Attachment 1

CITY OF MOUNTAIN VIEW
RESOLUTION NO.
SERIES 2018

A RESOLUTION CERTIFYING THE 700 EAST MIDDLEFIELD ROAD LINKEDIN OFFICE PROJECT ENVIRONMENTAL IMPACT REPORT (EIR) AND ADOPTING CEQA FINDINGS, INCLUDING A STATEMENT OF OVERRIDING CONSIDERATIONS, MITIGATION MEASURES, AND A MITIGATION MONITORING OR 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 700 East Middlefield Road LinkedIn Office Project; 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 16, 2018, 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 October 17, 2018; and

WHEREAS, the Environmental Planning Commission held a public hearing on November 7, 2018 on said application, and recommended approval to the City Council subject to the required findings; and

WHEREAS, the City Council held a public hearing on November 27, 2018 on said Project and the Final EIR, and received and considered all evidence presented at said hearing, including 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 impact to 46 freeway segments under Existing with Project conditions, 2 intersections under Background with Project conditions and 5 intersections and 49 freeway segments under Near-Term Cumulative with Project conditions for which a Statement of Overriding Considerations has been adopted; and

WHEREAS, a Statement of Overriding Considerations has been prepared which finds that the benefits of the Project outweigh the significant unavoidable impact caused by the Project; and

WHEREAS, the Final EIR, Statement of Overriding Considerations, and the Mitigation Monitoring or Reporting document for the 700 East Middlefield Road LinkedIn Office Project were presented to the Environmental Planning Commission on November 7, 2018, and the Environmental Planning Commission 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 or 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, attached hereto as Exhibit A, has been completed in compliance with CEQA, reflects the independent judgment and analysis of the City; and

2. Adopts the CEQA Findings of Fact and Statement of Overriding Considerations for the Project, attached hereto as Exhibit B, which findings are incorporated by reference herein; and

3. 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 46 freeway segments under Existing with Project conditions, 2 intersections under Background with Project conditions and 5 intersections and 49 freeway segments under Near-Term Cumulative with Project conditions, 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

4. Finds that the 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; and

5. Adopts a Mitigation Monitoring or Reporting Program for the Project, attached hereto as Attachment C.

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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DP/2/RESO
807-11-27-18r

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

Exhibit A

Draft Environmental Impact Report
700 East Middlefield Road LinkedIn Office Project
State Clearinghouse # 2017092025

CITY OF MOUNTAIN VIEW

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

May 2018

CITY OF MOUNTAIN VIEW

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Project Title: LinkedIn Office Project (SCH# 2017092025)
City/County: City of Mountain View, Santa Clara County, California
Public Review Period: May 31, 2018 to July 16, 2018

NOTICE IS HEREBY GIVEN that the Draft Environmental Impact Report (EIR) for the LinkedIn Office Project in the City of Mountain View is available beginning on May 31, 2018 for review and comment by the public and all interested persons, agencies, and organizations for a period of 45 days, ending July 16, 2018. All comments on the Draft EIR must be received by that date.

Project Location: The proposed project is located at 700 East Middlefield Road in the City of Mountain View, Santa Clara County, California on Assessor's Parcel Number (APNs) 165-38-001, -006, and -007. The approximately 28.7-acre project site is located on the east side of highway 237 between West Maude Avenue and East Middlefield Road.

Project Description: Request for a Rezoning from the ML (Limited Industrial) District to P (Planned Community) District to allow 0.86 FAR; a Planned Community Permit to construct three, 6-story office buildings, two 6-level parking structures (with one-level below grade), and retain three, 2-story office buildings resulting in 1.08 million sq. ft. of office at a 28.7-acre campus for LinkedIn Corporation, to replace two existing office buildings (151,364 sq. ft.) and surface parking lots; a Heritage Tree Removal Permit to remove 135 Heritage Trees. The project would result in significant and unavoidable traffic impacts to two intersections under Background With Project Conditions and five intersections under Near-Term Cumulative With Project conditions in the AM and PM peak hours. The project site is not included on lists compiled pursuant to Government Code Section 65962.5.

Availability of the Draft Environmental Impact Report: Copies of the Draft EIR will be available for review beginning on May 31, 2018 at the following locations:

- City of Mountain View, Community Development Department, 500 Castro Street, 1st Floor, Mountain View, during business hours, Monday to Friday, 8:00 AM to 4:00 PM, (650) 903-6306.
- Mountain View Public Library, 585 Franklin Street, Mountain View, CA, 94041, (650) 903-6887.
- City of Mountain View Website: https://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp

Comments may be submitted in writing to: Diana Pancholi, Senior Planner, City of Mountain View Community Development Department, 500 Castro Street, Mountain View, CA 94041, or emailed to diana.pancholi@mountainview.gov

Signature & Title: Pancholi Senior Planner Date: 05/31/2018

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EXECUTIVE SUMMARY

PROJECT LOCATION

The 28.7-acre project site is located in the East Whisman area of eastern Mountain View and includes the addresses 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue, on Assessor's Parcel Numbers (APNs) 165-38-001, -005, -006, and -007. A Caltrans easement is located on APN 165-38-005, at the corner of SR 237 and East Middlefield Road.

The project site is bordered by West Maude Avenue and the Sunnyvale Golf Course to the north, State Route (SR) 237 and the SR 237 frontage road to the west, East Middlefield Road to the south, and the City of Sunnyvale to the east.

The site is located within the East Whisman area of the City, and is surrounded by office and light-industrial uses on the south and west sides (across SR 237). Multi-family residential and office uses in the City of Sunnyvale are located east and southeast of the site. Moffett Federal Airfield is located further north of the project site across U.S. 101.

EXISTING SITE CONDITIONS

The project site currently contains approximately 466,000 square feet of office space in five one- and two-story buildings. The site also contains parking lots, utilities and landscaping. Three two-story buildings in the center of the site completed renovation in May 2017, along with associated site improvements for office use. These three buildings are currently occupied with office uses by LinkedIn, Inc.

PROJECT OVERVIEW

Two existing site buildings would be demolished, and three six-story office buildings and two seven-level parking structures would be built on the site. The three renovated two-story buildings in the central portion of the site would be retained. All surface parking lots would be removed as part of site development. Both parking structures would include one level of below-grade parking and six above-grade levels. The project would include a small retail space of up to 3,000 square feet.

The three proposed six-story office buildings would contain approximately 763,000 square feet of office space. The completed campus would be approximately 1,078,000 square feet in size, representing a net increase in development on the site of approximately 612,000 square feet.

Two of the three proposed buildings would be located along the SR 237 Frontage Road, and one building would be located at the main entrance at Middlefield Road and Bernardo Avenue, on the south end of the project site. This building would contain approximately 3,000 square feet of ground-floor retail space along Middlefield Road, which would be open to the public.

The applicant proposes to construct the project in three phases, maintaining occupancy in the three central buildings during the construction period. All building materials and construction parking would be staged on site.

2030 General Plan

The project site is currently designated as *High-Intensity Office* in the Mountain View 2030 General Plan. The project proposes a floor area ratio (FAR) of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline for the *High-Intensity Office* designation. The proposed project would be consistent with the land use designation, and would not require a General Plan amendment.

Rezoning

The project proposes rezoning the site from the existing *Limited Industrial (ML)*, to a *Planned Community (P)* zoning district, under Section 36.22 of the City's Municipal Zoning Ordinance. The *ML* zoning district allows development up to an FAR of 0.35, and the project proposes an FAR of up to 0.86. The *Planned Community* zoning would allow flexibility to implement standards and features (such as increased office density and building heights) that more closely conform to the Mountain View 2030 General Plan policy direction for the East Whisman Change Area.

The City of Mountain View is currently preparing the East Whisman Precise Plan, a zoning document that will provide standards and guidelines for the East Whisman Change Area, including the project site. The site will be rezoned to *East Whisman Precise Plan* following the Plan's adoption, anticipated to be in 2019.

SUMMARY OF SIGNIFICANT IMPACTS

The following table summarizes the ***significant*** effects of the proposed project on the environment and mitigation measures proposed to reduce the effects. A significant effect on the environment means a substantial, or potentially substantial, adverse change on the environment. Impacts that are less than significant are not described in this summary and can be found in the text of the EIR, except those less than significant impacts that have been further mitigated to some extent. A complete description of the project and of its impacts and proposed mitigation measures can be found in the text of the EIR which follows this summary.

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
Air Quality Impacts	
AQ-3: Health risks associated with exposure to Toxic Air Contaminants (TACs) during temporary construction activities could significantly impact sensitive receptors.	**MM AQ-3.1:** The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average of at least 81 percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following: • All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days shall meet, at a minimum, United States Environmental Protection Agency (EPA) particulate matter emissions standards for Tier four (4) engines or equivalent. Note that the construction contractor could use other measures to minimize construction period DPM emission to reduce the estimated cancer risk below the thresholds. The use of equipment that includes Tier two (2) engines and CARB-certified Level three (3) Diesel Particulate Filters* or alternatively-fueled equipment (i.e., non-diesel) could meet this requirement. Other measures may be the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to less than significant. (*See http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm.) **[Less than Significant Impact with Mitigation Measures Incorporated in the Project]**
Noise Impacts	
NOISE-2: The impacts of mechanical equipment noise on nearby noise-sensitive uses is conservatively considered a potentially significant impact. **[Significant Impact]**	**MM NOISE-2.1**: MECHANICAL EQUIPMENT: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's 55 dBA daytime threshold and 50 dBA nighttime threshold at the property line of the adjacent residences. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
	locating equipment in less noise-sensitive areas, such as the rooftop of the buildings away from the building's edge nearest the noise-sensitive receptors, where feasible. **[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]**
NOISE-4: Short-term construction activities during implementation of the proposed project could result in significant temporary construction noise impacts. **[Significant Impact]**	**MM NOISE-4.1**: While most construction activities will be conducted in accordance with the provisions of the City of Mountain View's General Plan and the Municipal Code, which limits temporary construction work to between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and prohibits construction on weekends and holidays, certain shutdowns and work that would interrupt utilities and major roadways may need to be completed outside the allowable hours. A condition of approval from the City must be included as part of the proposed project to allow for work to be conducted outside of these allowable hours. Additionally, the City of Sunnyvale permits construction activities between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and on Saturdays between 8:00 a.m. and 5:00 p.m. **MM NOISE-4.2:** The City shall require the construction crew to adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity. *Construction Best Management Practices* Develop and implement a construction noise control plan, including, but not limited to, the following construction best management controls: • Where construction work along the eastern boundary of the project site would be required outside the City of Mountain View's allowable construction hours, all efforts should be made to conduct the work on Saturdays between the hours of 8:00 a.m. and 5:00 p.m., in accordance with the City of Sunnyvale's allowable hours to minimize annoyance to adjacent residences located in the City of Sunnyvale. • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
	barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
	The implementation of the reasonable and feasible controls outlined above would reduce construction noise levels emanating from the site by five to 10 dBA in order to minimize disruption and annoyance. With the implementation of these measures, the temporary increase in ambient noise levels at the site would result in a less than significant impact. **[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]**
Transportation Impacts	
TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours. **[Significant Impact]**	**#5: Maude Avenue and SR 237 Ramps:** Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the project is considered to be significant and unavoidable. As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. **[Significant Unavoidable Impact]** **#20: Central Expressway and North Mary Avenue** The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a fourth lane in the eastbound direction. Adding a fourth lane in the eastbound direction would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
	significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Impact]**
C-TRANS-1: Implementation of the proposed project would result in significant impacts to five project study intersections under Near-Term Cumulative With Project conditions in the AM and PM peak hours. **[Significant Impact]**	**#2: Ellis Street / US 101 Northbound Ramps.** The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a dedicated southbound right-turn lane. Adding a dedicated southbound right-turn lane would likely require additional right-of-way, but may be able to shift and/or narrow the existing lane configuration to accommodate a right-turn lane. With this mitigation, the impact would be reduced to a less than significant level. This interchange, however, is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **#3: Ellis Street / US 101 Southbound Ramps.** The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a second eastbound right-turn lane. Adding a second eastbound right-turn lane would likely require the acquisition of additional right-of-way given the close proximity to the freeway overcrossing on one side and a development on the other. With this mitigation, the impact would be reduced to a less than significant level. However, the interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **#5: Maude Avenue and SR 237 Ramps.** Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
	highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the project is considered to be significant and unavoidable. As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. **[Significant Unavoidable Cumulative Impact]** **#8: Maude Avenue / Mathilda Avenue.** This intersection is already configured to provide substantial capacity for vehicles, with free right-turn lanes and dedicated single or dual left-turn lanes on all approaches. No further physical expansion that would reduce the project's traffic impact is considered feasible at this location, and no mitigation is proposed. Therefore, the impact would remain significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **#20: Central Expressway and North Mary Avenue**. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a fourth lane in the eastbound direction. Adding a fourth lane in the eastbound direction would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Cumulative Impact]**

SIGNIFICANT IMPACTS	MITIGATION AND AVOIDANCE MEASURES
C-TRANS-2: Implementation of the proposed project would result in significant impacts to 49 freeway segments under Near-Term Cumulative With Project conditions. **[Significant Impact]**	Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to acquire right-of-way for or to fully fund a freeway mainline improvement. Freeway improvements require approval by VTA and Caltrans, and it is outside the jurisdiction of a local agency to guarantee implementation of any improvement in the freeway right-of-way. To provide adequate funding, many sources are typically needed, which may include State Transportation Improvement Program funds for projects identified in the VTP, local agency impact fees, and/or a future regional impact fee. The City of Mountain View could potentially participate in development of a regional fee should it be proposed by regional agencies, such as VTA. For these reasons, the project's freeway impacts would remain significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

SIGNIFICANT UNAVOIDABLE IMPACTS

The project would result in the significant unavoidable impacts discussed below. All other impacts of the proposed project would be mitigated to a less than significant level with incorporation of applicable project-level mitigation measures identified in this EIR.

(Although mitigation measures are available for several of the intersection impacts, the City cannot guarantee their implementation, and therefore, the impacts remain significant and unavoidable.)

- **Intersection Impacts:**

  Under Background With Project Conditions, implementation of the proposed project would result in significant unavoidable impacts to two intersections:

  - Intersection #5: Maude Avenue / SR 237 Ramps (AM and PM peak hours)
  - Intersection #20: Central Expressway / North Mary Avenue (PM peak hour)

  Under Near-term Cumulative With Project Conditions, the project would result in significant unavoidable impacts to five intersections:

  - Intersection #2: US 101 Northbound Ramps / Ellis Street (PM peak hour)
  - Intersection #3: US 101 Southbound Ramps / Ellis Street (AM peak hour)
  - Intersection #5: Maude Avenue / SR 237 Ramps (AM & PM peak hour)
  - Intersection #8: Maude Avenue and North Mathilda Avenue (AM peak hour)
  - Intersection #20: Central Expressway / North Mary Avenue (PM peak hour)

- **Freeway Impacts:** Project traffic would add more than one percent of the freeway's capacity in either/both the AM or PM peak hour to segments currently operating at LOS F under Background With Project (46 segments), and Near-Term Cumulative With Project (49 segments).

  Although identifiable mitigation exists for these impacts, the mitigation would not add mainline capacity to the freeways, and therefore the project's impact to these freeway segments is considered significant and unavoidable.

SUMMARY OF ALTERNATIVES

CEQA requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines specify that an EIR identify alternatives which "would feasibly attain the most basic objectives of the project, but avoid or substantially lessen many of the significant environmental effects of the project," or would further reduce impacts that are considered less than significant with the incorporation of identified mitigation.

The following is a summary of the project objectives and the alternatives evaluated in this EIR. Please refer to *Section 8.0, Alternatives to the Proposed Project* for additional detail regarding these alternatives.

Project Objectives

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project. The stated primary objectives of the project proponent, LinkedIn, Inc., are:

- To provide LinkedIn a corporate headquarters location in the City of Mountain View of sufficient size of approximately one million square feet to accommodate its anticipated growth and reflective of its business.

- To provide high-quality, highly sustainable office space near public transit, with increased intensity of up to a floor area ratio (FAR) of 1.0 that targets LEED Platinum standards and incorporates a Transportation Demand Management (TDM) Plan, consistent with the 2030 General Plan and the Mountain View Greenhouse Gas Reduction Program.

- To develop a site with new high visibility office buildings that are compatible with the surrounding uses and are located close to major roadways.

- To develop office space that provides pedestrian and bicycle access to transit, and is located close to public transit and major roadways.

- To develop denser office space on the site at an increased FAR of up to 1.0 that will help the City of Mountain View both retain jobs and foster on-going job growth.

- To develop a headquarters campus location for a high-technology corporation in Mountain View, consistent with the General Plan land use planning principles of generating revenue for the City and supporting a larger, more diversified tax base in the City.

- To provide a sizeable corporate campus that supports 2030 General Plan Policies, including:

  - **LUD 3.8**: Preserved land use districts. Promote and preserve commercial and industrial districts that support a diversified economic base; and
  - **LUD 14.3:** Business attraction. Attract innovative and emerging technology businesses to the city.

- To further the 2030 General Plan's East Whisman Change Area policies, including:

  - **LUD 19.2:** Highly sustainable development. Provide incentives to encourage new or significantly rehabilitated development to include innovative measures for highly sustainable development; and
  - **LUD 19.6:** Residential transitions. Require development to provide sensitive transitions to adjacent residential uses.

- To support the VTA's investment in light rail transit by providing transit-supported development that facilitates pedestrian and bicycle access to transit.

- To incorporate several existing buildings, currently occupied by LinkedIn, into its campus development plans.

No Project Alternative: The No Project Alternative would avoid the project's significant intersection and freeway impacts. The No Project Alternative would also avoid the other less than significant (with mitigation incorporated) noise and air quality impacts of the proposed project.

The No Project Alternative would not meet any of the project's primary objectives, including those of redeveloping the site, developing high quality, highly sustainable office space, or increasing the size and employment capacity of the LinkedIn, Inc. campus.

Reduced Intensity Alternative:

To determine the percentage reduction in traffic trips that would be needed to avoid the significant intersection impacts, a TDM sensitivity test was completed. The analysis determined that the project would need to reduce trips by 80 percent to avoid all significant traffic impacts. Certain impacts, but not all, would be reduced at 30, 40, 50, and 70 percent reductions, as shown in Table 7.2-1 and 7.2-2. The project site, however, is located within an area that has multiple access points, in a location that has a lot of through traffic, and it is geographically different than other areas where higher TDM percentages are typically achieved. For these reasons, it is highly unlikely that trip reductions of 40 to 80 percent could be achieved without substantial reductions in the square footage proposed on the site.

Because of the substantially reduced square footage under the 80 percent reduction scenario, the amount of new building area would be much less, and it is anticipated that the construction air quality and noise impacts of the project could be greatly reduced. Under the other reduction scenarios, however, site clearing and disturbance would likely be similar to the proposed project.

The Reduced Intensity Alternative scenarios at 50, 70, or 80 percent would result in project sizes that would not meet the project objectives and may not be economically viable. The Reduced Intensity Alternative scenarios at 30 or 40 percent reduction would require less of a reduction in the proposed square footage, however, these amounts would also not achieve the objective of providing a headquarters campus of approximately one million square feet.

Alternatives Considered But Rejected – Location Alternative: The CEQA Guidelines encourage consideration of an alternative site when significant effects of the project might be avoided or substantially lessened (Section 15126.6(f)(2)(A)). Only locations that would avoid or substantially lessen any of the significant impacts of the project and meet most of the project objectives need be considered for inclusion in the EIR.

This size and intensity of development, however, within Mountain View could be expected to have similar freeway impacts, or possibly other traffic impacts (such as intersection impacts), as well as impacts associated with the project construction. In addition, a location alternative would not fulfill the objective of increasing the density on an existing campus for LinkedIn, since the company already has hundreds of employees located there and has invested in the current site. Since no

suitable alternative site was found that could meet the basic objectives of the project and reduce significant impacts, a feasible location alternative is not evaluated in this EIR.

Alternatives Considered But Rejected –Alternative Land Use: The proposed project site is located in the East Whisman Precise Plan area, in a sub-area known as the "South Plan Area." The project site is located within an area designated for office uses, and the existing and proposed office development on the 700 East Middlefield site has been considered in the planning and design of the draft Precise Plan.

A project alternative could consider different uses on site, such as residential or mixed use. This type of use could reduce vehicle trips to and from the site, by providing housing near jobs, but this type of development would not fulfill any of the stated objectives of the project applicant to create a modern corporate campus for the LinkedIn Corporation. Since the East Whisman Precise Plan land use planning and environmental review process is underway, residential or mixed-use development on the site would require a substantial amendment to the draft East Whisman Precise Plan. For these reasons, a feasible land use alternative is not evaluated in this EIR.

Environmentally Superior Alternative(s): The *CEQA Guidelines* state than an EIR shall identify an environmentally superior alternative. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)).

Based upon the previous discussion, the environmentally superior alternative would be the No Project Alternative, which would avoid the significant unavoidable impacts to intersection and freeway segments, and the impacts to nearby residential uses from construction, although it would not fulfill the project's objectives of redeveloping highly sustainable office space up to an FAR of 1.0 on a site served by transit and near major roadways.

The Reduced Intensity Alternative would also reduce the significant traffic impacts and impacts under Near-Term Cumulative With Project Conditions, and would partially, but not fully, meet the basic objectives of the project. Since it is slightly larger than the No Project Alternative scenario, and allows more development on the site, the Reduced Intensity Alternative would be the environmentally superior alternative.

AREAS OF KNOWN CONTROVERSY

Section 15123 of the State CEQA Guidelines requires the summary section of a Draft EIR to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The following provides a brief summary of the issues raised in comment letters received on the Notice of Preparation (Appendix A) and at the public scoping meeting.

- Include relevant projects within Sunnyvale and other neighboring jurisdictions in the background and cumulative traffic impact analyses;
- Indicate the location of the proposed retail space and identify reserve area for future retail space;

- Include VMT analysis, a robust TDM plan and evaluate the alternative modes of transportation in the traffic analysis;
- Provide exceptional pedestrian and bicycle accommodations to light rail and other nearby destinations;
- Analyze potential congestion impacts on transit travel times;
- Analysis of the following potential impacts:
  - noise impacts to nearby residents;
  - cultural resources impacts;
  - visual impacts to nearby residents;
  - air quality impacts;
  - impacts to Encinal Park in Sunnyvale

The comment letters received on the Notice of Preparation are included in Appendix B of this document. All of the substantive environmental issues raised in the Notice of Preparation comment letters have been addressed in this Draft EIR.

SECTION 1.0 INTRODUCTION

1.1 INTRODUCTION

The City of Mountain View, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the 700 East Middlefield Road LinkedIn Office project, in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (California Code Regulations, tit. 14, Section 15000 et seq.). The purpose of an EIR is to inform decision-makers and the general public of the environmental effects of the proposed 700 East Middlefield Road LinkedIn Office, to identify ways in which the significant effects might be minimized, and to identify alternatives to the project that could avoid or reduce those significant impacts.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines Section 15121(a)). As the CEQA Lead Agency for this project, the City of Mountain View is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, environmental impacts, mitigation measures, cumulative impacts, alternatives, and growth-inducing impacts. It is not the intent of an EIR to recommend either approval or denial of a project.

1.2.1 Notice of Preparation and Scoping

The City of Mountain View, as required under CEQA, encourages public participation in the environmental review process. Opportunities for comments by public agencies and the public include responding to the NOP, written comments on this Draft EIR, and presentation of written or verbal comments at public hearings.

In accordance with Sections 15063 and 15082 of the CEQA Guidelines, a Notice of Preparation (NOP) was circulated to the public and responsible agencies for input regarding the analysis in this EIR for 30 days, from September 11 to October 10, 2017. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. This Draft EIR addresses those environmental issues raised by the public and responsible agencies in response to the NOP. A copy of the NOP for the EIR is included as Appendix A of this Draft EIR. Responses to the NOP from public agencies and the public are included in Appendix B of this document.

In addition to circulation of the NOP to the public and responsible agencies, the public was invited to make comments on the proposed project at an EIR scoping meeting, held at Mountain View City Hall on September 27, 2017. In addition to this meeting that was held to provide scoping information for the Draft EIR, the proposed project has been discussed at several Environmental Planning Commission and City Council study sessions, when the public also had an opportunity to comment on the project.

1.2.2 Draft EIR Public Review and Comment Period

Under CEQA, the Lead Agency is required, after completion of a Draft EIR, to solicit comments from public agencies having jurisdiction by law with respect to the proposed project, and to provide the general public with an opportunity to comment on the Draft EIR. Written comments concerning the environmental review contained in this Draft EIR must be received by the Lead Agency at the following address before 5:00 p.m. on the last day of the 45-day public review and comment period, which will run from Thursday, May 31, 2018 to Monday, July 16, 2018. During this period, the Draft EIR will be available to local, state, and federal agencies and to interested organizations and individuals for review. Notice of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP.

Written and verbal comments may also be presented at scheduled public hearings on certification of the Final EIR; however, only timely comments on the Draft EIR will be provided written responses in the Final EIR. Written comments can be directed to the City of Mountain View, Community Development Department:

City of Mountain View
Community Development Department
Attention: Diana Pancholi, Senior Planner
500 Castro Street
Mountain View, CA 94039
(650) 903-6306
diana.pancholi@mountainview.gov

Copies of documents referred to in this EIR are available for review as follows:

City of Mountain View
Community Development Department
City Hall, 1st Floor
500 Castro Street
Mountain View, CA 94041
Main Phone Number: (650) 903-6306
Website: http://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp

Counter and Phone Hours:
Monday and Wednesday: 8:00 a.m. to 6:00 p.m.
Friday: 8:00 a.m. to 4:00 p.m.
Tuesday and Thursday: Closed

Mountain View Public Library
585 Franklin Street
Mountain View, CA 94041
Phone: 650-903-6887

Library Hours:
Monday to Thursday: 10:00 a.m. to 9:00 p.m.

Friday to Saturday: 10:00 a.m. to 6:00 p.m.
Sunday: 1:00 p.m. to 5:00 p.m.

1.2.3 Final EIR/Responses to Comments

Following the conclusion of the 45-day public review period, the City of Mountain View will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR text, as necessary;
- List of individuals and agencies commenting on the Draft EIR;
- Responses to comments received on the Draft EIR, in accordance with CEQA Guidelines (Section 15088);
- Copies of letters received on the Draft EIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. This Statement of Overriding Considerations must be included in the record of project approval.

1.2.4 Notice of Determination

If the project is approved, City of Mountain View will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

SECTION 2.0 PROJECT INFORMATION AND DESCRIPTION

2.1 PROJECT LOCATION

The 28.7-acre project site is located in the East Whisman area of eastern Mountain View and includes the addresses 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue, on Assessor's Parcel Numbers (APNs) 165-38-001, -005, -006, and -007. A Caltrans easement is located on APN 165-38-005, at the corner of SR 237 and East Middlefield Road. Regional, vicinity, and aerial maps of the project site are attached as Figures 2.1-1, 2.1-2, and 2.1-3, respectively.

The project site is bordered by West Maude Avenue and the Sunnyvale Golf Course to the north, State Route (SR) 237 and the SR 237 frontage road to the west, East Middlefield Road to the south, and the City of Sunnyvale to the east.

The site is located within the East Whisman area of the City, and is surrounded by office and light-industrial uses on the south and west sides (across SR 237). Multi-family residential and office uses in the City of Sunnyvale are located east and southeast of the site. Moffett Federal Airfield is located further north of the project site across U.S. 101.

2.1.1 Existing Site Conditions

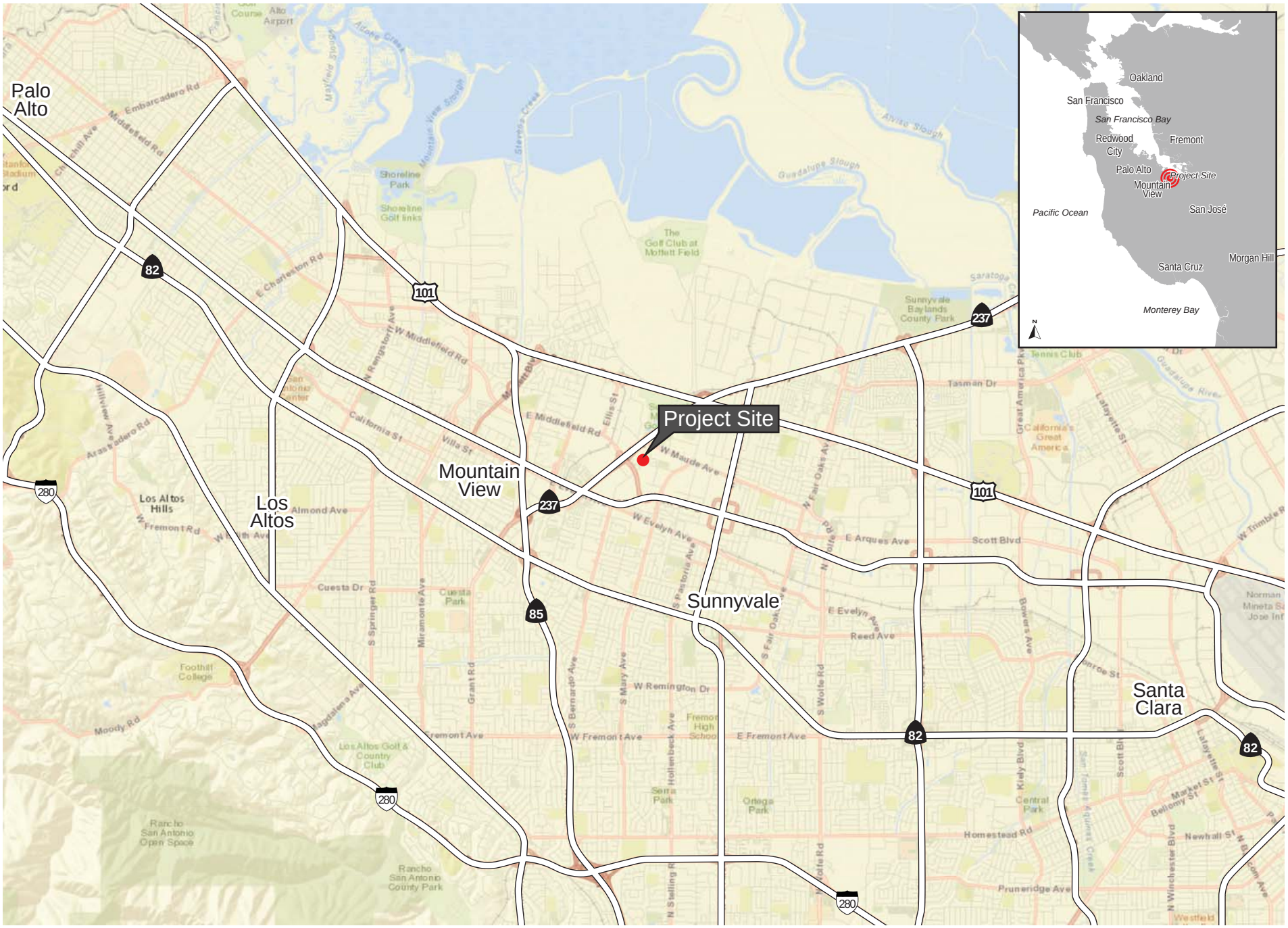
The project site currently contains approximately 466,000 square feet of office space in five one- and two-story buildings. The site also contains parking lots, utilities and landscaping. Three two-story buildings in the center of site completed renovation in May 2017, along with associated site improvements for office use. These three buildings are currently occupied with office uses by LinkedIn, Inc.

2.2 PROJECT DESCRIPTION

Two existing site buildings would be demolished, and three six-story office buildings and two seven-level parking structures would be built on the site. The three renovated two-story buildings in the central portion of the site would be retained. All surface parking lots would be removed as part of site development. Both parking structures would include one level of below-grade parking and six above-grade levels. The project would include a small retail space of up to 3,000 square feet. Refer to the conceptual site plan, Figure 2.2-1, and the conceptual elevations and site section, Figures 2.2-2 to 2.2-5.

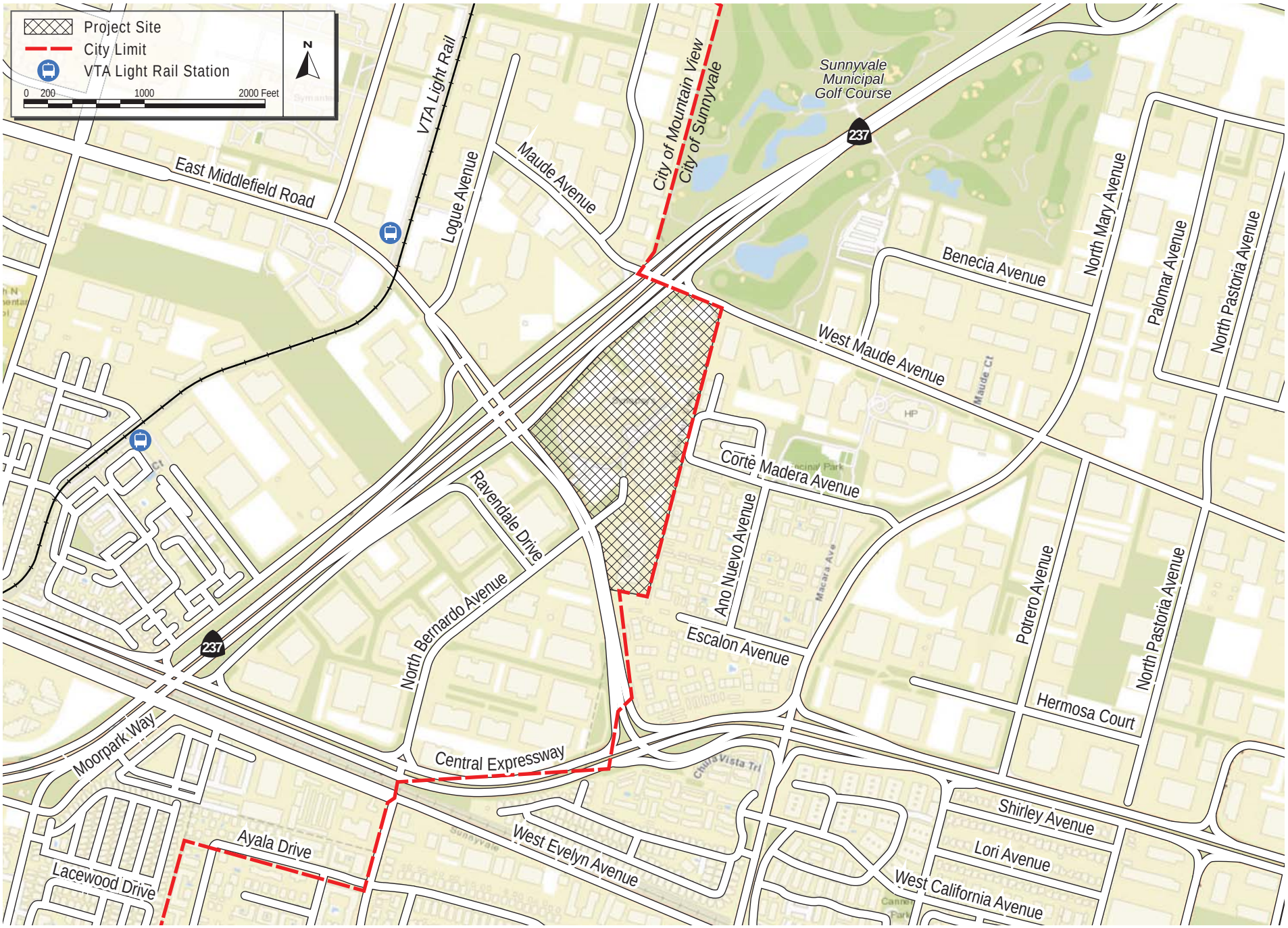
The three proposed six-story office buildings would contain approximately 763,000 square feet of office space. The completed campus would be approximately 1,078,000 square feet in size, representing a net increase in development on the site of approximately 612,000 square feet.

Two of the three proposed buildings would be located along the SR 237 Frontage Road, and one building would be located at the main entrance at Middlefield Road and Bernardo Avenue, on the south end of the project site. This building would contain approximately 3,000 square feet of ground-floor retail space along Middlefield Road, which would be open to the public.



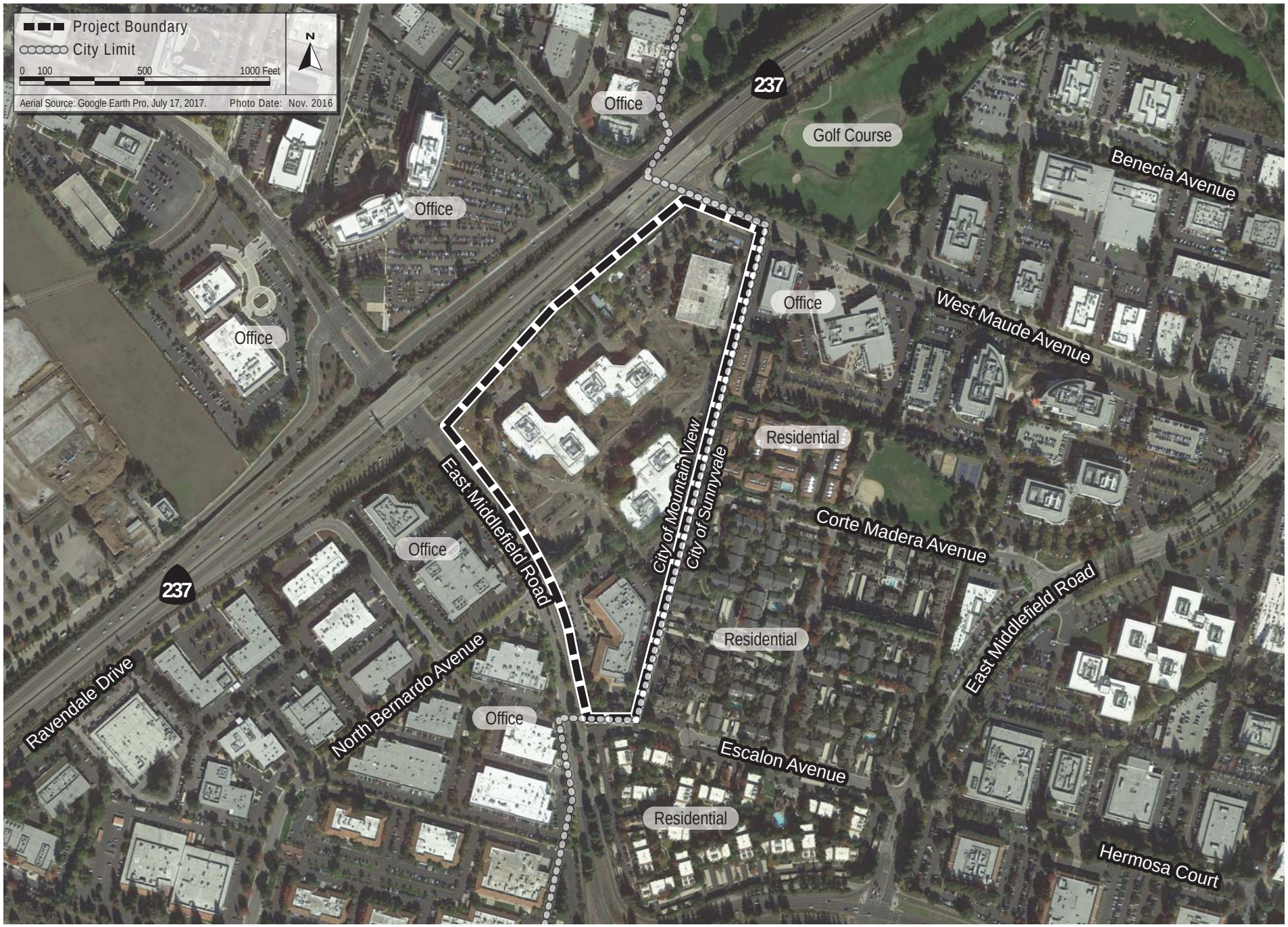
REGIONAL MAP

FIGURE 2.1-1



VICINITY MAP

FIGURE 2.1-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES FIGURE 2.1-3

EXISTING PROJECT BUILDINGS

FIGURE 2.1-4

The applicant proposes to construct the project in three phases, maintaining occupancy in the three central buildings during the construction period. All building materials and construction parking would be staged on site.

2.2.1 2030 General Plan

The project site is currently designated as *High-Intensity Office* in the Mountain View 2030 General Plan. The project proposes a floor area ratio (FAR) of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline for the *High-Intensity Office* designation. The proposed project would be consistent with the land use designation, and would not require a General Plan amendment.

2.2.2 Rezoning

The project proposes rezoning the site from the existing *Limited Industrial (ML)*, to a *Planned Community (P)* zoning district, under Section 36.22 of the City's Municipal Zoning Ordinance. The *ML* zoning district allows development up to an FAR of 0.35, and the project proposes an FAR of up to 0.86. The *Planned Community* zoning would allow flexibility to implement standards and features (such as increased office density and building heights) that more closely conform to the Mountain View 2030 General Plan policy direction for the East Whisman Change Area.

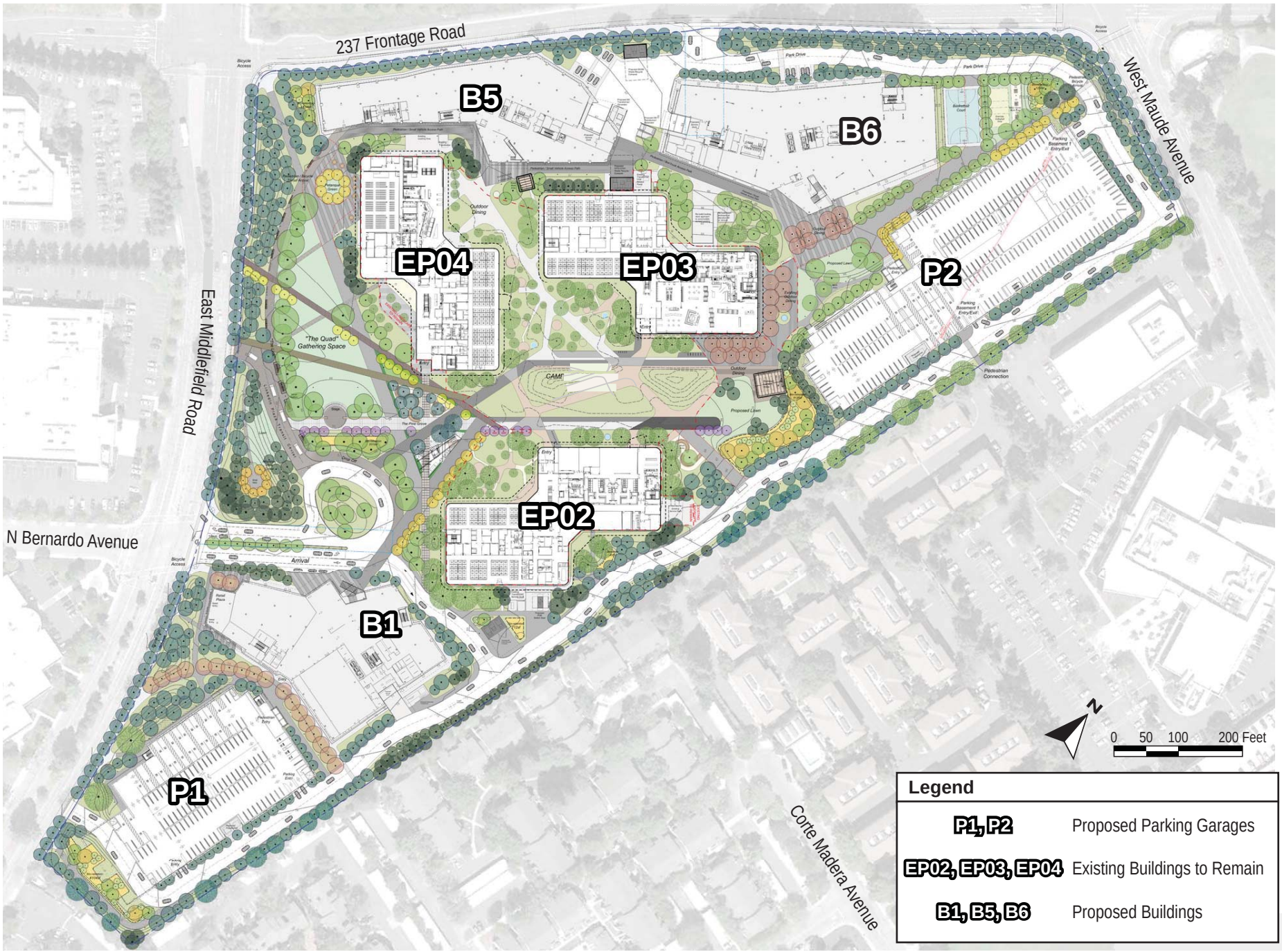
The City of Mountain View is currently preparing the East Whisman Precise Plan, a zoning document that will provide standards and guidelines for the East Whisman Change Area, including the project site. The site will be rezoned to *East Whisman Precise Plan* following the Plan's adoption, anticipated to be in 2019. The existing and proposed zoning districts for the site are shown on Figure 2.2-6.

