elementary Schools and Mountain View High School. Payment of fees and the School District Strategy would reduce impacts to a less than significant level."

Mountain View
Whisman
School District

On page 192, Impact PSR-2, please amend the language as indicated in redline below:

> "The project would increase the demand for new school facilities in the City; however, payment of school impact fees and the School District Strategy would offset this increase in demand.
> **[Less than Significant Impact with Mitigation]**"

Further, the School District Strategy should be made into an enforceable mitigation measure to make certain that the Developer will use its best efforts to provide for and support new school facilities for the residences of the precise plan area.

B. Transportation

Even though the precise plan and the Draft EIR identify a School District Strategy to set up a loose framework for Developer to provide sufficient school facilities, the Draft EIR notes there are no proposed schools. Until there is a proposed school, the project will be served by the Districts' existing schools. However, the Draft EIR is silent on the potential traffic impacts of the project on the Districts' schools, where, during student drop-off and pick-up, the streets along the Districts' schools are very congested. There is apparently no Level Of Service, street capacity, or queueing delay analysis in the Draft EIR on the project's added trips to and from the Districts' schools. Adding the project's students to project-serving schools must be analyzed to either demonstrate that the project's traffic impacts are less than significant or to acknowledge the impacts would be significant or cumulatively considerable and to provide adequate traffic mitigation to lessen those impacts. This traffic congestion problem is further evident given that the City of Mountain View 2030 General Plan ("General Plan") has a mobility policy, MOB 1.6 to "[p]rovide traffic calming, especially in neighborhoods and around schools, parks and gathering places." (Draft EIR, p. 196.) Without including traffic calming measures around the Districts' serving schools, the project would likely cause a significant or cumulatively considerable traffic impact and would be inconsistent with the General Plan.

Further, the Draft EIR's Vehicle Miles Traveled ("VMT") analysis does not appear to include either existing or estimated trips from a project area residence's home or place of work to drop off or pick up a student from his or her school. Without this data and analysis, the VMT is understated, does not reflect real-world conditions, and makes the project appear less environmentally damaging than it may be.

Mountain View
Whisman
School District

III. CONCLUSION

The Districts desire that the project's potential significant and cumulative impacts to the students, parents, faculty, and staff of the Districts' schools are fully analyzed and mitigated. Given the lack of required traffic analyses in the Draft EIR, the Districts respectfully request that the Draft EIR be revised to include those required analyses and mitigation measures, as set forth herein and recirculated per the requirements of the California Environmental Quality Act.

Thank you for the opportunity to participate in the review process and for your consideration of the above, and please include this letter in the project's record of proceedings. Please provide us with a copy of any future notices issued pursuant to Public Resources Code sections 21080.4, 21083.9, 21092, 21108, or 21152 for this project. Additionally, please provide us with a copy of any future notices pursuant to Government Code sections 65090 or 65091 for the project.

Sincerely,

Ayindé Rudolph
Superintendent
Mountain View Whisman
School District

Cc: Dan Rich

July 22, 2019

Community Development
456 West Olive Avenue
Sunnyvale, CA 94088-3707
TDD/TYY 408-730-7501
sunnyvale.ca.gov

Eric Anderson, AICP, Senior Planner
City of Mountain View, Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94041-7540
E-Mail: Eric.Anderson2@mountainview.gov

Re: Comments on the Draft Environmental Impact Report for the East Whisman Precise Plan

Dear Mr. Anderson,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed East Whisman Precise Plan (project or Precise Plan) in Mountain View. This letter includes all City of Sunnyvale comments.

General Questions and Comments:

1. We request that the City of Mountain View provide outreach to Sunnyvale residents, and that the notice area be expanded if the traffic impacts show potential significant impacts to the nearby Sunnyvale neighborhoods.

Traffic and Transportation:

If you have questions on the following transportation and traffic comments, please contact Lillian Tsang, Principal Transportation Engineer, Department of Public Works, at ltsang@sunnyvale.ca.gov or (408) 730-7556.

In the Transportation Impact Analysis Report:

2. Intersection #20 Central Expressway/Mary Avenue should be under the jurisdiction of SC/CMP, instead of Sunnyvale. Please change it on page iv and all other relevant sections.

3. Intersections #31 and 32 should be under the jurisdiction of Caltrans/CMP. Please change it on page iv and all other relevant sections.

4. Intersection #48 and 49 should be under the jurisdiction of Caltrans, instead of Sunnyvale. Please change it on page iv and all other relevant sections.

5. Table 7, the LOS standard for all intersections along Mathilda Avenue shall be E, instead of D. This applies to Intersection #30, 35, 48 and 49. Please change them in all relevant tables.

6. Page 64, it is noted that there are no planned transportation improvements within the study area that would affect the geometries at the study intersections. However, the Mathilda Avenue/US 101/SR 237 is scheduled to be completed by the end of 2020. Intersection configurations would change for Intersections 30, 31, 32, 48 and 49 for both the Background scenario and Cumulative Scenario. Intersections 31 and 32 would be eliminated under both the Background and Cumulative scenarios. Intersections 48 and 49 should be included under both the Background and Cumulative scenarios and they shall be signalized intersections (Table 20 listed them as unsignalized intersections). Intersection #30 will become Mathilda Avenue and West Moffett Park Drive/SR 237 WB Off-Ramp under both the Background and Cumulative scenarios; the lane geometry assumed under both the Background and Cumulative conditions are not correct. The traffic assumed for Intersections 30, 31, 32 shall be adjusted with the closure of the Moffett Park Drive between Mathilda Avenue and Bordeaux Drive as part of the Mathilda Avenue/US 101/SR 237 Interchange Improvement project. Please re-evaluate these intersections as appropriate.

7. In addition, the intersection of East Maude Avenue and Wolfe Road (#43) will be signalized by 2020; this change would affect the assumptions and the analysis under Background scenario and Cumulative scenario.

8. Page 75, move SR237/Mathilda Avenue and US 101 Mathilda Avenue Interchange Improvements to Background scenario.

9. For Cumulative conditions at Intersection 30 (North Mathilda Avenue and West Moffett Park Drive/SR237 WB off-ramp), the results in Table 20 shows that the LOS would degrade to having deficiency with the addition of the project for both AM and PM peak hours, however, results are not highlighted and the text did not include a discussion on it.

10. For Cumulative Conditions, pending projects within Sunnyvale and the application of an 1.5% annual growth rate need to be incorporated in the Cumulative traffic volume estimates in order to reflect the growth in both the local and regional traffic. The use of 2007 ABAG Projections seem to be outdated.

11. Intersection 5, SR 237 Ramps/Maude Avenue, the westbound approach should be two left turn lanes, one through lane, and one right turn lane, instead of one left turn lane, two through lanes, and one right turn lane. Please make changes in all figures as well as in the analysis for all scenario, as appropriate.

12. Intersection 8, Mathilda Avenue/Maude Avenue, the northbound approach should be two left turn lanes, two through lanes, and one through/right shared lane. The southbound approach should be two left turn lanes, four though lanes, and one right turn lane. Please make changes in all figures as well as in the analysis for all scenario, as appropriate.

Sunnyvale

13. Page 96, Sunnyvale's impact criteria for Unsignalized Intersections are as follows:

    Project impacts at City's unsignalized intersections would be considered significant if one of the following criteria is met:

    a. If an intersection operates at an acceptable LOS (i.e. D or better) without the project and degrades to an unacceptable LOS (i.e. LOS E or F) with the addition of project traffic, then it is a significant impact.
    b. If an unsignalized intersection operates at an unacceptable LOS (i.e. LOS E or F) without the project and the addition of project traffic increases:
        i. the average intersection delay by four (4) seconds or more, and the volume-to-capacity (v/c) value by 0.01 or more for all-way stop controlled intersections; or
        ii. the worst movement delay by four (4) seconds or more, and the critical volume-to-capacity (v/c) value by 0.01 or more for side-street stop-controlled intersections.
    c. Intersection meets the warrant(s) for installation of a traffic signal as per the latest edition of California Manual on Uniform Traffic Control Devices.

    Therefore, Intersection 43 would consider "deficient" even if the intersection did not meet the signal warrant.