2.2.3 Access, Circulation, and Parking

Vehicular access to the project site would be provided via four driveways: 1) a full access driveway at the intersection of East Middlefield Road and Bernardo Avenue would be the main site entrance, 2) a right-turn in and out driveway on East Middlefield Road south of Bernardo Avenue, 3) a right-turn in and out driveway on the SR 237 northbound frontage road, and 4) a full access driveway along the project's northern frontage on Maude Avenue (refer to Figure 2.2-7).

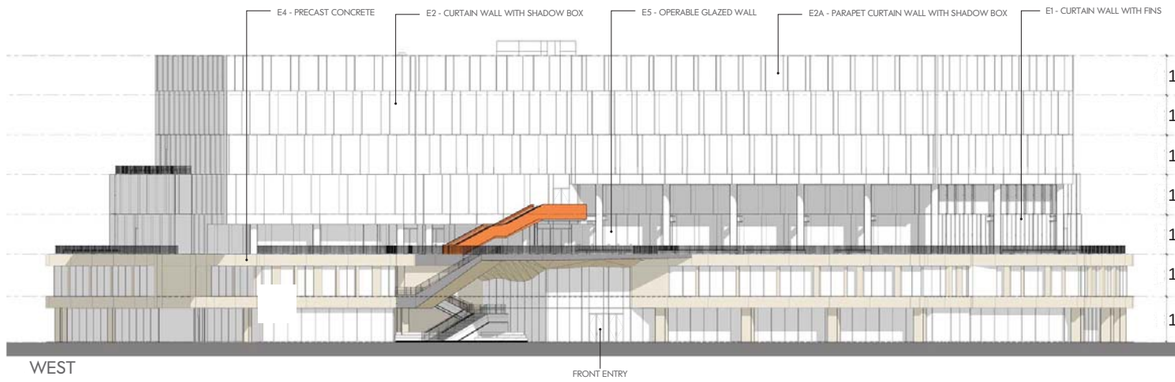
The project would construct two new six-level parking structures (with one level of below-grade parking in each structure) along the eastern portion of the site with direct access from a new perimeter drive aisle, connecting to Maude Avenue and East Middlefield Road. The parking structures would provide a total of approximately 2,913 total parking spaces.

The project would be required to provide at least 177 bicycle parking spaces, consistent with the requirements of the City of Mountain View Zoning Ordinance. The project includes features to support bicycle commuting and maintenance. Bicycle and pedestrian improvements near SR 237 and the associated SR 237 frontage road would be implemented as part of the project, and would require coordination with the appropriate transportation agencies.



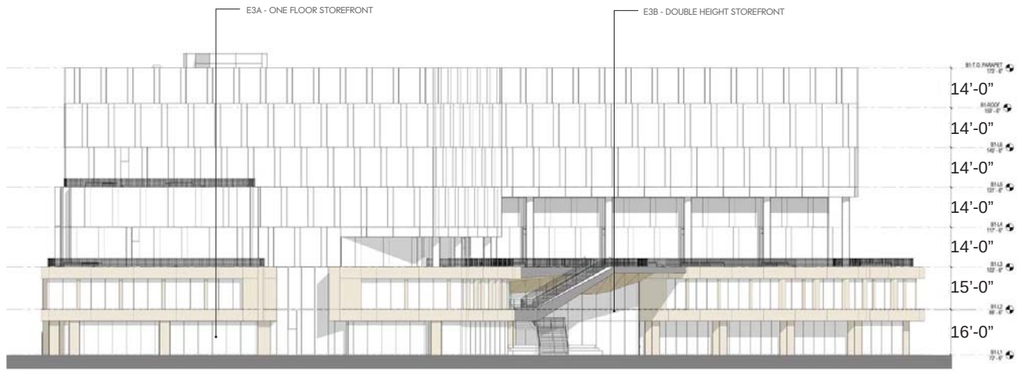
CONCEPTUAL SITE PLAN

FIGURE 2.2-1



WEST

SOUTH



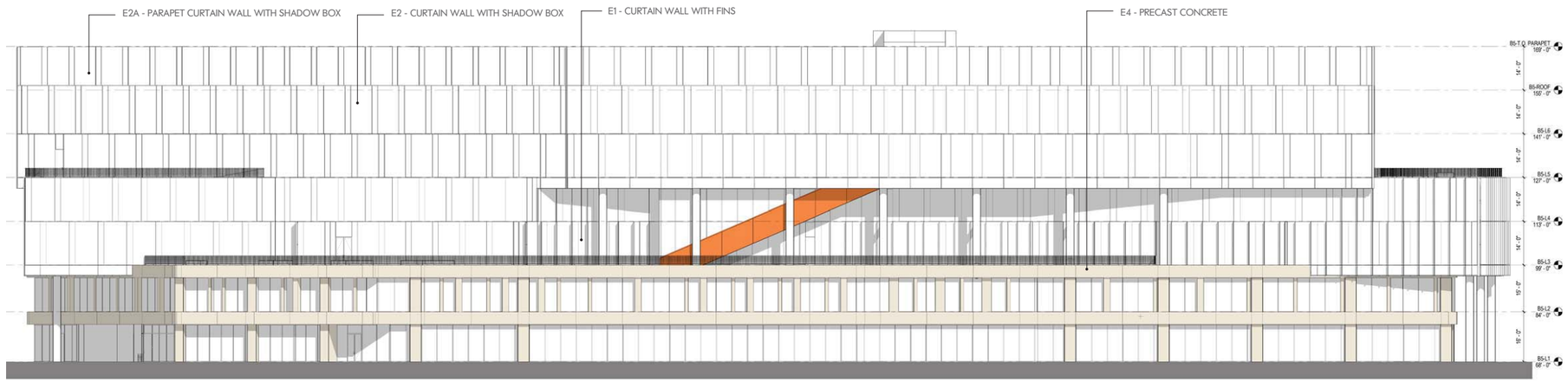
NORTH

EAST

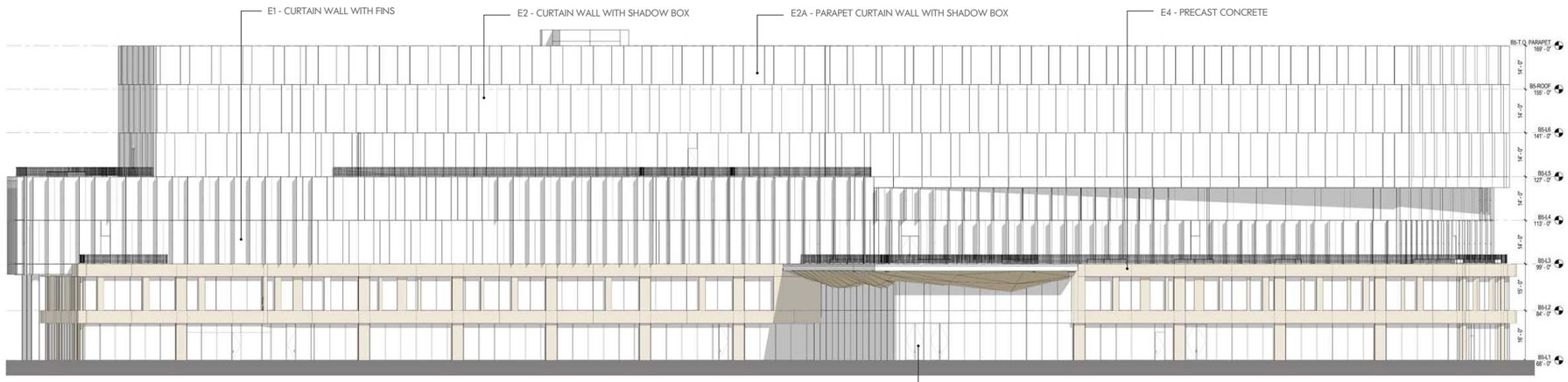
0 10 50 100 Feet

CONCEPTUAL BUILDING 1 ELEVATIONS

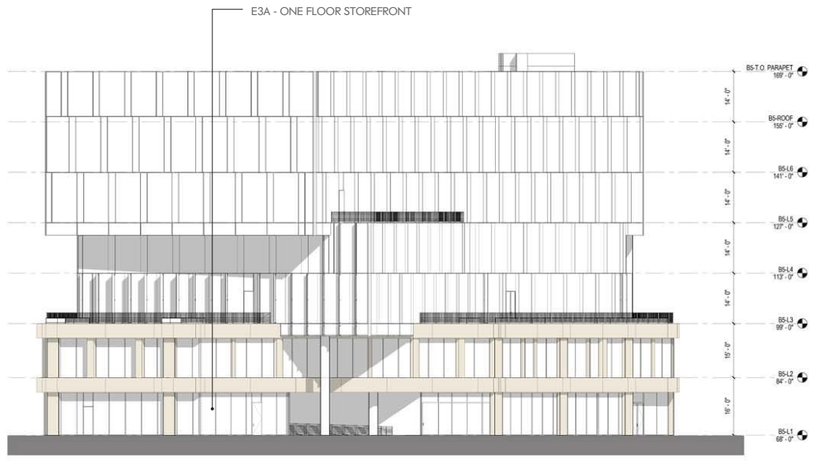
FIGURE 2.2-2



A. NORTHWEST



A. SOUTHEAST

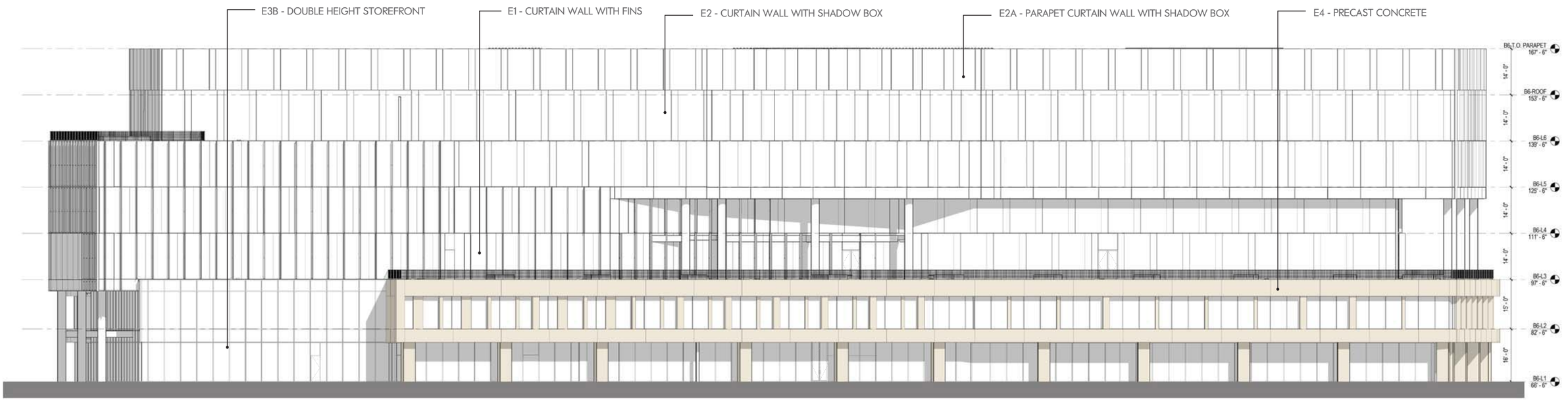


B. NORTHEAST

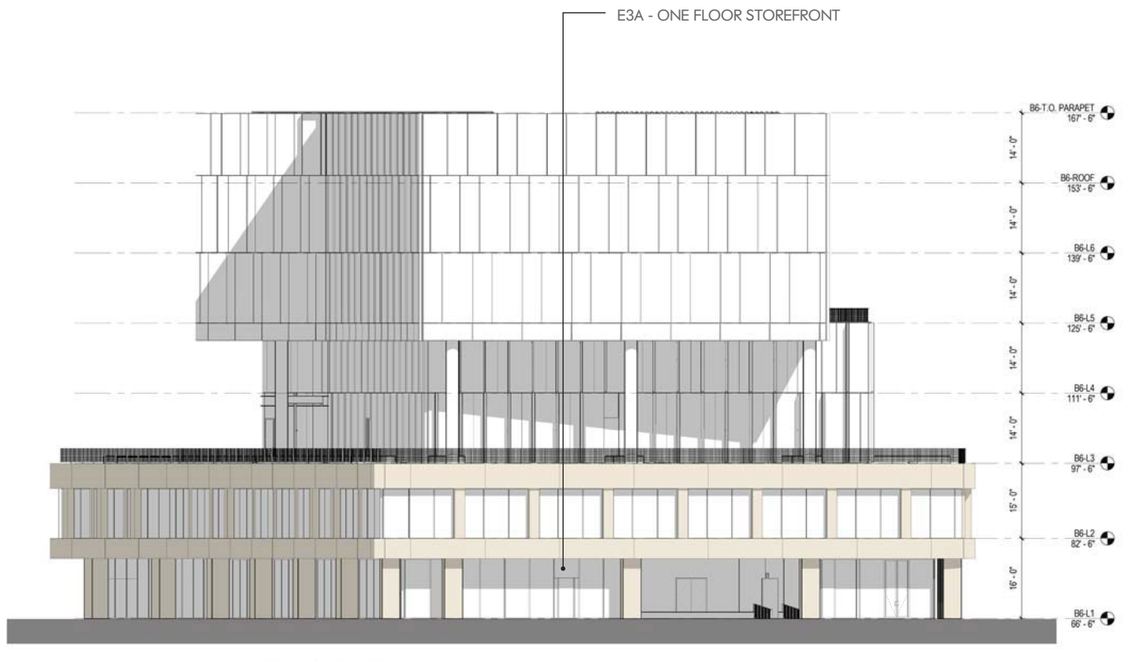
B. SOUTHWEST

CONCEPTUAL BUILDING 5 ELEVATIONS

FIGURE 2.2-3



NORTHWEST

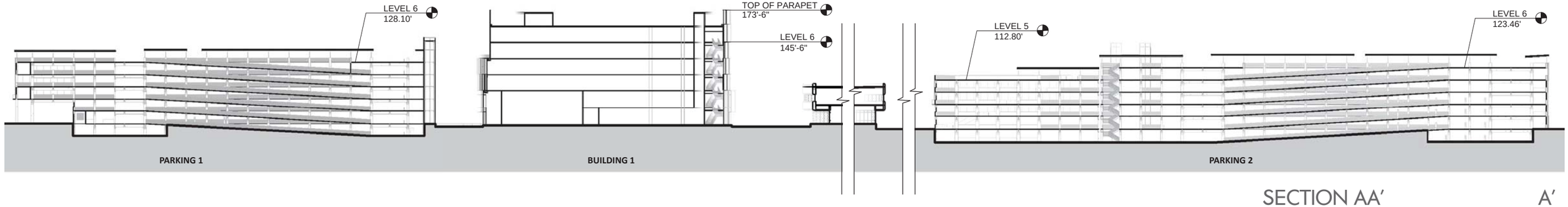


SOUTHWEST

0 10 50 100 Feet

CONCEPTUAL BUILDING 6 ELEVATIONS

FIGURE 2.2-4



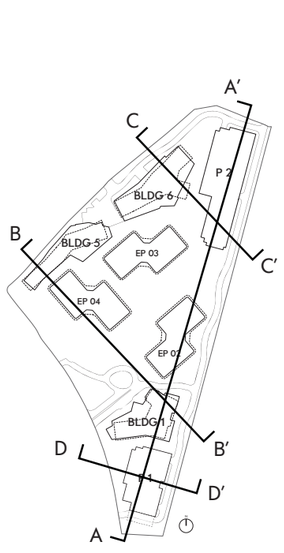
SECTION AA'

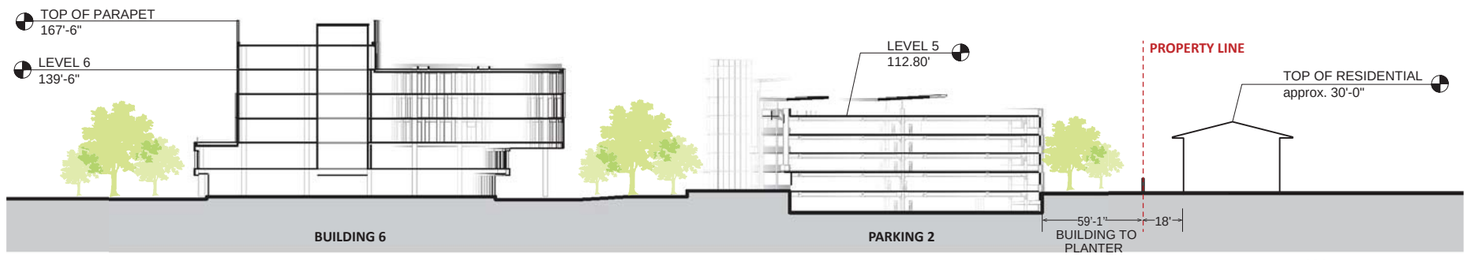
A'

B

SECTION BB'

B'

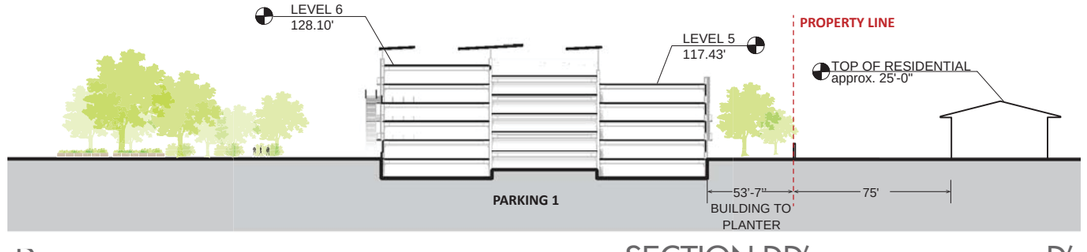




C

SECTION CC'

C'



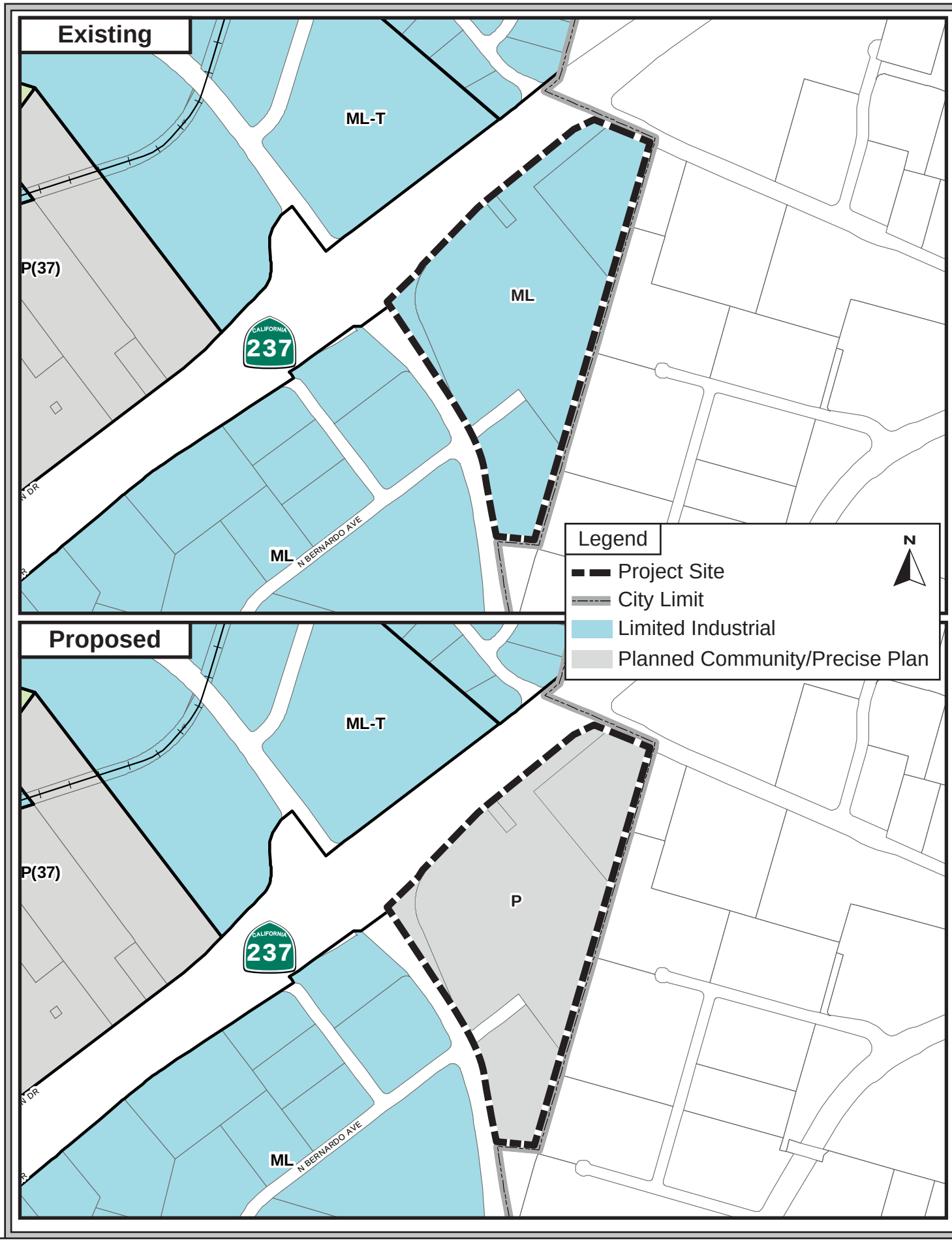
D

SECTION DD'

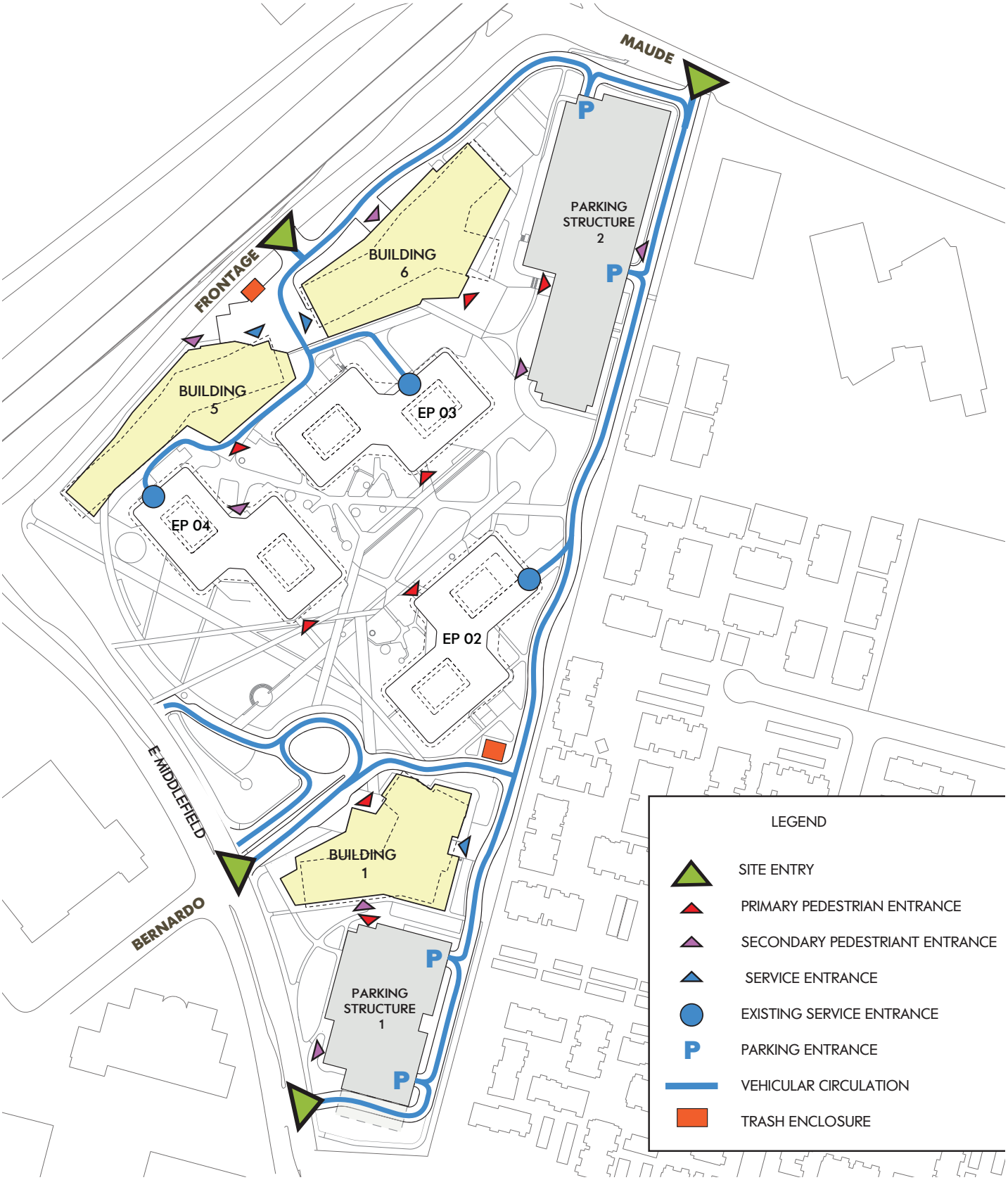
D'

CONCEPTUAL SITE SECTIONS

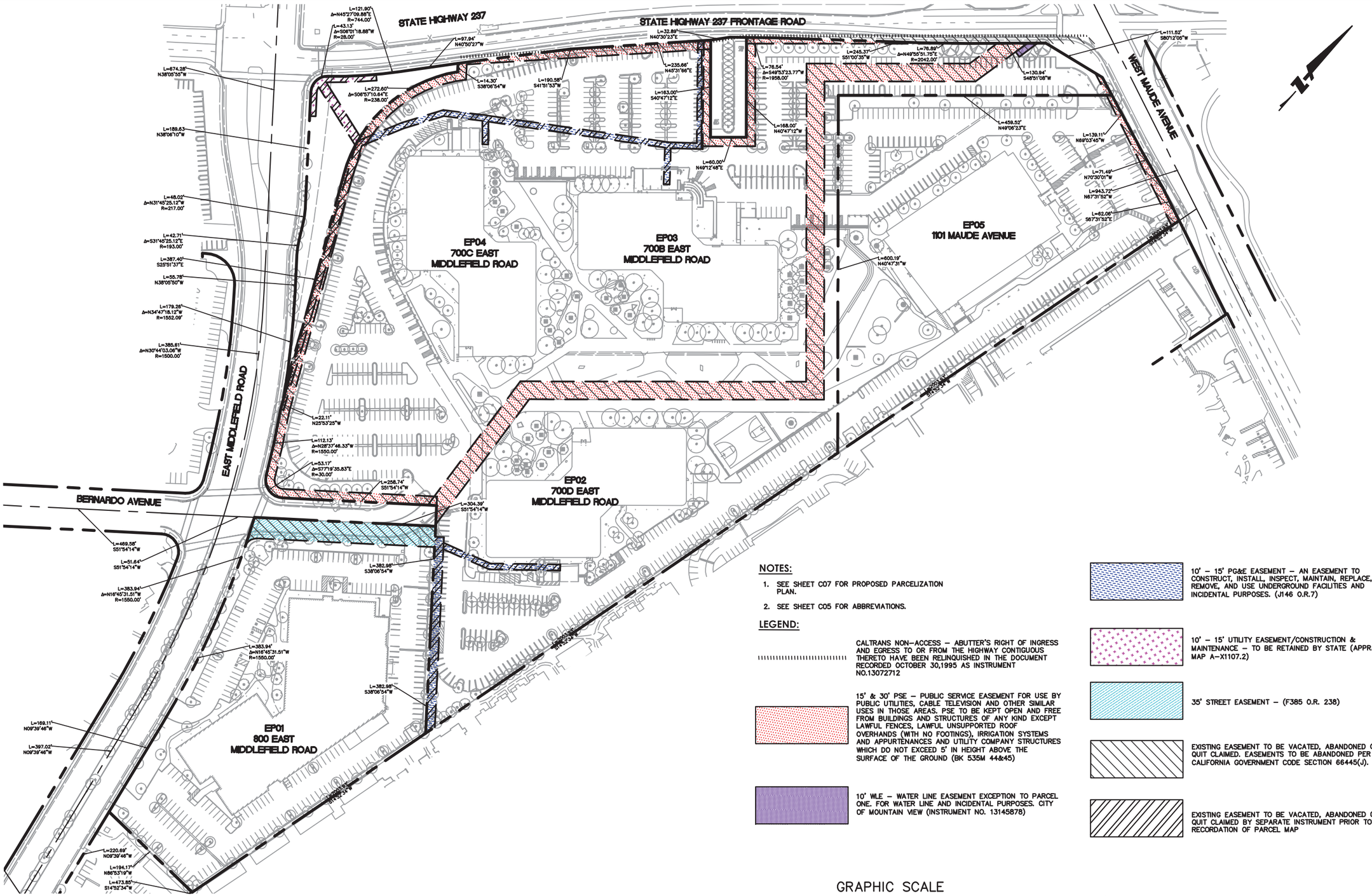
FIGURE 2.2-5



EXISTING AND PROPOSED SITE ZONING FIGURE 2.2-6



PROPOSED SITE ACCESS/VEHICULAR CIRCULATION FIGURE 2.2-7



NOTES:

1. SEE SHEET C07 FOR PROPOSED PARCELIZATION PLAN.
2. SEE SHEET C05 FOR ABBREVIATIONS.

LEGEND:

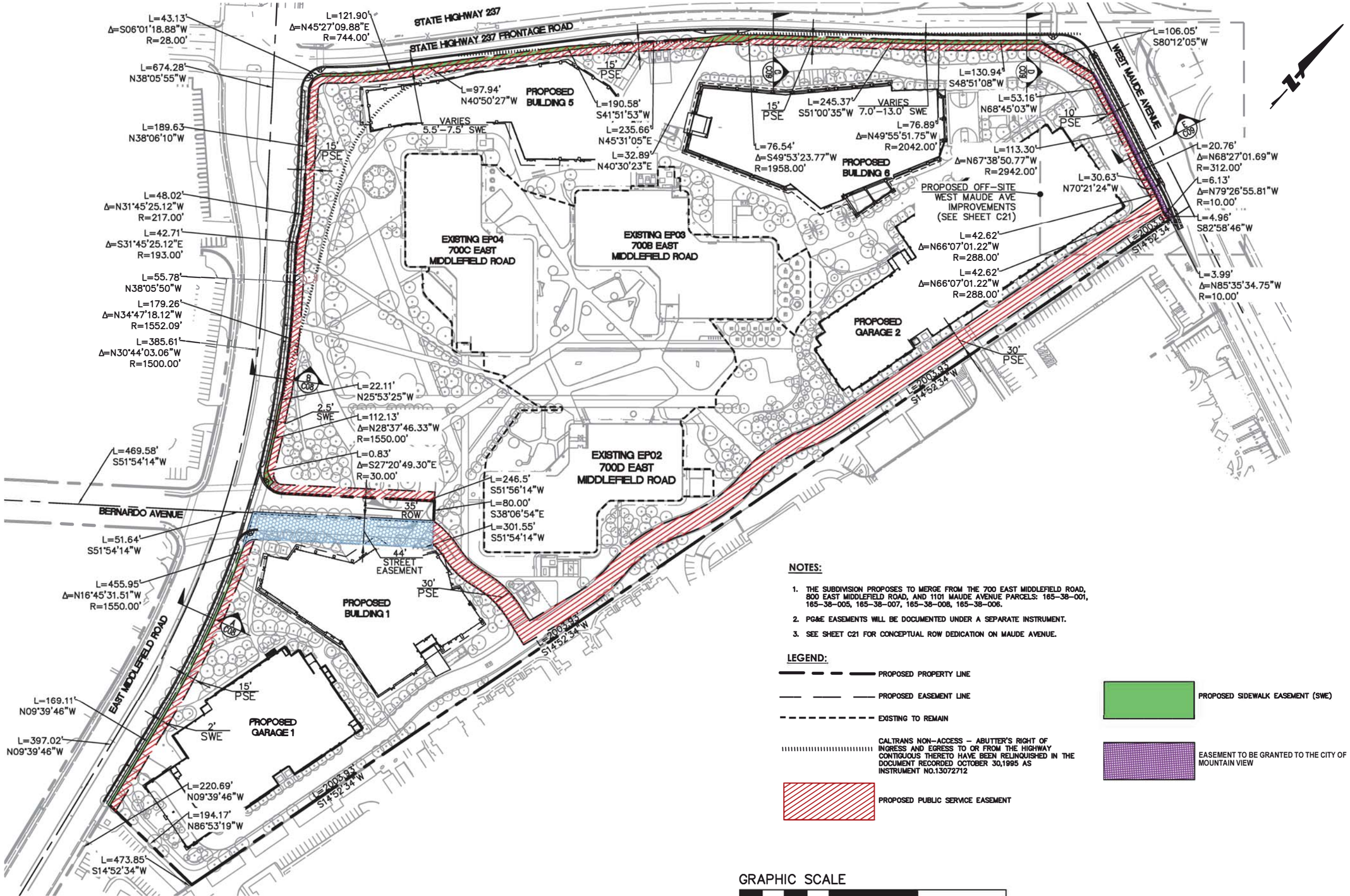
- CALTRANS NON-ACCESS – ABUTTER'S RIGHT OF INGRESS AND EGRESS TO OR FROM THE HIGHWAY CONTIGUOUS THERETO HAVE BEEN RELINQUISHED IN THE DOCUMENT RECORDED OCTOBER 30,1995 AS INSTRUMENT NO.13072712
- 15' & 30' PSE – PUBLIC SERVICE EASEMENT FOR USE BY PUBLIC UTILITIES, CABLE TELEVISION AND OTHER SIMILAR USES IN THOSE AREAS. PSE TO BE KEPT OPEN AND FREE FROM BUILDINGS AND STRUCTURES OF ANY KIND EXCEPT LAWFUL FENCES, LAWFUL UNSUPPORTED ROOF OVERHANDS (WITH NO FOOTINGS), IRRIGATION SYSTEMS AND APPURTENANCES AND UTILITY COMPANY STRUCTURES WHICH DO NOT EXCEED 5' IN HEIGHT ABOVE THE SURFACE OF THE GROUND (BK 535M 44&45)
- 10' WLE – WATER LINE EASEMENT EXCEPTION TO PARCEL ONE. FOR WATER LINE AND INCIDENTAL PURPOSES. CITY OF MOUNTAIN VIEW (INSTRUMENT NO. 13145878)
- 10' – 15' PG&E EASEMENT – AN EASEMENT TO CONSTRUCT, INSTALL, INSPECT, MAINTAIN, REPLACE, REMOVE, AND USE UNDERGROUND FACILITIES AND INCIDENTAL PURPOSES. (J146 O.R.7)
- 10' – 15' UTILITY EASEMENT/CONSTRUCTION & MAINTENANCE – TO BE RETAINED BY STATE (APPRAISAL MAP A–X1107.2)
- 35' STREET EASEMENT – (F385 O.R. 238)
- EXISTING EASEMENT TO BE VACATED, ABANDONED OR QUIT CLAIMED. EASEMENTS TO BE ABANDONED PER CALIFORNIA GOVERNMENT CODE SECTION 66445(J).
- EXISTING EASEMENT TO BE VACATED, ABANDONED OR QUIT CLAIMED BY SEPARATE INSTRUMENT PRIOR TO RECORDATION OF PARCEL MAP

GRAPHIC SCALE

150 0 150 300

EXISTING EASEMENT PLAN

FIGURE 2.2-8



PROPOSED PARCELIZATION AND EASEMENT PLAN

FIGURE 2.2-9

2.2.4 Utilities and Service Systems Improvements

The proposed project would connect to existing utilities in the vicinity, as discussed further in *Section 3.16, Utilities and Service Systems*. The project would contribute to upgrades of the water, sewer, and stormwater systems, as necessary for the development.

The project proposes to off-haul and recycle material from the two demolished buildings and site pavement. Soils would also be removed from the site for excavation of the below-grade parking structures and for utility improvements.

2.2.5 Trees and Landscaping

Approximately 644 trees, including 304 Heritage trees as defined in the City of Mountain View Municipal Code, are currently on the site. The project proposes to remove approximately 135 of the Heritage trees and 283 other trees. The project would plant approximately 905 new trees on-site, at a ratio of at least two replacement trees for each Heritage tree removed, in conformance with the City of Mountain View's requirements, as described further in *Section 3.4, Biological Resources* of this EIR.

The proposed project would relocate parking from surface lots to parking structures, and most of the space between buildings would become open areas for pedestrians and green space. Large gathering areas for employees would be constructed between the buildings, with pathways and other amenities. High water-use lawns will be limited to recreational fields and quads. Other landscaping would include drought-tolerant species and shade trees.

The project would increase pervious surfaces on the site, including landscaping, to approximately 44 percent (not including landscaped roofs and terraces), an increase of 20 percent over the existing condition (approximately 24 percent pervious). The project would construct a public-oriented open space along East Middlefield Road and a public open space area along Maude Avenue, as well as new landscaping throughout the site, increasing open space from 24 percent to 44 percent**.**

The project's proposed architectural design includes a number of features to reduce bird strikes, such as glass treatments and preparation of a bird strike management plan, as described in *Section 3.4.3.3, Bird Strike Hazards*.

2.2.6 Green Building and Emissions Reduction Features

The proposed project would be built according to the Mountain View Green Building Code, which requires adherence to the Nonresidential Mandatory Measures of the 2010 California Green Building Code (CALGreen). The Green Building Code also requires new non-residential buildings of over 25,000 square feet to exceed the energy use reduction requirements of Title 24, Part 6 by 10 percent, and meet the intent of Leadership in Energy and Environmental Design (LEED)[1] Silver.

In addition, the project would a number of energy and emissions reduction features (refer also to *Section 3.8, Greenhouse Gas Emissions*). The buildings to remain have recently been renovated, and

[1] US Green Building Council's Leadership in Energy and Environmental Design (LEED).

incorporate multiple green building and sustainable design features that will be maintained as part of the project, including:

- dual-plumbing in the three buildings to be retained with future connection to recycled water when available;
- a reclaimed HVAC condensation system, which irrigates landscaping and provides water to other landscape features;
- water-efficient landscaping; and
- energy-efficient building systems and fixtures (e.g., lighting, HVAC, etc.).

In addition to these existing features, LinkedIn, Inc. is proposing to design the project to meet LEED Platinum certified, with the following features:

- dual-plumbing in the three new office buildings with future connection to recycled water when available;
- photovoltaic panels located on the rooftop of the parking structures;
- potential green roof elements on the balconies of the new office buildings and existing office building rooftops;
- solar daylighting and narrow building floor plates utilized to allow for greater natural light into the office space;
- energy-efficient building systems (e.g., lighting, HVAC, etc.);
- electric vehicle (EV) charging stations for 10 percent of the parking spaces on-site; and water-efficient landscaping.

2.2.7 Transportation Demand Management Plan

A Transportation Demand Management Plan has been prepared by the applicant and is included in the project (Appendix J). As described in *Section 3.15, Transportation and Traffic*, this plan would provide at least a 20 percent reduction in vehicle trips to the project site.

The primary components of the TDM plan include:

- Priority parking for shared ride vehicles
- On-site transportation coordinator
- Bicycle parking, showers, and lockers
- Bicycle sharing
- Telecommuting/flexible work schedule program
- Guaranteed ride home program
- Membership in the Mountain View Transportation Management Association (MVTMA)
- Rideshare match services
- Transit shuttle services (long and short haul)
- Marketing and information

The applicant may consider additional measures, if required to meet trip reduction goals. These measures may include:

- Parking cash-out (or commuter credits)
- Pre-tax commuter benefits
- Subsidized or free vanpools or carpools
- Subsidized or free transit passes
- Biking programs, including: biking financial incentives, on-site bicycle repair facilities, bike buddy program, bicycle giveaway program, bike to work day and events, bike rider guides
- Expanded carpool matching and car sharing
- On-site amenities and services
- Other TDM measures: bicycle infrastructure improvements, passenger loading zones, building wiring (for telecommuting), pedestrian connectivity and access, building orientation, parking location and configuration, transit and electric vehicle amenities.

2.3 PROJECT OBJECTIVES

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project.

The stated primary objectives of the project proponent, LinkedIn, Inc., are:

- To provide LinkedIn a corporate headquarters location in the City of Mountain View of sufficient size of approximately one million square feet to accommodate its anticipated growth and reflective of its business.

- To provide high-quality, highly sustainable office space near public transit, with increased intensity of up to a floor area ratio (FAR) of 1.0 that targets LEED Platinum standards and incorporates a TDM Plan, consistent with the 2030 General Plan and the Mountain View Greenhouse Gas Reduction Program.

- To develop a site with new high visibility office buildings that are compatible with the surrounding uses and are located close to major roadways.

- To develop office space that provides pedestrian and bicycle access to transit, and is located close to public transit and major roadways.

- To develop denser office space on the site at an increased FAR of up to 1.0 that will help the City of Mountain View both retain jobs and foster on-going job growth.

- To develop a headquarters campus location for a high-technology corporation in Mountain View, consistent with the General Plan land use planning principles of generating revenue for the City and supporting a larger, more diversified tax base in the City.

- To provide a sizeable corporate campus that supports 2030 General Plan Policies, including:

  - **LUD 3.8**: Preserved land use districts. Promote and preserve commercial and industrial districts that support a diversified economic base; and
  - **LUD 14.3:** Business attraction. Attract innovative and emerging technology businesses

to the city.

- To further the 2030 General Plan's East Whisman Change Area policies, including:

  - **LUD 19.2:** Highly sustainable development. Provide incentives to encourage new or significantly rehabilitated development to include innovative measures for highly sustainable development; and
  - **LUD 19.6:** Residential transitions. Require development to provide sensitive transitions to adjacent residential uses.

- To support the VTA's investment in light rail transit by providing transit-supported development that facilitates pedestrian and bicycle access to transit.

- To incorporate several existing buildings, currently occupied by LinkedIn, into its campus development plans.

2.4 USES OF THE EIR

This EIR evaluates the environmental impacts that would likely result from the proposed project. Measures to mitigate impacts are also identified in this EIR. This EIR is intended to be an informational document and is subject to public review, agency review, and consideration by the City of Mountain View. The purpose of this EIR is to identify potentially significant effects of the project on the physical environment, to determine the extent to which these effects could be reduced or avoided, and to identify feasible alternatives to the project. The EIR is an informational document and in itself does not determine whether a project should or will be approved.

This EIR would provide decision-makers in the City of Mountain View (the CEQA Lead Agency), responsible agencies, and the general public with relevant environmental information to use in considering the project. The approvals that would require discretionary actions could include:

- Rezoning
- Planned Community Permit
- Development Review Permit
- Demolition Permit
- Grading Permit
- Heritage Tree Removal Permit
- Development Agreement

The EIR may also be relied upon for other agency approvals necessary to implement the project, including by the following agencies:

- Federal Aviation Administration
- California Department of Transportation
- Santa Clara County Airport Land Use Commission
- Local Agency Formation Commission (LAFCO) of Santa Clara County

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

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

3.1	Aesthetics	3.9	Hazards and Hazardous Materials
3.2	Agricultural and Forestry Resources	3.10	Hydrology and Water Quality
3.3	Air Quality	3.11	Land Use and Planning
3.4	Biological Resources	3.12	Noise and Vibration
3.5	Cultural Resources	3.13	Population and Housing
3.6	Energy	3.14	Public Services and Recreation
3.7	Geology, Soils, and Mineral Resources	3.15	Transportation/Traffic
3.8	Greenhouse Gas Emissions	3.16	Utilities and Service Systems

The discussion for each environmental subject includes the following subsections:

ENVIRONMENTAL SETTING

This subsection: 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

IMPACTS

This subsection: 1) includes thresholds of significance for determining impacts, 2) discusses the project's consistency with those thresholds, and 3) discusses the project's consistency with applicable plans. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered using an alphanumeric system that identifies the environmental issue. For example, **Impact HAZ-1** denotes the first potentially significant impact discussed in the Hazards and Hazardous Materials section. Mitigation measures are also numbered to correspond to the impact they address. For example, **MM NOISE-2.2** refers to the second mitigation measure for the second impact in the Noise section.

The project's consistency with applicable plans (such as general plans, specific plans, and regional plans) is also discussed within this subsection pursuant to CEQA Guidelines Section 15125(d). Plans relevant to implementation of the project and references to the sections of the Draft EIR where they are discussed are listed in Table 3.0-1.

Table 3.0-1: Consistency with Plans Discussions	
Relevant Regional and Local Plans	**Section(s) Discussed**
2030 General Plan *City of Mountain View*	All sections, where appropriate
Airport Comprehensive Land Use Plans *Santa Clara County Airport Land Use Commission*	*Section 3.9, Hazards and Hazardous Materials* *Section 3.11, Land Use* *Section 3.12, Noise and Vibration*
Bicycle and Pedestrian Master Plans *City of Mountain View*	*Section 3.15, Transportation/Traffic*
Clean Air Plan *Bay Area Air Quality Management District (BAAQMD)*	*Section 3.3, Air Quality*
Climate Change Scoping Plan *State of California*	*Section 3.8, Greenhouse Gas Emissions*
Congestion Management Program *Santa Clara County*	*Section 3.15, Transportation/Traffic*
Plan Bay Area *Metropolitan Transportation Commission, Association of Bay Area Governments, BAAQMD*	*Section 3.8, Greenhouse Gas Emissions*
San Francisco Bay Plan San Francisco Bay Conservation and Development Commission	*Section 3.1, Aesthetics* *Section 3.10, Hydrology and Water Quality* *Section 3.14, Public Services and Recreation*
Santa Clara Valley Habitat Plan *Local Partners and Wildlife Agencies*	*Section 3.4, Biological Resources* *Section 3.11, Land Use*
Water Quality Control Plan/Basin Plan *San Francisco Regional Water Quality Control Board*	*Section 3.10, Hydrology and Water Quality*

CUMULATIVE IMPACTS

Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts "when the project's incremental effect is cumulatively considerable." The discussion does not need to be in as great detail as is necessary for project impacts, but is to be "guided by the standards of practicality and reasonableness." The purpose of the cumulative analysis is to allow decision makers to better understand the impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence. To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document. The analysis must then determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3).