14. For all Sunnyvale intersections with a deficiency, the project shall pay a fair-share payment contribution based on City of Sunnyvale's traffic impact fee schedule.

The City of Sunnyvale appreciates your consideration in this matter. Please contact Kelly Cha, Associate Planner, at (408) 730-7408 or kcha@sunnyvale.ca.gov if you have any questions or concerns about items discussed in this letter.

Sincerely,

Michelle King
Principal Planner

cc: Trudi Ryan, Director, Community Development
Andrew Miner, Assistant Director, Community Development
Amber Blizinski, Principal Planner, Community Development
Chip Taylor, Director, Public Works
Lillian Tsang, Principal Transportation Engineer, Public Works

Santa Clara Valley Transportation Authority

July 22, 2019

City of Mountain View
Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94039
Email: Eric.Anderson2@mountainview.gov

Attention: Eric Anderson

Subject: Draft East Whisman Precise Plan and Draft Environmental Impact Report (EIR)

Dear Eric Anderson:

Thank you for the opportunity to review and comment on the Draft East Whisman Precise Plan and Draft Environmental Impact Report (DEIR). VTA appreciates our multi-year, ongoing involvement in the East Whisman planning process, including multiple consultation meetings with City of Mountain View staff ("City staff"). The East Whisman plan area represents a prime opportunity to implement shared City-VTA goals to improve transit options and encourage the use of transit. VTA is supports by the proposed land use intensification in the plan area, specifically adjacent to VTA's light rail network, including Middlefield Light Rail Station.

VTA has reviewed the Draft East Whisman Precise Plan ("Plan") and the Plan DEIR for consistency with VTA Board-adopted policies, specifically the VTA Land Use & Development Review Policy (see https://www.vta.org/programs/land-use-transportation-luti-program), as recommended by City staff. The VTA Land Use & Development Review Policy establishes a framework for VTA's involvement in local comprehensive planning and development review processes. VTA believes that the Plan embodies VTA's guiding principles that support sustainable transit-oriented communities. VTA has the following comments:

Consistency with VTA Land Use & Development Review Policy
The following comments are organized using the VTA Land Use & Development Review Policy's principles (underlined), and includes detailed comments regarding the implementation of these principles.

1. Build Effective Partnerships

   a) VTA appreciates the ongoing staff coordination between the City and VTA, specifically with regards to the Street C crossing identified in the Plan. City staff has welcomed VTA to apply its own policies (including the Land Use and Development Review policy, Station Access policy and Fast Transit Program) and goals alongside this plan to strengthen its effectiveness.

b) VTA commends the City for identifying that Street C would create significant impacts to VTA operations if built as an at-grade facility. This change in perspective is confirmed by VTA's Land Use & Development Review policy which does not support new at-grade crossings of light rail. VTA views this change of direction from previous plan iterations as the result of our ongoing coordination and partnership.

2. Support Fast, Frequent Safe and Reliable Transit

a) VTA supports the street design standards in Section 5.2.2 that include provisions for bus boarding islands, where appropriate.
b) To accommodate transit safety for in-lane stopping, VTA recommends an 11-foot minimum lane width for transit vehicles. VTA notes that several cross sections within the DEIR document include only 10-foot minimums. Please refer to VTA's *Design Guidance for Bike Lanes and Cycle Tracks at Bus Stops* (Attachment A) for in-lane stopping and cycle track configurations at bus stops. This document is in a final draft form and VTA's best guidance to date.
c) As part of the VTA Board-adopted 2019 New Transit Service Plan, Route 21 will run on Middlefield Road, Louge Avenue and Maude Avenues. This new route is expected to become active during late 2019/early 2020.
d) Section 5.5.1 references the transfer of passengers between private shuttles and public transit vehicles at a public bus stop. The use of public bus stops is intended for public transit vehicles because they are maintained and operated by VTA or its contractors. Any private operators requesting access to a public bus stop must coordinate with VTA in advance.
e) VTA supports bus boarding island dedication where appropriate and transit signal priority guidelines listed in Section 5.5.2.
    - VTA recommends bus boarding islands on Middlefield Road, Louge Avenue and Maude Avenue if cycle tracks will be present. These will support a Fast Frequent and Reliable bus network.
    - VTA also recommends that all signals along Middlefield Road, Louge Avenue and Maude Avenue all be upgraded with transit signal priority. To fully support VTA policies, VTA recommends the Plan language be revised from, "Transit signal prioritization (TSP) **must** be used…" to "should be used…"

3. Transit-Supportive Development in Close Proximity to Transit

a) VTA supports the Plan's Character Areas in Section 3.1 that intensify land uses surrounding the Middlefield Light Rail Station. VTA strongly supports Design Guideline 5.3.2, which defines visibility surround Middlefield Light Rail Station. Clear view corridors and sense of place surrounding transit station entrances allows for better navigation.

b) VTA is encouraged by the detailed residential and commercial transportation demand management (TDM) standards set forth in Section 3.9 and 3.92. VTA commends the City for clearly articulating methods to reduce solo vehicle trips and for requiring annual monitoring of the TDM strategies.
c) By requiring both commercial developments and residential developments (i.e., those that have a minimum of 100 units) to join the Mountain View Transportation Management Association (TMA), it is clear that the City is committed to managing trips and promoting the use of transit within the Plan area. VTA is always interested in seeking new ways to incentivize travel choices other than private automobiles.

4. Prioritize Sustainable Travel Behavior

a) VTA reiterates its support for transit signal priority within the Plan area where appropriate. By providing priority for transit the Plan supports a more active lifestyle and means for further reducing Vehicle Miles Traveled (VMT).
b) VTA commends the Plan for managing block sizes, creating flexible zones for future travel technologies, supporting VTA transit services and establishing clear TDM and parking polices. These strategies support limiting VMT by creating more options for alternative modes.
c) VTA also supports the comprehensive walking and biking network of greenways and paths throughout the Plan area. VTA recommends close ongoing coordination for the paths identified along or near VTA's LRT right of way.

Impacts to Transit Travel – DEIR
VTA commends the City for removing Street C from the Plan as part of Mitigation Measure TRA-4.1 in the Plan DEIR. As stated in our letter dated September 17, 2018 and as communicated with City staff between 2017 and 2018, VTA does not support new at-grade crossings of light rail for the purpose of safeguarding the travelling public and maintaining efficient operations. VTA has experienced pedestrian/train accidents at at-grade crossings that have resulted in significant and sometimes fatal injuries. By removing this crossing and mitigating it with a grade separated multi-use path, this strategy supports the VTA Board-adopted Land Use and Development Review Policy, which states VTA's stance on new at-grade crossings.

VTA also supports the City for identifying in Impact TRA-3, identifying that the Plan will have significant and unavoidable effects on transit vehicle operations, particularly at intersections with deficient Level-of-Service. By identifying these impacts, the final Plan should locate appropriate intersections for transit signal priority deployment, particularly along Middlefield Road, Louge Avenue and Maude Avenues where planned transit services are expected for the next 10 years as guided by the 2019 New Transit Service Plan. Transit signal priority is most effective when installed along a corridor. All intersections that have existing light rail crossings should also be considered, at a minimum, for transit signal priority, or full transit vehicle preemption. VTA

would support preemption for LRT as this provides the most reliable strategy for vehicle movement through intersections. VTA requests a meeting with staff to discuss potential locations for transit signal priority and transit vehicle preemption in the future to help offset the impacts identified in the Plan.

Bus Stop Improvements

Within the Plan area, VTA serves 15 transit locations. Four of the stops will be discontinued and two are proposed stops planned for future service expected to start late 2019/early 2020 in coordination with the start of BART Silicon Valley service to Santa Clara County. Per the Plan's 5.5.1 Standards, VTA recommends the following improvements:

1. Westbound Middlefield west of Whisman
    - Install new VTA metal bench
2. Eastbound Middlefield east of Whisman
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new 10'x55' new PCC bus pad.
    - Install a new VTA metal bench.
3. Westbound Middlefield west of Ellis
    - Install a new VTA metal bench
4. Northbound Ellis north of Middlefield
    - Install a new VTA metal bench
5. Eastbound Middlefield east of Ellis
    - Install a new VTA metal bench
6. Westbound Middlefield east of Ellis
    - No improvements needed
7. Eastbound Middlefield east of Logue (discontinued in future service)
8. Westbound Middlefield east of Logue (discontinued in future service)
9. Northbound Logue north of Middlefield (future stop)
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
10. Eastbound Maude west of Clyde (future stop)
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
    - Complete sidewalk network on this block
11. Westbound Maude west of Clyde
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
12. Northbound Middlefield north of Bernardo (discontinued stop)
13. Southbound Middlefield south of Bernardo (discontinued stop)
14. Eastbound Clyde west of Clyde Court
    - Bus stop is not to ADA standards. Install a new 8'x40' boarding area.
    - Install a new VTA metal bench
15. Northbound Ellis south of Fairchild

- Install a new VTA metal bench

The recommendations listed are the minimum improvements for each location, VTA would like the opportunity to review updated site plans as developments and new streets within the Plan area when they are constructed to ensure transit improvements are made to complement new developments and their uses. VTA's Transit Passenger Environment Plan provides design guidelines for bus stops. This document can be downloaded at http://www.vta.org/tpep. VTA has a Bus Stop Placement, Closures and Relocations Policy. Prior to any construction or bus stop impact, please contact bus.stop@vta.org.

Thank you for the opportunity to review the Draft East Whisman Precise Plan and Draft Environmental Impact Report. If you have any questions, please call me at (408) 546-7985.

Sincerely,

Brent Pearse
Transportation Planner

cc: Martin Alkire, Dawn Cameron, City of Mountain View
John Sighamony, Scott Haywood, VTA

Attachments:

- Attachment A: VTA *Design Guidance for Bike Lanes and Cycle Tracks at Bus Stops*

MV1710

Albert Jeans
820 San Lucas Ave.
Mountain View, CA 94043

Dear Council Member,

I am very concerned that little attention seems to have been paid to traffic in the East Whisman Precise Plan aside from a discussion about local streets within the project area and TDM measures. There is no mention of the major thoroughfares and highways in the vicinity which currently operate near capacity during peak commute times. It's obvious that full implementation of the Precise Plan will adversely impact traffic in the area, and the Draft EIR describes this in greater detail, although it is itself a summary of the 1861-page Transportation Analysis (TA) for East Whisman Precise Plan written by Fehr and Peers. I would like to highlight some points which are contained in the Draft EIR and TA which may not be evident from staff's Study Session Memo.

First, some 17 intersections will degrade to LOS E or F under Cumulative+Project Conditions (TA, p. 105). All but two these can be mitigated by capital improvements such as adding turn lanes and signals although the total cost will be substantial (hundreds of millions of dollars?) However, due to other constraints such as lack of jurisdiction, right-of-ways, and funding, only 6 intersections are deemed by the city likely to receive improvements, leaving 11 intersections which will be impacted. I have listed these in the attached spreadsheet, along with other Deficiencies and Impacts listed in the Draft EIR.

LOS ratings by themselves don't tell the whole story. The LOS rating for an intersection is based on the average delay for all movements through the intersection, and since commute traffic tends to be heavily biased in one direction, the actual delays experienced in the heavily traveled direction can be much higher. In addition, LOS F is used for any delay greater than 80 seconds, but actual delays can be much higher. I have personally measured the delay for vehicles on the 101 NB off-ramp to Shoreline Blvd. at 800 seconds or more! The attached graphic shows in practice what the various LOS ratings mean. Fehr and Peers conducted a micro simulation of the Ellis-101-Fairchild intersections (TA Ch. 9, p. 118) and found that eastbound cars on Fairchild would experience delays of over 1000 seconds just under the Existing+Project scenario (TA, Appendix L). Fortunately most of the other delays were not that high, but there were still significant delays (3-4 minutes) on the freeway off-ramps which could cause queues to extend onto 101. This is especially of concern because Ellis St. is considered to be one of the "gateways" of the East Whisman Area.

The attached spreadsheet also lists roadway segments which will be impacted under the 2030 Cumulative+Project scenario which were not listed in the General Plan EIR. What's distressing is that most of the segments will experience traffic volumes over 50% higher than current volumes. On already congested streets such as Shoreline Blvd. this is hard to imagine.

Traffic is a regional problem, and a lot of the future congestion would occur regardless of whether the East Whisman Precise Plan is implemented. Still, it seems shortsighted not to plan how future residents will be able to move about without having to spend hours sitting in traffic. Without a comprehensive transportation plan, that is almost certainly what will happen.

During the EPC Study Session there was no discussion at all of the traffic impacts of the project. I hope that you can at least acknowledge that traffic will be a problem and suggest additions to the Precise Plan to start to deal with it.

Sincerely,
Albert Jeans

Summary of Draft EIR Traffic Study

Compiled by Albert Jeans

Cumulative with Project, Unfeasible Intersection Improvements

Unavoidable Deficiencies

Intersection	Location	LOS, AM/PM
2	US 101 NB Ramps/Ellis St	F/F
4	Fairchild Dr/Ellis St	F/F
5	Maude Ave/SR 237 Ramps	E/D
7	Maude Ave/N Mary Ave	D/E
8	Maude Ave/N Mathilda Ave	E/F
20	Central Expwy/N Mary Ave	E+/F
22	W Evelyn Ave/N Mary Ave	F/E
29	Moffett Blvd/Central Expwy	F/F
36	N Mathilda Ave/Indio Ave	F/C
40	E Evelyn Ave/S Bernardo Ave	E/E+
46	E Arques Ave/Fair Oaks Ave	F/F

Deficiency C-TRA-3: Implementation of the Precise Plan would result in unacceptable cumulative operations at local and regional intersections.

Deficiency C-TRA-4: Implementation of the Precise Plan would result in unacceptable cumullative operations at freeway segments.

Impact TRA-3: Implementation of the Precise Plan would have a significant and unavoidable effect on transit vehicle operations, in particular at those intersections with a deficient LOS.

Impact TRA-4: Street C would result in increased light rail vehicle delay due to the slower train speeds through the crossing, disrupting the existing facility.

Impact TRA-5: The Precise Plan would result in a project-level and cumulative VMT impact due to project generated VMT on both a citywide and countywide level.

		Daily Traffic Volume			
Road Segment	Location	Existing	2030 w/Project	% Increase	LOS
8	Central Expwy: Bernardo Ave/Middlefield Rd	31,000	45,800	48%	F
21	Evelyn Ave: SR 237/Bernardo Ave	17,300	47,000	172%	F
38	San Antonio Rd: Bayshore Pkwy/NB US 101 Ramps	12,700	23,200	83%	F
39	Shoreline Blvd: SB US 101 Ramps/Middlefield Rd	30,200	46,000	52%	F
46	Springer Rd: El Monte Ave/Cuesta Dr	7,700	14,200	84%	E
47	Whisman Rd: Middlefield Rd/Central Expwy	27,200	35,000	29%	F

Deficiency GP-TRA-5: Implementation of the East Whisman Precise Plan would result in deficient roadway segment levels of service at six additional segments not identified in the General Plan EIR.

Deficiency GP-TRA-6: Implementation of the East Whisman Precise Plan would result in increased vehicle traffic on multiple deficient freeway segments, but would not create deficiencies at freeway segments not indentified in the General Plan EIR.

Deficiency GP-TRA-7: Implementation of the East Whisman Precise Plan would result in increased vehicle traffic in Los Altos, Palo Alto and Sunnyvale, but would not create additional deficiencies in jurisdictions not identified in the General Plan EIR.

Intersection Operation: Free Flow

Degree of Delay: Negligible Delays

Intersection Operation: Stable Flow

Degree of Delay: Minimal Delays

Intersection Operation: Stable Flow

Degree of Delay: Moderate Delays

Intersection Operation: Less Stable Flow

Degree of Delay: Long Delays

Intersection Operation: Unstable Flow

Degree of Delay: Substantial Delays Can Occur

Intersection Operation: Unpredictable Flow/Wait Through Multiple Cycles

Degree of Delay: Excessive Delays Can Occur

N:\Projects_SJ17_Projects\SJ17_1724_East_Whisman_Precise_Plan_EIR\Graphics\ADOBE\SJ17-1724_Fig03_Signalized_LOS_Examples.ai

Figure 3

Signalized Intersection Level of Service Examples

July 22, 2019

Eric Anderson, Senior Planner
City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94041

Re: Draft Environmental Impact Report for East Whisman Precise Plan

Dear Eric,

Google is pleased to submit the following comments regarding the City of Mountain View's ("City") East Whisman Precise Plan ("EWPP") Draft Environmental Impact Report ("DEIR"). Our comments below are organized by section and/or exhibit number in the DEIR.