The cumulative discussion for each environmental issue addresses two aspects of cumulative impacts: 1) would the effects of all of the pending development result in a cumulatively significant impact on the resources in question? And, if that cumulative impact is likely to be significant, 2) would the contribution to that impact from the proposed project make a cumulatively considerable contribution to that cumulative impact?

For each environmental issue, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire San Francisco air basin, whereas noise impacts would primarily be localized to the surrounding area. The water supply assessment considered the availability water supplies in the City of Mountain View to 2030, considering build-out of the General Plan.

Table 3.0-2 provides a summary of the different geographic areas used to evaluate cumulative aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, public facilities and services, population and housing, and utilities and service systems. For all other cumulative impacts, the cumulative discussion reflects impacts from past, future, and pending development within the immediate area of the project site (Table 3.0-2).

Table 3.0-2:
Geographic Considerations in Cumulative Analysis

Environmental Issue	Geographic Area
Air Quality	San Francisco Bay Air Basin (Clean Air Plan area)
Biological Resources	Vicinity of project.
Energy	City of Mountain View, State of California
Greenhouse Gas Emissions	City of Mountain View, Regional, State of California, global
Hydrology and Water Quality	City of Mountain View, local groundwater basin, San Francisco Bay
Population and Housing	City of Mountain View, the nine Bay Area Counties
Public Facilities and Services	City of Mountain View
Utilities and Service Systems: Water Supply	Existing/pending development in Mountain View to the year 2030.

As described in *Section 3.15, Transportation/Traffic*, the Background Conditions scenario analyzes existing volumes plus traffic from approved but not yet constructed and occupied developments in the area. The list of these projects is included in the TIA in Appendix J on Page 61.

The Near-term Cumulative scenario was estimated by applying an annual growth factor (two percent per year for five years) to existing (2017) traffic volumes to account for regional growth associated with development outside the City of Mountain View and other approved and pending projects in the City of Mountain View. The noise, air quality, and greenhouse gas emissions analyses used the traffic analysis data for their cumulative analysis. The utilities and services analysis uses the Mountain View 2030 General Plan buildout to evaluate cumulative impacts.

For other subject areas, Table 3.0-3 represents pending and approved Mountain View and Sunnyvale projects near the project site that may contribute to cumulative impacts for more localized cumulative impacts.

Table 3.0-3:
Near-Term Cumulative Projects List

Project Name/Address	Project Description	City
East Whisman Precise Plan	Zoning change for 403 acres	Mountain View
1001 North Shoreline Boulevard	Rezone; 203 apartments, 100 condominium units	Mountain View
555 West Middlefield Road	Rezone; 341-unit addition to an existing 402-unit residential development	Mountain View
777 West Middlefield Road	Rezone; demolition of 208 existing apartment units and construction of 711 new apartment units	Mountain View
460 North Shoreline Boulevard	Demolish 12 affordable townhouse units and replace them with 62 affordable units	Mountain View
1185 Terra Bella Avenue	Construct a new two-story, 9,700 square foot commercial office building to replace two existing commercial buildings	Mountain View
870 Leong Drive	Construct a new 41,039 square foot, 78-room hotel in a 0.85-acre project site	Mountain View
445 North Mary Avenue	New 4-story office building, 4.5-level parking structure and associated site work and landscaping to an existing campus consisting of 2 4-story office buildings and one 2-level parking deck.	Sunnyvale
610 North Mary Avenue	Demolition of 28 existing office/industrial buildings and construction of nine three-story and three four-story office buildings totaling 1,471,400 square feet.; a one-story & two, two-story amenity buildings totaling 40,000 square feet; a four-level, and three six-level above-grade parking structures.	Sunnyvale

Peery Park Plan Review Permit	To allow redevelopment of a site with construction of a new four-story, 121,715 square foot office/R&D building with underground parking resulting in 80 percent Floor Area Ratio (FAR); existing two one-story buildings to be demolished.	Sunnyvale

EFFECTS OF THE ENVIRONMENT ON THE PROJECT

The California Supreme Court in a December 2015 opinion [*California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 (No. S 213478)] confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, the evaluation of the significance of project impacts under CEQA in the following sections focuses on impacts of the project on the environment, including whether a project may exacerbate existing environmental hazards.

The City of Mountain View currently has policies that address existing conditions (e.g., air quality, noise, and hazards) affecting a proposed project, which are also addressed in this section. This is consistent with one of the primary objectives of CEQA and this document, which is to provide objective information to decision-makers and the public regarding a project as a whole. The CEQA Guidelines and the courts are clear that a CEQA document (e.g., EIR or Initial Study) can include information of interest even if such information is not an "environmental impact" as defined by CEQA.

Therefore, where applicable, in addition to describing the impacts of the project on the environment, this chapter will discuss effects on the project that relate to policies pertaining to existing conditions. Such examples include, but are not limited to, locating a project near sources of air emissions that can pose a health risk, in a floodplain, in a geologic hazard zone, in a high noise environment, or on/adjacent to sites involving hazardous substances.

3.1 AESTHETICS

3.1.1 Regulatory Setting

This section describes applicable state and local regulations that pertain to visual and aesthetic resources.

3.1.1.1 *California Scenic Highway Program*

The intent of the California Scenic Highway Program (Streets and Highway Code Section 260) is to protect and enhance California's natural beauty and to protect the social and economic values provided by the State's scenic resources. The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality.

Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. There are no officially designated State Scenic highways within the City of Mountain View.[2]

3.1.1.2 *City of Mountain View 2030 General Plan*

The goals and policies of the City of Mountain View 2030 General Plan provide direction for the future of the City and its residents. They reflect present-day community values, priorities, and compliance with current state laws and local ordinances. These goals and policies set forth the City's commitment to make appropriate decisions and allocate necessary resources to support fulfillment of the City vision. Key policies related to aesthetics are Land Use and Design (LUD) policies, and Trees, Gardens, and Landscaping policies of the Parks and Open Space (POS) section of the General Plan.

City Gateways

Gateways are the entries to a city, district, or neighborhood. They act as a point of distinction between different areas and contribute to a sense of place by announcing a threshold or a passage into a place while also reinforcing the unique identity of that place. For the most part, gateways in Mountain View are associated with the City's major transportation corridors, particularly those which cross the jurisdictional boundaries of Palo Alto, Los Altos, and Sunnyvale.

SR 237 at the Sunnyvale border is considered a gateway into the City of Mountain View in the 2030 General Plan, in the vicinity of the proposed project site.

3.1.1.3 *City of Mountain View City Code*

The City of Mountain View addresses visual considerations for development in many City documents, including the City Code. The City Zoning Ordinance (Chapter 36) sets forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements.

[2] California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed December 11, 2017.

The Zoning Ordinance promotes good design and careful planning of development projects to enhance the visual environment. The City's development review process includes the review of preliminary plans, the consideration of public input at and by the Development Review Committee (DRC), Zoning Administrator, Environmental Planning Commission and the City Council. The City's Planning Division reviews private and public development applications for conformance with City plans, ordinances, and policies related to zoning, urban design, subdivision, and CEQA.

The Zoning Administrator makes recommendations to the City Council for large development projects and makes final decisions for permits and variances, and the Development Review Committee reviews the architecture and site design of new development, and provides project applicants with appropriate design comments/direction. The development review process ensures the architecture and urban design of new developments would protect the City's visual environment.

3.1.2 Existing Setting

3.1.2.1 *Project Site*

The 28.7-acre project site is comprised of four parcels currently developed with five one- and two-story office buildings containing 466,000 square feet of office space. The site also contains parking lots, utilities and landscaping, and numerous mature trees. Three two-story buildings in the center of site completed renovation in May 2017, along with associated site improvements for office uses. The two single-story buildings on the project site are typical 1970s R&D light-industrial buildings, with an undistinguished architectural style, common in the office/industrial areas of Mountain View. The site is largely paved for parking and driveways and is visually similar to other light industrial/R&D development in the surrounding neighborhood and the East Whisman area of the city (refer to Photos 1-8).

The site is visible from the immediate surrounding area, including East Middlefield Road, SR 237, and West Maude Avenue. A concrete wall and mature trees partially obscure views of the property from the adjacent residential buildings to the east and southeast. There are a few mature trees along the western boundary, partially obscuring views from SR 237.

3.1.2.2 *Surrounding Area*

Surrounding land uses include West Maude Avenue, beyond which is the Sunnyvale Golf Course to the north; Escalon Avenue and apartment buildings to the south; East Middlefield Road, beyond which are commercial buildings to the southwest; SR 237 and the SR 237 frontage road, beyond which are commercial uses to the northwest; and commercial and apartment buildings to the east. Moffett Federal Airfield is located further north of the project site across US 101.

No scenic view corridors, scenic vistas, or scenic resources are located on site. The western foothills of the Santa Cruz Mountains can be seen from some portions of the project site.

Photo 1: View to the north of the three two-story 700 East Middlefield buildings at the main entrance of the site through the driveway located on East Middlefield Road and North Bernardo Avenue.

Photo 2: View of the one-story building at 800 East Middlefield Road building, looking southeast.

Photo 3: View of the 800 East Middlefield Road building from the south end of the site.

Photo 4: View of the mature trees and wall partially obscuring the site from adjacent neighbors to the southeast. The building to the right is 800 East Middlefield Road.

Photo 5: View of the multi-family homes immediately adjacent to the project site, looking east. Mature trees and a wall partially obscure views of the project site from the residential buildings.

Photo 6: View of the 1101 West Maude Avenue building, looking north

Photo 7: View of West Maude Avenue. The Sunnyvale Golf Course is across Maude Avenue to the north of the site. Note that City of Sunnyvale is located east of the project site.

Photo 8: Landscaping in Caltrans easement on project site, view of the SR 237 frontage road and SR 237 to the west of the project site.

3.1.2.3 *Light and Glare*

The existing site has been developed with light industrial/office uses for many decades. Streetlights and other lighting is found throughout the area in the vicinity of the project. Sources of light and glare in the surrounding area are those typical in developed urban areas, including headlights, streetlights, parking lot lights, security lights, and reflective surfaces such as windows.

3.1.3 Aesthetic Impacts

3.1.3.1 *Thresholds of Significance*

For the purposes of this EIR, an aesthetic impact is considered significant if the project would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Aesthetic values are, by their nature, subjective. Opinions as to what constitutes a degradation of visual character will differ among individuals. One of the best available means for assessing what constitutes a visually acceptable standard for new buildings are the City's design standards and implementation of those standards through the City's design process. The following discussion addresses the proposed changes to the visual setting of the project area and factors that are part of the community's assessment of the aesthetic values of a project's design. The Development Review Committee (DRC) and the Environmental Planning Commission (EPC) will make a determination if the project meets the City's design standards.

The project proposes to retain the three recently renovated buildings, demolish two of the five existing buildings and all surface parking lots, and redevelop the site with three new six-story office buildings containing approximately 763,000 square feet of office space. The project would also construct two seven-level parking structures, and both parking structures would include one level of below grade parking. The proposed project would increase development on the site by approximately 612,000 square feet.

3.1.3.2 *Impacts to Scenic Resources*

As described in the Existing Setting section above, the site does not contain any scenic view corridors or scenic resources, and the project would not block views of the Santa Cruz Mountains from nearby residents. For these reasons, the project would not substantially degrade the existing visual character of the site or the surrounding area, and would not impact scenic resources or a scenic vista.

Impact AES-1: The proposed project would result in a less than significant impact to scenic resources. **[Less Than Significant Impact]**

3.1.3.3 *Impacts to Visual Character and Quality*

Two of the three proposed buildings would be located along the SR-237 frontage road, and one building would be located at the main entrance at East Middlefield Road and Bernardo Avenue, on the south end of the project site. The project would construct two new seven-level parking structures along the eastern portion of the site. Conceptual elevations and a site section of the proposed buildings are shown on Figures 2.2-2 to 2.2-5.

The project would include common areas, landscaping, and other amenities. The proposed six-story office buildings would extend to a total height of approximately 101 feet to the top of parapet, and the parking structures would extend to a total height of approximately 46 feet to the top of the guard rail.

The proposed buildings would consist of precast concrete panels with sandblast finish, clear and patterned spandrel glass, and aluminum railings, typical of modern commercial office architecture. Although the proposed buildings would be substantially taller than the existing buildings on the site (six stories versus two stories), the buildings would not be out of character with the surrounding office development; the vicinity of the site is primarily developed with office and light industrial uses.

The proposed lower levels of the three new buildings would match the existing buildings floor heights, and light wells would perforate each volume to provide naturally day-lit upper floors. The proposed Building 1 would be six stories, and set back approximately 101 feet from the nearby multi-family uses.

Parking garage P1, along the eastern border of the project site, would be seven levels in height (maximum six levels above grade), and set back 55 feet from the border with the residential uses, which are set back an additional 75 feet from the property boundary. Parking garage P1 steps down to five levels above grade near the property line. Parking garage P2 would also be seven levels in height (up to six levels above grade), and set back 58 feet from the property boundary. Parking garage P2 also steps down to five levels above grade near the property line. The parking structures would be arranged along the eastern and southeastern project boundary in order to soften the edges of the project and provide an appropriate step down to the neighboring residences for both Parking Structures 1 and 2.

The project proposes additional landscaping and trees to visually separate the adjacent uses. Of the approximately 644 trees on the site, 418 would be removed, 135 of which are Heritage trees. New trees and landscaping would be planted, as discussed in *Section 3.4, Biological Resources* of this Draft EIR. These Heritage trees would be replaced on-site at a ratio of at least 2:1 (tree replaced to trees removed), in addition to other new landscaping.

New parking lots, driveways, and lighting would be constructed for the project, in compliance with the City of Mountain View design guidelines and city regulations.

Impact AES-2: While the project would change the look of the site, as compared to existing conditions, the proposed project would not result in a significant impact to visual character and quality. **[Less Than Significant Impact]**

3.1.3.4 *Lighting and Glare*

The project will be subject to the Development Review process prior to submittal of construction drawings for a building permit. This review and approval process is underway concurrent with the environmental review process and includes multiple Development Review Committee (DRC) public meetings to receive a recommendation on the design, followed by public hearings by the EPC and City Council. The DRC has already reviewed the project plans, and the design has been revised to address issues and questions raised by the DRC thus far. The DRC review will ensure the proposed design and construction materials are consistent with design and aesthetic standards for office development in the area, and will not adversely affect the visual quality of the area, or create a substantial new source of light and glare.

As described above, the project proposes to construct three six-story office buildings and two seven-level parking structures and associated improvements. The buildings and parking structures would be oriented and designed in accordance with the City of Mountain View's design standards to minimize reflective materials and glare. The proposed site lighting is designed to comply with ratings listed in the 2016 California Building Standards Code, which minimizes light pollution that is disruptive to the environment, wildlife and humans in an effort to maintain dark skies and reduce the amount of backlight, uplight, and glare generated by luminaires. Additionally, the proposed parking garage lighting will be designed to comply with LEED criteria for light pollution reduction.[3]

To avoid headlight and lighting spillover for residents, the project proposes to install green screen walls and planters, avoid or limit the use of highly reflective materials and utilize known standards for bird-safe buildings, such as glazing treatments, architectural screening, and opaque surfaces. New lighting sources would be installed on the site in conformance with the City's design direction for commercial and office uses. Given the location of the proposed buildings and the visual character of the site area, the project would not create a significant new source of light or glare.

Impact AES-3: The proposed project would not result in a significant impact from light and glare. **[Less Than Significant Impact]**

3.1.3.5 *Consistency with Plans*

Mountain View 2030 General Plan

The project site is currently designated as *High-Intensity Office* in the Mountain View 2030 General Plan. The project proposes a floor area ratio (FAR) of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline for the *High-Intensity Office* designation. The proposed project would be consistent with the site's land use designation.

[3] Horton Lees Brogden Lighting Design. *Linkedin Middlefield Site Lighting Trespass Study Memomarndum.* April 2018

Consistency: The proposed project would not result in significant aesthetic impacts with the implementation of standard City of Mountain View conditions of approval. The proposed project construct commercial office uses in an identified Change Area of the City, consistent with General Plan goals and policies. For these reasons, the project is consistent with the Mountain View 2030 General Plan.

3.1.3.6 *Cumulative Impacts*

The cumulative projects analyzed in this Draft EIR in the Cities of Mountain View and Sunnyvale may demolish existing buildings, construct taller buildings, remove Heritage trees, and possibly affect views of the Santa Cruz Mountains and other scenic resources. As discussed previously, the project would go through the City's design process to reduce impacts to scenic views or scenic resources. A number of sites in the East Whisman Change Area near the project site may be redeveloped with more intensive office uses similar to those being proposed, consistent with the General Plan and the proposed East Whisman Precise Plan zoning district.

All of cumulative projects occurring within Mountain View or Sunnyvale would be subject to the design guidelines, lighting standards, and signage regulations of their respective jurisdictions. Implementation of these measures and requirements would minimize or reduce visual impacts associated with community or urban design to a less than significant level. For these reasons, the cumulative projects, including the 700 East Middlefield Road LinkedIn project, would not result in significant cumulative aesthetic or visual impacts.

Impact C-AES-1: The proposed project, along with the cumulative projects in the area, would not result in significant cumulative aesthetic or visual impacts. **[Less Than Significant Cumulative Impact]**

3.1.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
AES-1: The proposed project would result in a less than significant impact to scenic resources.	Less Than Significant	No mitigation required	Less Than Significant
AES-2: The proposed project would not result in a significant impact to visual character and quality.	Less Than Significant	No mitigation required	Less Than Significant
AES-3: The proposed project would not result in a significant impact from light and glare.	Less Than Significant	No mitigation required	Less Than Significant
C-AES-1: The proposed project, along with the cumulative projects in the area,	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
would not result in significant cumulative aesthetic or visual impacts.			

3.2 AGRICULTURAL AND FORESTRY RESOURCES

3.2.1 Regulatory Setting

3.2.1.1 *Williamson Act*

The Williamson Act (California Land Conservation Act of 1965) enables local governments to enter into contracts with private land owners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, land owners receive property tax assessments which are lower than full market value of the property because they are based on farming and open space uses.

3.2.1.2 *Farmland Mapping and Monitoring Program*

The California Resources Agency's Farmland Mapping and Monitoring Program (FMMP) provides maps and data to decision makers to assist them in making informed decisions regarding the planning of the present and future use of California's agricultural land resources.

3.2.1.3 *Forest Land and Timberland*

Public Resources Code Section 12220(g) identifies forest land as land that can support a 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefit.

Public Resources Code Section 4526 identifies timberland as land, other than land owned by the federal government and land designated as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined on a district basis.

3.2.2 Existing Setting

The project site is not currently used for agricultural purposes, and is located within an existing developed, urban area of Mountain View. According to the *Santa Clara County Important Farmlands 2014 Map*,[4] the site is designated as "Urban and Built-up Land," which is defined as land with at least one unit to a 1.5-acre parcel (or approximately six structures to a 10-acre parcel). Common examples of "Urban and Built-Up Land" are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses.

The project site is not designated by the California Resources Agency as farmland of any type and is not subject to a Williamson Act contract. No land adjacent to the project site is designated or used as farmland or timberland.

[4] California Department of Conservation. *Santa Clara County Important Farmland 2014 Map*. Map published October 2016. Accessed: November 16, 2017. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/scl14.pdf.

3.2.3 Agricultural and Forestry Resources Impacts

3.2.3.1 *Thresholds of Significance*

For the purposes of this EIR, an agricultural and forestry resource impact is considered significant if the project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- Result in a loss of forest land or conversion of forest land to non-forest use; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

3.2.3.2 *Agricultural Resources*

The project site is located within an existing developed area, and has been developed with commercial uses since the 1970s. The site is not used or zoned for agricultural purposes. The site is not designated by the Department of Conservation as farmland of any type, and is not the subject of a Williamson Act contract. None of the properties adjacent to the project site are used for agriculture, nor are any designated as forest land. For these reasons, the project would have no impact on agricultural or forest resources. **[No Impact]**

3.2.3.3 *Consistency with Plans*

The proposed project would not affect agricultural and forestry resources. Therefore, the project would not conflict with applicable plans, policies, and regulations pertaining to agricultural and forestry resources (refer to *Section 3.2.1.1, Applicable Plans, Policies, and Regulations*). **[No Impact]**

3.2.3.4 *Cumulative Impacts*

As discussed above, the proposed project would not impact agricultural or forest resources or lands. Therefore, the proposed project would not contribute to a cumulative agricultural or forest resources or lands impact. **[No Cumulative Impact]**

3.2.4 Conclusion

Impact AG-1: The proposed project would not have an impact on agricultural land, agricultural activities, or forest resources. **[No Impact]**

3.3 AIR QUALITY

This section is based on the air quality analysis prepared for the project by *Illingworth & Rodkin, Inc.* in April 2018. This report is included as Appendix C to this Draft EIR.

3.3.1 Background

Air quality means the amount of a given pollutant in the atmosphere, and is measured by the amount of pollutants released and the atmosphere's ability to transport and dilute the pollutants. The major determinants of transport and dilution are wind, atmospheric stability, terrain and for photochemical pollutants, sunshine.

The City of Mountain View is located in the San Francisco Bay Area which typically has moderate ventilation, frequent inversions that restrict vertical dilution, and terrain that restricts horizontal dilution. These factors give the Bay Area a relatively high atmospheric potential for pollution.

3.3.2 Regulatory Setting

In recognition of the adverse effects of degraded air quality, Congress and the California Legislature enacted the Federal and California Clean Air Acts, respectively. The requirements of these acts are administered by the United States Environmental Protection Agency (EPA) at the federal level, the California Air Resources Board (CARB) at the state level, and the Bay Area Air Quality Management District (BAAQMD) at the regional level.

Regional air quality management districts, such as the BAAQMD, must prepare air quality plans specifying how state standards are to be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two closely related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how the BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other "super-GHGs" that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

3.3.2.1 *Air Pollutants of Concern (Criteria Air Pollutants)*

Major criteria pollutants, listed in "criteria" documents by the EPA and the CARB include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and suspended particulate matter (PM). These pollutants can have health effect such as respiratory impairment and heart/lung disease symptoms.

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels

aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant of the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

Violations of ambient air quality standards are based on air pollutant monitoring data and are judged for each pollutant. The Bay Area as a whole does not meet state or federal ambient air quality standards for ground level ozone and $PM_{2.5}$ and state standards for PM_{10}. The area is considered in attainment, or unclassified, for all other pollutants.

3.3.2.2 *Toxic Air Contaminants*

Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer), but are not limited to, the criteria air pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to the CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. The most recent Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines were published in February of 2015.[5]

3.3.2.3 *Sensitive Receptors*

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

[5] OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

receptors, since they are more susceptible to cancer-causing TACs. Residential locations are assumed to include infants and small children.

3.3.3 Environmental Setting

The project is located in northern Santa Clara County, which is in the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the State and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

3.3.4 Air Quality Impacts

3.3.4.1 *Thresholds of Significance*

For the purposes of this EIR, an air quality impact is considered significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.

Project-Level Significance Thresholds

In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA and were posted on BAAQMD's website and included in the Air District's updated CEQA Guidelines (updated May 2011).

BAAQMD's adoption of significance thresholds contained in the 2011 CEQA Air Quality Guidelines was called into question by an order issued March 5, 2012, in California Building Industry Association (CBIA) v. BAAQMD (Alameda Superior Court Case No. RGI0548693). In December 2015, the Supreme Court determined that an analysis of the impacts of the environment on a project – known as "CEQA-in-reverse" – is only required under two limited circumstances: (1) when a statute provides an express legislative directive to consider such impacts; and (2) when a proposed project risks exacerbating environmental hazards or conditions that already exist (Cal. Supreme Court Case No. S213478). Because the Supreme Court's holding concerns the effects of the environment on a project (as contrasted to the effects of a proposed project on the environment), and not the science behind the thresholds, the significance thresholds contained in the CEQA Air Quality Guidelines are applied to this project.

The significance thresholds identified by BAAQMD and used in this analysis are summarized in Table 3.3-1.

Table 3.3-1:
Air Quality Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
Reactive Organic Gases (ROG)	54	54	10
Nitrogen Oxides ($NO_{x)}$	54	54	10
PM_{10}	82	82	15
$PM_{2.5}$	54	54	10
Carbon Monoxide (CO)	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, and $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.			
Health Risks and Hazards for New Sources			
Excess Cancer Risk	10 per one million		
Chronic or Acute Hazard Index	1.0		
Incremental annual average $PM_{2.5}$	0.3 µg/m^3		
Health Risks and Hazards for Sensitive Receptors (Cumulative from all sources within 1,000 foot zone of influence) and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per one million		
Chronic Hazard Index	10.0		
Annual Average $PM_{2.5}$	0.8 µg/m^3		
Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, and $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.			

3.3.4.2 *Air Quality Impacts – Criteria Air Pollutants*

The Bay Area is considered a non-attainment area for ground-level ozone and $PM_{2.5}$ under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM_{10} under the California Clean Air Act, but not the federal act. The area has attained both state and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM_{10}, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO_x), PM_{10}, and $PM_{2.5}$ and apply to both construction period and operational period impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction and operation of the site assuming full build-out of the project.

Construction Period Emissions

CalEEMod provides annual emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. It was assumed the project would be built out over a period of approximately 48 months beginning as early as February 2019, for an approximate 1,040 construction workdays. Average daily emissions were computed for each phase by dividing the total construction emissions by the number of construction days. Table 3.3-2 shows average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project. As indicated in Table 3.3-2, construction period emissions would not exceed the BAAQMD significance thresholds. Therefore, the impacts to criteria air pollutants would be less than significant.

Table 3.3-2:
Construction Period Emissions

Scenario	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Demolition and Site Preparation	0.05 tons	1.02 tons	0.02 tons	0.02 tons
Phase 1	2.01 tons	6.82 tons	0.21 tons	0.20 tons
Phase 2	0.25 tons	3.22 tons	0.04 tons	0.04 tons
Phase 3	5.75 tons	2.84 tons	0.08 tons	0.08 tons
Paving	<0.01 tons	0.06 tons	<0.01 tons	<0.01 tons
Total construction emissions (tons)	8.06 tons	13.96 tons	0.35 tons	0.34 tons
Average daily emissions (pounds)[1]	**15.5 lbs./day**	**26.8 lbs./day**	**0.7 lbs./day**	**0.7 lbs./day**
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: [1]Assumes 1,040 workdays.

Fugitive Dust: Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils and debris. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices are implemented to reduce these emissions. These measures will be required of the project as City of Mountain View conditions of approval.

Standard Conditions of Approval

The project will implement the following measures to control dust and exhaust during construction.

> AIR QUALITY CONSTRUCTION MEASURES: The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Bay Area Air Quality Management District (BAAQMD) to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures. Additional measures may be identified by the BAAQMD or contractor as appropriate, such as:
>
> – All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
>
> – All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
>
> – All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
>
> – All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
>
> – All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;
>
> – Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five (5) minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
>
> – All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
>
> – Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number will also be visible to ensure compliance with applicable regulations.

Operational Period Emissions

Operational air emissions from the project would be generated primarily from autos driven by future employees and customers. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are also typical emissions from these types of uses.

CalEEMod was used to estimate emissions from operation of the proposed project assuming full build-out.

Several sources of stationary air pollutants have been identified with build-out of the project, including two 250 kW (approximately 335 horsepower) generators to provide emergency backup power to Buildings B1 and B6, and parking structures P1 and P2; one 150 kW (approximately 200 horsepower) generator for Building B5; and two boilers rated at three MMBTU/hour to provide the buildings with hot water. It is assumed for this assessment the generators would be driven by diesel-fueled engines and the boilers would be fired using natural gas.

The emergency back-up generators would be used for backup power in emergency conditions. A generator would be operated for testing and maintenance purposes, with a maximum of 50 hours each per year of non-emergency operation under normal conditions allowed by BAAQMD. During testing periods, the engine would typically be run for less than one hour. The engine would be required to meet CARB and EPA emission standards and consume commercially available California low-sulfur diesel fuel. The generator and boiler emissions were modeled using CalEEMod. Table 3.2-3 shows the predicted emission in terms of annual emissions in tons and average daily operational emissions, assuming 365 days of operation per year, more than the projected use.

Table 3.3-3:
Operational Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2024 Project Operational Emissions (*tons/year*)	4.75 tons	5.16 tons	4.96 tons	1.54 tons
Existing Operational Emissions (*tons/year*)	0.89 tons	0.95 tons	0.94 tons	0.27 tons
Net Project Total Operational Emissions (*tons/year*)	4.28 tons[2]	5.82 tons[2]	5.91 tons[2]	1.79 tons[2]
BAAQMD Thresholds (tons /year)	*10 tons*	*10 tons*	*15 tons*	*10 tons*
Exceed Threshold?	**No**	**No**	**No**	**No**
Net Project Total Operational Emissions (*pounds/day*)	23.5 lbs.	31.9 lbs.	32.4 lbs.	9.8 lbs.
BAAQMD Thresholds (pounds/day)	*54* lbs.	*54* lbs.	*82* lbs.	*54* lbs.
Exceed Threshold?	**No**	**No**	**No**	**No**

[1] Assumes 365-day operation.
[2] Includes VMT adjustment for mobile emissions, as described above.

As shown in the table, average daily and annual emissions of ROG, NO_x, PM_{10}, or $PM_{2.5}$ emissions associated with operations would not exceed the BAAQMD significance thresholds, with the minimum twenty percent TDM program in place. Any greater vehicle trip reduction rate for the project (over twenty percent) would further reduce emissions associated with project operations, below BAAQMD significance thresholds.

Impact AQ-1: With the implementation of standard conditions of approval, the proposed project would not result in significant emissions of criteria pollutants during the construction or operation period. **[Less Than Significant Impact]**

3.3.4.3 *Air Quality Violations*

As discussed previously, the project would have emissions below the BAAQMD thresholds for evaluating impacts related to ozone and particulate matter. Therefore, the project would not contribute substantially to existing or projected violations of those standards.

Carbon monoxide emissions from traffic generated by the project would be the pollutant of greatest concern at the local level. Congested intersections with a large volume of traffic have the greatest potential to cause high-localized concentrations of carbon monoxide. Air pollutant monitoring data indicate carbon monoxide levels have been at healthy levels (i.e., below state and federal standards) in the Bay Area since the early 1990s. As a result, the region has been designated as in attainment for the standard. The highest measured level over any eight-hour averaging period during the last three years in the Bay Area is less than 3.0 parts per million (ppm), compared to the ambient air quality standard of 9.0 ppm. Intersections affected by the project would have traffic volumes less than the BAAQMD screening criteria and, thus, would not cause a violation of an ambient air quality standard or have a considerable contribution to cumulative violations of these standards.[6]

Impact AQ-2: Intersections affected by project traffic would have traffic volumes below the BAAQMD screening criteria and, thus, the project would not cause a violation of an ambient air quality standard or have a considerable contribution to cumulative violations of these standards. **[Less Than Significant Impact]**

3.3.4.4 *Toxic Air Contaminant Impacts*

Project impacts related to increased community risk can occur either by introducing a new sensitive receptor, such as a residential use, in proximity to an existing source of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity. The project would not introduce new sensitive receptors. The BAAQMD recommends using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. Thresholds of significance for construction-related TAC and $PM_{2.5}$ are based upon health risk. Project emissions could result in a significant impact if they exceed the following thresholds.

- Increased cancer risk of >10.0 in one million
- Increased non-cancer risk of > 1.0 Hazard Index (chronic or acute)
- Ambient $PM_{2.5}$ increase: > 0.3 μ/m^3
  (Zone of influence: 1,000-foot radius from property line of source or receptor)

[6] For a land-use project type, the BAAQMD CEQA Air Quality Guidelines state that a proposed project would result in a less than significant impact to localized carbon monoxide concentrations if the project would not increase traffic at affected intersections with more than 44,000 vehicles per hour.

Operational Community Risk Impacts

Project Generators

The project would include several stationary sources, including two 250 kW generators to provide emergency backup power to Buildings B1 and B6, and parking structures P1 and P2; one 150 kW generator for Building B5; and two boilers rated at three MMBTU/hour to provide the buildings with hot water. It is assumed for this assessment that the generators would be driven by diesel-fueled engines and the boilers would be natural-gas powered. The generators would be operated for testing and maintenance purposes, with a maximum of 50 hours per year each of non-emergency operation under normal conditions. During testing periods, the engine would typically be run for less than one hour under light engine loads. The emissions from the operation of the generator were calculated using CalEEMod.

The generators would be located adjacent to the new buildings, at exterior grade, in a service yard. The maximum modeled off-site DPM and $PM_{2.5}$ concentrations occurred at a residence adjacent to the eastern project boundary across from the proposed new P1 parking structure (See Figure 3.3-1). The maximum annual DPM and $PM_{2.5}$ concentrations were 0.003 $\mu g/m^3$. Based on the maximum DPM concentration the maximum off-site residential cancer risk would be 1.9 in one million. The maximum on-site residential hazard index (HI) would be less than 0.01.

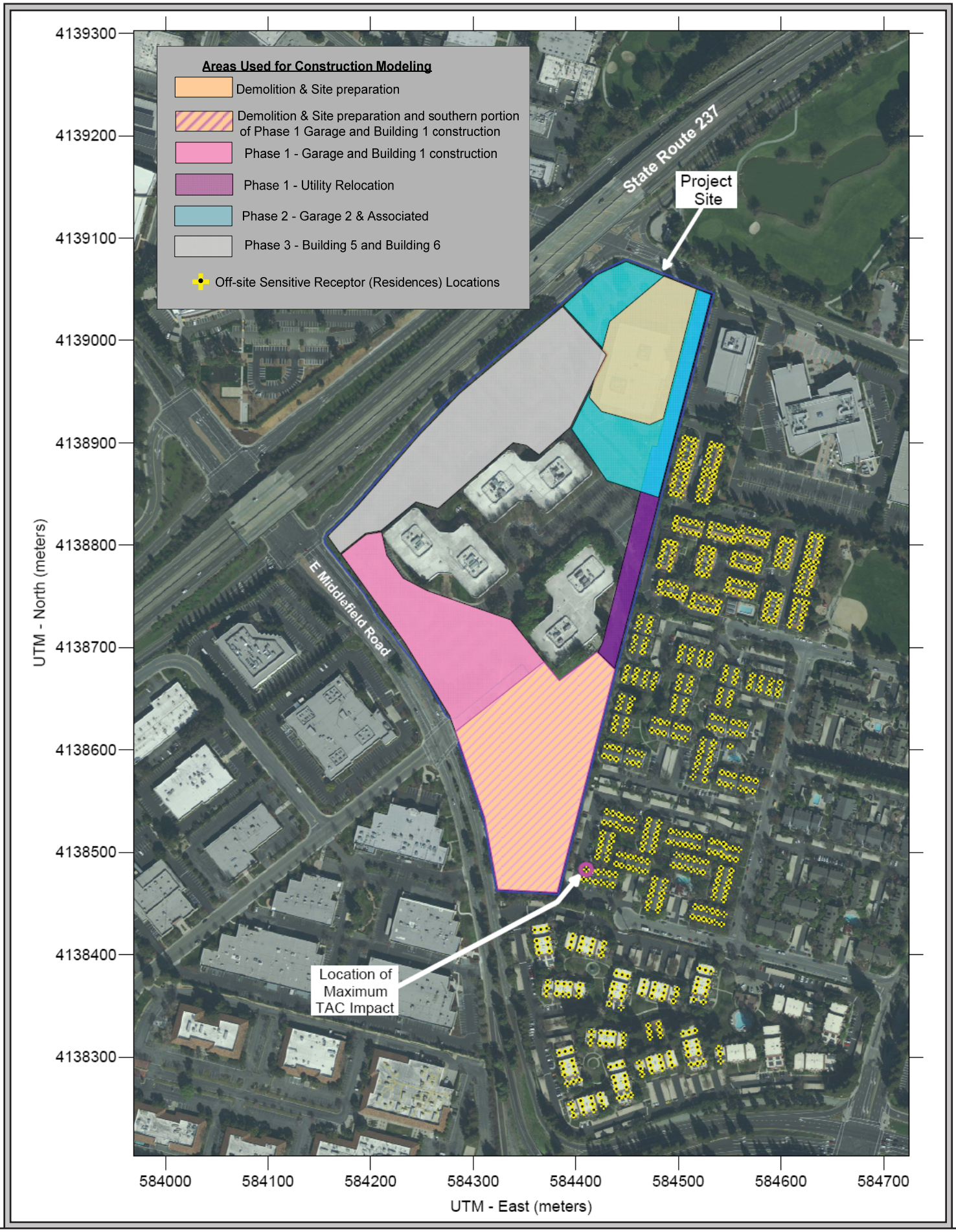
The increased cancer risks, $PM_{2.5}$ concentrations, and HIs at all sensitive receptors from operation of the project emergency generator would all be below BAAQMD significance thresholds.

Project Boilers

TACs are generated during the combustion of natural gas. As recommended in the *BAAQMD Permitting Handbook*, TAC emissions from natural gas combustion include emissions of benzene, formaldehyde, and toluene.[7] Benzene and formaldehyde are carcinogenic TAC compounds, in addition to causing acute and chronic non-cancer health effects. Toluene only causes non-cancer health effects.

Potential health risks to nearby residents from project natural gas combustion sources were evaluated for maximum operating conditions at full build-out. Emissions of benzene, formaldehyde, and toluene were calculated for two boilers using BAAQMD-recommended emission factors (*BAAQMD Permitting Handbook*) and assuming each boiler could operate 24 hours per day.

[7] BAAQMD, 2017. *BAAQMD Permit Handbook*, Section 2.1 Boilers, Steam Generators & Process Heaters. August 14, 2017.



LOCATION OF OFF-SITE SENSITIVE RECEPTORS AND MAXIMUM TAC IMPACTS FIGURE 3.3-1

Screening risk from the project's boilers was conducted with the BAAQMD *Risk and Hazards Emissions Screening Calculator (Beta Version)*. The total increased project cancer risk from the boilers would be 0.3 in one million. When combined with the risk from the generators, total increased risk from the project stationary sources would be 2.2 in one million. This total increased cancer risk is below the BAAQMD significance threshold for increased cancer risk of 10 in one million and would be considered a less than significant impact.

Potential acute and chronic non-cancer health effects from the boilers were evaluated using the BAAQMD *Risk and Hazards Emissions Screening Calculator (Beta Version)*. The total chronic and acute HI from all the boilers would be less than 0.01. When combined with the HIs from the generators the total HI would also be less than 0.01. This total HI is well below the BAAQMD significance threshold of a HI of 1.0 or greater. Thus, non-cancer health impacts from project operation would be considered a less than significant impact.

Project Construction Activity

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC as well as particulates ($PM_{2.5}$). The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. The closest sensitive receptors to the project site are residences located adjacent to the eastern project site boundary (see Figure 3.3-1).

Dispersion Modeling

The EPA AERMOD dispersion model was used to predict concentrations of DPM and $PM_{2.5}$ at sensitive receptors (residences) in the vicinity of the project construction area. Annual concentrations were computed for the initial demolition and construction activities and the five construction phases during the years 2019-2023:

- For **2019**, emissions would occur from initial demolition and site preparation activities, and from Phase one (1) construction activities. The AERMOD modeling of these emissions utilized eight area sources to represent the on-site emissions, with four areas for exhaust emissions and four areas for fugitive dust emissions.
- For **2020**, emissions would occur from Phase one (1) and Phase two (2) construction activities. For modeling these emissions, AERMOD utilized six area sources, with three areas used for exhaust emissions and three areas for fugitive dust emissions.
- For **2021**, emissions would be from Phase two (2) and Phase three (3) construction activities and paving emissions. The 2021 AERMOD modeling used eight area sources, with four areas for exhaust emissions and four areas for fugitive dust emissions.
- Emissions during **2022** and **2023** would be from Phase 3 construction activities. For modeling each year of these emissions, the AERMOD model utilized two area sources, with one area used for exhaust emissions and one area for fugitive dust emissions.

The maximum modeled DPM and $PM_{2.5}$ concentrations occurred at the first floor level of a residence near the southeast corner of the project site. Figure 3.3-1 shows the location where the maximum-modeled DPM and $PM_{2.5}$ concentrations occurred. Using the maximum annual modeled DPM concentrations over the construction period, the maximum increased cancer risk at the location of the

maximally exposed individual (MEI) was calculated. The results of this assessment indicate that the maximum increased residential cancer risks would be 51.3 in one million for an infant/child exposure and 0.9 in one million for an adult exposure. The maximum residential excess cancer risk would exceed the BAAQMD significance threshold of 10 in one million and would be considered a significant impact. **[Significant Impact]**

Predicted Annual $PM_{2.5}$ Concentration

The maximum-modeled annual $PM_{2.5}$ concentration, which is based on combined exhaust and fugitive dust emissions, was 0.2 $\mu g/m^3$. This maximum annual $PM_{2.5}$ concentration would not exceed the BAAQMD significance threshold of 0.3 $\mu g/m^3$. The location of the maximum $PM_{2.5}$ concentration (MEI location) is shown in Figure 3.3-1.

Non-Cancer Hazards

The maximum modeled annual residential DPM concentration (i.e., from construction exhaust) was 0.1869 $\mu g/m^3$. The maximum computed hazard index (HI) based on this DPM concentration is 0.04, which is lower than the BAAQMD significance criterion of a HI greater than 1.0.

Cumulative Community Risk

The cumulative impacts of TAC emissions from construction of the project and traffic on East Middlefield Road on the construction MEI have been summarized in Table 3.3-4. There were no existing stationary TAC sources with substantial risk identified within 1,000 feet of the construction MEI using BAAQMD screening tools. SR-237 is more than 1,000 feet from the construction MEI.

For local roadways, BAAQMD has provided the *Roadway Screening Analysis Calculator* to assess whether roadways with traffic volumes of over 10,000 vehicles per day may have a potentially significant effect on a proposed project. Based on the project traffic study, East Middlefield Road would have a daily traffic volume of more than 10,000 vehicles.

Overall, emission rates will decrease by the time the project is constructed and occupied, which is not likely to be prior to 2024. The average daily traffic (ADT) on East Middlefield Road was estimated to be about 19,820 based on the project traffic study's Near-term Cumulative With Project conditions, and assuming that ADT is approximately ten times peak hour volume. Using the BAAQMD *Roadway Screening Analysis Calculator* for Santa Clara County for east-west directional roadways and at a distance of 300 feet north of the roadway, the estimated cancer risk at the construction MEI would be 2.2 per million and $PM_{2.5}$ concentration would be 0.07 $\mu g/m^3$. Chronic or acute HI for the roadway would be below 0.03.

As shown in Table 3.3-4, the sum of impacts from combined sources at the construction MEI would be less than significant.

Table 3.3-4: Impacts from Combined Sources at Construction MEI			
Source	**Maximum Cancer Risk (per million)**	**$PM_{2.5}$ concentration ($\mu g/m^3$)**	**Hazard Index**
Project Construction	51.3	0.2	0.04
East Middlefield Road	2.4	0.07	<0.03
BAAQMD Threshold – Single Source	10.0	0.3	1.0
Exceed Threshold?	**Yes**	**No**	**No**
Combined Sources	53.7	0.27	<0.07
BAAQMD Threshold – Combined Sources	*100*	*0.8*	*10.0*
Exceed Threshold?	**No**	**No**	**No**
Note: [1]The annual $PM_{2.5}$ concentration is the sum of the DPM and fugitive $PM_{2.5}$ concentrations. Source: Illingworth & Rodkin, February 2018			

Impact AQ-3: Health risks associated with exposure to TACs during temporary construction activities could significantly impact sensitive receptors. **[Significant Impact]**

Mitigation Measure: The following mitigation measure is included in the project to reduce TAC emissions impacts during project construction to a less than significant level.

MM AQ-3.1: The project shall demonstrate that the off-road equipment used on-site to construct the project would achieve a fleet-wide average of at least 81 percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

- All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days shall meet, at a minimum, EPA particulate matter emissions standards for Tier four (4) engines or equivalent.

  Note that the construction contractor could use other measures to minimize construction period DPM emission to reduce the estimated cancer risk below the thresholds. The use of equipment that includes Tier two (2) engines and CARB-certified Level three (3) Diesel Particulate Filters[8] or alternatively-fueled equipment (i.e., non-diesel) could meet this requirement. Other measures may include the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to less than significant.

[Less than Significant Impact with Mitigation Measures Incorporated in the Project]

[8] See http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm.

Implementation of the standard conditions of approval described previously in *Section 3.3.4.2* will reduce exhaust emissions by five percent and fugitive dust emissions by over 50 percent. In addition, implementation of **MM AQ-3.1**, which requires the use of efficient construction equipment that meet the EPA particulate matter emissions standards for Tier four (4) engines or equivalent, would substantially further reduce on-site diesel exhaust emissions and health risks associated with TACs. With this mitigation, the computed maximum increased lifetime residential cancer risk from construction, assuming infant exposure, would be reduced to 7.6 in one million or less.[9] This would be below the BAAQMD threshold of 10 per one million for cancer risk. After implementation of these recommended measures, the project would have a less than significant impact with respect to community risk caused by construction activities.