Section 2.3

- We commend and support the City's effort to provide up to 5,000 new units of housing, along with new office, parks and open space and community amenities in the EWPP area. However the stated jobs-housing ratio of 3 units/1,000 square feet of new office referenced in this section would produce total residential development in the Project area that *exceeds* the 5,000 units contemplated in the EWPP and DEIR Project Description, necessitating additional environmental analysis and potentially requiring new mitigation measures. Please confirm that the EWPP and the DEIR will allow/study up to 5,000 residential units.
    - We recommend being precise and clarifying in the DEIR that the jobs-housing ratio is 2.61 units/1,000 s.f. new office. At the June 25th Study Session, the City Council directed City staff to remove 200,000 s.f. of office use from the Employment South Character Area. As a result, to continue to achieve the EWPP's goal to produce 5,000 new homes, the jobs housing ratio increased from 2.5 to 2.61 units/1,000 s.f. City staff appears to have rounded this total up to 3/1,000 s.f. However, a 3/1,000 ratio ultimately produces 5,700 new units at full buildout—700 more residential units than the 5,000 units studied in the DEIR's analysis.
    - Calculation: A required jobs-housing ratio of 3/1,000 s.f. (for 1.8M s.f. of "standard" Development Reserve plus 1.5/1,000 s.f. for the 200,000 s.f. Affordable Housing Development Reserve) would yield 5,700 new units—a 14 percent exceedance of the 5,000 new residential units studied in the DEIR.
- Please confirm that total EWPP buildout was analyzed in the DEIR at the precise plan level and not at the Character Area level.
    - Strictly limiting new office development by Character Area may ultimately impede the large mixed-use development contemplated in the EWPP. Setting office development targets and square footage allocations at a precise plan level, rather than at the Character Area level, is more likely to provide the

flexibility project applicants need to achieve the City's mixed-use development targets.
    - The DEIR should allow for flexible development parameters rather than set explicit targets for each Character Area e.g. residential units, unit mix, neighborhood commercial, and open space. City staff and the City Council previously recognized and supported this position verbally at the June 25th Study Session.
    - Confirming that the DEIR analyzed the EWPP's total buildout at the precise plan level would not require additional environmental review or modifications to the DEIR because the EWPP implies but does not state explicitly that, the buildout analysis was conducted at the precise plan level.
    - We further note that precise plan level allocations are consistent with the DEIR's objectives to facilitate streamlined environmental review of subsequent projects within the scope of the program EIR. (DEIR, pp. 15-16.)

Section 2.3.2.6

- The school impact analysis should assume a "mix" of rental and ownership units when calculating projected future school requirements for the Mountain View-Whisman School District and Mountain View Los Altos High School District. The EWPP intends to create "a mixed-income community with a balance of renters and owners", as reflected in the Character Area development targets.
- The DEIR does not include or clarify the underlying assumptions regarding the "mix" of rental and ownership units used in the school impact analysis. However, our understanding is that the DEIR may have assumed 100% rental units in order to assess school impacts. We seek confirmation that the DEIR included some combination of rental and ownership units to calculate student generation rates and projected changes in school demands. If only rental units were assumed, the final EIR should clarify that impacts may be reduced based on a composition of rental and ownership units.
- These Section 3.2.3.6 comments also apply to sections 3.13 and 3.13.2.4

Section 3.8

- Please confirm that the DEIR used the vapor intrusion screening levels as of the date of evaluation. Because Environmental Screening Levels ("ESLs") are updated periodically, the DEIR should clarify that vapor intrusion risk should be evaluated using screening levels (e.g. Regional Water Quality Control Board ("RWQCB") ESLs) that are current at the time of evaluation, not those that are established at the time of DEIR publication. This will ensure that the most current ESLs are used to evaluate vapor intrusion potential.
- Please clarify the potential for environmental conditions to change in the future. The DEIR should clarify that if environmental conditions related to the Middlefield-Ellis-Whisman ("MEW") groundwater plume change, for example due to future remediation activities, then the requirements for future development within the MEW Study Area may be updated as necessary.
    - These Section 3.8 comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.

Section 3.8.1.4

- Please confirm that, subject to applicable approvals (or amendment prior to the finalization of the EWPP), buildings in certain areas of the EWPP--in particular in proximity to the VTA station--could be built higher than 8-stories and up to the FAA-imposed height limit.

Section 3.8.2.3

- Please modify the timing of the Vapor Intrusion Response Action Completion Report submittal. Page 130 states "Prior to commencing any construction activities within the MEW Study Area, future project developers will be required to provide a Vapor Intrusion Response Action Completion Report to the EPA for review and approval, and to the City for review. The report will document installation of the vapor control measures identified in the Vapor Intrusion Mitigation Plan, including plans and specifications, and will include a long-term operations, maintenance and monitoring plan." A Completion Report documenting installation of vapor intrusion control measures cannot be prepared prior to commencing construction activities.
    - We therefore suggest modifying this requirement to note that the Completion Report must be submitted within 90 days of completion of installation of the vapor intrusion control measures, and clarifying that the "Vapor Intrusion Mitigation Plan" will be submitted prior to commencing any construction activities.
- Please update the vapor intrusion control system requirements for properties within the MEW study area. Page 129 states "At properties within the MEW Study Area, future developers will be required to submit the following plans and controls to EPA for review and approval…A Vapor Intrusion Mitigation Plan must be prepared…At a minimum, this design would include incorporation of vapor barrier and provisions of space to accommodate active ventilation equipment…"
  We note that Table 7 of the Record of Decision (ROD) Amendment for the Vapor Intrusion Pathway specifies that for future buildings on properties where lines of evidence indicate there is no potential for vapor intrusion into the building exceeding EPA's indoor air cleanup levels, it may be appropriate to only perform air sampling after the building is constructed to confirm there is no potential vapor intrusion risk.
    - Accordingly, we suggest clarifying that air sampling may be an acceptable approach for future buildings within the MEW Study Area.
    - The above two comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.
- Please adjust the scope of the Air Monitoring Plan requirement. Page 129 indicates that the scope of the Air Monitoring Plan requirement appears to capture the same information in a typical Site Management Plan (SMP). Accordingly, if accurate, indicate that these requirements may be met through completion of the SMP.
- Please clarify the Site Management Plan Development requirement. MM-HAZ-3.1 states that "At properties identified as being impacted or potentially impacted by Recognized Environmental Conditions as part of the property-specific Phase I ESA or subsequent studies, a SMP shall be prepared…" This requirement is overly broad because it could necessitate preparation of unnecessary SMPs. For example: if a Phase I ESA Report identifies vapor intrusion as a potential concern for a site, but

subsequent soil vapor sampling shows concentrations are below applicable screening levels, an SMP would likely not be required by a regulatory oversight agency (assuming no other environmental impacts are present necessitating an SMP); additionally, not all Recognized Environmental Conditions ("RECs") relate to subsurface contamination, and those that do not, may not warrant an SMP. Accordingly, we suggest revising to clarify the following:

  - Only RECs pertaining to significant contaminated soil, soil vapor and/or groundwater at a property should prompt an SMP.
  - Amend MM-HAZ-3.1 to allow for a more flexible SMP requirement based on the professional judgement of the environmental professional and/or determination by the City based on the available site-specific environmental information.
  - These two comments also apply to Section 6.3 of the Screening Level Phase I Environmental Site Assessment prepared for the EWPP and included as Appendix F to the DEIR.

- Please revise and specify the requirements for approval of a SMP. MM-HAZ-3.1 requires that every SMP be submitted and approved by a regulatory agency. However, even if the REC is significant enough to require an SMP, regulatory agencies often decline to be involved in redevelopment projects.
  - We suggest revising this mitigation measure to clarify that the developer would need to obtain either agency approval of the SMP or documentation of a regulatory agency's decision declining involvement in the project.
  - MM-HAZ-3.1 also requires that the City review and approve every SMP, even after a regulatory agency has overseen cleanup and reviewed and approved the SMP. This may significantly burden and unnecessarily delay the permitting process for development.

Section 3.10.2.3

- Please confirm the proposed East Whisman Mixed Use Zone reflects the ultimate development potential allowed under EWPP. Specifically, amend to state "Intensity (residential); 1.0 FAR (approximately 40 DU/ac or 40-80 residents per acre); intensities up to 1.85, 2.0, 2.5 or 3.5 FAR (and corresponding increase in DU/ac density) may be permitted with measures for highly sustainable development, public benefit and/or mixed use as specified within zoning ordinances or precise plan standards."

Table 3.14-9

- Please confirm that the VMT calculations in Table 3.14-9 and Impacts TRA-5 and 6 incorporated applicable CEQA Guidelines provisions. Specifically, the DEIR provides that ad-hoc VMT significance thresholds were used for the analysis. (DEIR, pp. 218-19.) However, CEQA Guidelines § 15064.3(b)(1) provide that, generally, projects within a half-mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Additionally, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
  - Thus, did the VMT analysis account for the fact that significant portions of the EWPP are located within a half-mile of major transit stops and existing high

quality transit corridors? Did the VMT analysis determine if the project would result in a decrease in VMT as compared to existing conditions?
    - Pursuant to CEQA Guidelines § 15064.3(b)(1), which areas in the EWPP were presumed to have a less than significant transportation impact? A map or figure in the DEIR would be helpful to illustrate these areas within East Whisman.

Appendix H

- Please explain how a long-term trip cap of 0.7 is achievable. We are concerned that the ultimate objective of a 0.7 trip cap ratio is a potentially unachievable outcome (based on the detail of the analysis included in the DEIR), and therefore may not be representative of actual potential impacts.
- Please resolve trip cap discrepancies in the EWPP DEIR analysis and Transportation Impact Analysis ("TIA"). The EWPP mentions a short-term trip cap of 1.1 and a long-term trip cap of 0.7, but the TIA mentions a short-term trip cap of 1.0. (see Table 43 among others). Please confirm which is correct, and which should be relied upon for determining threshold triggers for the trip cap.
- Please clarify how trip caps will be implemented, enforced, and monitored: Having a short-term and long-term trip cap can be confusing for developers planning a phased build out.
    - Please confirm that trip cap monitoring and enforcement will be on a project-specific basis. Such confirmation would allow developers to meet their single-occupancy vehicle targets.
    - Please explain how and when the City plans to transition from the short-term to long-term ratios and how the ratios will be enforced.
    - We suggest tying the transition to long-term trip cap to specific actions, such as VTA Light Rail Transit improvements, or other transit-related improvements.
- Clarification: In regards to VMT impact, page 147 of the Appendix H says the following: *"To reduce the potential project generated VMT impact would involve changes to the project description, or to previously adopted policies (see Chapter 12 for additional discussion of the potential modifications to reduce VMT impacts)."* Given this statement mentions potential changes to the project description, please clarify what the potential modifications to reduce VMT impacts would involve and produce, and which *"previously adopted policies"* apply to this issue. Such a clarification would allow developers to plan their build out while complying with the EWPP and avoiding project delays.
- Please include a summary of the assumptions used in the trip generation rates. These assumptions should include an explanation of the trip generation methodology, whether ITE trip generation rates were used, what land use categories were used as inputs, and mode split used, among others. Such a summary would clarify how the trip caps were established and what actions developers plan for to comply with those trip caps.

Miscellaneous Corrections

- Table 2.3-1: EWPP Growth shows that the EWPP adds 99 single family homes in the Village Center Character Area. Although the EWPP includes 100 units in this Character Area, such new units will be multi-family or townhouses/rowhouses, not single-family, as per Table 4 of the EWPP.
- Section 2.3.1: There are four character areas not three.

- Section 2.3.3.2: *Transportation Demand Management* - Non-Residential Standards. Clarify intended uses of "will" and "may." This section has conflicting statements. The bullet list of actions that **will** be included in the TDM program identifies "monetary incentives such as transit passes for employees" and "parking cash out or parking fees." But the following statement indicates that parking cash-out and paid parking **may** be included (implying it is not required).
    - Please clarify if parking cash out and/or parking fees must be included in the TDM program.
- Section 3.8.2.3: Page 128, change "TCEMEW" to "MEW."
- Section 3.10.2.3: TDM Measures should be referenced consistently: The DEIR provides that the "precise plan includes Transportation Demand Management (TDM) measures for future development," but there is no mention of TDM in the Transportation and Traffic section (3.14).
- Section 3.13.2.5: Clarify that land dedications, in lieu fees, or some combination of both may be used to satisfy Quimby Act park dedication requirements.

Thank you for your time and consideration of these comments.

Sincerely,

Michael Tymoff

Michael Tymoff
Real Estate District Development Director - Mountain View
Google

cc: Aarti Shrivastava, Assistant City Manager/Community Development Director
Martin Alkire, Principal Planner, Community Development

All appendices and hardcopies of this report can be viewed at:

Community Development Department
First Floor, City Hall
500 Castro Street
Mountain View, CA 94041

Monday – Friday
8 a.m. to 4 p.m.

Electronic copies of appendices are available on request:
Eric.Anderson2@mountainview.gov

Exhibit B

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

FOR THE

EAST WHISMAN PRECISE PLAN PROJECT ENVIRONMENTAL IMPACT REPORT

CITY OF MOUNTAIN VIEW
NOVEMBER 2019

Findings of Fact

INTRODUCTION

To support a decision on a project for which an environmental impact report (EIR) is prepared, a lead or responsible agency must prepare written findings of fact (Findings) for each significant effect on the environment identified in the EIR (Section 21081 of the Public Resources Code). The City of Mountain View, as the lead agency, has prepared these Findings for the East Whisman Precise Plan Project. The Findings must be adopted by the Mountain View City Council.

Public Resources Code Section 21081 states that no public agency shall approve or carry out a project for which an EIR that has been certified identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The State California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Section 15091), list the possible Findings as follows:

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

- Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

CEQA Guidelines Section 15093 further provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

PROJECT BACKGROUND AND OVERVIEW

The proposed project consists of City-initiated revisions to the Mountain View 2030 General Plan to add a new East Whisman Mixed-Use designation. It would also consolidate the zoning designations included in the project area into a single East Whisman Precise Plan zoning district, under Section 36.22 of the City's Municipal Zoning Ordinance.

The proposed Precise Plan would allow an increase in the intensity of office, commercial, hotel, and residential uses within the area. Specifically, the proposed Precise Plan would include up to 2.1 million square feet of net new office uses (and assumes conversion of approximately 2.2 million square feet of industrial and R&D space to office uses), 100,000 square feet of retail uses, 200 hotel rooms, and 5,000 multi-family residential units.

The project does not include a specific development proposal at this time. If the Council certifies the Final EIR and approves the East Whisman Precise Plan, future development proposals would be subject to City review and additional public hearings. The approvals required for a future development project could include Demolition Permits, Development Review Permits, Planned Community Permits, Tentative Map Permits, Grading Permits, and Heritage Tree Removal Permits.

In accordance with CEQA Guidelines, a Notice of Preparation (NOP) was circulated to the public and responsible agencies for input regarding the analysis in the Draft EIR from August 17, 2017 through September 15, 2017, and a public EIR scoping session for the project was held on September 7, 2017. The Draft EIR was circulated for public review for a 45-day comment period, which commenced on June 7, 2019 and ended on July 22, 2019 (Citation 1).

Formal written responses to each of the comments received during the comment period are included in the Final EIR, as well as text revisions to the Draft EIR.

No substantial changes to the Draft EIR were required, and the Final EIR includes the entire Draft EIR by reference. The Final EIR was made available to the public on September 20, 2019.

RECIRCULATION NOT REQUIRED

An EIR is adequate as long as it provides specific response to all specific questions about significant environmental issues, and as long as the EIR, as a whole, reflects a good faith effort at full disclosure. "Recirculation is not required where the new information added to an EIR merely clarifies or amplifies or makes insignificant modification in an adequate EIR." (CEQA Guidelines Section 15088.5(a).)