3.3.4.5 *Odor Impacts*

As a general matter, the types of land use development that pose potential odor problems include wastewater treatment plants, refineries, landfills, composting facilities, and transfer stations. No such uses are proposed or would occupy the project site.

The project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors. However, they would be localized and are not likely to adversely affect people off-site, resulting in confirmed odor complaints. Therefore, the project would not include any sources of significant odors that would cause complaints from surrounding uses.

Impact AQ-4: Implementation of the proposed project would not create objectionable odors. **[Less Than Significant Impact]**

3.3.4.6 *Consistency with Plans*

Clean Air Plan

The project site is located within the San Francisco Bay Area Air Basin. The BAAQMD is the regional government agency that monitors and regulates air pollution within the air basin, and assures that the federal and state ambient air quality standards are maintained. Air quality standards are set by the federal and the state government, and regional air quality management districts such as BAAQMD must prepare air quality plans specifying how state standards will be met. Regional air quality management districts, such as the BAAQMD, must prepare air quality plans specifying how state standards are to be met.

BAAQMD's most recently adopted plan is the Bay Area 2017 CAP. The 2017 CAP focuses on two closely related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how the BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such

[9] The mitigation plan used in the modeling and described for MM AQ-3.1 achieved an 85 percent reduction. 51.3 x 0.85 = 43.6. With this mitigation, the resulting maximum increased lifetime residential cancer risk would be 51.3 - 43.6 = 7.6 in one million.

as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other "super-GHGs" that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Consistency: As discussed previously, development under the project would not result in significant and unavoidable air quality impacts after the application of mitigation measures included in the project. The project would encourage employees to walk, bicycle, and take transit to reach their jobs instead of relying on private automobiles. The proposed project would implement extensive pedestrian and bicycle features as stated below to facilitate site access by these modes:

- The proposed project would place priority on bicycle commuters, enhancing the existing bicycle network and creating easy connections to bicycle support infrastructure at each building, compelling increased ridership within the company.

- At the southern boundary of the LinkedIn Quad would be the grand arc pathway connecting the headquarters entrance with the future phase buildings, and the Middlefield Transit Station further to the west. It is envisioned as a path made of inviting pedestrian furniture, campus benches, and unique pedestrian lighting. Additional pathways made of contrasting materials would be added to complete the campus green character, and provide additional path desire lines between the new and old buildings.

The project would not interfere with the implementation of control measures in the 2017 Clean Air Plan, and includes the provision of bicycle parking, and pedestrian and transit facilities. For these reasons, the project is consistent with the primary goals and intent of the 2017 Clean Air Plan.

3.3.4.7 *Cumulative Air Quality*

The San Francisco Bay Area Air Basin (SFBAAB) is currently designated as a non-attainment area for state and national ozone standards and national particulate matter ambient air quality standards. SFBAAB's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As described in this section and Appendix C, the project would not exceed thresholds for criteria pollutants and, therefore, would not make a cumulatively considerable contribution to regional air quality impacts.

Impact C-AQ-1: The project would not result in significant cumulative criteria air quality impacts. **[Less Than Significant Cumulative Air Quality Impact]**

3.3.4.8 *Cumulative Construction Air Quality*

Construction activities associated with all of the cumulative projects would temporarily affect local air quality. Construction activities such as demolition, earthmoving, construction vehicle traffic, and wind blowing over exposed earth would generate diesel exhaust emissions and fugitive particulate matter emissions that would affect local and regional air quality. The cumulative projects, however, are scattered throughout the City and neighboring jurisdictions, and their schedules for construction are different and likely to occur over the next several years. In addition, construction mitigation measures are typically included as part of each project, especially large development and public projects.

As discussed previously, the proposed project would implement mitigation measures to reduce its construction-related dust impacts. Based on this, the project would not make a cumulatively significant contribution to a cumulative impact.

Impact C-AQ-2: The proposed project would not result in or substantially contribute to a significant short-term cumulative air quality impact. **[Less Than Significant Short-term Cumulative Air Quality Impact]**

3.3.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
AQ-1: With the implementation of standard conditions of approval, the proposed project would not result in significant emissions of criteria pollutants during the construction or operation period.	Less Than Significant	No mitigation required	Less Than Significant
AQ-2: Intersections affected by project traffic would have traffic volumes below the BAAQMD screening criteria and, thus, the project would not cause a violation of an ambient air quality standard or have a considerable contribution to cumulative violations of these standards.	Less Than Significant	No mitigation required	Less Than Significant
AQ-3: Health risks associated with exposure to TACs during temporary construction activities could	Significant	**MM AQ-3.1,** Selection of off-road equipment. The project shall demonstrate	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
significantly impact sensitive receptors.		that the off-road equipment used on-site to construct the project would achieve a fleet-wide average of at least 81 percent reduction in diesel particulate matter exhaust emissions or greater.	
AQ-4: Implementation of the proposed project would not create objectionable odors.	Less Than Significant	No mitigation required	Less Than Significant
C-AQ-1: The project would not result in significant cumulative criteria air quality impacts.	Less Than Significant	No mitigation required	Less Than Significant
C-AQ-2: The proposed project would not result in or substantially contribute to a significant short-term cumulative air quality impact.	Less Than Significant	No mitigation required	Less Than Significant

3.4 BIOLOGICAL RESOURCES

The discussion of trees in this section is based on an arborist report prepared by *Urban Tree Management* on October 16, 2017. The report is included as Appendix D to this Draft EIR. Bird safe design measures provided by the applicant are included as Appendix E.

3.4.1 Regulatory Setting

3.4.1.1 *Special Status Species*

Special status species include plants or animals that are listed as threatened or endangered under the federal and/or California Endangered Species Acts (CESA), species identified by the California Department of Fish and Wildlife (CDFW) as a California Species of Special Concern, as well as plants identified by the California Native Plant Society (CNPS)[10] as rare, threatened, or endangered.

3.4.1.2 *Migratory Bird Treaty Act*

The federal Migratory Bird Treaty Act (MBTA: 16 USC Section 703, Supp. I, 1989) prohibits killing, possessing, or trading in migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, bird nests, and eggs. Construction disturbance during the breeding season could result in a violation of the MBTA such as the incidental loss of fertile eggs or nestlings, or nest abandonment.

3.4.1.3 *Mountain View Tree Preservation Ordinance*

The City of Mountain View tree regulations protect all trees designated as "Heritage" trees (Chapter 32, Article 2). Under this ordinance, a Heritage tree is defined as any one of the following:

- A tree which has a trunk with a circumference of forty-eight (48) inches or more measured at fifty-four (54) inches above natural grade;
- A multi-branched tree which has major branches below fifty-four (54) inches above the natural grade with a circumference of forty-eight (48) inches measured just below the first major trunk fork.
- Any *Quercus* (oak), *Sequoia* (redwood), or *Cedrus* (cedar) tree with a circumference of twelve (12) inches or more when measured at fifty-four (54) inches above natural grade;
- A tree or grove of trees designated by resolution of the City Council to be of special historical value or of significant community benefit.

A tree removal permit is required from the City of Mountain View for the removal of Heritage trees. It is unlawful to willfully injure, damage, destroy, move or remove a Heritage tree.

[10] The California Native Plant Society (CNPS) is a non-profit organization that maintains lists and a database of rare and endangered plant species in California. Plants in the CNPS "Inventory of Rare and Endangered Plants of California" are considered "Special Plants" by the CDFG Natural Diversity Database Program.

3.4.1.4 *Habitat Conservation Plans*

The City of Mountain View and the proposed project site are not included within the study area of the Santa Clara Valley Habitat Plan/Natural Community Conservation Plan (VHP).

The VHP, which encompasses a study area of 519,506 acres (or approximately 62 percent of Santa Clara County), was adopted by six local entities in Santa Clara County. The plan went into effect in October 2013 and the Santa Clara Valley Habitat Agency is charged with implementing the plan. The area for which development activities are covered by the plan is located south and east of Mountain View, primarily within the Llagas/Uvas/Pajaro, Coyote Creek, and Guadalupe Watersheds. The VHP was developed through a partnership between Santa Clara County, the Cities of San José, Morgan Hill, and Gilroy, the Santa Clara Valley Water District, and the Santa Clara Valley Transportation Authority (collectively termed the 'Local Partners'), the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife.

The VHP is a conservation program to promote the recovery of endangered species in portions of Santa Clara County while accommodating planned development, infrastructure and maintenance activities. The species of concern identified in the VHP include, but are not limited to, the California tiger salamander, California red-legged frog, western burrowing owl, Bay Checkerspot butterfly, and a number of species endemic to serpentine grassland and scrub. Projects and activities of the jurisdictions in Santa Clara County, such as the City of Mountain View, which are not Permittees, are not covered under the VHP.

3.4.2 Existing Setting

3.4.2.1 *Existing Biotic Resources On-Site*

Along with most of the City of Mountain View, the project site is located in a developed urban habitat. Urban habitats include street trees, landscaping, lawns, and vacant lots, and provide food and shelter for wildlife able to adapt to the modified environment. Since the original native vegetation of the area is no longer present, native species of wildlife have been supplanted by species that are more compatible with an urbanized area.

The project site is developed with five one and two-story office buildings, paved surface parking lots, pedestrian walkways, and urban landscaping, including mature ornamental trees. Wildlife habitats in developed urban areas are low in species diversity. Common species that occur in urban environments include rock pigeons, mourning doves, house sparrows, finches, and European starlings. Raptors and other avian species could forage in the project area or nest in surrounding landscaping or within buildings.

Most of the vegetation in the vicinity of the site consists of landscape trees, shrubs, and non-native herbaceous species. The site itself is entirely built on or paved, and where vegetation occurs on the site it consists primarily of ornamental landscaping, lawns, and trees. There are no undisturbed areas or sensitive habitats on the site, and the site itself does not contain any streams, waterways, or wetlands. The nearest waterway, Stevens Creek, is located approximately 1.1 mile west of the project site.

The project site is not included in the study area of the VHP, an adopted Habitat Conservation Plan and Natural Communities Conservation Plan (HCP/NCCP). Because of its urban setting and isolation from larger areas of undeveloped lands and riparian corridors, the site does not function as a movement corridor for local wildlife.

No rare, threatened, endangered, or special status species of flora or fauna are known to inhabit the site, and no sensitive species would be anticipated in this area of Mountain View. The special status plants and animals that have been identified as present or likely to be present in the City are primarily located in the northern area of the City in suitable habitats, such as open water, grasslands, salt ponds, and tidal marshes. Special status species are not expected to occur on or adjacent to the project site because the project site is completely developed.

3.4.2.2 *Trees on Site*

The primary biological resources on-site are ornamental landscape trees. Trees are located along the perimeter and few on the interior of the project site. The arborist report prepared for the project site evaluated 644 trees representing 24 different species on the site or immediately adjacent to the site. Approximately 304 of these trees qualify as Heritage trees in the City of Mountain View, as defined previously.

Six heritage trees are recommended for removal by the arborist due to serious health or structural issues. Tree species found on the project site are listed in Table 3.4-1, and a tree inventory map showing the location of the trees on-site is provided in Figure 3.4-1.

Table 3.4-1 Trees Species Found on Site	
Scientific Name	**Common Name**
Geijera parviflora	Australian willow
Eucalyptus globulus	Blue gum eucalyptus
Acer negundo	**Boxelder**
Cinnamomum camphora	Camphor
Pinus canariensis	Canary Island pine
Pistacia chinensis	Chinese pistache
Quercus agrifolia	**Coast live oak**
Sequoia sempervirens	**Coast Redwood**
Lagerstroemia indica	Crape myrtle
Malus eleyi	Dwarf crabapple
Prunus serrulata	Flowering cherry
Quercus gambelii	Gambel oak
Gingko biloba	Gingko
Eucalyptus sideroxylon	Ironbark eucalyptus
Acer palmatum	Japanese maple
Pyrus kawakami	Kawakami pear
Liquidambar styraciflua (cultivar)	Liquidambar
Liriodendron tulipfera	Liriodendron (tulip tree)
Platanus x acerifolia	London Plane
Olea europaea	Olive
Pittosporum eugenioides	Pittosporum
Quercus rubra	Red oak
Magnolia x soulangiana (cultivar)	Saucer (Chinese) magnolia
Fraxinus uhdei	Shamel ash
Magnolia grandiflora	Southern magnolia
Juglans sp.	Walnut
Betula pendula	White birch
Trees highlighted in **Bold** are species native to California.	

LEGEND - existing tree species

TRUNK LOCATION
DIAMETER AT BREAST HEIGHT (IN)
HERITAGE | STREET TREE
TAG #

HERITAGE TREE	NON-HERITAGE TREE	
		ACER NEGUNDO
		ACER PALMATUM
		BETULA PENDULA
		CERCIS OCCIDENTALIS
		CINNAMOMUM CAMPHORA
		CORNUS SP
		EUCALYPTUS GLOBULUS
		EUCALYPTUS SIDEROXYLON
		FRAXINUS UHDEI
		GEIJERA PARVIFLORA
		GINGKO BILOBA
		JUGLANS SP.
		LAGERSTROEMIA INDICA
		LIQUIDAMBAR STYRACIFLUA
		LIRIODENDRON TULIPIFERA
		MAGNOLIA GRANDIFLORA
		MAGNOLIA X SOULANGIANA
		MALUS ELEYI
		OLEA EUROPAEA
		PINUS CANARIENSIS
		PISTACIA CHINENSIS
		PITTOSPORUM EUGENIOIDES
		PLATANUS X ACERIFOLIA
		PRUNUS SERRULATA
		PRUNUS SP.
		PYRUS KAWAKAMII
		QUERCUS AGRIFOLIA
		QUERCUS GAMBELII
		QUERCUS RUBRA
		SALIX SP
		SEQUOIA SEMPERVIRENS
		ULMUS PARVIFOLIA

LEGEND - Preliminary Tree Disposition

- RETAIN - PROTECT TREE IN PLACE
- REMOVE - HERITAGE TREE
- REMOVE - NON- HERITAGE TREE
- TREE PROTECTION FENCING

NOT IN SCOPE OF WORK

- RETAIN - PROTECT IN PLACE

N

0 100 200 Feet

DRAFT TREE DISPOSITION

FIGURE 3.4-1

LEGEND

- EXISTING REDWOOD TREE
- EXISTING PINE TREE
- EXISTING TULIP TREE
- EXISTING ASH TREE
- EXISTING EUCALYPTUS TREE
- EXISTING CANOPY TREE
- CONIFER FOREST REDWOOD
- CONIFER FOREST PINE
- COAST LIVE OAK
- FEATURE DECIDUOUS TREE
- DECIDUOUS TREE
- BIORETENTION DECIDUOUS TREE
- BIORETENTION TREE
- LIGHT POLE - SEE L09.00

NOTE: ALL TREES TO BE 48" BOX FOR PRICING
FINAL SIZES TBD

0 100 200 Feet

PROPOSED SITE PLANTING PLAN

FIGURE 3.4-2

3.4.3 Biological Resources Impacts

3.4.3.1 *Thresholds of Significance*

For the purposes of this EIR, a biological resource impact is considered significant if the project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department (CDFW) of Fish and Wildlife or United States Fish and Wildlife Service (USFWS);
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal filling, hydrological interruption, or other means?
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.4.3.2 *Impacts to Special Status Plants and Animals*

Based on the highly urbanized and developed nature of the project site, natural communities or habitats for special status plant and wildlife species are not present on the site. The project site is located in a developed urban area, and lacks suitable habitat for the special-status species that have been identified in Mountain View. Development of the project would not result in impacts to special status species or sensitive habitats.

Impact BIO-1: The proposed project would not result in a significant impact to special status plants or animals. **[No Impact]**

3.4.3.3 *Bird Strike Hazards*

The project would demolish the two existing single-story office buildings and construct three new six-story office buildings and two six-level parking structures and would represent a change over the existing conditions. The six-story buildings would be four-stories taller than the existing buildings and contain four upper-stories of exterior glass windows that could be a potential strike hazard to birds in the project area. The portion of the buildings most likely to sustain bird strikes or bird collision zone is from ground to 60 feet above ground. Features for reducing the potential for bird strikes at the project site will be included in the project design as listed below:

- No more than 10 percent of the surface area of façades shall have untreated glazing between the ground and 60 feet above ground. Examples of bird-friendly glazing treatments include:

  - the use of opaque glass,
  - the covering of clear glass surface with patterns,
  - the use of paned glass with fenestration patterns, and
  - the use of external screens over non-reflective glass.

- Building facade is articulated with folds, recesses, and mullions to provide visual depth for birds.

- Patterns frits are within "2 x 4" rule where patterns are smaller than four inches tall by two inches wide. Bird safe glass frit patterns include 0.25-inch vertical lines with four inch spacing and 0.0625-inch (1/16-inch) dot fritted glass pattern. Both of these patterns would provide 90 percent coverage of the bird collision zone.

- Other design features include low glazing reflectivity and vertical fins and overhangs which block views of birds traveling above. New construction shall avoid the funneling of flight paths along buildings or trees towards a building façade.

- The proposed development does not include the following items:

  - glass skyways or walkways,
  - freestanding glass walls,
  - transparent building corners, and
  - glass guardrails.

- Occupancy sensors or other switch control devices shall be installed on non-emergency lights. These lights shall be programmed to shut off during non-work hours and between 10:00 PM and sunrise.

In order to further reduce potential bird strikes the project shall implement the following measures, as required by City standard conditions of approval, to further reduce the potential bird strikes.

Standard Condition of Approval

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

Impact BIO-2: With the incorporation of project design features and conditions of approval, impacts from bird strikes would be less than significant. **[Less Than Significant Impact]**

3.4.3.4 *Impacts to Nesting Birds*

Although unlikely, urban-adopted raptors (birds of prey) or other protected birds could use the mature trees on or near the site for nesting and foraging habitat. Raptors and nesting birds are protected by the MBTA and CDFW Code.

The project proposes to remove approximately 135 of the Heritage trees and 283 other trees. Raptor or other migratory bird nests present in these trees during construction activities could result in the loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes abandonment and/or loss of reproductive effort is considered a taking by the CDFW. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would constitute a significant impact.

In compliance with the MBTA and the CDFW Code, the proposed project shall implement the following measures, as required by City standard conditions of approval, to reduce or avoid construction-related impacts to nesting raptors and their nests.

Standard Conditions of Approval

- Nesting Bird Avoidance. To the extent practicable, vegetation removal and construction activities shall be performed from September 1 through January 31, to avoid the general nesting period for birds. If construction or vegetation removal cannot be performed during this period, pre-construction surveys shall be performed by a qualified biologist no more than two days prior to these activities, to locate any active nests. The applicant shall be responsible for the retention of a qualified biologist to conduct a survey of the project site and surrounding 500 feet or active nests – with particular emphasis on nests of migratory birds – if construction (including site preparation) will begin during the bird nesting season, from February 1 through August 31.

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

Impact BIO-3: With the incorporation of standard conditions of approval, impacts to nesting birds would be less than significant. **[Less Than Significant Impact]**

3.4.3.5 *Impacts to Trees and Landscaping*

The project site currently supports 644 existing landscaping trees. The proposed project would remove 418 trees, including 135 Heritage trees, to facilitate the redevelopment of the site (See Figure 3.4-2). Mountain View regulations require a permit to remove or move any tree over 48-inches in circumference (15-inch diameter) as measured at 54-inch above grade, or any *Quercus,* Sequoia or *Cedrus* over 12-inch circumference (4-inch diameter) at 54-inch above grade. A City of Mountain

View Heritage tree removal permit is required before any trees could be removed from the site under a development permit.

The project would include the planting of street trees and landscaping along the perimeter and within the project site. The project would also implement tree protection measures included in the arborist report in Appendix D to reduce impacts to trees retained on the project site.

To reduce the impacts of the loss of Heritage trees, the following measures are included in the project as standard City conditions of approval.

Standard Conditions of Approval

- Replacement: The applicant shall offset the loss of each Heritage tree with a minimum of two new trees, for a total of 270 replacement trees. Each replacement tree shall be no smaller than a 24-inch box, and shall be noted on the landscape plans submitted for building permit review as Heritage replacement trees. The project would plant approximately 905 new trees on site.

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

Impact BIO-4: With the incorporation of standard City conditions of approval, impacts to Heritage trees would be less than significant. **[Less Than Significant Impact]**

3.4.3.6 *Impacts from Conflict with Applicable Conservation Plans*

The project site is not within the area of an applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional, or state habitat conservation plan.

Impact BIO-5: The proposed project would not result in a significant impact due to a conflict with an applicable conservation plan. **[No Impact]**

3.4.4 Cumulative Biological Resources Impacts

3.4.4.1 *Cumulative Biological Resources Impacts: Nesting Birds*

The cumulative projects analyzed in this Draft EIR in the Cities of Mountain View and Sunnyvale may be near sensitive habitat areas, special-status species, and other native species, many of which are protected by state or federal law. As described above, there is a potential for nesting and migratory birds to occur in the project area. The project would not impact sensitive habitats or special status species. The project would implement conditions of approval to avoid nesting bird

impacts, which would reduce the project's contribution to cumulative impacts to nesting birds to a less than significant level.

Impact C-BIO-1: The proposed project would not result in a cumulatively considerable contribution to a significant impact to nesting and migratory birds. **[Less Than Significant Cumulative Biological Resources Impact]**

3.4.4.2 *Cumulative Biological Resources Impacts: Indirect Nitrogen Deposition*

The Santa Clara Valley Habitat Plan identified nitrogen deposition as an indirect cause of impacts to rare species in southern Santa Clara County, particularly those located on serpentine soils. Nonpoint air pollution sources such as automobiles emit nitrogen compounds into the air. Because serpentine soils tend to be nutrient poor, and nitrogen deposition artificially fertilizes serpentine soils, nitrogen deposition from vehicle traffic and other sources facilitates the spread of invasive plant species. Non-native annual grasses grow rapidly, enabling them to out-compete serpentine species.

The displacement of these species, and subsequent decline of the several federally-listed species, including the Bay Checkerspot butterfly and its larval host plants, has been documented on Coyote Ridge in central Santa Clara County (the last remaining major population of these butterflies). The invasion of native grasslands by invasive and/or non-native species is now recognized as one of the major causes of the decline of the federally endangered Bay Checkerspot butterfly.

Modeling completed as a part of the development of the SCV Habitat Plan identifies cumulative effects to serpentine habitats and serpentine species on Coyote Ridge and other areas in central and southern Santa Clara County. As discussed in *Section 3.4.1.3, Habitat Conservation Plan/Natural Community Conservation Plan*, nitrogen deposition on the effected serpentine habitats from areas of Santa Clara County not covered by the SCV Habitat Plan is about 17 percent. The development proposed would represent an extremely small portion of these emissions.

Conservation strategies included in the adopted SCV Habitat Plan account for the indirect impacts of nitrogen deposition (existing and future) and identify measures to conserve and manage serpentine areas over the term of the SCV Habitat Plan, such that cumulative impacts to this habitat and Bay Checkerspot butterfly would not be significant and adverse.[11]

A mitigation program for indirect impacts on Bay Checkerspot butterfly habitat is being implemented independently by others (i.e., SCV Habitat Agency) and there is no requirement for an individual project outside of the area covered by the SCV Habitat Plan to pay impact fees to this mitigation program.

Impact C-BIO-2: The cumulative projects, including the proposed project, would not result in significant cumulative impacts from indirect nitrogen deposition. **[Less Than Significant Cumulative Biological Resources Impact]**

[11] The Santa Clara Valley Habitat Plan Final EIR/EIS (August 2012) identifies a beneficial cumulative effect of implementing the Santa Clara Valley Habitat Plan.

3.4.4.3 *Cumulative Impacts: Heritage Trees*

The City of Mountain View Tree Preservation Ordinance defines "Heritage" trees based on their size, species, or special designation. A tree removal permit is required from the City for the removal of any Heritage trees, and it is unlawful to willfully injure, damage, destroy, move, or remove a Heritage tree without a tree removal permit. Similar restrictions are present in the codes of nearby cities, including the City of Sunnyvale.

Any project constructed in Mountain View is required to mitigate the removal of Heritage trees and protect any trees that remain from potential construction damage. For this reason, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative loss of Heritage trees.

Impact C-BIO-3: The proposed project, together with the cumulative projects, would not result in a cumulatively considerable contribution to a significant cumulative loss of Heritage trees. **[Less Than Significant Cumulative Biological Resources Impact]**

3.4.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
BIO-1: The proposed project would not result in a significant impact to special status plants or animals.	No Impact	No mitigation required	No Impact
BIO-2: With the incorporation of project design features and conditions of approval, impacts from bird strikes would be less than significant.	Less Than Significant Impact	No mitigation required	No Impact
BIO-3: With the incorporation of standard conditions of approval, impacts to nesting birds would be less than significant.	Less Than Significant Impact	No mitigation required	No Impact
BIO-4: With the incorporation of standard City conditions of approval, impacts to Heritage trees would be less than significant.	Less Than Significant	No mitigation required	Less Than Significant
BIO-5: The proposed project would not result in a significant	No Impact	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
impact due to a conflict with an applicable conservation plan.			
C-BIO-1: The cumulative projects, including the proposed project, would not result in significant cumulative impacts to nesting and migratory birds.	Less Than Significant	No mitigation required	Less Than Significant
C-BIO-2: The cumulative projects, including the proposed project, would not result in significant cumulative impacts from indirect nitrogen deposition.	Less Than Significant	No mitigation required	Less Than Significant
C-BIO-3: The proposed project, together with the cumulative projects, would not result in a cumulatively considerable contribution to a significant cumulative loss of Heritage trees.	Less Than Significant	No mitigation required	Less Than Significant

3.5 CULTURAL RESOURCES

The information in this section is based in part upon an archaeological literature review and Native American consultation report completed for the East Whisman Precise Plan area by *Holman & Associates* in February 2017.

3.5.1 Regulatory Setting

3.5.1.1 *Federal Statutes and Regulations*

National Historic Preservation Act

The National Register of Historic Places (NRHP), established under the National Historic Preservation Act (NHPA), is a comprehensive inventory of known historic resources throughout the United States. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects and districts that possess historic, architectural, engineering, archaeological or cultural significance. For a resource to be eligible for listing, it also must retain integrity of those features necessary to convey its significance in terms of 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association. CEQA requires evaluation of project effects on properties that are listed in or eligible for listing in the National Register.

3.5.1.2 *State Statutes and Regulations*

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR aids government agencies in identifying, evaluating, and protecting California's historical resources, and indicates which properties are to be protected from substantial adverse change (Public Resources Code, Section 5024.1(a)). The CRHR is administered through the State Office of Historic Preservation (SHPO), which is part of the California State Parks system. A historic resource listed in, or formally determined to be eligible for listing in, the National Register is, by definition, included in the California Register (Public Resources Code Section 5024.1(d)(1)).[12]

State Regulations Regarding Cultural and Paleontological Resources

Archaeological, paleontological, and historical sites are protected by a number of State policies and regulations under the California Public Resources Code, California Code of Regulations (Title 14 Section 1427), and California Health and Safety Code. California Public Resources Code Sections 5097.9-5097.991 require notification of discoveries of Native American remains and provides for the treatment and disposition of human remains and associated grave goods.

Both State law and County of Santa Clara County Code (Sections B6-19 and B6-20) require that the Santa Clara County Coroner be notified if cultural remains are found on a site. If the Coroner determines the remains are those of Native Americans, the Native American Heritage Commission and a "most likely descendant" must also be notified.

[12] Refer to Public Resources Code Section 5024.1(d)(1)

Assembly Bill 52 - Tribal Cultural Resources

A tribal cultural resource can be a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. It also must be either on or eligible for the California Historic Register, a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a tribal cultural resource. Assembly Bill 52 (AB 52), which amends the Public Resources Code, requires lead agencies to participate in formal consultations with California Native American tribes during the CEQA process, if requested by any tribe, to identify tribal cultural resources that may be subject to significant impacts by a project.

Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. Consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or when it is concluded that mutual agreement cannot be reached.

Paleontological Resources Regulations

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

3.5.1.3 *City of Mountain View Zoning Ordinance*

The City's Zoning Ordinance is in Chapter 36, Article 16 of the City's Code of Ordinances (City Code) and consists of land use regulations, based on policies of the General Plan, that have been enacted in order to promote the public health, safety, morals, comfort and general welfare throughout the City of Mountain View.

Division 15, Designation and Preservation of Historic Resources of the City's Zoning Ordinance includes a process for recognizing, preserving, and protecting historical resources. Division 15, Section 36.54.55 establishes the Mountain View Register of Historic Resources as the City's official list of historically significant buildings, structures, and sites that are considered during the development review process. The Mountain View Register has similar criteria for listing as the State of California Register and consists of historic resources that meet one or more of the following criterion (refer to Division 15, Section 36.54.65):

1. Is strongly identified with a person who, or an organization which, significantly contributed to the culture, history or development of the City of Mountain View;
2. Is the site of a significant historic event in the City's past;
3. Embodies distinctive characteristics significant to the City in terms of a type, period, region,

or method of construction or representative of the work of a master or possession of high artistic value;
4. Has yielded, or may be likely to yield, information important to the City's prehistory or history.

3.5.2 Existing Setting

3.5.2.1 *Prehistoric Resources*

For the East Whisman Precise Plan (including the project site), a records search was conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS), including an examination of the official records and maps for archaeological sites and surveys in East Whisman Precise Plan area, as well as a review of the NRHP, the CRHR, the California Inventory of Historic Resources, California State Landmarks, California Points of Historical Interest, the Directory of Properties in the Historical Resources Inventory, Caltrans Local Bridge Surveys, and secondary sources pertaining to state and local prehistory and history. Based upon this research, archaeological resources were not identified on the project site.

Mountain View is situated within territory once occupied by Costanoan (also commonly referred to as Ohlone) language groups. Mountain View lies on the approximate ethnolinguistic boundary between the Tamyen and Ramaytush languages.

No cultural resources are recorded within the project area, according to the archaeological literature review and Native American consultation report completed for the area. Areas that are near natural water sources, e.g., riparian corridors and tidal marshland, should be considered of high sensitivity for prehistoric archaeological deposits and associated human remains. The project site is more than 1.1 mile east of Stevens Creek, and is not considered to be an archaeologically sensitive area.

The project site is flat and has been previously disturbed for development of the existing five buildings, and does not contain any unique geologic features.

3.5.2.2 *Historic Resources*

The 800 East Middlefield Road building was constructed in 1982, and the 1100/1101 West Maude Avenue building was constructed in 1979. None of the buildings on the project site have been identified as historic properties in the City of Mountain View, or as eligible properties for the CRHR or the NRHP. No historic buildings or structures are located on or adjacent to the site.

3.5.2.3 *Paleontological Resources*

According to the General Plan EIR, no paleontological resources have been documented in the vicinity of the project site.

3.5.3 Cultural Resources Impacts

3.5.3.1 *Thresholds of Significance*

For the purposes of this EIR, a cultural resources impact is considered significant if the project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- Disturb any human remains, including those interred outside of dedicated cemeteries;
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
    - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying this criteria, the significance of the resource to a California Native American tribe shall be considered.

3.5.3.2 *Prehistoric Resources Impacts*

Although the likelihood of encountering buried cultural resources is low, the disturbance of these resources, if they are encountered during excavation and construction, could create an impact. The project will be required to comply with the City's standard conditions of approval, which include measures to avoid or reduce impacts to unknown cultural resources.

Standard Conditions of Approval

- DISCOVERY OF ARCHAEOLOGICAL RESOURCES. If prehistoric, or historic-period cultural materials are unearthed during ground-disturbing activities, it is recommended that all work within 100 feet of the find be halted until a qualified archaeologist and Native American representative can assess the significance of the find. Prehistoric materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and wall, filled wells or privies, and deposits of metal, glass, and/or ceramic refuse.

If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative, will develop a treatment plan that could include site avoidance, capping, or data recovery.

- DISCOVERY OF HUMAN REMAINS. In the event of the discovery of human remains during construction or demolition, there shall be no further excavation or disturbance of the site within a 50 foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his/her authority, he/she shall notify the NAHC, which shall attempt to identify descendants of the deceased Native American.

  If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.

  A final report shall be submitted to the City's Community Development Director prior to release of a Certificate of Occupancy. This report shall contain a description of the mitigation programs and its results, including a description of the monitoring and testing resources analysis methodology and conclusions, and a description of the disposition/curation of the resources. The report shall verify completion of the mitigation program to the satisfaction of the City's Community Development Director.

Impact CR-1: With the implementation of standard City conditions of approval, the proposed project would result in a less than significant impact to unknown cultural resources. **[Less Than Significant Impact]**

3.5.3.3 *Historic Resources Impacts*

The proposed project would demolish and remove two of the five existing buildings on the site (800 East Middlefield Road and 1100/1101 West Maude Avenue), as well as pavement, a number of trees, utilities, and other improvements.

The two office buildings proposed for demolition are not listed or considered eligible for listing on any federal, state, or Mountain View lists of historical significance (including recent city-wide historical surveys). For these reasons, the demolition of these buildings and other site clearing activities would have a less than significant impact on historic resources.

Impact CR-2: Implementation of the project would result in a less than significant impact to historic resources. **[Less Than Significant Impact]**

3.5.3.4 *Paleontological Resources Impacts*

Although no paleontological resources have been identified in the vicinity of the project site and the likelihood of encountering buried paleontological resources is low, the disturbance of these resources, if they are encountered during excavation and construction, could result in an impact. The

project will be required to comply with City's standard conditions of approval, which include measures to avoid or reduce impacts to unknown paleontological resources.

Standard Conditions of Approval

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

Impact CR-3: Implementation of the project would result in a less than significant impact to paleontological resources. **[Less Than Significant Impact]**

3.5.4 Cumulative Impacts

3.5.4.1 *Cumulative Impacts: Prehistoric Resources*

The cumulative projects analyzed in this Draft EIR in Mountain View and Sunnyvale may require excavation and grading or other activities that may affect unknown prehistoric cultural resources. All cumulative projects occurring within Mountain View or Sunnyvale, would be required to implement conditions of approval or mitigation measures that would avoid impacts to prehistoric resources and/or reduce them to a less than significant level. These projects would also be subject to federal, state, and county laws regulating cultural or paleontological resources. For these reasons, the proposed project would not make a cumulatively considerable contribution to a prehistoric resources impact.

Impact C-CR-1: Implementation of the project would result in a less than significant cumulative impact to prehistoric resources. **[Less Than Significant Cumulative Impact]**

3.5.4.2 *Cumulative Impacts: Historic Resources*

The cumulative projects analyzed in this Draft EIR in Mountain View and Sunnyvale may contain historic resources, whether or not they are currently recognized. For this reason, the proposed project would not make a cumulatively considerable contribution to a historic resources impact.

Impact C-CR-2: Implementation of the project would result in a less than significant cumulative impact to historic resources. **[Less Than Significant Cumulative Impact]**

3.5.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
CR-1: With the implementation of standard City conditions of approval, the proposed project would result in a less than significant impact to unknown cultural resources.	Less Than Significant	No mitigation required	Less Than Significant
CR-2: Implementation of the project would result in a less than significant impact to historic resources.	Less Than Significant	No mitigation required	Less Than Significant
CR-3: Implementation of the project would result in a less than significant impact to paleontological resources.	Less Than Significant	No mitigation required	Less Than Significant
C-CR-1: Implementation of the project would result in a less than significant cumulative impact to prehistoric resources.	Less Than Significant	No mitigation required	Less Than Significant
C-CR-2: Implementation of the project would result in a less than significant cumulative impact to historic resources.	Less Than Significant	No mitigation required	Less Than Significant

3.6 ENERGY

This section summarizes information on energy use in Mountain View and provides an evaluation of the effects the project would have on the City's energy demand. This section was prepared pursuant to CEQA Guidelines Section 15126.4(a)(1)(C) and Appendix F of the Guidelines (Energy Conservation), which require that EIRs include a discussion of the potential energy impacts of proposed projects with emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

3.6.1 Introduction

Energy consumption is analyzed in an EIR because of the environmental impacts associated with its production and usage. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and pollution resulting from their production and consumption.

Energy usage is typically quantified using the British thermal unit (Btu). As points of reference, the approximate amount of energy contained in a gallon of gasoline, a cubic foot of natural gas, and a kilowatt hour (kWh) of electricity are 123,000 Btu, 1,000 Btu, and 3,400 Btu, respectively. Utility providers measure natural gas usage in Btu.

Electrical energy is expressed in units of kilowatts (kW) and kilowatt-hours (kWh). If run for one hour, a 1,000 watt (1 kW) hair dryer would use one kilowatt-hour of electrical energy. Other measurements of electrical energy include the megawatt (1,000 kW) and the gigawatt (1,000,000 kW).

3.6.2 Regulatory Setting

Federal

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

State

Renewable Energy Standards

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. In 2006, California's 20 percent by 2010 RPS goal was codified under Senate Bill (SB) 107. Under the provisions of SB 107, investor-owned utilities were required to generate 20 percent of their retail electricity using qualified renewable energy technologies by the end of 2010. In 2008, Executive Order S-14-08 was signed into law requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. The community-owned Silicon Valley Clean Energy (SVCE) is the electricity provider for the City of Mountain View and generates its electricity from 100 percent carbon free sources.[13]

[13] SVCE. "Frequently Asked Questions". Accessed October 9, 2017. https://www.svcleanenergy.org/faqs.

In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030.

Building Codes

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, and the 2016 Title 24 updates went into effect on January 1, 2017.[14] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[15]

In January 2010, the state adopted the California Green Building Standards Code (CALGreen), which established mandatory green building standards for buildings in California. CALGreen was also updated and went in to effect on January 1, 2017. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality.

City of Mountain View

Green Building Code

At the local level, the Mountain View Green Building Code (MVGBC) amends the state-mandated CalGreen standards to include local green building standards and requirements for private development. The MVGBC applies to new construction, residential additions, and commercial/industrial tenant improvements based on building type and size. The MVGBC includes energy efficiency standards that exceed the 2016 Building Energy Efficiency Standards. The MVGBC does not require formal certification from a third-party organization, but requires projects to be designed and constructed to meet the intent of a third-party rating system. Formal certification is not required.[16] For nonresidential projects proposing over 25,000 square feet of new construction, the buildings must meet the intent of the LEED Silver certification from the U.S. Green Building Council, and must comply with mandatory CalGreen requirements.

3.6.3 Existing Setting

Total energy usage in California was approximately 7,322 trillion Btu in the year 2015, the most recent year for which this data was available.[17] The breakdown by sector was approximately 18 percent (1,357 trillion Btu) for residential uses, 19 percent (1,465 trillion Btu) for commercial uses,

[14] California Building Standards Commission. "Welcome to the California Building Standards Commission". Accessed February 6, 2018. http://www.bsc.ca.gov/.
[15] California Energy Commission (CEC). "2016 Building Energy Efficiency Standards". Accessed February 6, 2018. http://www.energy.ca.gov/title24/2016standards/index.html.
[16] City of Mountain View. *Mountain View Green Building Code (MVGBC).* 2017. Accessed November 28, 2017. Available at http://www.mountainview.gov/depts/comdev/building/construction/mvgbc.asp.
[17] United States Energy Information Administration. *State Profile and Energy Estimates, 2015.* Accessed November 28, 2017. Available at: https://www.eia.gov/state/?sid=CA#tabs-1.

24 percent (1,837 trillion Btu) for industrial uses, and 39 percent (3,017 trillion Btu) for transportation.[18] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

The project site is currently developed with five one- and two-story office buildings containing 466,000 square feet of space. Existing energy use primarily consists of gasoline for vehicle trips to and from the site, electricity for lighting, and natural gas for heating, cooling, and operations within the buildings. Given the nature of land uses on the site, the remainder of this discussion will focus on the three most relevant sources of energy: electricity, natural gas, and gasoline for vehicles.

3.6.3.1 *Electricity*

The electricity supply in California involves a complex grid of power plants and transmission lines. In 2016, California produced approximately 93 percent of the electricity it consumed and the rest was imported. California's non CO2-emitting electric generation (from nuclear, large hydroelectric, solar, wind, and other renewable sources) accounted for 50 percent of total in-state generation for 2016, compared to 40 percent in 2015.[19] Electricity supplied from out-of-state, coal-fired power plants has continued to decrease since 2006, following the enactment of a state law requiring California utilities to limit new long-term financial investments to power plants that meet California emissions standards.[20]

California's total system electric generation in 2016 was 290,567 gigawatt-hours (GWh), which was down 1.6 percent from 2015's total generation of 295,405 GWh. California's in-state electric generation was up by approximately one percent at 198,227 GWh compared to 196,195 GWh in 2015, and energy imports were down by 6,869 GWh to 92,341 GWh.[21] In 2016, total in-state solar generation increased 31.5 percent from 2015 levels and wind generation increased 10.8 percent.

Growth in annual electricity consumption from traditional power plants declined reflecting increased energy efficiency and higher self-generation from solar photovoltaic power systems. Per capita drops in electrical consumption are predicted through 2027 as a result of energy efficiency gains and increased self-generation (particularly from photovoltaic systems).[22] Due to population increases, however, it is estimated that future demand in California for electricity will grow at approximately one percent each year through 2027, and that 319,256 GWh of electricity would be utilized in the state in 2027.[23]

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[18] United States Energy Information Administration. *State Profile and Energy Estimates, 2015*. Accessed November 28, 2017. Available at: https://www.eia.gov/state/?sid=CA#tabs-2.
[19] CEC. "Total System Electric Generation". Accessed February 13, 2018. http://www.energy.ca.gov/almanac/electricity_data/total_system_power.html.
[20] EIA. "California State Profile and Energy Estimates Profile Analysis". Accessed February 13, 2018. https://www.eia.gov/state/analysis.php?sid=CA#40.
[21] CEC. "Total System Electric Generation". Accessed February 14, 2018. http://www.energy.ca.gov/almanac/electricity_data/total_system_power.html
[22] CEC. *California Energy Demand Updated Forecast, 2017-2027*. Accessed February 14, 2018. http://docketpublic.energy.ca.gov/PublicDocuments/16-IEPR-05/TN214635_20161205T142341_California_Energy_Demand_Updated_Forecast.pdf.
[23] Ibid.

The community-owned Silicon Valley Clean Energy (SVCE) is the electricity provider for the City of Mountain View[24] SVCE sources the electricity and the Pacific Gas and Electric Company delivers it to customers over their existing utility lines. Customers are automatically enrolled in the GreenStart plan, which generates its electricity from 100 percent carbon free sources; with 50 percent from solar and wind sources, and 50 percent from hydroelectric. Customers have the option to enroll in the GreenPrime plan, which generates its electricity from 100 percent renewable sources such as wind and solar.

Electricity usage for different land uses varies substantially by the type of uses in a building, the type of construction materials used, and the efficiency of the electricity-consuming devices used. Electricity in Santa Clara County in 2016 was consumed primarily by the commercial sector (77 percent), followed by the residential sector consuming 23 percent. In 2016, a total of approximately 16,800 GWh of electricity was consumed in Santa Clara County.[25] Electricity used in the county is consumed primarily by the commercial sector (approximately 46 percent), with the residential sector at 35 percent and the industrial sector at18 percent).[26] The annual electricity consumption for the existing 466,000 square feet of office buildings at the project site is 2,952,050 kWh.

3.6.3.2 *Natural Gas*

In 2016, approximately three percent of California's natural gas supply came from in-state production, while 97 percent was imported from other western states and Canada.[27] California's natural gas is supplied by interstate pipelines, including the Mojave Pipeline, Transwestern Pipeline, Questar Southern Trails Pipeline, Tuscarora Pipeline, and the Baja Norte/North Baja Pipeline.[28] As a result of improved access to supply basins, as well as pipeline expansion and new projects, these pipelines currently have excess capacity.

In 2016, approximately 32 percent of the natural gas delivered for consumption in California was for electricity generation, 37 percent for industrial uses, 19 percent for residential uses, 11 percent for commercial uses, and less than one percent for vehicle fuel. As with electricity usage, natural gas usage depends on the type of uses in a building, the type of construction materials used, and the efficiency of gas-consuming devices. In 2015, California consumed approximately 1,005,447,915 MMBtu (million btu) of natural gas; a slight increase from 2014 when 1,004,741,027 MMBtu were consumed.[29] In Santa Clara County, a total of 40,253,475 MMBtu of natural gas were consumed in 2015, which is about four percent of the state's total.[30]

[24] SVCE. "Frequently Asked Questions". Accessed October 9, 2017. https://www.svcleanenergy.org/faqs.
[25] CEC. Energy Consumption Data Management System. "Electricity Consumption by County". Accessed February 14, 2018. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[26] California Energy Commission, Energy Consumption Data Management System. *Electricity Consumption by Planning Area, 2016.* Accessed November 30, 2017. Available at: http://ecdms.energy.ca.gov/elecbyplan.aspx
[27] California Gas and Electric Utilities. 2016 California Gas Report. Accessed February 13, 2018. http://docketpublic.energy.ca.gov/PublicDocuments/16-BSTD-06/TN212364_20160720T111050_2016_California_Gas_Report.pdf.
[28] Ibid.
[29] EIA. "Natural Gas Delivered to Consumers in California". Accessed February 13, 2018. http://www.eia.gov/dnav/ng/ng_sum_lsum_dcu_SCA_a.htm.
[30] CEC. "Natural Gas Consumption by County". Santa Clara County 2015 Data. Accessed February 13, 2018. http://ecdms.energy.ca.gov/gasbycounty.aspx.

Natural gas demand in California is anticipated to decrease approximately one percent per year through 2035 and 2016 data is anticipated to reflect this trend when fully released. This decline is due to on-site residential, commercial, and industrial electricity generation; aggressive energy efficiency programs; and a decrease in demand for electrical power generation as a result of the implementation of state-mandated RPS targets (as the state moves to power generation resources that result in less GHG emissions than natural gas).[31] Annually, 3,189,120 kBtu of natural gas (provided by the Pacific Gas and Electric Company) are utilized by the existing commercial office uses at the project site.

3.6.3.3 *Fuel for Motor Vehicles*

California accounts for more than one-tenth of the United States' crude oil production and petroleum refining capacity.[32] The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 13.1 miles-per-gallon (mpg) in the mid-1970s to 22 mpg in 2015.[33] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was subsequently revised to apply to cars and light trucks Model Years 2011-2020.[34,35] In 2012, the federal government raised the fuel economy standard to 54.5 miles per gallon for cars and light-duty trucks by Model Year 2025.[36]

Gasoline usage in conjunction with the land uses on the project site includes gas consumed in vehicle trips to and from the site by employees and guests, and fuels used to power equipment used in the maintenance of buildings and landscaping. The CalEEMOD model used in the air quality analysis (Appendix C), estimates that the existing office buildings on the site result in about 3.17 million vehicle miles traveled (VMT) per year. Based on the 2016 EPA estimated average fuel economy of 22.0 mpg, the existing office development results in the consumption of approximately 141,253 gallons of gasoline per year.

[31] California Gas and Electric Utilities. 2016 California Gas Report. Accessed February 13, 2018. http://docketpublic.energy.ca.gov/PublicDocuments/16-BSTD-06/TN212364_20160720T111050_2016_California_Gas_Report.pdf.
[32] U.S. EIA. *California State Profile and Energy Estimates: Profile Analysis.* Accessed February 8, 2018. Available at: http://www.eia.gov/beta/state/analysis.cfm?sid=CA
[33] U.S. EPA. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Accessed February 6, 2018. http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/national_transportation_statistics/html/table_04_23.html.
[34] U.S. Department of Energy. Energy Independence & Security Act of 2007. Accessed February 8, 2018. http://www.afdc.energy.gov/laws/eisa.
[35] Public Law 110–140—December 19, 2007. Energy Independence & Security Act of 2007. Accessed February 8, 2018. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.
[36] National Highway Traffic Safety Administration. *Obama Administration Finalizes Historic 54.5 mpg Fuel Efficiency Standards.* August 28, 2012. Accessed February 8, 2018. http://www.nhtsa.gov/About+NHTSA/Press+Releases/2012/Obama+Administration+Finalizes+Historic+54.5+mpg+Fuel+Efficiency+Standards

3.6.4 Energy Impacts

3.6.4.1 *Thresholds of Significance*

Based on Appendix F of the CEQA Guidelines, and for the purposes of this EIR, a project will result in a significant energy impact if the project will:

- Result in a wasteful, inefficient, or unnecessary consumption of energy; or
- Result in a substantial increase in demand upon energy resources in relation to projected supplies.

3.6.4.2 *Energy Waste or Increase in Demand*

Construction

Construction activities associated with the proposed project are estimated to occur at the site over a four-year period, and would consist of demolition of the existing buildings and landscaping, site preparation, grading, construction of the proposed buildings, paving, and installation of landscaping. The overall construction schedule and process is designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, maintaining it, and fueling it; therefore, the opportunities for efficiency gains during construction are limited.

The project includes several measures that will improve the efficiency of the construction process. Implementation of the BAAQMD BMPs identified in *Section 3.2, Air Quality*, would restrict excessive equipment use by reducing idling times to five minutes or less and would require the County's contractors to post signs on the project site reminding workers to shut off idle equipment. In addition, consistent with mitigation measure MM AIR-1.1, equipment would be carefully selected to ensure the emissions from each phase were not significant or would be reduced to a level of insignificance through mitigation.

Energy is consumed during construction because the use of fuels and building materials are fundamental to construction of new buildings; however, with implementation of the BAAQMD BMPs and MM AIR-1.1, energy would not be wasted or used inefficiently. Thus, the short-term energy impacts during construction would be less than significant. **[Less than Significant Impact]**

Operational Energy Use

The operation of the proposed buildings would consume energy (in the form of electricity and natural gas) primarily for heating and cooling, lighting, and water heating. Table 3.6-1 compares the energy use that would result from the proposed project with the energy use of the existing, on-site development. The energy use increases shown in Table 3.6-1 is likely overstated, however, because the estimates for energy use do not take into account the efficiency measures and the required TDM program required as part of the project. In addition, the project would be built to the County's Green Building standards and would be constructed to LEED Platinum standard, Title 24 energy efficiency standards and Mountain View Green Building Code, thus reducing the overall demand for energy associated with the project. Under the proposed project, older, less energy efficient buildings would

be demolished and replaced with buildings constructed to current energy and building code requirements.

Efficiency standards for water use in plumbing fixtures would limit energy consumption from the pumping and delivery of water to the site. In addition, the redevelopment of a site in an urban area takes advantage of existing infrastructure and reduces the energy required to provide utilities and services to the site. If approved, a proposed connection to the Sunnyvale recycled water system would be used for project landscaping and fixture flushing (refer to *Section 3.16, Utilities and Service Systems*).

In addition, the project would use landscape plants with low-water requirements and install efficient irrigation systems with timers and shut off devices to prevent irrigation after significant precipitation (see requirements in *Section 3.8, Hydrology and Water Quality*). The use of low-water plantings, efficient irrigation systems, and flow reducers to limit water waste from leaks will avoid inefficient or wasteful energy use for pumping and delivery of irrigation water to the site.

Table 3.6-1:
Annual Operational Energy Demand Summary (Existing and Proposed)

Development Scenario	Electricity (kWh)	Natural Gas (kBtu)	Gasoline (gallons)
Proposed Development	16,818,440	16,122,900	599,450
Existing Development (Two existing buildings would be demolished)	2,952,050	3,189,120	141,253
Increase:	**13,866,390**	**12,933,780**	**458,197**

Source: Illingworth & Rodkin. *700 E. Middlefield Office Project Air Quality and Greenhouse Gas Assessment*. April 18, 2018.

Electricity

As described previously, California's total system electric generation in 2016 was 290,567 gigawatt-hours (GWh) and future demand in California for electricity will grow at approximately one percent each year through 2027.[37] Operation of the proposed project would increase annual electricity consumption at the site by approximately 13,866,390 kWh, or 13 GWh. In comparison to total system supply, the project would not result in a substantial increase in demand on electrical energy resources.

Natural Gas

It is assumed that energy efficiency technology and the RPS targets are likely to reduce demand for natural gas in the state in the future (by a continued approximately one percent each year through

[37] Ibid.

2035). Additionally, system and drilling efficiencies will continue to enhance production.[38] Assuming an estimated increase of 12,933,780 kWh for the proposed project, it would not result in a substantial increase in natural gas demand relative to projected supplies.

Gasoline

As detailed previously, the proposed project would increase annual gasoline demand by approximately 458,197 gallons over the existing condition. Though this increase is sizable when compared to the gasoline use associated with the existing development, it would not be substantial in the context of gasoline supply and demand in the City of Mountain View, County of Santa Clara, and in the State of California. New automobiles used by future employees of the proposed project would be subject to fuel economy and efficiency standards applied throughout the State of California, which means that over time the fuel efficiency of vehicles associated with the project site would improve.

The project would be required to implement a TDM program to reduce daily vehicle trips. As described in Section 3.15, Transportation and Traffic, the TDM program would provide at least a 20 percent reduction in vehicle trips to and from the project site. As such, project gasoline consumption would be minimized through the use transit, bicycle, and pedestrian facilities serving the site. The project site is approximately 0.5 mile from the Middlefield Light Rail Station with continuous sidewalks and crosswalks between the site and station via Middlefield Road. There is also a local bus stop adjacent to the site on Middlefield Road. The proposed project also includes installation of pedestrian and bicycle paths throughout the project site. While gasoline consumption would increase as a result of the project, implementation of the TDM program would lessen the potential for energy impacts as a result of waste or inefficiencies to a less than significant level. **[Less than Significant Impact]**

Impact EN-1: The proposed project would not result in the wasteful use of energy or a substantial increase in demand upon energy resources in relation to projected supplies. **[Less than Significant Impact]**

3.6.4.3 *Consistency with Plans*

Mountain View Green Building Code

The MVGBC includes energy efficiency standards that exceed the 2016 Building Energy Efficiency Standards. For nonresidential projects proposing over 25,000 square feet of new construction, the buildings must meet the intent of the LEED Silver certification from the U.S. Green Building Council, and must comply with mandatory CalGreen requirements.

Consistency: The proposed project would seek LEED Platinum certification that would exceed the state energy efficiency standards (i.e., Part 6 of Title 24 of the California Code if Regulations) by at least five percent. The proposed project would be built according to the provisions of Title 24 of the California Code of Regulations, 2010 California Green Building Code (CALGreen) and Mountain

[38] California Gas and Electric Utilities. 2016 California Gas Report. Accessed February 14, 2018. http://docketpublic.energy.ca.gov/PublicDocuments/16-BSTD-06/TN212364_20160720T111050_2016_California_Gas_Report.pdf.

View Green Building Code. Therefore, the proposed project would be consistent with the Mountain View Green Building Code.

3.6.4.4 *Cumulative Impacts*

Cumulative Energy Impacts

Future development within the PG&E service area will increase residential, commercial, office, and other non-residential needs for electricity and gas. SVCE power that is currently used at the site and will be used in the future throughout the City of Mountain View comes from carbon-free sources.

Impacts from energy use from the proposed project, together with other cumulative projects, would be considered less than significant due to the small increment of increased energy demand attributable to the project. Waste for all projects in the cumulative scenario would not occur because they would also be subject to energy conservation requirements and programs that have been established under the Mountain View 2030 General Plan and Greenhouse Gas Reduction Program. Additionally, with the implementation of Title 24 requirements, future development throughout California would be required to integrate energy efficiency measures that would reduce average demand per type of use. Thus, the proposed project would not make a significant cumulative contribution to impacts as a result of energy waste or use, and cumulative energy impacts would be less than significant.

Impact C-EN-1: Implementation of the proposed project, in addition to the cumulative projects, would not result in significant cumulative impacts as a result of energy demand or waste. **[Less than Significant Cumulative Energy Impact]**

3.6.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
EN-1: The proposed project would not result in the wasteful use of energy or a substantial increase in demand upon energy resources in relation to projected supplies	Less Than Significant	No mitigation required	Less Than Significant
C-EN-1: Implementation of the proposed project, in addition to the cumulative projects, would not result in significant cumulative impacts as a result of energy demand or waste.	Less Than Significant	No mitigation required	Less Than Significant

3.7 GEOLOGY, SOILS, AND MINERAL RESOURCES

The discussion in this section is based in part on the Design-Level Geotechnical Investigation prepared by *Cornerstone Earth Group* in December 2017. This report is included as Appendix F of this Draft EIR.

3.7.1 Regulatory Setting

3.7.1.1 *Seismic Hazards Mapping Act (SHMA)*

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed by the California legislature in 1990 to protect the public from the effects of strong ground shaking, liquefaction, landslides, and other seismic hazards. The SHMA established a state-wide mapping program to identify areas subject to violent shaking and ground failure; the program is intended to assist cities and counties in protecting public health and safety. The SHMA requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones. As a result, the California Geological Survey (CGS) is mapping SHMA Zones and has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, ground shaking, and landslides: the central San Francisco Bay Area and Los Angeles basin.

3.7.1.2 *California Building Standards Code*

Title 24 of the California Code of Regulations, known as the California Building Standards Code (CBSC), contains the regulations that govern the construction of buildings in California. The CBSC contains specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. It also regulates grading activities, including drainage and erosion control.

3.7.1.3 *City of Mountain View 2030 General Plan*

The goals and policies of the City of Mountain View 2030 General Plan provide vital direction for the future of the City and its residents. *Infrastructure and Conservation* and *Public Safety* goals and policies set forth the City's commitment to the use of appropriate design and construction to minimize the impacts of seismic hazards and to provide for emergency response.

3.7.1.4 *City of Mountain View City Code*

The City of Mountain View has adopted the California Building Code (CBC), with amendments, as the reference building code for all projects in the City under Chapter 8 of the City's Code of Ordinances. The City of Mountain View's Building Inspection Division, which is part of the Community Development Department, is responsible for reviewing plans, issuing building permits, and conducting field inspections. Geotechnical investigation reports, as required by the CBC, would be reviewed by the City of Mountain View's Building Inspection Division prior to issuance of building permits to ensure compliance.

3.7.2 Existing Setting

3.7.2.1 *Geology, Soils, and Topography*

Regional Geology

The project site is located in the Santa Clara Valley, an alluvial basin, bound by the Santa Cruz Mountains to the southwest and west, the Hamilton/Diablo Range to the northeast, and the San Francisco Bay to the north. The Santa Clara Valley was formed when sediments derived from the Santa Cruz Mountains and the Hamilton/Diablo Range were exposed by continued tectonic uplift and regression of the inland sea that had previously inundated this area. Bedrock in this area is made up of the Franciscan Complex, a diverse group of igneous, sedimentary, and metamorphic rocks of Upper Jurassic to cretaceous age (70 to 140 million years old). Overlaying the bedrock at substantial depths are marine and terrestrial sedimentary rocks of Tertiary and Quaternary age.

Site Topography

The site is relatively flat and located at approximately 57 feet elevation above mean sea level on the north side of the project site to 74 feet above mean sea level towards the south side of the project site.

The project site is not located within a 100-year flood hazard zone. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) for the project area, the site is located within Zone X, which is defined as "Areas of 0.2 percent annual chance flood; areas of one percent annual chance flood with average depths of less than one-foot or with drainage areas less than one square mile; and areas protected by levees from one percent annual chance flood."[39]

Site Soils

The project site is primarily underlain by Urbanland-Hangerone complex soils of zero to two percent slopes.[40] These soils are clay alluvium soils derived from metamorphic or sedimentary rock.

Five subsurface exploratory test borings were drilled on the site on August 24 to 25, 2017 for the geotechnical study (Appendix F). The borings were drilled to depths of approximately 33.5 to 45 feet. Fifteen Cone Penetration Tests (CPTs) were advanced on August 17 to 18, 2017 to depths of approximately 28 to 86 feet. In general, very stiff to hard clays were encountered in the upper five to 15 feet of the explorations. Medium dense to dense sands with varying thicknesses and fines contents were encountered interbedded within the clays to the maximum depth explored of 86 feet. Very dense sands and gravels were also encountered in the boring explorations at various depths. About three feet of undocumented fill was encountered in one of the borings, in the area of the southern parking structure (P1).

[39] Federal Emergency Management Agency. *Flood Insurance Rate Map, Community Panel No. 06085C0045H*. Map. Effective Date: May 18, 2009.
[40] United States Department of Agriculture, Natural Resources Conservation Service. W*eb Soil Survey: Santa Clara Area, California, Western Part (CA641)*. Accessed November 2, 2017. Available at: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

Plasticity Index (Pl) tests were performed on representative samples; the results of which indicated low to high expansion potential to wetting and drying cycles. In-situ moisture content within upper 15 feet range was found to be about three percent under to three percent over the estimated laboratory optimum moisture, from about three to five percent over the estimated laboratory optimum moisture at basement subgrade elevations.

Groundwater

Groundwater was encountered in all borings at the depth of 15 to 20.5 feet below current grades. In addition, soil tests inferred groundwater depths ranging from nine to 23.5 feet below current grades.

The boring explorations indicated that groundwater is generally shallower on the north side of the project site. The depth to groundwater can vary seasonally, and can be influenced by underground drainage patterns, regional fluctuations, and other factors. Historic high groundwater in the area has been measured at depths ranging from about 10 feet on the north side of the site to 20 feet on the south side below grade. Although the groundwater can vary significantly throughout the site, the design-level geotechnical report prepared for the site (see Appendix F) recommends a design groundwater depth of nine feet in the area of the northern parking structure (P2), and 15 feet in the area of the southern parking structure (P1).

3.7.2.2 *Seismicity and Seismic Hazards*

The project site is located within the seismically active San Francisco Bay region, but is not located within a currently designated Alquist-Priolo Earthquake Fault Zone or a Santa Clara County Fault Hazard Zone. The major earthquake faults in the project area are the San Andreas Fault, located approximately eight miles southwest of the site, and the main Hayward Fault, which is located approximately ten miles east of the project site. These regional faults are capable of generating earthquakes of at least 7.0 in magnitude.

The Association of Bay Area Governments (ABAG) has reported that the Working Group on California Earthquake Probabilities (2007) has estimated that there is a 63 percent probability that one or more major earthquakes would occur in the San Francisco Bay Area between 2007 and 2036. As seen with damage in San Francisco and Oakland due to the 1989 Loma Prieta earthquake that was centered about 50 miles south of San Francisco, significant damage can occur at considerable distances. Higher levels of shaking and damage would be expected for earthquakes occurring at closer distances.

Liquefaction

Liquefaction is the result of seismic activity and is characterized as the transformation of loose water-saturated soils from a solid state to a liquid state during ground shaking. During ground shaking, such as during earthquakes, cyclically induced stresses may cause increased pore water pressures within the soil voids, resulting in liquefaction. Liquefied soils may lose shear strength that may lead to large shear deformations and/or flow failure under moderate to high shear stresses, such as beneath foundations or sloping ground.

Lateral spreading is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction.

The project site is located in a state-designated Liquefaction Hazard Zone, as well as a Santa Clara County Liquefaction Hazard Zone. Therefore, the project site could potentially be subject to liquefaction hazards such as differential settlement, ground rupture, etc.

3.7.2.3 *Mineral Resources*

Initial statewide mapping of aggregate resources includes a small area within the southern boundary of Mountain View along Stevens Creek that is classified MRZ-3, "Areas containing mineral deposits the significance of which cannot be evaluated from the available data." Based on subsequent mapping by the State of California for suitability of use as construction materials, however, it was determined that no minerals or aggregate resources of statewide importance are located within Mountain View. There are no natural gas, oil, or geothermal resources identified in or adjacent to Mountain View.

3.7.3 Geology and Soils Impacts

3.7.3.1 *Thresholds of Significance*

For the purposes of this EIR, a geology and soils impact is considered significant if the project would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42);
    - Strong seismic ground shaking;
    - Seismic-related ground failure, including liquefaction;
    - Landslides;
- Result in substantial soil erosion or the loss of topsoil; or
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2016), creating substantial risks to life or property;
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
- Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state; or
- Result in the loss of availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

3.7.3.2 *Geologic and Soils Impacts*

The project site would not be exposed to slope instability, erosion, or landslide related hazards due to the relatively flat topography of the site and surrounding areas. Excavation and grading would occur to prepare the project site for new construction. The project proposes one level of below-grade parking.

Surface soil samples indicate the presence of expansive soils at the project site. Fluctuations in soil moisture can cause expansive soils to shrink and swell, thereby compromising the integrity of foundations, pavements, and exterior flatwork.

The proposed project will be designed and constructed in accordance with standard engineering safety techniques and in conformance with a final design-specific geotechnical report prepared for the site. The design specifications will be reviewed and monitored by a qualified geotechnical specialist to ensure conformance with required design specifications, as a condition of approval:

Standard Conditions of Approval

- GEOTECNICAL REPORT. The applicant shall have a design-level geotechnical investigation prepared which includes recommendations to address and mitigate geologic hazards in accordance with the specifications of California Geological Survey (CGS) Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards*, and the requirements of the Seismic Hazards Mapping Act. The report will be submitted to the City prior to the issuance of building permits, and the recommendations made in the geotechnical report will be implemented as part of the project.

  Recommendations may include considerations for design of permanent below-grade walls to resist static lateral earth pressures, lateral pressures causes by seismic activity, and traffic loads; method for back-draining walls to prevent the buildup of hydrostatic pressure; considerations for design of excavation shoring system; excavation monitoring; and seismic design.

Impact GEO-1: With the implementation of standard City conditions of approval, the proposed project would result in a less than significant geologic and soils impacts. **[Less Than Significant Impact]**

3.7.3.3 *Seismicity and Seismic Hazards*

As previously discussed, the project site is located in a seismically active region and, as such, strong to very strong ground shaking would be expected during the lifetime of the proposed project. While no active faults are known to cross the project site, ground shaking on the site could damage buildings and other proposed structures and threaten residents and occupants of the proposed development. The project structural design should therefore, be based on the most recent CBC.

Liquefaction

The project site is located in a State-designated Liquefaction Hazard Zone and Santa Clara County Liquefaction Hazard Zone, and the geotechnical investigation concluded that the site has the potential to be subject to liquefaction hazard such as differential settlement and ground rupture. The geotechnical report indicated that the project site could experience liquefaction-induced settlement on the order of 0.5 to 1.5 inches, resulting in differential settlement on the order of one-inch. Static settlements on the order of two inches and three inches could occur within the office buildings and below-grade portion of the parking structure, respectively.

To avoid or minimize potential damage from seismic shaking and liquefaction, all portions of the project will be designed and constructed in accordance with City of Mountain View requirements and seismic design guidelines for Seismic Design Category D in the current (2016) California Building Code. Specific recommendations contained in the geotechnical report prepared for the site shall also be implemented to the satisfaction of the City of Mountain View Building Inspection Division.

There are no open faces within a distance considered susceptible to lateral spreading; therefore, the potential for lateral spreading to affect the site is low.

Impact GEO-2: With the implementation of standard City conditions of approval and conformance with California Building Code, the proposed project would result in a less than significant impacts from seismicity and seismic hazards. **[Less Than Significant Impact]**

3.7.3.4 *Groundwater Hazards*

As discussed above in *Section 3.7.2.1*, the design groundwater depth is between 10 and 20 feet below current grades in parking structures P2 and P1, respectively. The excavations for the below-grade parking structures are anticipated to be approximately 11 to 13 feet. As previously mentioned, the in-situ moisture contents of the soil at basement subgrade elevation range from about three to five percent over the estimated laboratory optimum moisture. In addition, the planned basement excavation for parking structure P2 will extend near or below the current groundwater level. Therefore, the following recommendations from the design-level geotechnical report will be incorporated as conditions of approval:

Conditions of Approval

- To provide a firm base for construction for the parking structure basement foundation, it may be necessary to remove and replace approximately 12 to 18 inches of native soil below the basement foundation level and replace it with a bridging layer, such as crushed rock, or to chemically treat the exposed soil with lime or cement.

- Dewatering may be required and should be in accordance with the specifications outlined in the design-level geotechnical report prepared for the project.

Impact GEO-3: With the implementation of conditions of approval, the proposed project would result in a less than significant impact from groundwater hazards. **[Less Than Significant Impact]**

3.7.3.5 *Mineral Resources Impacts*

Based on mapping by the State of California, no minerals or aggregate resources of statewide importance are located in the vicinity of Mountain View, and there are no natural gas, oil, or geothermal resources identified as being located in or adjacent to the City. Implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state; nor would it result in the loss of availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact MIN-1: Implementation of the proposed project would not result in an impact to mineral resources. **[No Impact]**

3.7.3.6 *Cumulative Impacts*

The cumulative projects in Mountain View and neighboring cities analyzed in this Draft EIR will be subject to similar geology, soils, and seismicity impacts as the proposed project. All cumulative projects occurring within Mountain View and neighboring cities, would implement conditions of approval, mitigation measures, and consistency with State Building Code that would avoid impacts from geology and soils hazards, and/or reduce them to a less than significant level. These projects would also be subject to federal, state, city, or county laws for building and construction in seismic hazard areas. For these reasons, the proposed project would not make a cumulatively considerable contribution to a significant cumulative geology and soils impact.

Impact C-GEO-1: The proposed project would not make a cumulatively considerable contribution to a significant cumulative geology and soils impact. **[Less Than Significant Cumulative Geology and Soils Impact]**

3.7.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
GEO-1: With the implementation of standard City conditions of approval, the proposed project would result in a less than significant geologic and soils impacts.	Less Than Significant	No mitigation required	Less Than Significant
GEO-2: With the implementation of standard City conditions of approval and conformance with California Building Code, the proposed project would result in a	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
less than significant impacts from seismicity and seismic hazards.			
GEO-3: With the implementation of conditions of approval, the proposed project would result in a less than significant impacts from groundwater hazards.	Less Than Significant	No mitigation required	Less Than Significant
MIN-1: Implementation of the proposed project would not result in an impact to mineral resources.	No Impact	No mitigation required	No Impact
C-GEO-1: The proposed project would not make a cumulatively considerable contribution to a significant cumulative geology and soils impact.	Less Than Significant	No mitigation required	Less Than Significant

3.8 GREENHOUSE GAS EMISSIONS

The discussion in this section is based on the greenhouse gas (GHG) emissions analysis prepared by *Illingworth & Rodkin* on April 18, 2018, which is attached to this EIR as Appendix C.

3.8.1 Environmental Setting

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming associated with the greenhouse effect is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming and associated climate change are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial and manufacturing, utility, residential, commercial, and agricultural sectors.

3.8.1.1 *Regulatory Framework*

Federal

Clean Air Act

The EPA is the federal agency responsible for implementing the Clean Air Act (CAA). Under the CAA, the EPA has the authority to regulate emissions of GHGs. The EPA also has authority to monitor GHG emissions and potentially prescribe actions to reduce those emissions.

State

California Global Warming Solutions Act

Under the California Global Warming Solution Act, also known as Assembly Bill (AB) 32, the CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHG, and adopted a comprehensive plan, known as the *Climate Change Scoping Plan*, identifying how emission reductions will be achieved from significant GHG sources.

In 2016, Senate Bill (SB) 32 was signed into law, amending the California Global Warming Solution Act. SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its *Climate Change Scoping Plan* in December of 2017 to express the 2030 statewide target in terms of million metric tons of carbon dioxide equivalent ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

Senate Bill 375 – Redesigning Communities to Reduce GHG Emissions

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light-truck sectors for 2020 and 2035, as compared to 2005 emissions levels. The per-capita GHG emissions reduction targets for passenger vehicles in the

San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.[41]

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with ABAG, BAAQMD, and Bay Conservation and Development Commission (BCDC) to prepare the region's Sustainable Communities Strategy, known as *Plan Bay Area*. This plan establishes a course for reducing per-capita GHG emissions through the promotion of compact, mixed-use residential and commercial neighborhoods near transit, particularly within identified Priority Development Areas (PDAs). The proposed project is not within a defined PDA.

Plan Bay Area 2040 was adopted in July 2017 as a focused update to the 2013 version with revised planning assumptions based on demographic trends. Target areas in the *Plan Bay Area 2040* Action Plan include reducing GHG emissions, improving transportation access, maintaining the region's infrastructure, and enhancing resilience to climate change.

Other Implementing Laws and Regulations

There are a number of laws that have been adopted as a part of the State of California's efforts to reduce GHG emissions and their contribution to climate change. State laws and regulations related to growth, development, planning and municipal operations in Mountain View include, but are not limited to:

- California Mandatory Commercial Recycling Law (AB 341)
- California Water Conservation in Landscaping Act of 2006 (AB 1881)
- California Water Conservation Act of 2009 (SBX7-7)
- Various Diesel-Fuel Vehicle Idling regulations in (Chapter 13 of the California Code of Regulations)
- Building Energy Efficiency Standards (Title 24)
- CalGreen (Title 24, Part 11)
- Appliance Energy Efficiency Standards (Title 20)

Regional

Bay Area 2017 Clean Air Plan

BAAQMD and other agencies prepare clean air plans as required under state and federal CAAs. The *Bay Area 2017* CAP focuses on two closely related BAAQMD goals: protecting public health and protecting the climate. Consistent with the GHG reduction targets adopted by the State of California, the 2017 CAP lays the groundwork for the BAAQMD's long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2017 CAP includes a wide range of control measures designed to decrease emissions of methane

[41] The emission reduction targets are for those associated with land use and transportation strategies, only. Emission reductions due to the California Low Carbon Fuel Standards or Pavley emission control standards are not included in the targets.

(and other super-GHGs), as well as decrease emissions of carbon dioxide resulting from fossil fuel combustion.

BAAQMD CEQA Air Quality Guidelines

The BAAQMD CEQA *Air Quality Guidelines* are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the Bay Area. The City of Mountain View and other jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds, rules, plans, and methodologies for evaluating GHG emissions specified in the BAAQMD CEQA *Air Quality Guidelines.*

The BAAQMD thresholds were developed specifically for the Bay Area after considering the effects of AB 32 scoping plan measures that would reduce regional emissions. BAAQMD intends to achieve GHG reductions from new land use developments to close the gap between projected regional emissions with AB 32 scoping plan measures and the AB 32 targets. The BAAQMD GHG recommendations include a project-level GHG emission efficiency metric of 4.6 MT of CO_2e per service population (future residences and full-time workers) per year through 2020. In addition, the City's Greenhouse Gas Reduction Program (GGRP) established an efficiency metric of 4.5 MT of CO_2e per service population/year for 2030. Future (post-2020) emissions thresholds consistent with AB 32 requirements for 40 percent GHG reduction from 1990 levels by 2030 and 80 percent below 1990 levels by 2050 have not yet been released by BAAQMD.

For stationary sources, BAAQMD has established a recommended threshold of 10,000 MT CO_2e/year, which is used in this assessment to compare with operational emissions from the proposed emergency back-up generators and boilers.

Local

2030 General Plan and Greenhouse Gas Reduction Program

The City of Mountain View certified the General Plan Program EIR and adopted the Mountain View 2030 General Plan and GGRP in July 2012. The General Plan is the guiding document for future growth of the City. The GGRP is a separate but complementary document and long-range plan that implements the GHG emissions reduction goals of the General Plan, and serves as a programmatic GHG reduction strategy for CEQA tiering purposes. The GGRP includes goals, policies, performance standards, and implementation measures for achieving GHG emission reductions, to meet the requirements of AB 32. The program includes a goal to improve communitywide emissions efficiency (per-service population – residents and full-time employees) by 15 to 20 percent over 2005 levels by 2020 and by 30 percent over 2005 levels by 2030.

The GGRP implements the following policies and actions from the Mountain View General Plan Mobility Element:

Mobility Element	
Goal MOB-9	Achievement of state and regional air quality and greenhouse gas emission reduction targets.
Policy MOB 9.1	Develop cost-effective strategies for reducing greenhouse gas emissions in coordination with the GGRP.
Action MOB 9.1.1	Maintain and regularly update the City's municipal and community GHG Inventory to track emissions.
Action MPB 9.1.2	Regularly update the GGRP to address transportation emissions reductions.

Implementation of the policies in the 2030 General Plan programmatically, and as a part of the City's development permitting process, provides for meeting standards for energy efficiency, recycling, and water conservation, consistent with laws and regulations to reduce GHG emissions.

3.8.2 Existing Setting

The 28.7-acre project site is developed with office uses. These uses generate direct GHG emissions from the vehicle trips of employees and visitors, natural gas used for cooking and building heating, operation of stationary equipment (such as back-up generators), and indirect GHG emissions from operational electricity, water use, and other sources.

3.8.3 Greenhouse Gas Emissions Impacts

3.8.3.1 *Thresholds of Significance*

For the purposes of this EIR, a GHG emissions impact is considered significant if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

3.8.3.2 *GHG Emissions*

Construction Emissions

Short-term GHG emissions from the construction phase of the project would consist of primarily heavy equipment exhaust, worker travel, materials delivery, and solid waste disposal. Neither the City of Mountain View nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions; however, BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. The emissions summary calculations (see Appendix C) for the construction phase of the project show that the project would generate approximately 3,444 MT of CO_2e during the construction period, with an annual maximum of 1,137 MT of CO_2e during 2020.

BAAQMD encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. Best management practices that would be incorporated into construction of the proposed project include, but are not limited to, using at least 10 percent local building materials and recycling or reusing at least 50 percent of construction waste or demolition materials.

Operational Emissions

Pursuant to the latest BAAQMD CEQA *Air Quality Guidelines*, a local government may prepare a Qualified GHG Reduction Strategy that is consistent with AB 32 goals. If a project is consistent with an adopted Qualified GHG Reduction Strategy, it can be presumed that the project would not have a significant GHG emissions impact under CEQA.[42] BAAQMD also developed a quantitative threshold for project- and plan-level analyses based on estimated GHG emissions, as well as per service population metrics. These thresholds are the basis upon which post-2020 GHG thresholds have been developed at the project level. Because the proposed project would not be operational until after 2020, these estimates are used as thresholds of significance for this analysis.

The BAAQMD GHG recommendations include a project-level GHG emission efficiency metric of 4.6 MT of CO_2e per service population (future residences and full-time workers) per year. In addition, the City's GGRP established an efficiency metric of 4.5 MT of CO_2e per service population/year for 2030. The California Emission Estimator Model (CalEEMod) was used to estimate daily emissions associated with operation of the proposed project. In 2024, as shown in Table 3.8-1, annual emissions resulting from operation of the proposed project are estimated to be 3.3 MT of CO_2e/year/service population (S.P.), which would be below the GGRP significance threshold of 4.5 MT of CO_2e/ year/S.P.

Table 3.8-1:
Annual GHG emissions of CO_2e (MT/year)

Source Category	Existing Uses	2024 Proposed Project
Area	<1	<1
Energy Consumption[1]	171	822
Mobile	1,281[3]	6,470[3]
Waste	71	357
Water Usage	63	321
Total	1,587	7,971
Service Population Emissions[2]		2.6 MT of CO_2e/s.
2030 Threshold		**4.5 MT of CO_2e/S.P.**
Significant?		***No***

[1] Based on GHG emissions from natural gas only, SVCE energy is GHG emissions free.
[2] Based on an estimated service population of 3,053.
Includes VMT adjustment for mobile emissions, as described above.

[42] Bay Area Air Quality Management District2017. *CEQA Air Quality Guidelines*. May 2017.

Operational Stationary Equipment

The project would include several stationary sources, including two 250 kW generators to provide emergency backup power to Buildings B1 and B6 and parking structures P1 and P2; one 150 kW generator for Building B5; and two boilers rated at three MMBTU/hour to provide the buildings with hot water. It is assumed for this assessment that the generators would be driven by diesel-fueled engines and the boilers would be natural-gas powered. The generators would be operated for testing and maintenance purposes, with a maximum of 50 hours per year each of non-emergency operation under normal conditions. During testing periods, the engine would typically be run for less than one hour under light engine loads. The emissions from the operation of the generators were calculated using CalEEMod. GHG emissions from these stationary sources include CO_2 and methane (CH_4).

The total GHG emissions for project operation in 2024 would be 2,823 MT CO_2e/year. Therefore, stationary source GHG emissions from the proposed project would not exceed the BAAQMD stationary source threshold of 10,000 MT CO_2e/year and would be considered a less than significant impact.

Impact GHG-1: Under the proposed project buildout, annual service population emissions of CO_2e/yr/service population would not exceed the 2030 threshold of 4.5 MT of CO_2e/year/service population, and the GHG emissions from the stationary sources would also not exceed the stationary source threshold of 10,000 MT CO_2e/year. This impact is, therefore, less than significant under the current GHG thresholds. **[Less than Significant Impact]**

3.8.3.3 *Consistency with Plans*

Mountain View Greenhouse Gas Reduction Program

Global Climate Change Impacts from Project Operation

As described previously, the City of Mountain View adopted the GGRP, along with the 2030 General Plan, on July 10, 2012. The GGRP identifies a series of GHG emissions reduction measures to be implemented by development projects that would allow the City to achieve its GHG reduction goals. In the GGRP, Mandatory Measure E-1.7, which reinforces the implementation of current codes for energy efficiency, and Mandatory Measure T-1.1, Transportation Demand Management, would apply to the proposed project.

Table 3.8-2:
Greenhouse Gas Reduction Program -- Measures Applicable to Project

Mandatory/ Voluntary	Measure	Consistency
Mandatory	Measure E-1.7: Exceed State Energy Standards in New Non-Residential Development	The proposed project would comply with Title 24 requirements for energy efficiency. This includes the installation of high efficiency lighting.
Mandatory	Measure T-1.1: Transportation Demand Management (TDM)	As described in the TDM program included in the project (Appendix J), the project would achieve 20 percent reduction in vehicle trips to the project site.

The TDM Plan prepared for the project (Appendix J) is a set of strategies, measures and incentives to encourage people to walk, bicycle, use public transportation, carpool or use other alternatives to driving alone. The proposed TDM measures for the project will include:

- Priority parking for shared ride vehicles
- On-site transportation coordinator
- Bicycle parking, showers, and lockers
- Bicycle sharing
- Telecommuting/flexible work schedule program
- Guaranteed ride home program
- Membership in the MVTMA
- Rideshare match services
- Transit shuttle services (long and short haul)
- Marketing and information

The applicant may consider additional measures, if required to meet trip reduction goals. These measures may include:

- Parking cash-out (or commuter credits)
- Pre-tax commuter benefits
- Subsidized or free vanpools or carpools
- Subsidized or free transit passes
- Biking programs, including: biking financial incentives, on-site bicycle repair facilities, bike buddy program, bicycle giveaway program, bike to work day and events, bike rider guides
- Expanded carpool matching and car sharing
- On-site amenities and services
- Other TDM measures, prioritization: bicycle infrastructure improvements, passenger loading zones, building wiring, pedestrian connectivity and access, building orientation, parking location and configuration, transit and electric vehicle amenities.

The City of Mountain View requires project applicants to implement monitoring and reporting of their TDM programs. City conditions of approval related to TDM programs will be required of the project, and may include:

Standard Conditions of Approval

- TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM: The property owner is required to maintain a TDM program for the life of the project which will achieve a minimum twenty (20) percent reduction in peak-hour vehicle trips to the site. The TDM program measures shall be formally accepted by the property owner prior to building permit issuance through a legal agreement or recorded document, as determined by the City Attorney, with contents to the satisfaction of the Zoning Administrator.

- TRANSPORTATION DEMAND MANAGEMENT (TDM) MONITORING: The property owner, or tenant, shall prepare an annual TDM report and submit it to the City to document

the effectiveness of the TDM program in achieving the goal of twenty (20) percent peak-hour vehicle trip reduction by employees within the project. The TDM report shall be prepared by an independent consultant and paid for by the property owner or tenant; the consultant shall work with the property's TDM coordinator. The TDM report will include a determination of historical employee commute methods, which shall be informed by surveying all employees working on the project site and through driveway traffic counts. All nonresponses to the employee commute survey will be counted as a drive-alone trip. The driveway traffic counts shall be prepared and provided by an independent, licensed consultant and paid for by the property owner or tenant. The driveway counts and resulting data shall be included in the TDM report provided to the City.

If, after the initial TDM report, the second annual report indicates that, in spite of the changes in the TDM program, the required percent peak-hour vehicle trip reduction is still not being achieved, or if the applicant fails to submit such a TDM report at the required times, the City may assess the property owner, or tenant, a monetary penalty.

Consistency: With the implementation of the required measures and standard conditions of approval, the proposed project is consistent with the Mountain View 2030 General Plan and the resulting greenhouse gas emissions targeted for reduction in the GGRP, and therefore, would not result in a significant greenhouse gas emissions impact.

Consistency with Plan Bay Area (SB 375 Implementation) and the 2017 CAP

The proposed project is not within a PDA identified by the City of Mountain View and in Plan Bay Area. The project is in conformance with the development intensity and development standards for the site in the City's General Plan, which are considered as part of preparation of Plan Bay Area and the 2017 CAP.

Consistency: The project would include numerous features to increase energy efficiency, water conservation, and reduce mobile emissions. Proposed buildings would be constructed to achieve the goal of LEED Platinum certification, including low-energy lighting and on-site photovoltaic panels. Drought-tolerant species would be used for landscaping. The project would use low-flow fixtures. A substantial waste diversion rate will be achieved through on-site recycling operations. Finally, the project site would include connections to pedestrian and bicycle pathways and transit, and a TDM program, reducing mobile GHG emissions. Therefore, the project would generally be consistent with Plan Bay Area and 2017 CAP.

3.8.4 Cumulative Greenhouse Gas Emissions Impacts

The discussion above addresses the project's contribution to cumulative GHG emissions impacts on a regional, statewide, and global basis. Cumulatively considerable GHG emission impacts from cumulative development in Mountain View would be avoided by implementing measures included in the City's GGRP. It is assumed that additional GHG reduction measures would be added to the GGRP, as needed, to reduce the cumulative impacts of private development within the City through 2030 to a less than significant level, in accordance with targets in the General Plan and GGRP.

Impact C-GHG-1: The proposed project would not result in a significant contribution to cumulative GHG impacts from construction or operation of the project with implementation of the measures within the General Plan and City's qualified GGRP. **[Less than Significant Cumulative Greenhouse Gas Emissions Impact]**

3.8.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
GHG-1: Under the proposed project buildout, annual service population emissions of CO_2e/yr/service population would not exceed the 2030 threshold of 4.5 MT of CO_2e/year/service population, and the GHG emissions from the stationary sources would also not exceed the stationary source threshold of 10,000 MT CO_2e/year. This impact is, therefore, less than significant.	Less Than Significant	No mitigation required	Less Than Significant
C-GHG-1: The proposed project would not result in a significant contribution to cumulative GHG impacts from construction or operation of the project with implementation of the measures within the General Plan and City's qualified GGRP.	Less Than Significant	No mitigation required	Less Than Significant

3.9 HAZARDS AND HAZARDOUS MATERIALS

The discussion in this section is based in part on a Phase I Environmental Site Assessment prepared by *RPS Iris Environmental,* on May 10, 2017. The report is included in this Draft EIR as Appendix G.

3.9.1 Regulatory Setting

3.9.1.1 *Federal Laws and Regulations*

The primary federal laws regulating hazardous wastes/materials are the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). The purpose of CERCLA, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. RCRA provides for "cradle to grave" regulation of hazardous wastes.

Other federal laws include:

- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act (OSHA)
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

3.9.1.2 *California Laws and Regulations*

Hazardous waste in California is regulated primarily under the authority of the federal Resource Conservation and Recovery Act of 1976, and the California Health and Safety Code. Other California laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning. In California, the EPA has granted most enforcement authority of federal hazardous materials regulations to the California Environmental Protection Agency (Cal/EPA). Under the authority of Cal/EPA, the Department of Toxic Substances Control (DTSC) or the San Francisco Bay Regional Water Quality Control Board (RWQCB) is responsible for overseeing the remediation of contaminated sites in the San Francisco Bay area.

Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous material is vital if it is disturbed during project construction. The California Department of Industrial Relations, Division of Occupational Safety and Health (DOSH) enforce state worker health and safety regulations related to construction activities. Regulations include exposure limits, protective clothing, and training requirements to prevent exposure to hazardous materials. DOSH also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement, which equal or exceed their federal counterparts.

3.9.1.3 *Local Regulations*

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

3.9.1.4 *General Plan Policies*

The goals and policies of the City of Mountain View 2030 General Plan provide vital direction for the future of the City and its residents. They reflect present-day community values, priorities, and compliance with current state laws and local ordinances. General Plan Policies applicable to the proposed project for hazards and hazardous materials impacts are included in *Public Safety* and *Infrastructure and Conservation* sections of the General Plan and address consideration of identification and remediation of contamination as a part of development review (Policy PSA 3.3) in order to protect human and environmental health (Policy INC 18.1).

3.9.2 Existing Setting

Hazardous materials encompass a wide range of substances, some of which are naturally-occurring and some of which are man-made. Examples include pesticides, herbicides, petroleum products, metals (e.g., lead, mercury, arsenic), asbestos, and chemical compounds used in manufacturing. Determining if such substances are present on or near project sites is important because, by definition, exposure to hazardous materials above regulatory thresholds can result in adverse health effects on humans, as well as harm to plant and wildlife ecology.

Due to the fact that these substances have properties that are toxic to humans and/or the ecosystem, there are multiple regulatory programs in place designed to minimize the chance for unintended releases and/or exposures to occur. Other programs set forth remediation requirements at sites where contamination has occurred.

Hazardous waste generators and hazardous materials users in the City are required to comply with regulations enforced by several federal, state, and county agencies. The regulations are designed to reduce the risk associated with the human exposure to hazardous materials and minimize adverse environmental effects. State and federal construction worker health and safety regulations require protective measures during construction activities where workers may be exposed to asbestos, lead, and/or other hazardous materials.

3.9.2.1 *General Site History*

The approximately 27.47 acre project site was historically used for agricultural purposes (orchards) from 1939 until approximately 1974. During the time for agricultural usage, it appears that there were several small farmhouse buildings, one on each farm parcel. By 1956, various agricultural-

related structures, including several greenhouses, appear on-site. The configuration of the agricultural-related structures changes throughout the 1960s and 1970s.

The 1100/1101 West Maude Avenue building was constructed on the northern portion of the site in 1979. By 1980, East Middlefield Road was constructed to south of the site, and SR 237 was widened along the northwest site border. The building at 800 East Middlefield Road was under construction in 1980 and completed by 1982. The three buildings located at 700 East Middlefield Road were constructed in 1984. The site appears in its current configuration through the present time.

The surrounding area appears to have been used for agricultural purposes (orchards) in the early 20th century. In the 1960s, commercial development began north and west of the site. Commercial development continued to replace agricultural uses in the site vicinity throughout the 1970s and 1980s. Residential structures were constructed east of the site and SR 237 was constructed north of the site in the 1990s. No significant changes were noted between the 1990s and today.