The EIR is not inadequate nor did any of the commenters disclose any new significant information that would require recirculation of the EIR. No new significant or substantially more severe environmental impacts have been identified that would result from the Project or from an alternative or a new mitigation measure proposed as part of the Project. Moreover, no new feasible mitigation measures or alternatives have been identified that are considerably different from others previously analyzed and would clearly lessen the significant environmental impacts of the Project that the City and the applicant have declined to implement. All of the responses to comments contained in this Final EIR merely provide information that clarifies and amplifies the evaluation of impacts contained in the Draft EIR.

INCORPORATION BY REFERENCE

The Final EIR is hereby incorporated into these Findings in its entirety. Without limitation, this incorporation is intended to elaborate on the comparative analysis of alternatives, the basis for determining the significance of impacts, the scope and nature of mitigation measures, and the reasons for approving the project.

RECORD OF PROCEEDINGS

Various documents and other materials constitute the record of proceedings upon which the City Council bases its findings and decisions contained herein, including, without limitation, the Draft EIR, and the Final EIR. The documents related to the project are located in the offices of the City of Mountain View, Community Development Department, 500 Castro Street, Mountain View, California, 94039.

FINDINGS

These Findings are based on substantial evidence contained in the Final EIR for the East Whisman Precise Plan Project, relevant technical studies supporting the EIR's analysis, and other supporting documentation included in the administrative record. As previously stated, the Draft EIR addresses the potential effects on the environment that are associated with the project, and the Final EIR includes the Draft EIR comments received on the Draft EIR and text revisions to the Draft EIR. These documents, as well as relevant technical studies, are available for review at the City of Mountain View Community Development Department. This section provides a summary of the significant environmental effects of the project that are discussed in the EIR and provides written findings for each of those significant effects accompanied by a brief explanation of the rationale for each finding.

SUMMARY OF IMPACTS

The Final EIR indicated that significant effects on the environment to the following environmental resources would occur if the project were implemented:

- Air Quality (construction tonic air contaminants, including dust and diesel exhaust)
- Hazardous Materials (existing contamination)
- Noise and Vibration (groundborne vibration)
- Transportation (light rail delay)
- Transportation (transit delay at intersections with a deficient level of service)
- Transportation (project-level VMT)
- Cumulative Transportation (cumulative-level VMT)
- Utilities (infrastructure impacts)

The environmental impacts listed above would be reduced to less-than-significant levels through the incorporation of mitigation measures into the project for all impacts except those related to transit delay at intersections with a deficient level of service and Project-level and cumulative-level VMT. A Statement of Overriding Consideration has been prepared for the significant, unavoidable impacts. The mitigation measures are listed under each of the impacts below and are included in a Mitigation Monitoring and Reporting Program, which has been prepared separately from these findings (Citation 2).

Significant Impacts that are Mitigated to Less-Than-Significant Levels

The Final EIR identifies the following significant adverse impacts that are reduced to a less-than-significant level by the mitigation measures identified in the Final EIR. Impact TRA-4 would be reduced to no impact with mitigation, as also described below.

AIR QUALITY IMPACTS

Impact AQ-3: Emissions of criteria pollutants during construction of future project under the Precise Plan could exceed Bay Area Air Quality Management District (BAAQMD) thresholds and result in a significant impact.

Mitigation

The following mitigation measure is included in the project to reduce emissions during project construction to a less-than-significant level.

MM AQ-3.1: Construction criteria pollutant and toxic air contaminant quantification shall be required on individual projects developed under the Precise Plan once construction equipment and phasing details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. Reductions in emissions can be accomplished through, not limited to, the following measures:

- Construction equipment selection for low emissions;
- Use of alternative fuels, engine retrofits, and added exhaust devices;
- Low-VOC paints;
- Modify construction schedule; and
- Implementation of BAAQMD Basic and/or Additional Construction Mitigation Measures for control of fugitive dust.

Impact AQ-4: Health risks associated with exposure to toxic air contaminants (TACs) during temporary construction activities associated with development under the Precise Plan could significantly impact sensitive receptors.

Mitigation

Implementation of MM AQ-3.1 during development of future projects under the Precise Plan would reduce TAC-related health impacts at sensitive receptors to a less than significant level.

HAZARDOUS MATERIALS IMPACTS

Impact HAZ-3: Future construction and demolition activities could expose construction workers, the environment, and area residents to potentially unacceptable health risks from contaminated groundwater, soils, and soil gas.

Mitigation

The following mitigation measure is included in the project to reduce hazardous materials impacts to a less-than-significant level.

MM HAZ-3.1: Prior to the start of any redevelopment activity, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with ASTM Standard Designation E 1527-13 (or the standard that is effective at the time the Phase I ESA is conducted) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor, and/or groundwater quality studies shall subsequently be conducted, if warranted based on the findings of the property-specific Phase I ESAs, to evaluate if mitigation measures are needed to protect the health and safety of construction workers, the environment, and area residents.

At properties identified as being impacted or potentially impacted by Recognized Environmental Conditions pertaining to contaminated soil, soil vapor and/or groundwater (based on the professional judgement of the environmental professional and/or determination by the City based on the property-specific Phase I ESA or subsequent studies), a Site

Management Plan (SMP) shall be prepared prior to development activities to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction activities. The SMP shall be prepared by an Environmental Professional and submitted to the overseeing regulatory agency (e.g., U.S. Environmental Protection Agency, Regional Water Quality Control Board and/or County Department of Environmental Health) for review and approval prior to commencing construction activities. Management of site risks during earthwork activities in areas where impacted soil, soil vapor, and/or groundwater are present or suspected, shall be described. Worker training requirements, and health and safety measures shall be described. The SMP shall also be submitted to the City of Mountain View Planning Division for review. The project developer shall also submit to the City agency approval of the SMP or provide documentation of a regulatory agency's decision declining involvement in the project.

NOISE IMPACTS

Impact NOI-4: Construction activities during implementation of the Precise Plan could result in significant groundborne vibration-related impacts to existing structures.

Mitigation

The following mitigation measure is included in the project to reduce noise impacts to a less-than-significant level.

MM NOI-4.1: Use drilled piles (which cause lower vibration levels) where geological conditions permit their use. In areas where project construction is anticipated to include vibration-generating activities, such as pile driving or use of vibratory rollers, in close proximity to existing structures, site-specific vibration studies should be conducted to determine the area of impact and to identify appropriate mitigation measures which may include the following:

- Identification of sites that would include vibration compaction activities such as pile driving and have the potential to generate ground-borne vibration, and the sensitivity of nearby structures to ground-borne vibration. Vibration limits should be applied to all vibration-sensitive structures located within 200 feet of the project. A qualified structural engineer should conduct this task.
- Development of a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions.
- Construction contingencies would be identified for when vibration levels approached the limits.

- At a minimum, vibration monitoring should be conducted during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.
- Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

TRANSPORTATION IMPACTS

Impact TRA-4: Street C would result in increased light rail vehicle delay due to the slower train speeds through the crossing, disrupting the existing facility.

Mitigation

The following mitigation measure is included in the project to entirely avoid light rail vehicle delay-related impacts; thus, there would be no impact.

MM TRA-4.1: The proposed Street C shall be removed from the Precise Plan and replaced with a grade-separated multi-use path (public pedestrian and bicycle access). This improvement would eliminate disruption of the existing light rail facility and there would be no impact.

UTILITIES IMPACTS

Impact UTL-1: Future large-scale, site-specific development projects associated with implementation of the Precise Plan could result in impacts to the existing water, sewer, and storm drainage infrastructure. Proposed new development may require upsizing and/or improvements to nearby water distribution, sewer, and storm drainage infrastructure to accommodate growth associated with larger projects.

Mitigation

The following mitigation measure is included in the project to reduce water, sewer, and stormwater infrastructure impacts to a less-than-significant level.

MM UTL-1.1: The City shall require, determined on a project by project basis, the preparation of a site-specific utility analysis of applicable water, sewer, and stormwater infrastructure systems adjacent to and downstream of the project site to identify capacity issues. The utility impact analysis will be submitted to the Planning Division as part of future project applications. The analysis will determine the proportional utility impact fees to be paid under the nexus

study and will identify any other utility infrastructure improvements required as a result of individual projects.