Table 3.9-1:
Project Site Occupancy History

1100 West Maude Avenue

Site Occupant	*Years Occupied*	*Type of Use*	*Type of Waste Generated*	*Status of Site*
Litton Applied Technologies	1979-1988	Metal machining, plating, and etching	Storage of hazardous materials on-site, including solvents, toluene, xylene, and trichloroethylene.	Closed with no further action required in December 1986
Apple Computers	1994-1995	Engineering design and target production for missile testing	Oils, solvents, acetone, resins, paints, gases	N/A
Synopsis	1995	Office uses and test labs	Small quantities of solder flux and isopropyl alcohol	N/A

700 East Middlefield Road

Site Occupant	*Years Occupied*	*Type of Use*	*Type of Waste Generated*	*Status of Site*
Daisy Systems Corporation	1985-1990	Materials laboratory	Corrosive liquids	Closed with no further action required in August 1998
Synopsis	1991-1994	Office uses and test labs	Chemicals were not used in buildings A,B and C	Unknown

Table 3.9-1: Project Site Occupancy History (continued)				
800 East Middlefield Road				
Site Occupant	***Years Occupied***	***Type of Use***	***Type of Waste Generated***	***Status of Site***
National Advanced Systems	1982-1986	Offices and research and development activities	Unknown	Closed with no further action required in January 2004
Expertest Inc.	1991	Offices and research and development activities	Unknown	Unknown
Synopsis	1997	Office uses and test labs	Unknown	Unknown
Philips Semiconductor	1997-2001	Offices and research and development activities	Unknown	Unknown
Western Digital and Paradise Systems	1991-2008	Industrial Development	Unknown	Unknown
Hansen Medical	2008-2012	Medical	Used solder flux and used IPA.	Ingenium transported all hazardous materials by Hansen Medical off-site for disposal, as needed.

3.9.2.2 *Prior Hazardous Material Investigations: On-Site Contamination*

No areas of oil or other staining of concrete, asphalt, or soils were noted by *RPS Iris Environmental* during a site visit in May 2017. There was no visible evidence that significant spills or leaks had occurred. No evidence of stressed vegetation was noted during the site visit. At the time of the site visit, no strong odors or excessive noise were noted at the site.

Hazardous materials observed on-site included construction related materials in the 700 East Middlefield Road and 1100/1101 West Maude Avenue buildings and diesel fuel in the three on-site emergency generators. No records of current or historical Underground Storage Tank (USTs) were found. Three aboveground storage tanks (ASTs), with capacities ranging from 135 to 660 gallons, were observed on-site associated with the emergency generators located adjacent to Buildings 2, 4, and the 1100/1101 West Maude Avenue building. No staining was observed beneath the ASTs. Hazardous materials were used at 800 East Middlefield Road for research and development and manufacturing purposes. Small quantities of hazardous materials were properly stored in flammable and corrosive cabinets. According to an earlier Phase I ESA, isopropyl alcohol was the main hazardous compound formerly used on-site. Other hazardous materials noted during a former site visit included: solder and solder flux, silicon adhesive, acetylene and oxygen compressed gases, hexanes, soaps, disinfectants, and germicides.

3.9.2.3 *Potential Off-Site Sources of Contamination*

Hewlett-Packard TCE Groundwater Plume

The project site is located cross- to-upgradient from the former Hewlett-Packard (HP) TCE groundwater plume, located at 690 East Middlefield Road. An April 2014 groundwater monitoring investigation conducted at the former HP facility detected a maximum TCE concentration of 63 micrograms per liter (µg/L) in groundwater within 400 feet northwest of the site. Current delineation of the plume extends within 400 feet to the northwest and cross- to downgradient of the site. HP received a 'no further action' letter from the RWQCB on January 15, 2016 and removed all wells associated with investigation of the HP plume.

E/M Lubricants PCE Groundwater Plume

The proposed project site is located upgradient from the E/M Lubricants PCE groundwater plume, located at 875 Maude Avenue. April 2014 groundwater monitoring results from the E/M Lubricants facility detected a maximum PCE concentration of 35 µg/L in groundwater within 1,000 feet northwest of the site. Current delineation of the plume extends within 900 feet to the northwest and downgradient of the site. The E/M Lubricants site owner is currently attempting to obtain a 'no further action' letter from the RWQCB.

Lynch Circuits TCE Groundwater Plume

The Lynch Circuits property located at 1140 West Evelyn is located approximately 0.4 miles south and upgradient of the proposed project site. TCE is present in groundwater within 250 feet up- to cross-gradient of the site boundary. A soil vapor extraction (SVE) system was installed at Lynch Circuits in 1994 and was operated until 2000. Approximately 150 kilograms of VOCs were removed by the SVE system until it no longer was effective. A groundwater extraction (GWE) treatment system was installed at Lynch Circuits in 1993 to treat the local shallow and deeper groundwater, and was operated until 2001. By 2001, influent VOC concentrations had decreased from 396 micrograms per liter (µg/L) to 129 µg/L.

Based on a review of the most recent reports on file on the GeoTracker database, the 2014 Data Gap Investigation Report and 2016 Final Data Gap Investigation Report, which were prepared by CH2M, TCE concentrations were above the Tier 1 groundwater ESL for TCE of 5 µg/L but below the groundwater ESL for vapor intrusion in a commercial/industrial setting of 1,300 µg/L. CH2M also collected shallow and deep soil gas samples to assess the potential for vapor intrusion in off-site areas. CH2M concluded that "the results show that VOCs are not detected at the shallow depths and the vapor intrusion pathway was not complete in off-site areas." TCE concentrations were reported below the TCE soil gas ESL for a commercial/industrial scenario of 3,000 µg/m^3. CH2M stated that "no additional soil gas samples are recommended at this time."

Indoor Air

CH2M completed five indoor air sampling events at the 1140 West Evelyn building between 2012 and 2014 and concluded that, between 2012 and 2014, the indoor air sampling results for the site-related chemicals of concern were less than the ESLs, except for two instances that were likely related to remodeling activities in the area being sampled. Subsequent sampling showed results

lower than the screening levels. CH2M concluded that further indoor air sampling may be needed based on significant changes in site-related groundwater concentrations or in significant changes in use or condition of the building (that is, use for noncommercial purposes or significant remodeling effort).

3.9.2.4 *Current Site Conditions*

The three existing project buildings proposed to remain completed extensive renovations in May 2017, along with associated site improvements for office uses. These three buildings are currently occupied with office uses by LinkedIn employees.

The 1100/1101 West Maude Avenue building is a shell with all interior walls, stairwells and elevators removed and is currently being used for construction storage. The 800 East Middlefield Road building is currently unoccupied and unused.

3.9.2.5 *Lead-based Paint and Asbestos-Containing Materials (ACM)*

Lead-based paint was commonly used in the construction of buildings prior to being phased out of regular use in California starting in 1978. A previous Phase I ESA for 700 East Middlefield Road and 1100/1101 West Maude Avenue buildings included a limited asbestos survey. The Phase I concluded that there is potential that asbestos containing roofing materials may be present in these buildings. Per the Phase I, all asbestos containing materials have been abated in these buildings during renovation activities.

No previous asbestos surveys were provided for the 800 East Middlefield Road building. According to the 1997 Phase I, based on the age of the building, presumed asbestos-containing materials were identified including, but not limited to: sheetrock and sheetrock joint compound, floor tile and mastic, suspended ceiling tile, and roofing materials. Building materials were observed to be in good condition.

3.9.2.6 *Airport Safety*

Federal Aviation Administration (FAA)

Restriction on the height of buildings, antennas, trees, and other objects near Moffett Federal Airfield is regulated by the Federal Aviation Administration (FAA), Federal Aviation Regulations (FAR) Part 77. The FAR Part 77 map is used by the FAA and the Santa Clara County Airport Land Use Commission (ALUC) to identify potential obstructions and hazards to aviation traffic and determine consistency with the Comprehensive Land Use Plan (CLUP).

The project site is located within the mapped Part 77 182-foot mean sea level (msl) horizontal surface for Moffett Federal Airfield. No buildings would be allowed on this site higher than 182 in elevation without FAA approval.

Comprehensive Land Use Plan for Moffett Federal Airfield

The proposed project site is approximately one mile southwest of the Moffett Federal Airfield, the closest airport to the project site. The site is within the planning area for Moffett Federal Airfield, as described in the CLUP adopted by the Santa Clara County ALUC in November 2012, and amended in November 2016.

Airport Influence Area (AIA): The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations. The AIA is defined as a feature-based boundary around the airport within which all actions, regulations and permits must be evaluated by local agencies to determine how the Airport CLUP policies may impact the proposed development. This evaluation is to determine that the development meets the conditions specified for height restrictions, and noise and safety protection to the public. The project is within the AIA for Moffett Federal Airfield.

Airport Safety Zones: Airport safety zones are established to minimize the number of people exposed to potential aircraft accidents in the vicinity of the airport by imposing density and use limitations within these zones. The safety zones are related to runway length and expected use.

The project site is just outside the Turning Safety Zone (TSZ). The TSZ represents the approach and departure areas that have the third highest level of exposure to potential aircraft accidents. Safety Zone Compatibility Policies are used to determine if a specific land use is consistent with the Comprehensive Land Use Plan, in this case the Moffett Field Airport Land Use Plan.

3.9.2.7 *Other Hazards*

The project site is located in a developed urban area and is not located in a very high hazard zone for wildland fires.

3.9.3 Hazards and Hazardous Materials Impacts

3.9.3.1 *Thresholds of Significance*

For the purposes of this EIR, a hazards and hazardous materials impact is considered significant if the project would:

- Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;

- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

3.9.3.2 *On-Site Sources of Contamination: Prior Agricultural Use*

The project site has historically been developed with agricultural use including greenhouses and other buildings between 1939 to at least 1980. Activities commonly associated with agriculture include the use and storage of hazardous materials and petroleum products (e.g., agricultural chemicals). Soils on site could be impacted by residual pesticides and chemicals used during the agricultural process. Construction activities could encounter these chemicals during excavation and construction, should they be present.

RPS Iris Environmental conducted a limited soil investigation in October 2016 to assess potential soil disposal concerns regarding the construction of two proposed parking structures on the site, which included analyses for pesticides. Detected pesticide concentrations were below RWQCB Environmental Screening Levels (ESLs), with one exception, and below hazardous waste disposal levels. One detection of dieldrin in one of the samples exceeded the Residential ESL, but was below the Commercial ESL. This sole exceedance in only one sample is isolated and is not considered representative of any extensive condition at the site.[43] Soils excavated for disposal would be further tested for hazardous materials contamination prior to being removed from the site, based on standard industry practice. Therefore, no special handling procedures are anticipated during the construction of the parking structures and the impact from on-site sources of contamination from prior agricultural use would be less than significant.

Impact HAZ-1: The proposed project would not worsen off-site conditions due to soil contamination from to prior agricultural uses. **[Less Than Significant Impact]**

3.9.3.3 *Sources of Contamination: Prior Industrial Uses*

Groundwater contaminated with VOCs is most likely associated with the Lynch Circuit groundwater plume that has been detected beneath the project site. The plume is known to originate off-site and upgradient of the project site, is well documented, and under remediation. VOC concentrations in groundwater beneath the site project site are below RWQCB ESLs for vapor intrusion and are not

[43] RPS Iris Environmental. *Memorandum. In-situ Soil Assessment for Redevelopment and Disposal/Reuse, 700 Middlefield Road, Mountain View, California*. October 28, 2016.

considered to pose a risk to site occupants under current or future site conditions.[44] Project construction would not worsen groundwater contamination such that it would exacerbate off-site conditions.

Impact HAZ-2: Project construction would not worsen groundwater contamination such that it would exacerbate off-site conditions. **[Less Than Significant Impact]**

Although VOC concentrations in soil and groundwater at the site have been reduced, the likelihood of future construction workers encountering residual VOC contamination in soils and groundwater is low, as there is no documentation of historical plume beneath the site; accidental exposure to hazardous materials could create an impact.

The project will be required to comply with the City's standard conditions of approval, which could include measures to avoid or reduce impacts to accidental discovery of any hazardous materials.

Standard Conditions of Approval

- DISCOVERY OF CONTAMINATED SOILS: If contaminated soils are discovered, the applicant will ensure the contractor employs engineering controls and Best Management Practices (BMPs) to minimize human exposure to potential contaminants. Engineering controls and construction BMPs will include, but not be limited to, the following:

  (a) Contractor employees working on-site will be certified in OSHA's 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training for performing remedial tasks in the area of concern;
  (b) Soil shall be properly characterized and approved by a disposal facility prior to transportation off-Site;
  (c) Contractor will water/mist soil as it is being excavated and loaded onto transportation trucks;
  (d) Contractor will place any stockpiled soil in areas shielded from prevailing winds; and
  (e) Contractor will cover the bottom of excavated areas with sheeting when work is not being performed.

- HEALTH AND SAFETY MEASURES: Permittee/Contractor is responsible for preparing and implementing an appropriate health and safety plan to address the contamination and manage the operations in a safe manner and in compliance with the Cal/OSHA Construction Safety Orders and other State and Federal requirements.

3.9.3.4 *On-Site Sources of Contamination: Existing Structures, Demolition and Disposal*

Based on the estimated age of the existing on-site buildings, asbestos-containing materials (ACM) and lead-based paint may be present in some building materials. Building demolition could result in the release of these materials to the environment, if appropriate control measures are not implemented.

[44] RPS Iris Environmental. *Personal and written communication to DJP&A*. January 19, 2018, and April 24, 2018.

Impact HAZ-3: Hazardous materials contamination from asbestos-containing materials and lead-based paint remaining on the site could pose a risk to construction workers and adjacent uses during building demolition. Compliance with standard demolition and construction requirements as conditions of approval would reduce this impact to less than significant. **[Less Than Significant Impact]**

Conditions of Approval

- To reduce the potential for construction workers and adjacent uses to encounter hazardous materials contamination from ACMs and lead-based paint, the following measures are included in the project.

  – In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition. The surveys shall be completed prior to demolition work beginning on these structures.

  – A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.

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

3.9.3.5 *On-Site Sources of Contamination: Hazardous Materials Use by Proposed Uses*

The project proposes to construct approximately 612,000 square feet of new office uses on the project site. The nearest school to the site is Slater Elementary, approximately 3,400 feet to the west of the project site.

There is a potential for the redevelopment on the site to include the use, storage, transport, or disposal of hazardous materials. Depending on the nature of the use of such materials at the site, there is a potential for these activities to impact other uses in the vicinity. If future uses on the site involve the use, storage, transport, or disposal of hazardous materials, the site operator will be required to comply with federal, state, and local requirements for managing hazardous materials.

Depending on the type and quantity of hazardous materials, these requirements could include the preparation of, implementation of, and training in the plans, programs, and permits prepared for the

site, and compliance would be monitored and enforced during the permitting process for these activities.

Impact HAZ-4: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **[Less Than Significant Impact]**

3.9.3.6 *Airport Safety*

Federal Aviation Administration

The project site is located within the mapped FAA Part 77 182-foot mean sea level (msl) horizontal surface for Moffett Federal Airfield. The project site is located at an elevation of approximately 60-75 feet above msl. The project would construct two new six-story office buildings reaching a height of 73 feet and 101 feet to the parapet. Combined with the existing elevation of the site, the proposed structure could reach a maximum height of 176 feet msl and would not be in conflict with FAA Part 77 horizontal surface for Moffett Federal Airfield.

As a condition of approval, prior to the issuance of building permits, the applicant will obtain a "Determination of No Hazard to Air Navigation" from the FAA, in accordance with Part 77.

Comprehensive Land Use Plan for Moffett Federal Airfield

The project site is located within the AIA of Moffett Federal Airfield, as identified in the Moffett Field CLUP. While the proposed project appears just outside of the Turning Safety Zone (TSZ), the project requires review by the ALUC through a separate application process (done concurrently with the City's review process), which will confirm compliance with the Moffett Field CLUP.

Impact HAZ-5: With implementation of conditions of approval requiring coordination with the Santa Clara County Airport Land Use Commission and the FAA, the proposed project would not result in an airport safety hazard. **[Less Than Significant Impact]**

3.9.3.7 *Other Hazards*

The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project site is located in a developed urban area and would not expose people or structures to wildland fires. These hazards would not present a significant impact to those living near or working at the project site.

Impact HAZ-6 The project would not result in a significant impact due to interference with emergency response plans, evacuation plans, or wildland fires. **[Less Than Significant Impact]**

3.9.3.8 *Cumulative Impacts*

Some of the projects included in the cumulative analysis are proposed on properties that were previously developed with industrial or commercial uses (Table 3.0-3). It is likely that hazardous materials may have been stored and used on, and/or transported to and from some of these properties as part of activities on the sites. These hazardous materials (such as gasoline, oil, propane, and various chemicals used in R&D and manufacturing) may have been stored on these sites in aboveground or underground tanks. Storage tanks can leak, often resulting in soil and/or groundwater contamination. If groundwater is affected, it can impact properties down gradient of the spill.

In addition, many of the properties in Mountain View and surrounding cities were used for agricultural purposes prior to their development for industrial and residential uses and agricultural chemicals such as pesticides and fertilizers may have been used on site in the past. The use of these chemicals can result in widespread residual soil contamination, sometimes in concentrations that exceed regulatory thresholds. In addition, development and redevelopment of some of the sites would require demolition of existing buildings that may contain ACMs and/or lead paint. Demolition of these structures could expose construction workers or other persons in the vicinity to harmful levels of asbestos or lead.

Based on the above-described conditions, which are present on most project sites to varying degrees, potentially significant environmental impacts could occur under the cumulative development scenario since such conditions can lead to the exposure of residents and/or workers to substances that have been shown to adversely affect health. For each of the projects under consideration, various mitigation measures will be implemented as a condition of development approval for the risks associated with exposure to hazardous materials. Measures would include incorporating the requirements of applicable existing local, state, and federal laws, regulations, and agencies such as the DTSC and the California Occupational Safety and Health Administration (Cal/OSHA), during all phases of project development.

If chemical releases have occurred on these sites, and depending upon the extent of the release, contaminated soils could be excavated and transported to appropriate landfills, or treated on-site. If groundwater is affected, remediation and ongoing groundwater sampling both on the site and on surrounding down gradient properties could be warranted. Finally, determining the extent of asbestos and lead paint contamination would also be required prior to building demolition and site grading and, if present, such substances would be handled and disposed of in a manner that minimizes human exposure. These measures are all included in the proposed project for hazardous materials impacts. Therefore, with the inclusion of required conditions of approval and compliance with existing statutes and regulations, the cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts.

Impact C-HAZ-1: The cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts. **[Less Than Significant Cumulative Hazardous Materials Impact]**

3.9.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
HAZ-1: The proposed project would not worsen off-site conditions due to soil contamination from to prior agricultural uses.	Less Than Significant	No mitigation required	Less Than Significant
HAZ-2: Project construction would not worsen groundwater contamination such that it would exacerbate off-site conditions.	Less Than Significant	No mitigation required	Less Than Significant
HAZ-3: Hazardous materials contamination from asbestos-containing materials and lead-based paint remaining on the site could pose a risk to construction workers and adjacent uses during building demolition. Compliance with standard demolition and construction requirements as conditions of approval would reduce this impact to less than significant.	Less Than Significant	No mitigation required	Less Than Significant
HAZ-4: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less Than Significant	No mitigation required	Less Than Significant
HAZ-5: With implementation of conditions of approval requiring coordination with the Santa Clara County Airport Land Use Commission and the FAA, the proposed project would not result in an airport safety hazard.	Less Than Significant	No mitigation required	Less Than Significant
HAZ-6: The project would not result in a significant impact due to interference with emergency response plans, evacuation plans, or wildland fires.	Less Than Significant	No mitigation required	Less Than Significant
C-HAZ-1: The cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts.	Less Than Significant	No mitigation required	Less Than Significant

3.10 HYDROLOGY AND WATER QUALITY

3.10.1 Regulatory Setting

3.10.1.1 *Federal Emergency Management Agency*

In 1968, Congress created the National Flood Insurance Program (NFIP) in response to the rising cost of taxpayer funded disaster relief for flood victims and the increasing amount of damage caused by floods. The NFIP makes federally-backed flood insurance available for communities that agree to adopt and enforce floodplain management ordinances to reduce future flood damage.

The Federal Emergency Management Agency (FEMA) manages the NFIP and creates Flood Insurance Rate Maps (FIRMs) that designate 100-year floodplain zones and delineate other flood hazard areas. A 100-year floodplain zone is the area that, based on historical data, has a one in one hundred (one percent) chance of being flooded in any one year. Portions of the City are identified as special flood hazard areas with a one percent annual chance and two percent annual chance of flooding (also known as the 100-year and 500-year flood zones) as determined by the FEMA NFIP.

3.10.1.2 *Water Quality (Non-point Source Pollution Program)*

The federal Clean Water Act (CWA) and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality. Regulations set forth by the EPA and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA's regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the water quality control boards, which for the Mountain View area is the San Francisco RWQCB.

Statewide Construction General Permit

The SWRCB has implemented a NPDES Construction General Permit (CGP) for the State of California. For projects disturbing one acre or more of soil, a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) must be prepared prior to commencement of construction. The CGP, which became effective July 1, 2010, includes additional requirements for training, inspections, recordkeeping, reporting, and for projects of certain risk levels, monitoring. Since the project would disturb more than one acre of soil, it will be required to prepare a NOI and SWPPP pursuant to the CGP.

Municipal Regional Stormwater NPDES Permit (MRP)/C.3 Requirement

The San Francisco Bay RWQCB also has issued a Municipal Regional Stormwater NPDES Permit (Permit Number CAS612008) (MRP). In an effort to standardize stormwater management requirements throughout the region, this permit replaces the formerly separate countywide municipal stormwater permits with a regional permit for 77 Bay Area municipalities, including the City of Mountain View. Under provisions of the NPDES Municipal Permit, redevelopment projects that disturb more than 10,000 square feet are required to design and construct stormwater treatment controls to treat post-construction stormwater runoff. Amendments to the MRP require all of the

post-construction runoff to be treated by using Low Impact Development (LID) treatment controls, such as biotreatment facilities. Due to the existing site groundwater contamination (described previously in *Section 3.9, Hazardous Materials)*, LID treatment controls will be selected, designed, and constructed in a way that will minimize the potential to adversely affect the site.

The project would disturb more than 10,000 square feet and is, therefore, subject to the requirements of the MRP.

Impaired Water Bodies (Section 303(d))

Pursuant to the CWA Section 303(d), the State of California assesses the water quality of the state's waterways to determine if they contain pollutants in concentrations that exceed federal standards. Total Maximum Daily Load (TMDL) programs are established by the State and Regional Water Quality Control Boards for waterways that exceed these limits. A TMDL is a calculation of the maximum amount of a pollutant that body of water can receive and still meet water quality standards. A body of water is deemed 'impaired' if, despite the use of pollution control technologies, pollutant concentrations exceed the standards.

3.10.2 Existing Setting

3.10.2.1 *Water Quality*

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

3.10.2.2 *Groundwater*

Subsurface exploration for the project site found groundwater at depths ranging from nine feet to 15 feet below ground surface. The depth of groundwater can vary seasonally, and can be influenced by underground drainage patterns, regional fluctuations, and other factors.

3.10.2.3 *Stormwater Drainage*

The existing project site is developed with five one- and two-story office buildings containing a total of approximately 466,000 square feet of office space. The site is developed with paved driveways and parking lots, as well as landscaping and utilities. The site is almost entirely paved; it currently contains approximately 76 percent impervious surfaces and approximately 24 percent pervious surfaces.

The City of Mountain View Public Works Department operates and maintains the storm drainage system in the City. The project site contains 24- to 30-inch storm drains that traverse the site within a 30-foot utility easement (refer to Figure 2.2-8). Storm water at the site drains to the storm drain

systems on East Middlefield Road, the SR 237 frontage road, and West Maude Avenue. These storm drain systems convey flow to Stevens Creek, which flows north towards San Francisco Bay.

3.10.2.4 *Flooding*

The site does not contain any streams, waterways, or wetlands. The nearest waterway, Stevens Creek, is located approximately 1.1 mile west of the project site. Stevens Creek flows north toward the San Francisco Bay, which is located approximately 2.5 miles north of the project site.

The project site is not located within a 100-year flood hazard zone. According to the FIRM prepared by the FEMA for the project area, the site is located within Zone X, which is defined as "Areas of 0.2 percent annual chance flood; areas of one percent annual chance flood with average depths of less than one-foot or with drainage areas less than one square mile; and areas protected by levees from one percent annual chance flood."[45]

3.10.2.5 *Other Inundation Hazards*

ABAG compiles with the dam failure inundation hazard maps submitted to the State Office of Emergency Services by dam owners throughout the Bay Area.

The Mountain View dam hazard map contained within the General Plan EIR shows the project site is not located within a dam failure inundation hazard zone.[46] The project would not be affected by sea-level rise of up to 55-inches.[47]

The site is not located near a large enclosed body of water, near the ocean, or in a landslide hazard zone. The site is approximately 2.5 miles inland from San Francisco Bay shoreline, and is approximately 60 to 75 feet above mean sea level. Therefore, it is not vulnerable to inundation by seiche, tsunami, or mudflow.

3.10.3 Hydrology and Water Quality Impacts

3.10.3.1 *Thresholds of Significance*

For the purposes of this EIR, a hydrology and water quality impact is considered significant if the project would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level

[45] Federal Emergency Management Agency. *Flood Insurance Rate Map, Community Panel No. 06085C0045H*. Map. Effective Date: May 18, 2009.
[46] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report*. November 2011. Figure IV.H-3.
[47] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report*. November 2011. Figure IV.E-1.

which would not support existing land uses or planned uses for which permits have been granted);

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impeded or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- Inundation by seiche, tsunami, or mudflow.

3.10.3.2 *Construction Water Quality Impacts*

During-Construction Impacts

Implementation of the project would require demolition, paving, and grading of the site, activities that would temporarily increase the amount of unconsolidated materials on-site. Grading activities could increase erosion and sedimentation that could be carried by runoff into natural waterways, which could increase sedimentation impacts to local creeks or the San Francisco Bay.

Implementation of the project would result in the disturbance of most of the site (apart from the central area, with continuing uses), which is approximately 28.7 acres in size. As a result, the project would disturb more than one acre and would be required to comply with the State of California General Construction Permit. The project would also be required to comply with the City of Mountain View's requirements for reducing erosion and sedimentation during construction, which are described below.

Following the implementation of appropriate stormwater treatment measures, the proposed project, when completed, would not significantly increase the amount of runoff or pollutants flowing into the storm drain system compared to existing conditions. Construction and grading activities could, however, temporarily increase pollutant loads. With the implementation of the following measures, which are required by the City as conditions of approval and are based on RWQCB requirements, impacts to water quality during construction would be less than significant.

Standard Conditions of Approval

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

- CONSTRUCTION SEDIMENT AND EROSION CONTROL PLAN: The applicant shall submit a written plan acceptable to the City which shows controls that will be used at the site to minimize sediment runoff and erosion during storm events. The plan should also include routine street sweeping and storm drain catch basin cleaning. The plan should include installation of the following items where appropriate:

  - Silt fences around the site perimeter;
  - Gravel bags surrounding catch basins;
  - Filter fabric over catch basins;
  - Covering of exposed stockpiles;
  - Concrete washout areas;
  - Stabilized rock/gravel driveways at points of egress from the site; and
  - Vegetation, hydroseeding or other soil stabilization methods for high-erosion areas.

Post-Construction Impacts

The proposed project would construct three six-story buildings, and two six-level parking structures, common areas, surface parking, new landscaping, and new utility infrastructure on the site. Based on preliminary project plans, the project would increase pervious surfaces from 24 percent to 44 percent (not including landscaped roofs and terraces).

Although impervious surfaces would be reduced with implementation of the project, the project disturbance area is greater than 10,000 square feet; therefore, it would be required to comply with the MRP. The following measures, based on RWQCB requirements and required as conditions of approval, have been included in the project to reduce stormwater runoff impacts from project implementation:

Standard Conditions of Approval

- The project shall comply with the requirements of the MRP, as well as other local, state, and federal requirements. The project shall comply with provision C.3 of the MRP, which provides performance standards for the management of stormwater for new development, and any new requirements. The installation of on-site trash capture devices will be required as a result of recent changes to the MRP permit.

- LANDSCAPE DESIGN: Landscape design shall minimize runoff and promote surface filtration. Examples include:

- No steep slopes exceeding 10 percent;
- Using mulches in planter areas without ground cover to avoid sedimentation runoff;
- Installing plants with low water requirements; and
- Installing appropriate plants for the location in accordance with appropriate climate zones.

- EFFICIENT IRRIGATION: Common areas shall employ efficient irrigation to avoid excess irrigation runoff. Examples include:

  - Setting irrigation timers to avoid runoff by splitting irrigations into several short cycles;
  - Employing multi-programmable irrigation controllers;
  - Employing rain shutoff devices to prevent irrigation after significant precipitation;
  - Use of drip irrigations for all planter areas which have a shrub density that will cause excessive spray interference of an overhead system; and
  - Use of flow reducers to mitigate broken heads next to sidewalks, streets and driveways.

- OUTDOOR STORAGE AREAS (INCLUDING GARBAGE ENCLOSURES): Outdoor storage areas (for storage of equipment or materials which could decompose, disintegrate, leak or otherwise contaminate stormwater runoff), including garbage enclosures, shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following:

  - Paving the area with concrete or other nonpermeable surface;
  - Covering the area; and
  - Sloping the area inward (negative slope) or installing a berm or curb around its perimeter. There shall be no storm drains in outdoor storage areas.

Impact HYDRO-1: With the implementation of standard conditions of approval to reduce impacts to stormwater, the project would result in a less than significant impact**.** **[Less than Significant Impact]**

3.10.3.3 *Groundwater Impacts*

Based on subsurface investigations for the project site, groundwater would be expected at approximately nine to 15 feet below ground surface, although groundwater depths fluctuate seasonally. Shallow groundwater in the vicinity of the project site is not used for drinking water. The excavations for each of the below-grade parking structure are anticipated to be approximately 11 to 13 feet. It is anticipated that groundwater may be encountered during excavation, especially at proposed parking structure P2 on the north side of the site, as the groundwater level on the north end of the site is shallower.

Groundwater levels are anticipated to be within five feet below the planned parking structure excavation bottom. Therefore, the following recommendations from the design-level geotechnical report will be incorporated as conditions of approval:

Conditions of Approval

- To provide a firm base for construction for the parking structure basement foundation, it may be necessary to remove and replace approximately 12 to 18 inches of native soil below the basement foundation level and replace it with a bridging layer, such as crushed rock, or to chemically treat the exposed soil with lime or cement.

- Dewatering may be required and that should be in accordance with the specifications outlined in the deign-level geotechnical report prepared for the project.

Impact HYDRO-2: With the implementation of conditions of approval, the proposed project would result in less than significant impacts from groundwater hazards. **[Less Than Significant Impact]**

3.10.3.4 *Stormwater Drainage*

The proposed project would reduce impervious surfaces from 76 to 56 percent and increase pervious surface area from 24 to 44 percent (not including landscaped roofs and terraces), allowing local infiltration and reduced peak stormwater runoff. Since the total runoff would decrease and since the existing storm drainage system has adequate capacity for the existing developed site, the proposed project would not exceed the capacity of the storm drainage system. Therefore, the impact to the storm drainage system would be less than significant.

Impact HYDRO-3: The proposed project would not result in significant impacts from stormwater runoff. **[Less Than Significant Impact]**

3.10.3.5 *Flooding Impacts*

As discussed previously, the project site is not located within a 100-year flood hazard area, and would not place housing within a 100-year flood hazard area. Construction on the site would not expose people or structures to flooding risks.

Impact HYDRO-4: The proposed project would not result in significant flooding impacts. **[Less Than Significant Impact]**

3.10.3.6 *Other Inundation Hazards (Including Projected Sea-Level Rise)*

The Mountain View General Plan EIR dam hazard map shows that the project site is not located within a dam failure inundation hazard zone.

Based upon the City's *Shoreline Regional Park Community Sea Level Rise Study*, the project site is not within an area that would be directly affected by a projected future sea level rise from global climate change.

The site is not located near a large body of water, near the ocean, or in a landslide hazard zone. Therefore, it is not vulnerable to inundation by seiche, tsunami, or mudflow.

Impact HYDRO-5: The proposed project would not result in a significant impact from dam failure, sea-level rise, or other inundation hazards. **[Less Than Significant Impact]**

3.10.4 Cumulative Hydrology and Water Quality Impacts

3.10.4.1 *Cumulative Stormwater Impacts*

Buildout of the cumulative projects would involve redevelopment of existing developed sites that contain substantial impervious surfaces, and these projects would be required to conform to applicable General Plan goals, policies, and action statements regarding stormwater runoff, infrastructure and flooding. In addition, future projects proposed in the project development timeframe would be required to comply with applicable requirements in the City of Mountain View Municipal Zoning Code, and the City's stormwater management guidelines, and the NPDES permits standards to avoid hydrology and water quality impacts or reduce them to a less than significant level.

Additionally, the cumulative projects would be required to implement construction-period stormwater pollution practices, and post-construction Low Impact Development measures to comply with the NPDES Municipal Regional Permit to reduce water quality impacts. For these reasons, the proposed project would not make a cumulatively considerable contribution to a significant cumulative hydrology and water quality impact.

Impact C-HYDRO-1: For these reasons, the proposed project would not make a cumulatively considerable contribution to a significant cumulative hydrology and water quality impact. **[Less Than Significant Cumulative Hydrology and Water Quality Impact]**

3.10.4.2 *Cumulative Flooding Impacts*

The proposed project is not located in a flood hazard zone Other projects built in the City during the 2030 General Plan buildout process may also be located in flood zones, but all of these projects would be subject to FEMA regulations and the Mountain View Flood Ordinance. Therefore, cumulative flooding impacts would be less than significant.

Impacts to the project site from a potential sea-level rise of eight inches are described in *Section 3.10.2.5, Other Inundation Hazards.* The project would not contribute to a significant cumulative impact from sea-level rise.

Impact C-HYDRO-2: The cumulative projects, including the proposed project, would not result in significant cumulative hydrology impacts. **[Less Than Significant Cumulative Hydrology and Water Quality Impact]**

3.10.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
HYDRO-1: With the implementation of standard conditions of approval to reduce impacts to stormwater, the project would result in a less than significant impact.	Less Than Significant	No mitigation required	Less Than Significant
HYDRO-2: With the implementation of conditions of approval, the proposed project would result in less than significant impacts from groundwater hazards.	Less Than Significant	No mitigation required	Less Than Significant
HYDRO-3: The proposed project would not result in significant impacts from stormwater runoff.	Less Than Significant	No mitigation required	Less Than Significant
HYDRO-4: The proposed project would not result in significant flooding impacts.	Less Than Significant	No mitigation required	Less Than Significant
HYDRO-5: The proposed project would not result in a significant impact from dam failure, sea-level rise, or other inundation hazards.	Less Than Significant	No mitigation required	Less Than Significant
C-HYDRO-1: For these reasons, the proposed project would not make a cumulatively considerable contribution to a significant cumulative hydrology and water quality impact.	Less Than Significant	No mitigation required	Less Than Significant
C-HYDRO-2: The cumulative projects, including the proposed project, would not result in significant cumulative hydrology impacts.	Less Than Significant	No mitigation required	Less Than Significant

3.11 LAND USE AND PLANNING

'Land use' is a term that describes different types of activities that occur in a particular area. For example, different areas in Mountain View contain homes, retail stores, industry, parks, open spaces, and public facilities, such as schools. Mountain View includes a mixed-use Downtown core, distinct residential neighborhoods and commercial corridors, and industrial areas, each embodying a character that makes it unique.

Local land use is governed by the City's General Plan which, in turn, provides the basis for the City's Zoning Ordinance, precise plans and design guidelines. The current Mountain View 2030 General Plan and City's Zoning Ordinance are described below.

3.11.1 Regulatory Setting

3.11.1.1 *Mountain View 2030 General Plan*

The City of Mountain View adopted the Mountain View 2030 General Plan and GGRP, and certified the *2030 General Plan and Greenhouse Gas Reduction Program EIR* in July 2012 (State Clearinghouse #2011012069). The General Plan is the guiding document for future growth of the City, and provides the City a template for future land use decisions in the City. The GGRP is a separate but complementary document and long-range plan that implements the greenhouse gas emissions reduction goals of the General Plan.

The 2030 General Plan designates the project site as *High-Intensity Office*. This designation accommodates major corporations, financial and administrative offices, high-technology industries, and other scientific facilities, as well as supporting retail and service uses. High-intensity office areas support technological advancement and research and development. The High-Intensity Office designation is further defined as follows:

Allowed Land Uses: Office and ancillary commercial; light industrial, light manufacturing, and other commercial and industrial uses as appropriate.

Density and Intensity: 0.35 FAR; intensities above 0.35 FAR and up to 1.0 FAR may be permitted with measures for highly sustainable development specified within zoning ordinance or precise plan standards.

Height Guideline: Up to 8 stories.

East Whisman Change Area

The site is within the East Whisman Change Area of the 2030 General Plan. The East Whisman Change Area is located within the Moffett/Whisman planning district of the General Plan, and encourages sustainable, transit-oriented employment centers with strong pedestrian and bicycle connectivity to light rail, employers, and amenities. Commercial buildings are designed to respect the scale and character of adjacent residential neighborhoods. The *High-Intensity Office* designation is found throughout the East Whisman Change Area. The goals and policies of the East Whisman Change Area that apply to the project are as follows:

Goal LUD-19: An area with innovative transit-oriented developments, services for area residents and workers and strong connections to the rest of the city.

Policy LUD 19.1: Land use and transportation. Encourage greater land use intensity and transit-oriented developments within a half-mile of light rail transit stations.

Policy LUD 19.2: Highly sustainable development. Provide incentives to encourage new or significantly rehabilitated development to include innovative measures for highly sustainable development.

Policy LUD 19.3: Connectivity improvements. Support smaller blocks, bicycle and pedestrian improvements and connections throughout the area.

Policy LUD 19.4: Transportation Demand Management strategies. Require development to include and carry out Transportation Demand Management strategies.

Policy LUD 19.5: Village centers. Promote new or expanded village centers that serve the area.

Policy LUD 19.6: Residential transitions. Require development to provide sensitive transitions to adjacent residential uses.

Policy LUD 19.7: NASA Ames and Moffett Field area connections. Create stronger connections between East Whisman and the NASA Ames and Moffett Field areas.

3.11.1.2 *City of Mountain View Zoning Ordinance*

As a long-range planning document, the General Plan outlines long-term visions, policies, and actions designed to shape future development within Mountain View. The Zoning Ordinance serves as an implementing tool for the General Plan by establishing detailed, parcel-specific development regulations and standards in each area of the City.

The project site has an existing zoning district of *Limited Industrial (ML)*. The *ML* district is designed to provide an environment conducive to the development and protection of modern, large-scale administrative facilities, research institutions and specialized manufacturing organizations, all of a non-nuisance type.

The floor area ratio (FAR) allowed in the *ML* zoning district is 0.35. The district does not have a standard allowed maximum height, but limits height based on an included plane measured from the property lines.

The City of Mountain View 2030 General Plan includes a goal to develop a new zoning district, or Precise Plan, for the East Whisman Change Area. City Council has authorized the analysis of an interim *Planned Community (P)* zoning designation for projects in the East Whisman Change Area. The intent is for the interim zonings to be incorporated into the future Precise Plan, once adopted, for the East Whisman Change Area. If the proposed project is approved, the site would be zoned with

the *Planned Community (P)* designation until such time that the East Whisman Precise Plan and zoning designation is adopted for the area.

3.11.2 Existing Setting

The 28.7-acre project site consists of four parcels (APNs 165-38-001, -005, -006 and -007) located at 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue in the City of Mountain View. The project is located on the west side of the City of Sunnyvale boundary, north of East Middlefield Road and east of SR 237 and a SR 237 frontage road. The site is currently developed with five single- and double-story office buildings containing approximately 466,000 square feet of space.

Surrounding land uses include office and light industrial uses to the south and west (across SR 237), and the Sunnyvale Golf Course is located directly north of the proposed project site across West Maude Avenue. The NASA-Ames Research Center/Moffett Federal Airfield is located farther north, north of U.S. Highway 101. Multi-family residential uses and office uses in the City of Sunnyvale are located east and southeast of the site.

The VTA NASA/Bayshore light rail station is located northwest of the project site on the north side of Manila Drive, east of Ellis Street. The VTA Middlefield light rail station is located west of the project site, at 580 East Middlefield Road, approximately 0.5 mile from the site across SR 237.

3.11.3 Land Use and Planning Impacts

3.11.3.1 *Thresholds of Significance*

For the purposes of this EIR, a land use and planning impact is considered significant if the project would:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

3.11.3.2 *Land Use Impacts*

Community Impacts

The project would demolish two of the five existing office buildings and construct three new six-story office buildings containing approximately 763,000 square feet of space, for a net increase of approximately 612,000 square feet. The project would not physically divide an established community within the City, and would not interfere with or modify the movement of pedestrians through the area.

Impact LU-1: The proposed project would not divide an existing community. **[Less Than Significant Impact]**

Land Use Compatibility Impacts

Land use conflicts can arise from two basic causes: 1) a new development or land use may cause impacts to persons or the physical environment in the vicinity of the project site or elsewhere; or 2) conditions on or near the project site may have impacts on the persons or development introduced onto the site by the new project. Both of these circumstances are aspects of land use compatibility. Potential incompatibility may arise from placing a particular development or land use at an inappropriate location, or from some aspect of the project's design or scope. Depending on the nature of the impact and its severity, land use compatibility conflicts can range from minor irritation and annoyance to potentially significant effects on human health and safety.

The area surrounding the proposed project site consists of similar office and light industrial uses on the south and west sides. Multi-family residential uses and office uses in the City of Sunnyvale are located east and southeast of the site. The proposed project site is located on the eastern edge of the East Whisman Change Area as identified in the Mountain View 2030 General Plan, which is an area consisting of similar office and light industrial uses as the project site.

The proposed project would redevelop the existing office uses on the site with the same use at a greater density (0.86 FAR) than is currently allowed under the existing zoning (0.35 FAR). This greater density would not result in an incompatible land use, since it would not introduce new uses to the area, and would not introduce new sources of hazardous chemicals, odors, or new sources of noise and vibration to the site (following project completion).

It should be noted, however, that the project proposes taller buildings than are currently on the site near residential uses. As described in *Section 3.1, Aesthetics,* parking garage (P1) along the eastern border of the project site would be five levels in height, and set back 55 feet from the border with the residential uses, which are set back an additional 75 feet from the property boundary. Parking garage (P2) would also be five levels in height near the property line, set back 58 feet from the property boundary. The proposed Building 1 would be six stories, and set back approximately 101 feet from the nearby multi-family uses. The project proposes additional landscaping and trees to visually separate the adjacent uses. With these considerations, the project would not result in a land use compatibility issue with neighboring land uses.

In order to accommodate the high intensity office use, the project is proposing to rezone the site from *Limited Industrial (ML)* to *Planned Community (P)* zoning district, which, as part of the rezone, requires the project to be more sustainable and provide improved amenities and connectivity for pedestrians and bicyclists. The project would not physically divide an existing community, and therefore is consistent with these thresholds. The existing and proposed zoning districts for the site are shown on Figure 2.2-6.

The City of Mountain View is currently preparing the East Whisman Precise Plan, a zoning document that will provide standards and guidelines for the East Whisman Change Area, including the project site. The proposed office development is consistent with the uses planned for the site by

the East Whisman Precise Plan, and the site will be rezoned to *East Whisman Precise Plan* following the Plan's adoption, anticipated to be in 2019.

Impact LU-2: The proposed project would not result in a significant land use compatibility impact. **[Less Than Significant Impact]**

Conflict with Environmental Plans, Policies, or Regulations

CEQA requires consideration of whether a proposed project may conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's land use policies and regulations. The CEQA determination is based on, and limited to, a review and analysis of environmental matters.

The project site is designated *High Intensity Office* in the adopted Mountain View 2030 General Plan, which allows development up to an FAR of 1.0. The proposed office project at 0.86 FAR is compatible with this current General Plan designation. The proposed project would seek LEED Platinum certification, and would be constructed using green building features in conformance with City of Mountain View standards. The project includes TDM features as described in *Section 3.15, Transportation and Traffic*. Since the project includes these sustainability and green building features, the proposed project would be consistent with the current 2030 General Plan land use designation of *High-Intensity Office*.

The following table summarizes the project's consistency with the 2030 General Plan goals and policies for the East Whisman Change Area.

Table 3.11-1:
Consistency With General Plan

General Plan Goals and Policies	Consistency
Goal LUD-19: An area with innovative transit-oriented developments, services for area residents and workers and strong connections to the rest of the city.	The proposed project provide multi-modal improvements and connections to transit.
Policy LUD 19.1: Land use and transportation. Encourage greater land use intensity and transit-oriented developments within a half-mile of light rail transit stations.	The proposed project would intensify land uses on the site.
Policy LUD 19.2: Highly sustainable development. Provide incentives to encourage new or significantly rehabilitated development to include innovative measures for highly sustainable development.	The proposed project would seek LEED Platinum certification and include measures to reduce use of resources.
Policy LUD 19.3: Connectivity improvements. Support smaller blocks, bicycle and pedestrian improvements and connections throughout the area.	The proposed project provide multi-modal improvements and connections to transit.