Finding

Mitigation measures have been incorporated into the project that avoid or reduce the above described significant impacts to a less-than-significant level (or no-impact level). The City of Mountain View hereby finds that implementation of the mitigation measures described above are feasible and are hereby adopted and incorporated into the project. Adoption of these mitigation measures will reduce impacts to a less-than-significant of no-impact level by requiring mitigation measures of future development under the Precise Plan.

Significant and Unavoidable Impacts

The Final EIR identifies the following significant and unavoidable impacts.

TRANSPORATION IMPACTS

Impact TRA-3: Implementation of the Precise Plan would have a significant and unavoidable effect on transit vehicle operations, in particular at those intersections with a deficient level of service.

Finding

The Santa Clara Valley Transportation Authority (VTA) will make transit service changes over time based on ridership performance standards and land use density targets. Increased or modified public transit service is reviewed and approved by a publicly appointed decision body (i.e., the VTA board). Transit operational improvements, such as signal coordination and transit vehicle preemption, could reduce the magnitude of peak-hour congestion on transit operations and potentially improve the overall reliability of transit in congested areas. Operational and service improvements within the Precise Plan area would not fully mitigate impacts to a less than significant level; therefore, the impact remains significant and unavoidable.

Impact TRA-5: The Precise Plan would result in a project-level and cumulative VMT impact due to project generated VMT on both a citywide and countywide level.

Finding

East Whisman is currently an employment-centric area with no residents and over 15,000 jobs, as compared to City of Mountain View's average of 0.97 jobs-to-residents ratio and Santa Clara County's average of 0.53 jobs-to-residents ratio. Transportation Demand Management (TDM)

programs and land use changes would be needed to achieve at least a 15 percent reduction in the Precise Plan VMT per capita below countywide thresholds.

To reduce the potential project generated VMT impact on both a project-level and cumulative basis, the following actions could be taken: increase the TDM effectiveness requirements or modify the project size and/or land use mix. Given the difficulty of increasing TDM requirements even greater than what is required in the Precise Plan and the land use changes proposed as part of the Precise Plan, neither an increased TDM effectiveness requirement, or additional housing is considered feasible mitigation; therefore, the VMT impact remains significant and unavoidable.

ALTERNATIVES TO THE PROPOSED PROJECT

In addition to the project, the following alternatives were evaluated in the Draft EIR, and are more fully described in Section 6.0 of the Draft EIR.

No Project Alternative: Under the No Project Alternative, development would occur consistent with the current General Plan and zoning in the East Whisman area. The constraining factor on development is the zoning, which is predominantly ML (Limited Industrial), allowing up to 0.35 FAR for office, R&D and light industrial uses. Additional FAR consistent with the General Plan would require rezoning. The General Plan identified an increase in office intensity for the area (and no residential uses) for the East Whisman Change Area. However, the existing zoning only supports about 100,000 square feet of additional office floor area, and the intensification of employment density within existing light industrial and R&D buildings. Implementation of infrastructure projects described in the General Plan and funded by development fees would continue.

Finding

The No Project Alternative, while feasible, could result in more severe VMT impacts; though, it would reduce the significant, unavoidable transit delay impact. It would not meet any project objectives related to creating a mixed-use, transit-oriented development. For all these reasons, the No Project Alternative is considered infeasible and is not adopted.

Additional Housing Alternative: East Whisman is currently an employment-centric area with a no residents and over 15,000 jobs, as compared to City of Mountain View's average of 0.97 jobs-to-residents ratio and Santa Clara County's average of 0.53 jobs-to-residents ratio. The proposed addition of 5,000 units in East Whisman would bring the Precise Plan ratio closer to the City and County average. The Additional Housing Alternative evaluates the additional residential development needed to achieve at least a 15 percent reduction in VMT per capita below Existing Conditions. This alternative assumes:

- 7,500 housing units (2,500 more than the proposed Precise Plan)
- 2.2 million square feet of existing R&D and industrial space rebuilt/re-occupied as office space (no net new office space, whereas the Precise Plan proposes 2.1 million square feet)
- 100,000 square feet of retail and restaurant uses (same as the proposed Precise Plan)
- 200 hotel rooms (same as the proposed Precise Plan)

Finding

This alternative would reduce the significant and unavoidable VMT impact to a less than significant level. The transit delay impact would remain significant due to increases in area traffic. The already less than significant greenhouse gas (GHG) emissions impact would be further lessened. The Additional Housing Alternative would meet project objectives related to creating a mixed-use, transit-oriented development; however, the lack of office development would not be consistent with the specified General Plan East Whisman Change area policies calling for greater office intensity. In addition, based on economic feasibility analyses, residential development has a lower return than office development, so some office development may be necessary to create the full range of public improvements envisioned by the Precise Plan. For these reasons, the Additional Housing Alternative is considered infeasible and is not adopted.

Reduced Office Alternative: The Reduced Office Alternative would include 1.7 million square feet of net new office space (as compared to the proposed project's 2.1 million square feet), 2.2 million square feet of existing R&D and industrial space rebuilt/re-occupied as office space, and would include the same 5,000 housing units, 100,000 square feet of retail and restaurant space, and 200 hotel rooms as the proposed project. The Reduced Office Alternative would represent a 26 percent reduction in the amount of office space allowed in the Precise Plan area.

Finding

While temporary construction-related air pollutant and GHG emissions would be less, the Reduced Office Alternative would increase the severity of the operational VMT impact on an areawide and citywide basis, with countywide VMT being slightly less but still above the impact threshold. GHG emissions per service population would also increase. The Reduced Office Alternative would meet project objectives related to creating a mixed-use, transit-oriented development; though with lesser office intensity. For all these reasons, the Reduced Office Alternative is considered infeasible and is not adopted.

Environmentally Superior Alternative(s): Based upon the above discussion, the No Project Alternative would be the environmentally superior alternative. This alternative, however,

would not fully fulfill of the Precise Plan's objectives for the density of new residential units in the area, and, as explained above, the Council finds it to be infeasible for that reason.

The Additional Housing Alternative would be the environmentally superior alternative (out of the analyzed alternatives) because it would reduce significant, unavoidable VMT impact to a less than significant level, though not the significant transit delay impact. Though temporary air pollutant and GHG emissions would be higher due to additional construction, the already less than significant GHG impact would be further lessened. The Additional Housing Alternative would meet project objectives related to creating a mixed-use, transit-oriented development; however, this alternative would not be consistent with the specified General Plan East Whisman Change area policies and Draft EIR objectives calling for greater office intensity, and may not create the full range of public improvements envisioned by the Precise Plan.

SIGNIFICANT UNAVOIDABLE IMPACTS

The Final EIR and the CEQA Findings of Fact conclude that implementing the East Whisman Precise Plan will result in certain significant impacts to the environment that cannot be avoided or substantially lessened with the application of feasible mitigation measures or feasible alternatives. A Statement of Overriding Considerations is therefore necessary to comply with CEQA, Public Resources Code, Section 21081, and the State CEQA Guidelines, Section 15093. The significant and unavoidable impacts and the benefits related to the Precise Plan are described below. The City Council has carefully weighed these impacts and benefits and finds that the benefits of implementing the Precise Plan outweigh the following significant and unavoidable environmental impacts.

- **Transportation: Transit Vehicle Delay Impacts -** Implementation of the Precise Plan would result in a significant and unavoidable effect on transit vehicle operations at intersections with a deficient level of service.

- **Transportation: Project-level and cumulative-level VMT** - Impacts due to project generated VMT on both a citywide and countywide basis.

The City Council finds that each of the following specific economic, legal, social, technological, environmental and other considerations and benefits of the Precise Plan, separately and independently, outweigh the unavoidable adverse environmental effects of the project, and each one is an overriding consideration independently warranting project approval. The Council finds that the significant unavoidable impacts of the project are overridden by each of these individual considerations, standing alone. The significant unavoidable environmental effects remaining after adoption of mitigation measures are considered acceptable in light of these significant benefits of the Precise Plan, as described in this statement of overriding considerations.