Table 3.11-1: Consistency With General Plan	
General Plan Goals and Policies	**Consistency**
Policy LUD 19.4: Transportation Demand Management strategies. Require development to include and carry out Transportation Demand Management strategies.	The proposed project includes at least a 20 percent TDM program.
Policy LUD 19.5: Village centers. Promote new or expanded village centers that serve the area.	The proposed project would not conflict with this policy.
Policy LUD 19.6: Residential transitions. Require development to provide sensitive transitions to adjacent residential uses.	The proposed project includes setbacks and building step-downs to the adjacent residential uses.
Policy LUD 19.7: NASA Ames and Moffett Field area connections. Create stronger connections between East Whisman and the NASA Ames and Moffett Field areas.	The proposed project provide multi-modal improvements and connections to transit.

The project proposes a rezoning to change from a *Light Industrial (ML)* to *Planned Community (P)* designation that would allow an increase of density of office space on the site up to an FAR of 0.86. The increased density would allow for the development of more jobs in the City and thus provide an increase in the number of jobs compared to the number of housing units. The project would be consistent with employment projections in the 2030 General Plan, however, and would not contribute to worsening the jobs/housing ratio beyond what was anticipated in the current General Plan. Therefore, based on the existing General Plan, the project would not result in a significant population or housing impact.

Impact LU-3: The proposed project would not conflict with environmental plans, policies, or regulations. **[Less Than Significant Impact]**

3.11.3.3 *Habitat Conservation Plans*

As described in *Section 3.4, Biological Resources*, the City of Mountain View and the proposed project site are not included within the study area of the Santa Clara Valley Habitat Plan, and, therefore, the project would not conflict with the plan.

Impact LU-4: The proposed project would not result in a significant impact due to a conflict with an applicable conservation plan. **[No Impact]**

3.11.3.4 *Cumulative Impacts*

Construction of projects within the boundaries of the Cities of Mountain View and Sunnyvale, since little open land is available in the City, generally would consist of redevelopment of previously developed sites. Development on a number of these sites would result in a change of uses and/or an intensification of development. The compatibility of new development with adjacent land uses, and the general character of surrounding areas are considered as a part of the City of Mountain View's architectural and environmental review processes for its projects. Through appropriate site design

and review of these projects, land use compatibility impacts such as visual intrusion and noise would be avoided. The adjacent Cities of Palo Alto and Sunnyvale have similar review processes. Through appropriate site design and review of these projects, land use compatibility impacts such as visual intrusion and noise would be minimized.

All development projects in the City would be subject to 2030 General Plan goals, policies, and action statements that require appropriate buffers, edges, and transition areas between dissimilar land uses. In addition, the setback, design, and operational requirements of the Mountain View City Code should minimize land use compatibility issues.

The project, in conformance with the applicable 2030 General Plan goals, policies, and action items and with the implementation of mitigation measures, would not result in significant land use compatibility impacts or conflict with a policy or regulation adopted for the purpose of avoiding or mitigating an environmental impact. The project, therefore, in combination with the cumulative development, would not result in significant land use impacts.

Impact C-LU-1: The cumulative projects, including the proposed project, would not result in significant cumulative land use impacts. **[Less Than Significant Cumulative Land Use Impact]**

3.11.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
LU-1: The proposed project would not divide an existing community.	Less Than Significant	No mitigation required	Less Than Significant
LU-2: The proposed project would not result in a significant land use compatibility impact.	Less Than Significant	No mitigation required	Less Than Significant
LU-3: The proposed project would not conflict with environmental plans, policies, or regulations.	Less Than Significant	No mitigation required	Less Than Significant
LU-4: The proposed project would not result in a significant impact due to a conflict with an applicable conservation plan.	No Impact	No mitigation required	No Impact
C-LU-1: The cumulative projects, including the proposed project, would not result in significant cumulative land use impacts.	Less Than Significant	No mitigation required	Less Than Significant

3.12 NOISE AND VIBRATION

The following discussion is based in part upon a noise and vibration assessment completed for the project by *Illingworth & Rodkin* in April 2018. This report is attached to this Draft EIR as Appendix H.

3.12.1 Background

Noise may be defined as unwanted sound. Acceptable levels of noise vary from land use to land use. In any one location, the noise level will vary over time, from the lowest background, or ambient noise level, to temporary increases caused by traffic or other sources. State and federal standards have been established as guidelines for determining the compatibility of a particular use with its noise environment.

There are several methods of characterizing sound. The most common in California is the A-weighted sound level or dBA.[48] This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, different types of noise descriptors are used to account for this variability. Typical noise descriptors include maximum noise level (L_{max}), the energy-equivalent noise level (L_{eq}), and the day-night average noise level (L_{dn}). The L_{dn} noise descriptor is commonly used in establishing noise exposure guidelines for specific land uses. For the energy-equivalent sound/noise descriptor called L_{eq} the most common averaging period is hourly, but L_{eq} can describe any series of noise events of arbitrary duration.

Although the A-weighted noise level may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of noise from distant sources which create a relatively steady background noise in which no particular source is identifiable.

Since the sensitivity to noise increases during the evening hours, 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events. The Day/Night Average Sound Level (L_{dn}) is the average A-weighted noise level during a 24-hour day, obtained after the addition of 10 dB to noise levels measured in the nighttime between 10:00 p.m. and 7:00 a.m. The Community Noise Equivalent Level (CNEL) is a 24-hour A-weighted noise level from midnight to midnight after the addition of five dBA to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dBA to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.

3.12.2 Regulatory Setting

3.12.2.1 *2016 California Building CALGreen Code*

The State of California established exterior sound transmission control standards for new non-residential buildings, as set forth in the 2010 California Green Building Standards Code (Section 5.507.4.1 and 5.507.4.2). These standards were not altered in the 2016 revisions. Section 5.507

[48] The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. All sound levels in this discussion are A-weighted, unless otherwise stated.

states that either the prescriptive (Section 5.507.4.1) or the performance method (Section 5.507.4.2) shall be used to determine environmental control at indoor areas. The prescriptive method is very conservative and not practical in most cases; however, the performance method can be quantitatively verified using exterior-to-interior calculations. For the purposes of this report, the performance method is utilized to determine consistency with the CALGreen Code. Both of the sections that pertain to this project are as follows:

5.507.4.1 Exterior noise transmission, prescriptive method. Wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the building falls within the 65 dBA L_{dn} noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source, as determined by the local general plan noise element.

5.507.4.2 Performance method. For buildings located, as defined by Section 5.507.4.1, wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level (L_{eq} (1-hr)) of 50 dBA in occupied areas during any hour of operation.

3.12.2.2 *City of Mountain View 2030 General Plan*

General Plan Noise Element

The purpose of the City of Mountain View 2030 General Plan Noise Element is to guide policies for addressing exposure to current and projected noise sources in Mountain View. The Element covers State Government Code requirements and the State Office of Noise Control Guidelines. The Noise Element includes a land use compatibility section which outlines acceptable outdoor noise environment standards for different land uses categories.

The following Noise Element goals, policies, and actions are intended to reduce conflicts between noise and land use and to lessen noise sources that reduce the quality of life in the City:

Noise	
Goal NOI-1	**Noise levels that support a high quality of life in Mountain View.**
Policy NOI 1.1	Land Use Compatibility. Use the Outdoor Noise Acceptability Guidelines as a guide for planning and development decisions.
Policy NOI 1.3	Exceeding acceptable noise thresholds. If noise levels in the area of a proposed project would exceed normally acceptable thresholds, the City shall require a detailed analysis of proposed noise reduction measures to determine whether the proposed use is compatible. As needed, noise insulation features shall be included in the design of such projects to reduce exterior noise levels to meet acceptable thresholds, or for uses with no active outdoor use areas, to ensure acceptable interior noise levels.

Policy NOI 1.4	Site planning. Use site planning and project design strategies to achieve the noise level standards in NOI 1.1 (Land Use Compatibility) and in NOI 1.2 (Noise Sensitive Land Uses). The use of noise barriers shall be considered after all practical design-related noise measures have been integrated into the project design.
Policy NOI 1.5	Major roadways. Reduce the noise impacts from major arterials and freeways.
Policy NOI 1.6	Sensitive uses. Minimize noise impacts on noise-sensitive land uses, such as residential uses, schools, hospitals and child-care facilities
Policy NOI 1.7	Stationary sources. Restrict noise levels from stationary sources through enforcement of the Noise Ordinance.
Policy NOI 1.8	Moffett Federal Airfield. Support efforts to minimize noise impacts from Moffett Federal Airfield in coordination with Santa Clara County's Comprehensive Land Use Plan.

3.12.2.3 *Santa Clara County Airport Land Use Commission Comprehensive Land Use Plan*

The Santa Clara County Airport Land Use Commission prepares Comprehensive Airport Land Use Plans (CLUPs) for public airports in Santa Clara County (e.g., Moffett Federal Airfield, San Jose Mineta International Airport, Palo Alto Airport, Reid-Hillview Airport, and South County Airport). The CLUPs are intended to provide guidelines that minimize the public's exposure to excessive noise and safety hazards. The ALUC has established provisions for regulating land use, building height, safety and noise insulation within the vicinity of Santa Clara County airports ("referral boundaries"). The ALUC also reviews the General and Specific plans prepared by local agencies (including Mountain View) for consistency with the ALUC plan.

The Santa Clara County ALUC has jurisdiction over new land uses in the vicinity of airports, and establishes 65 dBA CNEL as the maximum allowable noise level considered compatible with residential uses. Recommendations made by the ALUC are advisory in nature to the local jurisdictions, not mandatory.

3.12.2.4 *City of Mountain View Municipal Code*

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

Section 8.70.1 of the City's Municipal Code restricts the hours of construction activity to 7:00 a.m. to 6:00 p.m., Monday through Friday. No construction activity is permitted on Saturday, Sunday, or holidays without written approval from the City. Authorized land uses and construction activity established through the discretionary land use permit process may be subject to specific noise conditions of approval that may be more restrictive. Construction activities are defined to include any physical activity on the construction site or in the project's staging area, including the delivery of materials.

The General Plan identifies a generally acceptable noise environment guideline for Multi-Family Residential land uses, which are located east of the site, of up to 60 L_{dn}. The City of Mountain View also identifies limits on noise from stationary equipment (such as heating, ventilation, and air conditioning mechanical systems, delivery truck idling, loading/unloading activities, recreation activities, and parking lot operations) in Section 21.26 of the Municipal Code. The maximum allowable noise level is 55 dBA during the day and 50 dBA at night (10:00 p.m. to 7:00 a.m.), unless it has been demonstrated that such operation will not be detrimental to the health, safety, peace, morals, comfort or general welfare of residents subjected to such noise, and the use has been granted a permit by the Zoning Administrator.

3.12.3 Existing Noise Conditions

The project is located to the east of SR 237 between East Middlefield Road and West Maude Avenue in Mountain View, California. The nearest noise-sensitive receptors are multi-family residences east of the project site. Existing office uses are located adjacent to the site to the east, opposite East Middlefield Road to the south, opposite West Maude Avenue to the north, and opposite SR 237 to the west.

The noise environment on the site and in the vicinity results primarily from vehicular traffic along SR 237 and other surrounding roadways. Occasional aircraft associated with Moffett Federal Airfield contributes to the ambient noise environment. The project is located between the 60 and 70 dB CNEL/L_{dn} contours for the year 2030 in the 2030 General Plan.[49]

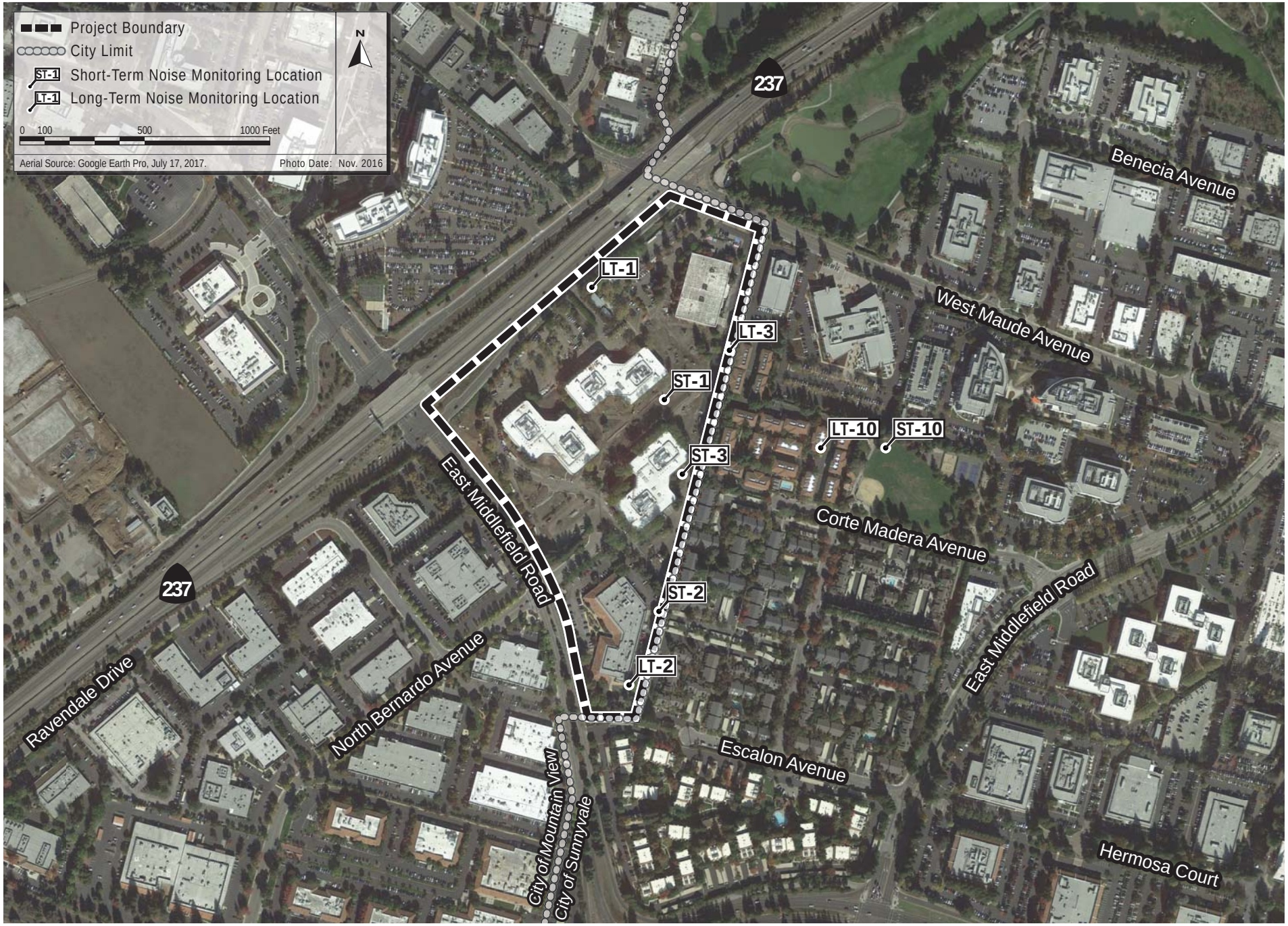
The project site is located within the airport influence area for Moffett Federal Airfield. The project site falls outside of the 65 CNEL noise contour for the year 2022 for this airport.[50] There are no sensitive receptors on the project site and the closest residential uses are adjacent to the east side of the site in the City of Sunnyvale.

3.12.3.1 *Noise Monitoring*

A noise monitoring survey was made to document ambient noise conditions between Wednesday, November 29, 2017 and Friday, December 1, 2017. The monitoring survey included three long-term (LT-1 through LT-3) noise measurements and three short-term (ST-1 through ST-3) noise measurements. All measurement locations are shown in Figure 3.12-1.

Long-term noise measurement LT-1 was made approximately 50 feet east of the centerline of the SR 237 frontage road that runs parallel to SR 237, and approximately 100 feet from the centerline of the nearest through traffic lane along the highway. Hourly average noise levels at this location typically ranged from 67 to 73 dBA L_{eq} during the day and from 57 to 69 dBA L_{eq} at night. The day-night average noise level measured on Thursday, November 30, 2017 was 72 dBA L_{dn}.

[49] City of Mountain View. *Mountain View 2030 General Plan*. Figure 7.3.
[50] Santa Clara County Airport Land Use Commission. *Final Draft Comprehensive Land Use Plan, Moffett Federal Airfield.* November 2, 2012.



NOISE MONITORING LOCATIONS FIGURE 3.12-1

LT-2 was made in the southernmost corner of the project site near the existing building at 800 East Middlefield Road, which would be demolished under the proposed project. East Middlefield Road was the dominant noise source at this measurement location, and LT-2 was set back approximately 230 feet from the centerline of the roadway. Hourly average noise levels at this location typically ranged from 55 to 62 dBA L_{eq} during the day and from 49 to 64 dBA L_{eq} at night. The day-night average noise level measured on Thursday, November 30, 2017 was 64 dBA L_{dn}.

LT-3 was made along the eastern boundary of the project site. This measurement location was chosen to document ambient noise levels at residential land uses adjacent to the site. Hourly average noise levels at this location typically ranged from 57 to 68 dBA L_{eq} during the day and from 52 to 61 dBA L_{eq} at night. The day-night average noise level measured on Thursday, November 30, 2017 was 64 dBA L_{dn}.

Short-term noise measurement ST-1 was conducted on Wednesday, November 29, 2017 at 1:00 p.m., and short-term measurements ST-2 and ST-3 were made on Friday, December 1, 2017 between 12:00 p.m. and 12:40 p.m. All three measurements were made in 10-minute intervals.

ST-1 was made between the existing on-site Buildings EP02 and EP03, which would both remain under future project conditions. Building EP02 has two shipping and receiving locations that are located approximately 60 feet from the fence line along the eastern boundary shared with existing residences. Additionally, an existing basketball court is also located in the vicinity of ST-1. The 10-minute noise measurement documented noise levels from transportation noise sources in the project vicinity and LinkedIn employees. The shipping and receiving locations and basketball court were not being used during the short-term noise measurement. While the dominant noise source observed at ST-1 was vehicular traffic from SR 237, the maximum instantaneous noise level of 69 dBA was the result of a helicopter flying overhead. The 10-minute average noise level measured at ST-1 was 56 dBA $L_{eq(10\text{-}min)}$.

ST-2 was made along the eastern boundary of the site shared with the adjacent residences. The dominant noise source at this location was SR 237. The 10-minute L_{eq} measured at ST-2 was 49 dBA $L_{eq(10\text{-}min)}$).

ST-3 was made behind existing Building EP02, approximately 70 feet from the eastern boundary of the site near an existing eight-foot sound wall that runs along the shared property boundary. Site ST-3 was approximately 155 feet from the basketball court, which was used for about five minutes during the 10-minute measurement. Ambient noise levels before the basketball game were approximately 50 dBA, and the use of the court increased noise levels to 52 to 53 dBA at ST-3. The maximum instantaneous noise level measured at ST-3 was 65 dBA and was due to a vehicle in the parking lot. The 10-minute $L_{eq(10)}$ measured at ST-3 was 53 dBA $L_{eq(10\text{-}min)}$).

3.12.4 Noise and Vibration Impacts

3.12.4.1 *Thresholds of Significance*

For the purposes of this EIR, a noise and vibration impact is considered significant if the project would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; or
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

CEQA does not define what noise level increase would be considered substantial. Typically, project-generated noise level increases of three (3) dBA L_{dn} or greater would be considered significant where exterior noise levels would exceed the normally acceptable noise level standard (60 dBA L_{dn} for residential land uses). Where noise levels would remain at or below the normally acceptable noise level standard with the project, noise level increases of five dBA L_{dn} or greater would be considered significant.

3.12.4.2 *Permanent Noise Level Increase (Project Traffic Noise)*

Increases in traffic noise gradually degrade the environment in areas sensitive to noise as development occurs and the population increases. A significant impact would result if traffic generated by development under the project would substantially increase noise levels at sensitive receivers within the project area or in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA L_{dn} or greater, with a future noise level of less than 60 dBA L_{dn}, or b) the noise level increase is three dBA L_{dn} or greater, with a future noise level of 60 dBA L_{dn} or greater.

The peak hour traffic volumes along roadways in the project area were provided for the proposed project. To determine the permanent traffic noise level increase, the Existing With Project peak hour traffic volumes were compared to the existing traffic volumes. Along Maude Avenue, East Middlefield Road, and North Bernardo Avenue, the permanent noise level increase was estimated to be one (1) dBA L_{dn}. All other existing roadways in the project vicinity were estimated to increase by less than one dBA L_{dn}. While the proposed project would result in more than a three dBA L_{dn} increase at the project site access driveway along East Middlefield Road at the intersection of North

Bernardo Avenue, this roadway segment is on the project site and would not affect existing off-site noise-sensitive receptors. Since the permanent noise level increase due to this project-generated traffic increase at the surrounding noise-sensitive receptors would be one dBA L_{dn} or less, the proposed project would not cause a substantial permanent noise level increase at the surrounding noise-sensitive receptors.

Impact NOISE-1: Buildout of the proposed project would not result in a substantial permanent noise level increase from increased traffic noise. **[Less Than Significant Impact]**

3.12.4.3 *Project Operation and Mechanical Equipment Impacts*

Mechanical Equipment Noise

Section 21.26 of the City of Mountain View's Municipal Code limits noise levels due to stationary mechanical equipment to 55 dBA during daytime hours between 7:00 a.m. and 10:00 p.m. and to 50 dBA during nighttime hours between 10:00 p.m. and 7:00 a.m.

The residences to the east of the project site are located in the City of Sunnyvale. While properties within the City of Mountain View are not legally required to enforce Sunnyvale standards, compliance with Sunnyvale's Noise Ordinance is analyzed for purposes of this study. Section 19.42.030 of the City of Sunnyvale Municipal Code states that operational noise shall not exceed 75 dBA at any point on the property of origin provided the noise level does not exceed 60 dBA during daytime hours and 50 dBA during nighttime hours on the adjacent receiving residential property.

If the noise source involves a steady, audible tone such as a whine, screech or hum, or is a staccato or intermittent noise (e.g., hammering) or includes music or speech, the allowable noise level shall not exceed 45 dBA during nighttime hours. Mechanical equipment noise would not be considered tonal; therefore, the 60 dBA daytime and 50 dBA nighttime standards would be applicable. Since Mountain View's daytime standards are more restrictive than Sunnyvale's daytime standards, and the nighttime standards for both cities are the same, meeting Mountain View's noise level thresholds would be considered acceptable at the adjacent Sunnyvale residences as well.

Commercial buildings and parking structures typically require various mechanical equipment, such as HVAC systems, cooling and exhaust fans, air handling equipment, emergency generators, etc. The site plan for the proposed project indicates a cooling tower, a chiller and boiler room, and other mechanical equipment, which would be located on the rooftop of the proposed buildings. While the site plan indicates the location of the mechanical equipment for the proposed buildings to be on the rooftop, the exact location on the rooftop was not identified. Additionally, the number of units for each individual building and the noise information for the equipment were not available at the time of this study. Additionally, exhaust fans for the mechanical ventilation system in the parking structures would be installed with the exhaust shafts. However, the location of the mechanical ventilation systems in the parking structures were not identified.

Based on this, the impacts of mechanical equipment noise on nearby noise-sensitive uses should be assessed during the final project design stage. Design planning should take into account the noise criteria associated with such equipment and utilize site planning to locate equipment in less noise-

sensitive areas, such as the rooftop away from the edge of the building nearest to residential land uses. Other controls could include, but shall not be limited to, fan silencers, enclosures, and screen walls.

The preliminary electrical site plan shows three emergency generators, two 250 kilowatt (kW) generators and one 150 kW generator. The 250 kW generators will be located near the southeastern corner of Building B1 and to the south of Building B6, and the 150 kW generator is proposed to the north of Building B5. While the proposed generators at Buildings B5 and B6 would be adequately shielded from the nearby existing residences by existing on-site Buildings, the proposed generator to the east of Building B1 would be facing adjacent residences, with a setback of approximately 70 feet from the nearest residential property line.

A typical 250 kW generator with a weather-protective enclosure would produce noise levels of about 90 dBA at a distance of 23 feet. With a Level I sound attenuation enclosure, a typical 250 kW generator would produce noise levels of about 86 dBA at a distance of 23 feet, and with a Level II sound attenuation enclosure, a typical 250 kW generator would produce noise levels of about 71 dBA at a distance of 23 feet. The existing eight-foot sound wall located along the shared property line would provide some additional shielding, as well. Assuming a conservative five dBA reduction from the existing sound wall, a typical 250 kW generator would potentially generate noise levels ranging from 56 to 75 dBA, depending on the enclosure. Conservatively, this would be considered a significant impact and would require further mitigation.

Impact NOISE-2: The impacts of mechanical equipment noise on nearby noise-sensitive uses is conservatively considered a potentially significant impact. **[Significant Impact]**

Mitigation Measures: The following mitigation measures would reduce impacts from mechanical equipment on nearby residences or businesses to a less than significant level.

MM NOISE-2.1 MECHANICAL EQUIPMENT: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's 55 dBA daytime threshold and 50 dBA nighttime threshold at the property line of the adjacent residences. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as the rooftop of the buildings away from the building's edge nearest the noise-sensitive receptors, where feasible.

[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]

Parking Structure Noise

Two parking structures are proposed as part of the project. P1 would be located in the southernmost corner of the site, and P2 would be located on the northernmost corner of the site. Both parking structures would be located along the eastern boundary, near adjacent residences. Both structures would have one below-grade level and six above-grade levels. The property line of the nearest sensitive receptors would be located approximately 60 to 70 feet from the nearest façade of the proposed parking structures. There is an existing eight-foot sound wall that runs along the shared property line of the project site and the adjacent residences is assumed to remain under future project conditions. The sound wall would only provide shielding for parking structure noise occurring on the ground level. Conservatively, potential shielding provided by the eight-foot barrier was not assumed for this analysis. At a distance of 60 to 70 feet, parking structure noise levels would range from 54 to 60 dBA L_{max} at the nearest residential property line, and typical car horn noise levels would range from 63 to 72 dBA L_{max} at the nearest residential property line.[51]

Section 21.26 of the City's Municipal Code and Section 19.42.030 of the City of Sunnyvale Municipal Code only apply to stationary and operational equipment and would not apply to parking structure noise. During daytime hours, the typical maximum instantaneous noise levels at the adjacent residences would range from 62 and 86 dBA L_{max} (average of 70 dBA L_{max}). Since the parking structures are reserved for usage by the commercial office buildings, use is generally assumed during daytime hours only. While there would be instances when noise from the parking garages would range from 62 and 86 dBA, most activity would occur during the daytime, and the average noise levels associated with the proposed parking structures would fall within the range of existing ambient noise levels. **[Less Than Significant Impact]**

Truck Loading and Unloading

Typical noise levels generated by loading and unloading of truck deliveries would be similar to noise levels generated by truck movements at the existing commercial buildings on the project site. While no deliveries were observed during the noise monitoring survey, the size of the commercial land use indicates that heavy trucks and smaller vendor trucks would potentially be used at the site. Heavy truck deliveries typically generate noise levels of 70 to 75 dBA L_{max} at a distance of 50 feet. Smaller delivery trucks typically generate noise levels of 60 to 65 dBA L_{max} at the same distance. Low speed truck noise results from a combination of engine, exhaust, and tire noise, as well as the intermittent sounds of back-up alarms and releases of compressed air associated with truck/trailer air-brakes. The noise level of backup alarms can vary depending on the type and directivity of the sound, but noise levels are typically in the range of 65 to 75 dBA L_{max} at a distance of 50 feet. Noise generated by loading dock activities and slow-moving trucks would drop off at a rate of about six dB per doubling of distance between the noise source and receptor.

The property line of the nearest sensitive receptor would be located approximately 100 feet from the proposed service area. The existing eight-foot sound wall that runs along the shared property line of the project site and the adjacent residences is assumed to remain under future project conditions. The eight-foot barrier would provide up to eight dBA of noise reduction from the ground-level truck

[51] The discussion of parking structure noise is characterized in terms of maximum instantaneous noise level, $L_{max,}$ instead of the day-night average noise level, Ldn, since such noise is experienced typically in brief episodes.

deliveries. At a distance of 100 feet, heavy trucks would generate noise levels ranging from 56 to 61 dBA L_{max} at the nearest residential property line, while smaller vendor trucks would generate noise levels ranging from 46 to 51 dBA L_{max} at the nearest residential property line.

Truck deliveries associated with the proposed project would not exceed ambient conditions. The City of Sunnyvale prohibits nighttime deliveries on commercial or industrial properties when the loading/unloading area is adjacent to residentially zoned properties. Therefore, to meet the City of Sunnyvale Municipal Code standards, deliveries and maintenance activities would be limited to daytime hours. This would be a less than significant impact. Therefore, the proposed project development would comply with the City Code requirements for stationary equipment. **[Less Than Significant Impact]**

Impact NOISE-3: Through compliance with the City Code and standard conditions of approval, the proposed project would not result in significant noise impacts from parking structure noise and truck loading and unloading. **[Less Than Significant Impact]**

3.12.4.4 *Short-Term Construction Noise Impacts*

Construction noise impacts primarily occur when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses (e.g., residences), and/or when construction duration lasts over an extended period of time.

Construction-related noise levels are normally highest during the demolition phase, grading, and during excavation, including installation of project infrastructure, such as underground utility lines. These phases of construction require heavy equipment (e.g., earth moving equipment and impact tools) that normally generate the highest noise levels during site redevelopment. Construction-related noise levels are normally less during building erection, finishing, and landscaping phases.

Hourly average noise levels generated by construction are about 75 to 89 dBA L_{eq} for office buildings and about 71 to 89 dBA L_{eq} for parking structures measured at a distance of 50 feet from the center of a busy construction site. Construction-generated noise levels drop off at a rate of about six dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain often result in lower construction noise levels at distant receptors.

Table 3.12-1
Estimated Construction Noise Levels at the Noise-Sensitive Receptors

Stage of Construction	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average Noise Levels, L_{eq} (dBA)			
			Nearest Res. East (adjacent)	Nearest Comm. East (adjacent)	Nearest Comm. West (opposite E. Middlefield Rd.)	Nearest Comm. North (opposite SR 237)
			Ambient levels = 57-68 dBA		Ambient levels = 55-62 dBA	Ambient levels = 67-73 dBA
Make Ready/Demolition Phase (total of two months)						
Demolition	2/1/2019-3/13/2019	AC Grinder (1) Excavator (6) Tractor/Loader/Backhoe (2)	79 dBA (at 140 feet)	79 dBA (at 150 feet)	73 dBA (at 290 feet)	67 dBA (at 600 feet)
Site Preparation	3/14/2019-3/20/2019	Grader (1) Tractor/Loader/Backhoe (2) Water Truck (1) Scraper (1)	78 dBA (at 140 feet)	77 dBA (at 150 feet)	71 dBA (at 290 feet)	65 dBA (at 600 feet)
Phase 1: Building B1 and Parking Structure P1 (total of 18 months)						
Grading/Excavation	3/4/2019-4/12/2019	Scraper (1) Excavator (2) Grader (2) Tractor/Loader/Backhoe (4) Crawler Truck (1) Water Truck (2) Compactor (1)	79 dBA (at 180 feet)	71 dBA (at 445 feet)	74 dBA (at 300 feet)	51 dBA* (at 1,365 feet)
Trenching	2/14/2019-5/13/2019	Tractor/Loader/Backhoe (1) Excavator (4) Rubber-Tired Loader (1)	74-80 dBA (at 180 feet)[a]	66-72 dBA (at 445 feet)[a]	70-76 dBA (at 300 feet)[a]	46-52 dBA* (at 1,365 feet)[a]
Building Exterior-P1	4/4/2019-3/27/2020	Crane (1) Forklift (2) Welder (2)	66-80 dBA (at 180 feet)[b]	58-72 dBA (at 445 feet)[b]	61-76 dBA (at 300 feet)[b]	38-52 dBA* (at 1,365 feet)[b]
Building Exterior-B1	2/6/2020-8/20/2020	Crane (1) Forklift (2) Generator Set (2) Welder (2)	71-72 dBA (at 180 feet)[c]	63-64 dBA (at 445 feet)[c]	67-68 dBA (at 300 feet)[c]	44-45 dBA* (at 1,365 feet)[c]
Building Interior – B1	12/11/2019-9/26/2020	Air Compressor (2) Aerial Lift (2)	67-73 dBA (at 180 feet)[d]	59-65 dBA (at 445 feet)[d]	62-69 dBA (at 300 feet)[d]	39-46 dBA* (at 1,365 feet)[d]
Phase 2: Parking Structure P2 (total of 11 months)						
Grading/Excavation	10/5/2020-11/6/2020	Scraper (1) Excavator (2)	80 dBA (at 145 feet)	80 dBA (at 145 feet)	51 dBA*6 (at 1,255 feet)	67 dBA (at 590 feet)

Table 3.12-1
Estimated Construction Noise Levels at the Noise-Sensitive Receptors

Stage of Construction	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average Noise Levels, L_{eq} (dBA)			
			Nearest Res. East (adjacent)	Nearest Comm. East (adjacent)	Nearest Comm. West (opposite E. Middlefield Rd.)	Nearest Comm. North (opposite SR 237)
			Ambient levels = 57-68 dBA		Ambient levels = 55-62 dBA	Ambient levels = 67-73 dBA
		Grader (2) Tractor/Loader/Backhoe (2) Crawler Truck (1) Water Truck (2) Compactor (1)				
Trenching	11/9/2020-1/21/2021	Tractor/Loader/Backhoe (1) Excavator (4) Rubber-Tired Loader (1)	76 dBA (at 145 feet)	76 dBA (at 145 feet)	47 dBA* (at 1,255 feet)	64 dBA (at 590 feet)
Building Exterior	10/5/2020-9/28/2021	Crane (1) Forklift (2) Generator Set (2) Welder (2)	68-80 dBA (at 145 feet)[b]	68-80 dBA (at 145 feet)[b]	39-51 dBA* (at 1,255 feet)[b]	56-68 dBA (at 590 feet)[b]
Phase 3: Buildings B5 and B6 (total of 21 months)						
Grading/Excavation	10/4/2021-1/21/2021	Scraper (1) Excavator (2) Grader (2) Tractor/Loader/Backhoe (2) Crawler Truck (1) Water Truck (2) Compactor (1)	58 dBA* (at 580 feet)	57 dBA* (at 600 feet)	65 dBA (at 815 feet)	71 dBA (at 380 feet)
Trenching/Site Utilities	11/15/2021-1/7/2022	Tractor/Loader/Backhoe (1) Excavator (4) Rubber-Tired Loader (1)	54 dBA* (at 580 feet)	54 dBA* (at 600 feet)	61 dBA (at 815 feet)	68 dBA (at 380 feet)
Building Exterior – Building 5	7/5/2022-12/8/2022	Crane (1) Forklift (2) Generator Set (2) Welder (2)	51 dBA* (at 580 feet)	51 dBA* (at 600 feet)	58 dBA (at 815 feet)	65 dBA (at 380 feet)
Building Exterior – Building B6	7/5/2022-12/8/2022	Crane (1) Forklift (2) Generator Set (2) Welder (2)	51-54 dBA* (at 580 feet)[e]	51-54 dBA* (at 600 feet)[e]	58-61 dBA (at 815 feet)[e]	65-68 dBA (at 380 feet)[e]

Table 3.12-1
Estimated Construction Noise Levels at the Noise-Sensitive Receptors

Stage of Construction	Time Duration	Construction Equipment (Quantity)	Calculated Hourly Average Noise Levels, L_{eq} (dBA)			
			Nearest Res. East (adjacent)	Nearest Comm. East (adjacent)	Nearest Comm. West (opposite E. Middlefield Rd.)	Nearest Comm. North (opposite SR 237)
			Ambient levels = 57-68 dBA		Ambient levels = 55-62 dBA	Ambient levels = 67-73 dBA
Building Interior/Architectural Coating – Building B5	5/2/2022-1/26/2023	Air Compressor (2) Aerial Lift (2)	46-55 dBA* (at 580 feet)[f]	46-54 dBA* (at 600 feet)[f]	54-62 dBA (at 815 feet)[f]	60-68 dBA (at 380 feet)[f]
Building Interior/Architectural Coating – Building B6	5/2/2022-1/31/2023	Air Compressor (2) Aerial Lift (2)	46-55 dBA* (at 580 feet)[g]	46-55 dBA* (at 600 feet)[g]	54-62 dBA (at 815 feet)[g]	60-69 dBA (at 380 feet)[g]
Paving	4/2/2021-4/16/2021	Paver (1) Roller (2) Tractor/Loader/Backhoe (2)	89 dBA (at 30 feet)[h]	89 dBA (at 30 feet)[h]	78 dBA (at 105 feet)[h]	70 dBA (at 270 feet)[h]

*10 dBA reduction applied to at least some of the construction noise levels. The reduction is only applied when existing or future intervening buildings located on the project site provide shielding for the receiving land use.
a Ranges of levels represent noise levels generated by Trenching alone and during the overlapping period with the Grading/Excavation stage.
b Ranges of levels represent noise levels generated by Building Exterior alone and during the overlapping period with the Trenching and Grading/Excavation stages.
c Ranges of levels represent noise levels generated by Building Exterior of B1 alone and during the overlapping period with the Building Exterior of P1 stage.
d Ranges of levels represent noise levels generated by Building Interior of B1 alone and during the overlapping period with the Building Exterior of B1 & P1 stages.
e Ranges of levels represent noise levels generated by Building Exterior of B6 alone and during the overlapping period with the Building Exterior of B5 stage.
f Ranges of levels represent noise levels generated by Building Interior of B5 alone and during the overlapping period with the Building Exteriors of B5 and B6 stages/

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Demolition, grading, and construction activity would be necessary to complete the project. Demolition of the existing buildings would take place first, followed by grading, site preparation, and then construction of the new facility. Table 3.12-1 summarizes the equipment and quantity expected to be used during each phase and stage of construction, as well as the estimated noise levels at the receiving land uses surrounding the site when each piece of equipment is used simultaneously. As shown in Table 3.12-1, construction noise levels would exceed 60 dBA L_{eq} at the existing residential land uses and would exceed 70 dBA L_{eq} at the existing adjacent commercial land uses when construction would occur near the off-site receptors.

Ambient levels at the surrounding uses would potentially be exceeded by five dBA L_{eq} or more when construction occurs in close proximity to the receptors. Since project construction is expected to last for a total of 48 months, and the off-site noise-sensitive receptors would be exposed to noise levels exceeding ambient conditions for a period of more than one year, temporary construction noise would be considered a significant impact.

Additionally, the three existing office buildings would be exposed to temporary construction noise levels exceeding the ambient noise levels throughout project construction. However, these on-site receptors are part of the project and are not considered noise-sensitive receptors.

Impact NOISE-4: Short-term construction activities during implementation of the proposed project could result in significant temporary construction noise impacts. **[Significant Impact]**

Mitigation Measures: The following mitigation measures would reduce temporary construction impacts from future construction on nearby residences or businesses to a less than significant level.

MM NOISE-4.1: While most construction activities will be conducted in accordance with the provisions of the City of Mountain View's General Plan and the Municipal Code, which limits temporary construction work to between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and prohibits construction on weekends and holidays, certain shutdowns and work that would interrupt utilities and major roadways may need to be completed outside the allowable hours. A condition of approval from the City must be included as part of the proposed project to allow for work to be conducted outside of these allowable hours. Additionally, the City of Sunnyvale permits construction activities between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and on Saturdays between 8:00 a.m. and 5:00 p.m.

MM NOISE-4.2: The City shall require the construction crew to adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity.

Construction Best Management Practices

Develop and implement a construction noise control plan, including, but not limited to, the following construction best management controls:

- Where construction work along the eastern boundary of the project site would be required outside the City of Mountain View's allowable construction hours, all efforts should be made to conduct the work on Saturdays between the hours of 8:00 a.m. and 5:00 p.m., in accordance with the City of Sunnyvale's allowable hours to minimize annoyance to adjacent residences located in the City of Sunnyvale.
- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The implementation of the reasonable and feasible controls outlined above would reduce construction noise levels emanating from the site by five to 10 dBA in order to minimize disruption and annoyance. With the implementation of these measures, the temporary increase in ambient noise levels at the site would result in a less than significant impact.

[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]

3.12.4.5 *Groundborne Vibration During Construction*

Construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction activities would include site demolition, preparation work, foundation work, and new building framing and finishing. The proposed project is not expected to require pile driving, which can cause excessive vibration.

For structural damage, the California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in/sec PPV for ancient buildings or buildings that are documented to be structurally weakened. No historical buildings or buildings that are documented to be structurally weakened adjoin the project site. For the purposes of this study, groundborne vibration levels exceeding the conservative 0.3 in/sec PPV limit at the existing nearby residences and commercial buildings would have the potential to result in a significant vibration impact.

Project construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Jackhammers typically generate vibration levels of 0.035 in/sec PPV, and drilling typically generates vibration levels of 0.09 in/sec PPV at a distance of 25 feet. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

While some paving would occur right along the eastern boundary, which is shared with the existing residences, the heavy equipment usage would occur at least 60 feet from the shared property line. At this distance, vibration levels would be at or below 0.08 in/sec PPV. In addition to the existing residences and commercial buildings adjacent to the site to the east, existing commercial buildings are also located across East Middlefield Road and across SR 237. These land uses would be at least 160 feet from heavy construction equipment usage on the project site, which would result in vibration levels up to 0.03 in/sec PPV.

Three existing office buildings are located on-site and would remain with the project. These buildings (EP02, EP03, and EP04) would be located within 50 feet of heavy construction activities. At this distance, vibration levels would be at or below 0.1 in/sec PPV.

The construction-generated vibration levels for the proposed project would not result in "architectural" damage at any existing structure on- or off-site. While vibration levels from

construction activities could at times be perceptible, this would be considered a less than significant impact.

Impact NOISE-5: Construction activities during implementation of the proposed project would not result in significant groundborne vibration impacts to existing structures. **[Less than Significant Impact]**

3.12.4.6 *Noise and Land Use Compatibility*

The "normally acceptable" exterior noise threshold established in the City's General Plan for commercial developments is 67.5 dBA L_{dn} at usable outdoor activity areas. For non-residential land uses, the CALGreen Code interior noise level threshold of 50 dBA L_{eq}(1-hr) would apply. The future noise environment at the project site would continue to result primarily from vehicular traffic along the surrounding roadways.

Future Exterior Noise Environment

The proposed project's site plan indicates several commercial use outdoor activity areas. On the ground-level, activity areas are proposed adjacent to East Middlefield Road along the southwestern boundary of the site, in the northernmost corner of the site, adjacent to SR 237 and West Maude Avenue, and on the interior of the site between Buildings B6 and P2, between Buildings EP02 and P2, and east of Building B5. Proposed Buildings B1, B5, and B6 include third-, fifth-, and sixth-floor terraces attached to the buildings. The site plan identified third- and sixth- level terraces to be outdoor terraces for recreational use.

The ground-level open space area adjacent to East Middlefield Road and north of the entrance driveway, would be set back approximately 175 feet from the centerline of the roadway. The open space area adjacent to East Middlefield Road and south of the entrance driveway was positioned approximately 100 feet from the centerline of the roadway. At these distances, the predicted future exterior noise levels would range from 64 to 66 dBA L_{dn}, and would be below the "normally acceptable" exterior noise level threshold of 67.5 dBA L_{dn}.

A basketball court, volleyball court, and picnic area with a barbeque are proposed in the northernmost corner of the site, adjacent to SR 237 and West Maude Avenue. The center of the courts and picnic area would be set back approximately 180 feet from the centerline of the nearest through travel lane of SR 237 and approximately 185-270 feet from the centerline of West Maude Avenue. Additionally, the SR 237 frontage road, which runs parallel to SR 237, would be approximately 125 feet from the center of these outdoor use areas and would also affect the noise levels. At these distances, the future exterior noise levels at the sports courts and picnic area would range from 66 to 68 dBA L_{dn}. While the centers of these outdoor use areas would potentially exceed the 67.5 dBA L_{dn} threshold, the exceedance would be less than one dBA L_{dn}, which is unnoticeable to the human ear, and 68 dBA L_{dn} is well-within the range of "conditionally acceptable" noise and land use compatibility for exterior use areas at commercial land uses. A sound wall would not be recommended for these outdoor use areas.

The remaining ground-level outdoor use areas proposed for this project would be located on the interior of the project site and would be shielded from the surrounding roadways by intervening project buildings. The future exterior noise levels at these outdoor use areas would be below 60 dBA L_{dn}.

One third-floor terrace located at Building B1 along the western building façade facing the main entrance driveway and wrapping around the corner of the building to face East Middlefield Road, would be set back from the centerline of East Middlefield Road by 100 to 340 feet. At these distances, the third-floor terrace would have future exterior noise levels at or below 60 dBA L_{dn} at the center of the terrace and up to 65 dBA L_{dn} at the edge of the terrace nearest to East Middlefield Road. Two fifth-floor terraces are also proposed in Building B1 along the southern and northern façades. The terrace located on the northern façade would be mostly shielded from direct line-of-sight to the traffic noise sources by the proposed and existing buildings. This terrace would have future exterior noise levels below 60 dBA L_{dn}. The terrace located along the southern façade would have direct line-of-sight to East Middlefield Road, with setbacks ranging from 100 to 250 feet from the centerline of the roadway. At these distances, the future exterior noise levels would range from below 60 to 63 dBA L_{dn}. The third- and fifth-floor terraces at Building B1 would not exceed the commercial use exterior noise level threshold established by the City.