STATEMENT OF OVERRIDING CONSIDERATIONS

The City of Mountain View finds that the East Whisman Precise Plan Project has benefits that outweigh the significant, unavoidable impacts identified above. The benefits of the project are:

A. Includes significant new land use strategies in the area such as "character area targets" that blend a mix of uses with multimodal transportation options for new residents and employees. These strategies will allow area residents and employees to make local trips in the area by walking and biking. This will help reduce the area's vehicle miles travelled per capita and use of private automobiles, thereby helping achieve longer-range goals to lessen air pollution, traffic impacts, and greenhouse gas emissions;
B. Improves the area's and City's job-housing balance by allowing up to 5,000 new units in East Whisman, and a jobs-housing linkage program ensuring they will be provided prior to new office development;
C. Provides a strategy to increase the amount of affordable housing in the area; and
D. Sets requirements for new public parks and open spaces, providing valuable passive and active recreation amenities for nearby residents.

SUMMARY

- Based on the foregoing Findings and the information contained in the record, the City Council has made the following findings with respect to each of the significant effects of the project:

  - Changes or alterations have been required in, or incorporated into, the project, which avoid or mitigate the significant effects on the environment to a less-than-significant level.

  - To the extent that those changes or alterations are within the responsibility and jurisdiction of another public agency, those changes have been, or can and should be, adopted by that other agency.

  - Based on the foregoing Findings and the information contained in the record, it is determined that all significant effects on the environment due to the approval of the project have been eliminated or substantially lessened to a less-than-significant level, with the exception of the significant unavoidable transit delay and vehicle miles travelled impacts listed on the preceding pages for which a Statement of Overriding Consideration is adopted.

CITATIONS

1. City of Mountain View. 2019. Draft Environmental Impact Report for the City of Mountain View East Whisman Precise Plan Project.
2. City of Mountain View. 2019. Mitigation Monitoring and Reporting Program for the City of Mountain View East Whisman Precise Plan Project.

CITY OF MOUNTAIN VIEW

MITIGATION MONITORING & REPORTING PROGRAM
East Whisman Precise Plan Project
State Clearinghouse #2017082051

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
Air Quality Impacts				
Impact AQ-3: Emissions of criteria pollutants during construction of future project under the Precise Plan could exceed Bay Area Air Quality Management District (BAAQMD) thresholds and result in a significant impact.	**MM AQ-3.1:** Construction criteria pollutant and toxic air contaminant quantification shall be required on individual projects developed under the Precise Plan once construction equipment and phasing details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. Reductions in emissions can be accomplished through, not limited to, the following measures: • Construction equipment selection for low emissions; • Use of alternative fuels, engine retrofits, and added exhaust devices; • Low-VOC paints; • Modify construction schedule; and Implementation of BAAQMD Basic and/or Additional Construction Mitigation Measures for control of fugitive dust.	Project applicant and contractors implementing the project	Measures will be required to be implemented as part of demolition and development permits. Measures will be printed on all construction documents, contracts, and project plans prior to issuance of permits. Oversight of implementation by the City's Community Development Department.	Prior to and during any construction activities, as specified
Impact AQ-4: Health risks associated with exposure to TACs during temporary construction activities associated with development under the Precise Plan could significantly impact sensitive receptors.	Implementation of MM AQ-3.1 during development of future projects under the Precise Plan would reduce TAC-related health impacts at sensitive receptors to a less than significant level.			

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
Hazards and Hazardous Materials Impacts				
Impact HAZ-3: Future construction and demolition activities could expose construction workers, the environment, and area residents to potentially unacceptable health risks from contaminated groundwater, soils, and soil gas.	**MM HAZ-3.1:** Prior to the start of any redevelopment activity, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with ASTM Standard Designation E 1527-13 (or the standard that is effective at the time the Phase I ESA is conducted) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor, and/or groundwater quality studies shall subsequently be conducted, if warranted based on the findings of the property-specific Phase I ESAs, to evaluate if mitigation measures are needed to protect the health and safety of construction workers, the environment, and area residents. At properties identified as being impacted or potentially impacted by Recognized Environmental Conditions pertaining to contaminated soil, soil vapor and/or groundwater (based on the professional judgement of the environmental professional and/or determination by the City based on the property-specific Phase I ESA or subsequent studies), a Site Management Plan (SMP) shall be prepared prior to development activities to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction activities. The SMP shall be prepared by an Environmental Professional and submitted to the overseeing regulatory agency (e.g., U.S.	Project applicant and contractors implementing the project.	Project will be evaluated during the development review and entitlement process to identify their compliance with this measure. Measures will be required as part of demolition and development permits, as applicable. Measures will be printed on all construction documents, contracts, and project plans prior to issuance of permits. Oversight of implementation by the City's Community Development Department, EPA, RWQCB, and/or County Department of Environmental Health	Prior to the approval of grading permits.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	Environmental Protection Agency [EPA], Regional Water Quality Control Board [RWQCB] and/or County Department of Environmental Health) for review and approval prior to commencing construction activities. Management of site risks during earthwork activities in areas where impacted soil, soil vapor, and/or groundwater are present or suspected, shall be described. Worker training requirements and health and safety shall be described. The SMP shall be submitted to the City of Mountain View Planning Division for review. The project developer shall also submit to the City agency approval of the SMP or provide documentation of a regulatory agency's decision declining involvement in the project.			
Noise and Vibration				
Impact NOI-4: Construction activities during implementation of the Precise Plan could result in significant groundborne vibration-related impacts to existing structures.	**MM NOI-4.1:** Use drilled piles (which cause lower vibration levels) where geological conditions permit their use. In areas where project construction is anticipated to include vibration-generating activities, such as pile driving or use of vibratory rollers, in close proximity to existing structures, site-specific vibration studies should be conducted to determine the area of impact and to identify appropriate mitigation measures which may include the following: • Identification of sites that would include vibration compaction activities such as pile driving and have the potential to generate ground-borne vibration, and the sensitivity of	Project applicant and contractors implementing the project	Measures will be required to be implemented construction and development permits. Measures will be printed on all construction documents, contracts, and project plans prior to issuance of permits. Oversight of implementation by the City's Community Development Department.	During construction activities, as specified

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	nearby structures to ground-borne vibration. Vibration limits should be applied to all vibration-sensitive structures located within 200 feet of the project. A qualified structural engineer should conduct this task. • Development of a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. • Construction contingencies would be identified for when vibration levels approached the limits. • At a minimum, vibration monitoring should be conducted during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures. • Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.			

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
Transportation				
Impact TRA-4: Street C would result in increased light rail vehicle delay due to the slower train speeds through the crossing, disrupting the existing facility.	**MM TRA-4.1:** The proposed Street C shall be removed from the Precise Plan and replaced with a grade-separated multi-use path (public pedestrian and bicycle access). This improvement would eliminate disruption of the existing light rail facility and there would be no impact.	The Adopted Precise Plan reflects this change. The multi-use path may be constructed by the City or project applicants during construction of adjacent projects	Oversight of implementation by the City's Community Development Department and/or implementation of the improvement through the City's Capital Improvement Program by the Public Works Department.	As adjacent properties redevelop
Utilities and Service Systems				
Impact UTL-1: Future large-scale, site-specific development projects associated with implementation of the Precise Plan could result in impacts to the existing water, sewer, and storm drainage infrastructure. Proposed new development may require upsizing and/or improvements to nearby water distribution, sewer, and storm drainage infrastructure to accommodate growth associated with larger projects.	**MM UTL-1.1:** The City shall require, determined on a project by project basis, the preparation of a site-specific utility analysis of applicable water, sewer, and stormwater infrastructure systems adjacent to and downstream of the project site to identify capacity issues. The utility impact analysis will be submitted to the Planning Division as part of future project applications. The analysis will determine the proportional utility impact fees to be paid under the nexus study and will identify any other utility infrastructure improvements required as a result of individual projects.	Project applicant and contractors implementing the project	Measures will be required to be implemented as part of development permits based on the findings of the future site-specific utility studies and public works requirements. Measures will be printed on all construction documents, contracts, and project plans prior to issuance of permits. Oversight of implementation by the City's Community Development Department and Public Works Department.	Prior to and during any construction activities, as specified

SOURCE: City of Mountain View. East Whisman Precise Plan Draft Environmental Impact Report (EIR). June 2019. and Final EIR. September 2019.