Buildings B5 and B6 are adjacent to SR 237. Building B5, would have two outdoor terraces on the third-floor and one outdoor terrace on the fifth floor. The third-floor terrace nearest East Middlefield Road would be shielded from SR 237 by the proposed Building B5 and would be set back from the centerline of East Middlefield Road by approximately 180 to 220 feet. At these distances, the future exterior noise levels would be at or below 60 dBA L_{dn}. The majority of the other third-floor terrace would be on the eastern façade; however, this terrace wraps around the northern building façade. Along the north building façade, receptors would have partial line-of-sight to SR 237. With setbacks ranging from 385 to 620 feet from the centerline of East Middlefield Road, the portion of this terrace located on the eastern façade would have future exterior noise levels below 60 dBA L_{dn}. With setbacks from the centerline of eastbound SR 237 ranging from 215 to 270 feet, the portion of this terrace located on the northern façade would have future exterior noise levels at or below 66 dBA L_{dn}. The fifth-floor terrace would be located on the eastern building façade, between the third-floor terraces on this building. The future exterior noise levels at this terrace would be below 60 dBA L_{dn}.

Building B6 has two third-floor terraces and two sixth-floor terraces. Both of the third-floor terraces are located along the eastern façade of Building B6; however, the terrace to the south does stretch further south than the upper floors of the building, which would provide receptors at the southern corner of this terrace direct line-of-sight to SR 237. With a setback of approximately 245 feet from the centerline of eastbound SR 237, the southern corner of the third-floor terrace at Building B6 would have future exterior noise levels of 66 dBA L_{dn}. The remainder of the third-floor terraces would be shielded from most of the surrounding traffic noise. These terraces would have future exterior noise levels below 60 dBA L_{dn}. The sixth-floor terraces would be located on the eastern and northern building façades. While the eastern terrace would be mostly shielded and have future exterior noise levels below 60 dBA L_{dn}, the northern façade would have direct line-of-sight to SR 237. The edge of the terrace would be set back approximately 160 feet from the centerline of eastbound SR 237. While future exterior noise levels at the edge of the terrace would be up to 72 dBA L_{dn}, most of the outdoor use at this terrace would occur towards the center of the space, which would have future exterior noise levels of 65 dBA L_{dn}. Since the majority of this terrace would have

future exterior noise levels below the 67.5 dBA L_{dn} threshold, mitigation measures to reduce noise levels at the western edge of the terrace would not be recommended.

The predicted future noise levels indicate that all of the outdoor use areas associated with the proposed project would be within the City's 67.5 dBA L_{dn} "normally acceptable" threshold and would not require mitigation.

Airport Noise

Moffett Federal Airfield is a joint civil-military airport located a little more than a 0.5 mile north of the project site. Based on the position of the runways and direction of flights, the project site falls outside the 65 dBA CNEL noise contour, according to the 2022 Aircraft Noise Contours figure provided in the Comprehensive Land Use Plan for Moffett Federal Airfield. While aircraft flyovers would at times be audible at the outdoor use areas on the project site, noise levels due to aircraft would not result in future exterior noise levels of 65 dBA L_{dn}/CNEL or more and, therefore, both the exterior and interior noise levels resulting from aircraft would be compatible with the proposed project.

Future Interior Noise Environment

The performance method enforced in the CALGreen Code requires that interior noise levels be maintained at 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation at the proposed commercial land uses.

The western façades of proposed Buildings B5 and B6 would be exposed to the highest future exterior noise levels at setbacks of approximately 120 feet or more from the centerline of the nearest through travel lane of SR 237. Based on the existing measurements made at LT-1 and the estimated two dBA future noise level increase calculated in the modeling, the typical hourly average noise levels during daytime operational hours would range from 72 to 74 dBA $L_{eq(1\text{-}hr)}$ at these building façades.

Typically, commercial buildings provide an exterior-to-interior noise level reduction of about 30 dBA; however, the exterior wall assembly proposed in the plans dated October 27, 2017, indicates glass walls with a ceramic frit as the curtain wall system for the proposed buildings. These glass wall assemblies are to have a minimum STC rating of 32 in Building B5 and 30 in Building B6 in order to provide a minimum reduction of about 27 dBA. Adequate forced-air mechanical ventilation systems would be required to ventilate the interior spaces. Assuming a minimum reduction of 27 dBA and the inclusion of forced-air mechanical ventilation, the future daytime hourly average noise levels would range from 45 to 47 dBA $L_{eq(1\text{-}hr)}$ on the building interiors. This would satisfy the daytime threshold of 50 dBA $L_{eq(1\text{-}hr)}$.

Impact NOISE-6: The proposed project would be consistent with the requirements of the CalGreen building code and includes ventilation and other design measures to reduce impacts to future interior noise environments to less than significant. **[Less Than Significant Impact]**

Santa Clara County Airport Land Use Commission Airport Land Use Plan

The project area is located just beyond the 65 dBA CNEL contour for aircraft activities associated with Moffett Federal Airfield, and well outside of the 65 dBA CNEL noise contour for aircraft activities associated with Palo Alto Airport. Noise from aircraft operations would be considered by Santa Clara County ALUC to be compatible with the land uses proposed as part of the proposed project.

Consistency: The project is consistent with the ALUC Airport Land Use Plan.

3.12.4.7 *Cumulative Impacts*

The project would result in a significant cumulative traffic noise impact if noise levels at existing sensitive receivers would be substantially increased (e.g., three dBA L_{dn} above existing traffic noise levels where noise levels would exceed 60 dBA L_{dn} or five (5) dBA L_{dn} or greater for future levels at or below 60 dBA L_{dn}) under cumulative conditions, and if the project would make a "cumulatively considerable" contribution to the overall traffic noise level increase. A "cumulatively considerable" contribution would be defined as an increase of one dBA L_{dn} or more attributable solely to the proposed project.

Cumulative traffic noise level increases were calculated by comparing the Cumulative traffic volumes and the Cumulative With Project volumes to Existing traffic volumes. The traffic noise increases calculated under both Cumulative scenarios were three dBA L_{dn} or more along Ellis Street north of Manila Drive, Macara Avenue north of Maude Avenue, North Mary Avenue north of Maude Avenue, and East Middlefield Road in the vicinity of the SR 237 interchange. Additionally, the project site access driveway along East Middlefield Road at the intersection of North Bernardo Avenue would result in more than a three dBA L_{dn} increase under the Cumulative With Project scenario; however, this segment is on-site and would not affect any surrounding off-site noise-sensitive receptors. Since the traffic noise increase under Near-term Cumulative No Project conditions is the same as the increase under Near-term Cumulative With Project conditions, the project would not make a cumulatively considerable contribution to increased noise levels. This would be a less than significant impact.

Impact C-NOISE-1: Through compliance with all applicable General Plan policies, Mountain View City Code, and Conditions of Approval described above in *Section 3.12.2*, the proposed project will minimize noise impacts. The proposed project would not result in any new or greater cumulative impacts than were previously identified in the 2030 General Plan EIR (as amended). **[Less Than Significant Cumulative Impact]**

3.12.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
NOISE-1: Buildout of the proposed project would not result in a substantial permanent noise level increase from increased traffic noise.	Less Than Significant	No mitigation required	Less Than Significant
NOISE-2: The impacts of mechanical equipment noise on nearby noise-sensitive uses is conservatively considered a potentially significant impact.	Significant Impact	**MM NOISE-2.1**, Mechanical Equipment	Less Than Significant
NOISE-3: Through compliance with the City Code and standard conditions of approval, the proposed project would not result in significant noise impacts from parking structure noise and truck loading and unloading.	Less Than Significant	No mitigation required	Less Than Significant
NOISE-4: Short-term construction activities during implementation of the proposed project could result in significant temporary construction noise impacts.	Significant Impact	**MM NOISE-4.1**, Construction Hours; **MM NOISE-4.2,** Construction Noise BMPs.	Less Than Significant
NOISE-5: Construction activities during implementation of the proposed project would not result in significant groundborne vibration impacts to existing structures.	Less Than Significant	No mitigation required	Less Than Significant
NOISE-6: The proposed project would be consistent with the requirements of the CalGreen building code and includes ventilation and other design measures to reduce impacts to future interior noise environments to less than significant.	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
C-NOISE-1: Through compliance with all applicable General Plan policies, Mountain View City Code, and Conditions of Approval, described above in Section 3.12.2, the proposed project will minimize noise impacts. The proposed project would not result in any new or greater cumulative impacts than were previously identified in the 2030 General Plan EIR (or subsequent General Plan EIRs).	Less Than Significant	No mitigation required	Less Than Significant

3.13 POPULATION AND HOUSING

3.13.1 Regulatory Framework

The Association of Bay Area Governments (ABAG) allocates regional housing needs to each city and county within the nine-county Bay Area, based on statewide goals. ABAG also develops forecasts for population, households and economic activity in the Bay Area. ABAG's forecast has become a part of Plan Bay Area, a joint effort led by ABAG and the MTC in partnership with the Bay Area's other two regional government agencies, the BAAQMD and BCDC. The most recent projections series, Projections 2013, distributes activity in conformance with expected development patterns described in Plan Bay Area to the year 2040.

Plan Bay Area 2040 is the strategic update to Plan Bay Area 2013. In July 2013, the Plan 2013 was jointly approved by ABAG Executive Board and by MTC. Plan Bay Area 2013 includes the region's Sustainable Communities Strategy and the 2040 Regional Transportation Plan. Plan Bay Area 2040 is a state-mandated, integrated long-range transportation, land-use and housing plan that will support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the Bay Area.

3.13.2 Existing Setting

3.13.2.1 *Population and Housing Units in Mountain View*

Table 3.13-1, below, summarizes the existing and projected population data in 2030 for Mountain View. Estimates are included from the 2030 General Plan EIR (2012) and ABAG's *Plan Bay Area Projections 2013*, the Plan Bay Area 2040 Draft Preferred Land Use Scenario with a 2016 estimate from the California Department of Finance.

Table 3.13-1:
Population and Housing in Mountain View

	2010 Estimates			2030 Projections		2040 Projections
	General Plan 2010[1]	**Plan Bay Area 2010**[2]	**California Depart-ment of Finance**[1]	**2030 General Plan, 2030 Estimate**[1]	**Plan Bay Area, 2030 Estimate**[2]	**Draft Plan Bay Area 2040, 2040 Estimate**[4]
Population	74,066[1]	74,066[2]	79,278[3]	88,570[1]	90,500[2]	N/A
Households/ Dwelling Units	31,957[1]	31,957[2]	35,595[3]	42,240[1]	38,510[2]	58,500

[1] Based on 2030 General Plan Draft EIR. September 2012.
[2] Association of Bay Area Governments. *Plan Bay Area Projections 2013*. December 2013.
[3] California Department of Finance. *Table 2: E-5 City/County Population and Housing Estimates, for January 1, 2011-2017*. May 2017
[4] Plan Bay Area 2040. *Re: Plan Bay Area 2040 Draft Preferred Land Use Scenario*. September 2, 2016.

The California Department of Finance identifies the City of Mountain View's population (within the City limits) at 79,278, with an estimated 35,595 housing units (as of January 1, 2017).[52] The Mountain View 2030 General Plan assumed the proposed land use designations in the Plan would allow development of 21,760 new jobs and 8,970 new housing units, for a total of 82,230 jobs and 42,240 housing units in the City by 2030, with a projected population in the City of 88,570 residents. This estimate is roughly consistent with the residential projections of *Plan Bay Area 2013*, jointly approved by ABAG and MTC.

3.13.2.2 *Existing Setting – Project Site*

The four parcels comprising the 28.7-acre project site are currently developed with five one- and two-story office buildings containing approximately 466,000 square feet of space. The existing site buildings on site currently support approximately 1,400 employees. Although the campus could support a higher number of employees, the existing buildings were recently remodeled and contain a large amount of employee amenity space.

There are no residences on the project site; there are residential uses bordering the site to the east and southeast in the City of Sunnyvale.

Employment

Plan Bay Area (2013) estimated that the City of Mountain View contained approximately 47,950 jobs in 2010. The General Plan EIR estimated that the number of jobs in the City would increase to 82,230 in 2030, although *Plan Bay Area* estimated that jobs in Mountain View would rise to 59,390 in 2030 (a substantially lower estimate).

Table 3.13-2:
Jobs and Employment in Mountain View

	General Plan 2010[1]	Plan Bay Area 2010[2]	2030 General Plan 2030 Estimate[1]	Plan Bay Area 2030 Estimate[2]	Draft Plan Bay Area 2040, 2040 Estimate[3]
Employed Residents	38,260	38,650	48,580	49,330	N/A
Jobs	60,460	47,950	82,230	59,390	69,600

[1] Based on the Mountain View 2030 General Plan Draft EIR.
[2] Association of Bay Area Governments. *Plan Bay Area Projections 2013*. December 2013.
[3] Plan Bay Area 2040. *Re: Plan Bay Area 2040 Draft Preferred Land Use Scenario*. September 2, 2016.

[52] California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State-January 1, 2011-2017 with 2010 Census Benchmark*. May 2017. Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/

3.13.3 Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, and for the purposes of this EIR, a population and housing impact is considered significant if the project would:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

3.13.3.1 *Population and Housing Impacts*

The proposed project would demolish two existing buildings and construct three six-story office buildings containing approximately 763,000 square feet of office/industrial space. The completed campus would be approximately 1,078,000 square feet in size, representing a net increase in development on the site of approximately 612,000 square feet.

The proposed project could support approximately 4,312 employees, 411 more than could work on-site within the existing buildings. Based on a ratio of one full-time employee per 200 square feet of office space, the population of the three new buildings would house about 3,800 employees. Since there are two existing buildings on site that aren't currently occupied and are planned for demolition and replacement, the net new area of 612,000 square feet would yield about 3,060 net new employees.

Displacement of any existing employees on the site during construction is not anticipated, and the completed project would increase available employment in the area overall. The proposed project would not displace or create any housing.

The project would contribute to growth in the East Whisman Change Area, an area designated in the City's General Plan for transit-oriented commercial and industrial development. The proposed project would incrementally increase the number of jobs available in the City of Mountain View. Since the project would be consistent with employment projections in the 2030 General Plan, it would not contribute to worsening the jobs/housing ratio beyond the current General Plan. The site is already served by infrastructure and would not create growth outside of the urban envelope. The growth is within the City's and ABAG's projections for the City of Mountain View through the year 2035. The project, therefore, would result in a less than significant population and housing impact.

Impact POP-1: The proposed project would not substantially induce population growth by introducing new businesses or extending or expanding infrastructure beyond areas planned for development. The project would not result in a substantial displacement of housing or people. **[Less Than Significant Impact]**

3.13.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
POP-1: The proposed project would not substantially induce population growth by introducing new businesses or extending or expanding infrastructure beyond areas planned for development. The project would not result in a substantial displacement of housing or people.	Less Than Significant	No mitigation required	Less Than Significant

3.14 PUBLIC SERVICES AND RECREATION

This section discusses the proposed project's impacts on fire and police services as well as parks and recreational facilities. Since the project does not propose residential development, it is not expected to have an adverse effect on school enrollment or the availability of library services. Therefore, schools and libraries are not discussed further.

3.14.1 Regulatory Setting

3.14.1.1 *Quimby Act - Parks*

The Quimby Act (California Government Code Sections 66475-66478) was approved by the California legislature to preserve open space and parkland in the State. This legislation was in response to California's increased rate of urbanization and the need to preserve open space and provide parks and recreation facilities for California's growing communities. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate parks, pay an in-lieu fee, or perform a combination of the two.

3.14.2 Existing Setting

3.14.2.1 *Fire Protection Services*

Fire protection to the project site is provided by the City of Mountain View Fire Department (MVFD), which serves a population of approximately 77,914 and an area of 12 square miles. The MVFD provides fire suppression and rescue response, hazard prevention and education, and disaster preparedness. In Fiscal Year 2014/2015, out of 5,703 emergency calls made to the MVFD, 3,786 of the calls (66 percent) were for medical aid (rescue and EMS incident), and 122 were for fire (two percent).[53]

The MVFD operates out of five stations, strategically located throughout the City to ensure fast responses. The MVFD has an established response time goal of six minutes (from dispatch) for "Medical Code Three" calls (i.e., those requiring expedited transport). During the 2014/2015 fiscal year, the MVFD achieved this goal 93 percent of the time.[54]

The MVFD has five engine companies, one rescue unit, one ladder truck, and one HAZMAT unit. The 86 full-time personnel are divided into three divisions: Suppression, Fire and Environmental Protection, and Administration. There is a minimum on-duty daily staffing of 21 personnel, and each of the Department's five engines is staffed with at least one firefighter/paramedic. The City of Mountain View also participates in a mutual aid program with neighboring cities, including Palo Alto, Los Altos, and Sunnyvale. Through this program, one or more of the mutual aid cities would provide assistance to Mountain View in whatever capacity was needed.

Station Four is the closest fire station to the project site. Station Four is located at 229 North Whisman Road, approximately one mile northwest of the project site. The Mountain View Fire

[53] Mountain View Fire Department. *Stats/Response/Annual Report*. Available at: http://mountainview.gov/depts/fire/about/report.asp. Accessed November 21, 2017.
[54] Mountain View Fire Department. Annual Report- Fiscal Year 2014-2015. Available at: http://mountainview.gov/civicax/filebank/blobdload.aspx?blobid=7735. Assessed November 21, 2017.

Department reviews applications for new projects to ensure that they comply with the City's current codes and standards.

3.14.2.2 *Police Protection Services*

Police protection services are provided to the project site by the Mountain View Police Department (MVPD). The MVPD consists of authorized staff of 90 sworn and 55 non-sworn personnel.[55] The MVPD conducts an active volunteer program (non-officers). Officers patrolling the area are dispatched from police headquarters, located at 1000 Villa Street, approximately 2.5 miles driving distance southwest of the project site.

The most frequent crimes in the City of Mountain View are larceny, burglary, and motor vehicle theft.[56] The MVPD has a goal to respond to Priority E and Priority 1 calls in less than four minutes at least 55 percent of the time. Priority E and Priority 1 calls are considered the highest priority calls and signal emergency dispatch from the MVPD. Priority E calls are of higher importance, because they are often associated with violent crime incidents.

To ensure that their standards are always met, MVPD has a mutual aid agreement with the surrounding jurisdictions, under which the other agencies would assist the MVPD in responding to calls, when needed.

3.14.2.3 *Parks and Open Space*

The City of Mountain View currently owns or manages 993.07 acres of parks and open space facilities, including 22 urban parks and the Stevens Creek Trail. The urban parks are divided among 18 mini-parks (one undeveloped), 13 neighborhood/school parks (under joint-use agreements with local school districts), five neighborhood parks not associated with school sites, two community parks, and one regional park (Shoreline at Mountain View).[57] The City also maintains 10 parks under joint-use agreements with local school districts.

The proposed project site is located within the Whisman Planning Area of the City of Mountain View 2014 *Parks and Open Space Plan*. At 1,100 acres the Whisman Planning Area is the second largest planning area in the City and contains 15.41 acres of park and open space facilities. Residential density is above the average for all planning areas and in 2010 the population in the Whisman Planning Area was estimated to be 8,627. The area contains 1.79 park acres per 1,000 residents and currently does not meet the City standard of 3.0 acres per 1,000 residents. All portions of the Whisman Planning Area are located within a one-half mile walking distance of a park facility. The largest park facilities in the area include the 8.6-acre Whisman School/Park and the 3.39-acre Slater School/Park.

[55] Mountain View Police Department. Annual Report 2015. Available at: http://www.mountainview.gov/documents/2015%20MVPD%20Annual%20Report.pdf. Accessed November 21, 2017.
[56] Mountain View Police Department. Annual Report 2016. Available at: http://mountainview.gov/documents/2016%20Annual%20Report.pdf. Accessed November 21, 2017.
[57] City of Mountain View. *2014 Parks and Open Space Plan*. Adopted October 28, 2014. Available at http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=14762. Accessed November 22, 2017.

Devonshire Park, dedicated in January 2007, is one of four mini-parks in the Whisman Planning Area. The nearest public park to the project site is Slater School/Park, located approximately one miles to the west of the site. Park amenities include grass fields, playgrounds, and sitting areas. Other nearby park facilities include Whisman School/Park, Creekside Park and Devonshire Park, located approximately 1.3 miles to the northwest, and Chetwood Park and Magnolia Park, located approximately 1.3 miles to the southwest of the project site.

Encinal Park is located approximately 0.5 miles walking distance east of the project site at 999 Corte Madera Avenue in the City of Sunnyvale. The park features include a parcourse, reservable multi-use sports fields, sand volleyball court, and a half basketball court.

3.14.3 Public Services and Recreation Impacts

3.14.3.1 *Thresholds of Significance*

For the purposes of this EIR, a public services impact is considered significant if the impacts are associated with:

- The provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire protection
    - Police protection
    - Schools
    - Parks
    - Other public facilities.
- An increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction of expansion of recreational facilities which might have an adverse physical effect on the environment.

3.14.3.2 *Fire Protection Services*

The project would increase the office development on the site by approximately 612,000 square feet, increasing the number of people working at the site and thus incrementally increasing the need for fire suppression and rescue response services. The project would be constructed to current Fire Code standards, and would not increase the urban area already served by the Mountain View Fire Department. The Mountain View Fire Department does not anticipate the need to construct a new fire station to accommodate growth anticipated in the 2030 General Plan.[58]

Since the project is consistent with the 2030 General Plan and would implement relevant General Plan policies and action items listed in *Regulatory Section 3.14.1* above, the incremental increase in

[58] City of Mountain View. *Draft 2030 General Plan and Greenhouse Gas Reduction Program, Draft EIR.* November 2011. Page 502-503.

demand for fire services represented by the project would not result in the need to expand or construct new fire facilities.

3.14.3.3 *Police Protection Services*

The redevelopment of the project site within Mountain View is not expected to substantially increase demand for police services in the project area. The Mountain View Police Department maintains a staffing ratio of approximately 1.3 officers per 1,000 residents. Since the proposed project would not add any residents, the project would not represent a significant demand for increased police staffing to serve the site. The new project buildings would be designed with safety and security measures.

Impact PS-1: The project may incrementally increase the demand for fire and police protection services in the City by increasing the about of office space and people on site, but would not result in adverse physical impacts or deterioration of facilities. **[Less Than Significant Impact]**

3.14.3.4 *Parks and Recreation Impacts*

To meet the Mountain View's demand for parks and open space, the City uses the Quimby Act (California Government Code, Section 66477), which allows cities to require builders of residential subdivisions to dedicate land for parks and recreational areas, or pay an open space fee to the City. The project does not propose residential development, thus it would not be required to dedicate parkland or pay in lieu fees for parkland.

The project, which would result in a net increase of 612,000 square feet of office space on the project site and employment increase of approximately 3,000 on site, would slightly increase the number of people using nearby park facilities. The incremental increase would not require the construction of new parkland or cause the deterioration of existing facilities. New landscaped areas would be provided on the project site to serve new employees.

The project proposes to develop three commercial office building and two parking structures. The project does not propose any residential development. Increased use of parks by approximately 3,060 additional employees would be incremental and would not cause significant physical deterioration. The project does not propose or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Since the proposed project does not include residential development, it would not be required to dedicate park land or pay fees toward parkland pursuant to Chapter 41.6 of the Mountain View Municipal Code.

Impact PS-2: The project would not result in a significant adverse impact to parks and recreation facilities within the City of Mountain View. **[Less Than Significant Impact]**

3.14.3.5 *Consistency with Plans*

Mountain View 2030 General Plan

The project site is currently designated as *High-Intensity Office* in the Mountain View 2030 General Plan. The project proposes an FAR of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline for the *High-Intensity Office* designation. The proposed project would be consistent with this land use designation, and would not require a General Plan amendment.

Consistency: The proposed project would not result in significant impacts with the implementation of 2030 General Plan policies and standard City of Mountain View conditions of approval, and consistency with adopted plans and policies. Although the number of employees on the site would increase, policies and actions included in the General Plan would be available to maintain service levels and facilities. For these reasons, the project is consistent with the Mountain View 2030 General Plan.

3.14.4 Cumulative Public Services Impacts

The cumulative projects in Mountain View and Sunnyvale may require provision of public services, including, like the project site, increased fire and police services. All of cumulative projects occurring within Mountain View or neighboring cities, would implement conditions of approval or mitigation measures that would reduce impacts to public services. These projects would also be subject to state, county, and City codes regulating public services. The cumulative projects, including the proposed project, would not result in significant cumulative impacts to public services.

Impact C-PS-1: The project would not contribute to a cumulatively considerable contribution to a significant public services impact. **[Less Than Significant Impact]**

3.14.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
PS-1: The project may incrementally increase the demand for fire and police protection services in the City by increasing the about of office space and people on site, but would not result in adverse physical impacts or deterioration of facilities.	Less Than Significant	No mitigation required	Less Than Significant
PS-2: The project would not result in a significant adverse impact to parks and recreation facilities within the City of Mountain View.	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
C-PS-1: The project would not contribute to a cumulatively considerable contribution to a significant public services impact.	Less Than Significant	No mitigation required	Less Than Significant

3.15 TRANSPORTATION/TRAFFIC

The discussion in this section is based on the "Draft Transportation Impact Analysis, prepared by *Fehr & Peers, Transportation Consultants,* in May 2018. This report is attached as Appendix I of this Draft EIR.

The proposed Transportation Demand Management Plan prepared for the project by *Fehr & Peers* in October 2017 is attached as Appendix J.

3.15.1 Regulatory Setting

3.15.1.1 *Regional Plans and Agencies*

Santa Clara County Valley Transportation Authority (VTA)

The proposed project is located within the City of Mountain View, in Santa Clara County. The Santa Clara County Valley Transportation Authority (VTA) is the Congestion Management Agency (CMA) for the County and has policies and regulations that are relevant to the project. The VTA is responsible for ensuring local government conformance with the Congestion Management Program (CMP), a program aimed at reducing regional traffic congestion. The CMP requires that each jurisdiction identify existing and future transportation facilities that will operate at an acceptable service level and provide mitigation where future growth degrades that service level. The VTA has review responsibility for proposed development projects that are expected to generate 100 or more peak-hour trips.

Santa Clara Countywide Bicycle Plan

The Santa Clara Countywide Bicycle Plan synthesizes other local and County plans into a comprehensive 20-year cross-county bicycle corridor network and expenditure plan (May 2008). The long-range countywide transportation plan and the means by which projects compete for funding and prioritization are documented in the Valley Transportation Plan (VTP) 2035 (adopted in January 2009). VTA has adopted the Santa Clara Countywide Bicycle Plan (June 2008), which is a planned bicycle network of 24 routes of countywide or intercity significance. One of these proposed facilities, Route #5 Shoreline-Miramonte/El Monte Corridor, travels near the North Bayshore Precise Plan area. This plan is currently under update by the VTA, with an anticipated completion date of summer 2017.

3.15.1.2 *City of Mountain View*

Mountain View 2030 General Plan

The Mountain View 2030 General Plan was adopted in July 2012, and provides the City with goals and policies that reflect shared community values, potential change areas, and compliance with state law and local ordinances. The General Plan provides a guide for future land use decisions in the city, and includes goals and policies to support multi-modal transportation methods and facilities.

City of Mountain View Bicycle Transportation Plan

The *Mountain View Bicycle Transportation Plan Update* (November 2015) summarizes goals for improving the bicycle network, existing and proposed facilities, and programs involving education, enforcement, and promotion. The Plan was developed in conformance with several other plans including the *2030 Mountain View General Plan*, the *Santa Clara Valley Transportation Authority Countywide Bicycle Plan*, the *Metropolitan Transportation Commission Regional Bicycle Plan*, the *Santa Clara County Trails Master Plan*, and the Caltrans Streets and Highways Code Section 891.2.

Santa Clara Countywide Bicycle Plan

The Santa Clara Countywide Bicycle Plan (May 2008) synthesizes other local and County plans into a comprehensive 20-year cross-county bicycle corridor network and expenditure plan. The long-range countywide transportation plan and the means by which projects compete for funding and prioritization are documented in the Valley Transportation Plan (VTP) 2035 (adopted in January 2009). The Countywide Bicycle Plan includes a planned bicycle network of 24 routes of countywide or intercity significance. Several of these proposed facilities travel through or near the study area, including (listing street followed by cross-county bicycle corridor number and name):

- Maude Avenue (#1 US 101 Corridor)
- Dana Street (#2 Alma Street/Caltrain Corridor)
- El Camino Real (#4 El Camino Real – Grand Boulevard Corridor)
- Ellis Street (#6 Tasman/Alum Rock Light Rail Corridor)
- Mary Avenue (#7 Old Highway 9 Corridor)

City of Mountain View Pedestrian Master Plan

The City of Mountain View Pedestrian Master Plan (January 2014) summarizes goals for the pedestrian network, existing and proposed facilities, and priority of pedestrian improvements. The Plan was developed in conformance with the Mountain View 2030 General Plan, and other City guidance documents.

3.15.2 Existing Setting: Project Study Area

3.15.2.1 *East Whisman Precise Plan*

The proposed project is within the East Whisman Precise Plan Area, which is generally bordered by Central Expressway to the south, US 101 to the north, Whisman Road to the west, and the border of Mountain View and Sunnyvale to the east. The Mountain View 2030 General Plan envisions East Whisman as a sustainable, transit-oriented employment center with a diversity of land uses. The East Whisman Precise Plan is currently in development. It will include development standards, such as allowed land uses, and will identify new public improvements for the area.

3.15.2.2 *Study Intersections*

Project impacts on the study area roadway facilities were determined by measuring the effect project traffic would have on intersection operations during the morning (7:00 to 9:00 a.m.) and evening (4:00 to 6:00 p.m.) peak periods. A total of 23 intersections were selected as study locations in

consultation with City of Mountain View staff and based on VTA's Transportation Impact Analysis Guidelines (updated October 2014). The project location and study intersections are shown on Figure 3.15-1. These locations (and their respective jurisdictions) include:

1. Ellis Street and Manila Drive (Mountain View)
2. Ellis Street and US 101 Northbound Ramps (Caltrans/Mountain View)
3. Ellis Street and US 101 Southbound Ramps (Caltrans/Mountain View)
4. Fairchild Drive and Ellis Street (Mountain View)
5. Maude Avenue and SR 237 Ramps (Caltrans/Mountain View)
6. Maude Avenue and Macara Avenue (Sunnyvale)
7. Maude Avenue and North Mary Avenue (Sunnyvale)
8. Maude Avenue and North Mathilda Avenue (Sunnyvale/CMP*)
9. East Middlefield Road and North Whisman Road (Mountain View)
10. East Middlefield Road and Ellis Street (Mountain View)
11. East Middlefield Road and Logue Avenue (Mountain View)
12. East Middlefield Road and Ferguson Drive (Mountain View)
13. East Middlefield Road and SR 237 Westbound Ramps (Caltrans/Mountain View)
14. East Middlefield Road and SR 237 Eastbound Ramps (Caltrans/Mountain View)
15. East Middlefield Road and Bernardo Avenue (Mountain View)
16. Central Expressway and SR 85 Southbound Ramp (Santa Clara County)
17. Central Expressway and Whisman Station Drive (Santa Clara County/CMP*)
18. Central Expressway and Ferguson Drive (Santa Clara County/CMP*)
19. Central Expressway and Bernardo Avenue (Mountain View)
20. Central Expressway and North Mary Avenue (Santa Clara County/CMP*)
21. El Camino Real and Grant Road-SR 237 (Caltrans/CMP*)
22. North Mary Avenue and West Evelyn Avenue (Sunnyvale)
23. North Mary Avenue and West Washington Avenue (Sunnyvale)

*Note: CMP = VTA Congestion Management Program

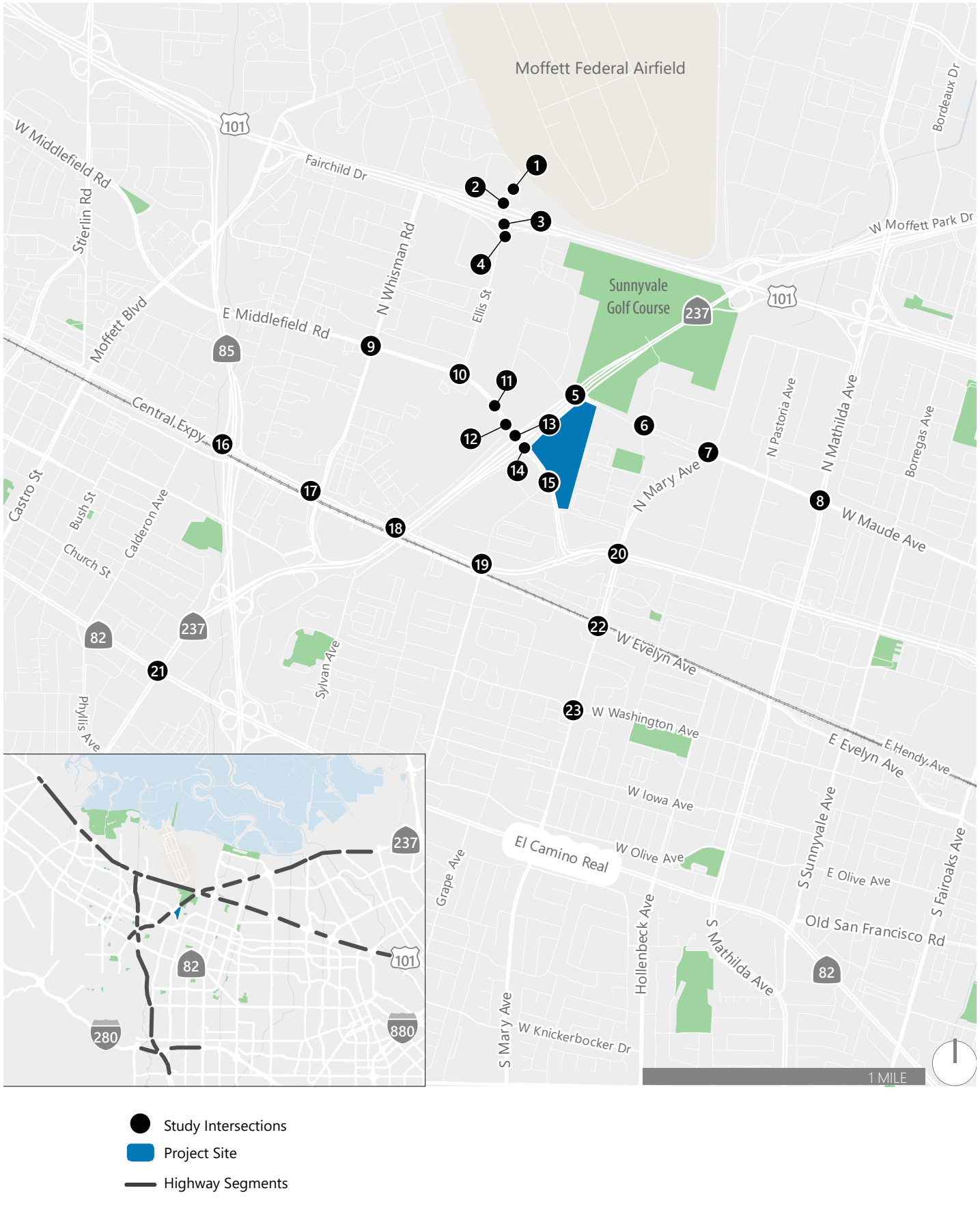
3.15.2.3 *Freeway Segments*

The study freeway segments were selected in consultation with the City of Mountain View and finalized based on VTA guidelines. This analysis evaluates the operations of the following freeway segments:

- SR 85, between Stevens Creek Boulevard and US 101 (7 segments)
- US 101, between Guadalupe Parkway and Embarcadero Road (14 segments)
- SR 237, between El Camino Real and Zanker Road (10 segments)
- I-280, between Foothill Expressway and De Anza Boulevard (2 segments)

Freeway Ramps

The study freeway ramps were also selected in consultation with the City of Mountain View and finalized based on VTA guidelines. The TIA evaluated the operations of the following freeway ramps:



PROJECT LOCATION & STUDY INTERSECTIONS FIGURE 3.15-1

- SR 237 Eastbound
  - Middlefield Road off-ramp
  - Maude Avenue on-ramp
- SR 237 Westbound
  - Maude Avenue off-ramp
  - Middlefield Road on-ramp
- US 101 Northbound
  - Mathilda Avenue loop off-ramp
  - Ellis Street on-ramp
- US 101 Southbound
  - Ellis Street off-ramp
  - Mathilda Avenue diagonal on-ramp

3.15.2.4 *Transit Service*

Public transit services in the project vicinity are provided by VTA and the City of Mountain View. Some private businesses also operate bus transit vehicles in the area.

3.15.2.5 *Existing Roadway Network*

Existing Street System

State Route (SR) 237, US 101, SR 85, and I-280 provide regional access to the project site. The following streets provide local access: Middlefield Road, Maude Avenue, SR 237 frontage roads, Central Expressway, and Bernardo Avenue. Each access facility is described below in more detail.

SR 237 is a primarily east-west freeway located immediately west of the project site with two to three travel lanes in each direction. One travel lane in each direction is designated as a high-occupancy vehicle (HOV) lane between Mathilda Avenue and I-880 eastbound and between I-880 and Fair Oaks Avenue westbound. HOV lanes, also known as diamond or carpool lanes, are limited to use by vehicles occupied by two or more persons Monday through Friday between 5:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 7:00 p.m. SR 237 merges into Grant Road in Mountain View and extends east to I-880 in Milpitas. Access to the site from SR 237 is via Middlefield Road, Maude Avenue, and the SR 237 frontage road. The westbound direction is typically congested during the AM peak period and the eastbound direction is congested during the PM peak period.

US 101 is a primarily north-south freeway located north of the project site with four travel lanes in each direction. One travel lane is designated as a high-occupancy vehicle (HOV) lane in the northbound direction between Cochrane Road and Shoreline Boulevard and between Oregon Expressway and Embarcadero Road; and in the southbound direction between Embarcadero Road and Oregon Expressway and between Shoreline Boulevard and Burnett Avenue. Two travel lanes in each direction are designated as HOV lanes between Oregon Expressway and Shoreline Boulevard. US 101 extends north through San Francisco and south through San Jose and Gilroy. Access to the site from US 101 is via Ellis Street, the SR 237 interchange, and Mathilda Avenue. The northbound direction is typically congested during the AM peak period and both northbound and southbound directions are congested during the PM peak period near the project.

SR 85 is a north-south freeway extending from the US 101 interchange in the City of San José to the south and the US 101 interchange in Mountain View to the north. The freeway has two mixed-flow lanes plus one HOV lane per direction along its entirety. The peak commute directions on SR 85 near the project site are northbound during the AM peak period and southbound during the PM peak period. Access to the site from SR 85 is via its interchanges with SR 237 and Central Expressway.

I-280 is a north-south freeway extending from I-680 in San Jose in the south to King Street in San Francisco in the north. The freeway has three mixed-flow lanes plus one HOV lane per direction near the site. The HOV lane extends from Magdalena Avenue to Meridian Avenue in both directions. The peak commute directions on I-280 near the project site are northbound during the AM peak period and southbound during the PM peak period. Access to the site from I-280 is via its interchange with SR 85.

Middlefield Road is a four-lane, east-west arterial street that extends from Central Expressway in Mountain View to Jefferson Avenue in Redwood City. Middlefield Road provides access to local residential streets as well as to light industrial and commercial developments. Access from Middlefield Road to the project site is via a private driveway. The posted speed limit on Middlefield Road near the project is 35 miles per hour (mph).

Maude Avenue is a two- to four-lane, east-west arterial street that extends from North Wolfe Road in Sunnyvale to the east to Logue Avenue approximately 1,000 feet west of the project site. It provides access to light industrial and commercial developments. Access to the project site from Maude Avenue is via a private driveway. The posted speed limit on Maude Avenue near the project is 35 mph.

The frontage roads adjacent to SR 237 extend from Middlefield Road to Maude Avenue. On the east side are two eastbound lanes which connect the eastbound off-ramp at Middlefield Road to the eastbound on-ramp at Maude Avenue. On the west side are two westbound lanes which connect the westbound off-ramp at Maude Avenue to the westbound on-ramp at Middlefield Road. There is access to the project site via a private driveway from the east side frontage road.

Central Expressway is a four- to six-lane, east-west expressway which extends from the City of Santa Clara in the east to San Antonio Road in the west where it becomes Alma Street. In Mountain View, it runs on the north side of the Caltrain tracks with limited connections to the south side of the tracks at Castro Street/Moffett Boulevard, Shoreline Boulevard, and Rengstorff Avenue. There is access to the project site via Bernardo Avenue and Middlefield Road. The posted speed limit on Central Expressway is 45 mph.

Bernardo Avenue is a two-lane arterial which extends from Homestead Road in the south to the project site in the north. Bernardo Avenue does not cross the Caltrain tracks at Evelyn Avenue/Central Expressway. It provides access to the project site via Central Expressway and Middlefield Road. The posted speed limit on Bernardo Avenue is 30 mph.

Truck Routes

The City of Mountain View Municipal Code section 19.60 designates truck routes within the city limits. Near the project site, US 101, SR 85, Moffett Boulevard, Whisman Road, Central Expressway, El Camino Real, and Evelyn Avenue are designated truck routes.

3.15.2.6 *Existing Intersection Volumes and Lane Configurations*

Weekday morning (7:00 to 9:00 a.m.) and evening (4:00 to 6:00 p.m.) peak period intersection turning movement counts were conducted at the study locations in April and May 2017 on clear days with area schools in session. For the study intersections, the single hour with the highest traffic volumes during the count period was identified. Existing lane configurations and signal controls were obtained through field observations.

Existing Intersection Operations

Existing intersection lane configurations, signal timings, and peak hour turning movement volumes were used to calculate the levels of service for the key intersections during each peak hour. The results of the LOS calculations indicate that all of the study intersections operate at acceptable levels of service according to their designated LOS standard.

3.15.2.7 *Existing Freeway Segment Operations*

The study area includes a number of freeway segments. Caltrans is the owner/operator of the State highway system, including freeways, interchanges, and arterial State Routes. As the Congestion Management Agency, VTA is responsible for monitoring operations on Caltrans facilities within Santa Clara County.

3.15.2.8 *Existing Transit Facilities*

Bus and light rail service in Mountain View is operated by the VTA. Commuter rail service (Caltrain) is operated from San Francisco to Gilroy by the Peninsula Joint Powers Board. The Mountain View Community Shuttle is operated jointly by the City of Mountain View and Google. Figure 3.15-2 shows the existing transit services near the project site.

The project site is served by VTA local Bus Route 32 and is located one-half mile from the VTA Middlefield Light Rail Station. The Mountain View Community Shuttle stop at Middlefield Road and Whisman Road is approximately one mile from the project site. The Mountain View and Sunnyvale Caltrain Stations are each approximately two miles from the project site. The Mary Moffett Caltrain shuttle operates free shuttle service between the Mountain View Caltrain station and Moffett Field/NASA with two stops near the project site. Table 3.15-1 describes the span of services and frequency of service during the week with average weekday load factors for VTA buses and Caltrain.

EXISTING TRANSIT FACILITIES FIGURE 3.15-2

Table 3.15-1:
Existing Transit Services

Route[1]	From	To	Weekdays		Weekends		Peak Load Factor[3]
			Operating Hours	Peak Headway[2] (minutes)	Operating Hours	Headway[2] (minutes)	
VTA							
32	San Antonio Shopping Center	Santa Clara Transit Center	5:45 AM – 8:30 PM	30	8:45 AM-6:00 PM Sat. (N/A Sun.)	60 Sat. (N/A Sun.)	N/A
902 (Light Rail)	Mountain View	Winchester	4:45 AM-12:40 AM	15	6:00 AM-12:40 AM	30	0.42
Mountain View Community Shuttle							
Community Shuttle	Loop throughout the City of Mountain View		10:00 AM – 6:00 PM	30	10:00 AM – 6:00 PM	60	N/A
Caltrain							
Caltrain California Avenue	San Francisco	Gilroy	4:30 AM-1:30 AM	20-40	7:30 AM - 1:40 AM	60	0.80[4]
Caltrain Shuttle							
Mary Moffett Shuttle	Mountain View Caltrain Station	Moffett Field/NASA	6:35 AM - 6:50 PM	60	No service	No service	N/A

Notes:
1. Weekday and weekend service as of June 2013.
2. Headways are defined as the time between transit vehicles on the same route (e.g. time between two Route 32 buses stopping at the Middlefield Road and Bernardo Avenue intersection bus stops.
3. Peak load factor for entire route. The peak load factor is the ratio of the average peak number of on-board passengers during the peak hour to supply of seats.
4. Caltrain load factor based on overall system peak boardings. The peak periods identified were 7-8 AM and 5-6 PM.
5. Route 120 provides twice daily northbound and twice daily southbound transit trips along Manila Drive and Ellis Street all other Route 120 trip terminate at the Lockheed Martin Transit Center.

Sources: VTA April 2017; Caltrain, April 2017.

3.15.2.9 *Existing Bicycle Facilities*

The City of Mountain View promotes bicycling as an active mode of transportation for both commuting and recreation. The City's 2015 *Bicycle Transportation Plan Update* describes the five bikeway classifications in the City, which all meet the design guidelines of the: (1) VTA Bicycle Technical Guidelines for bicycle facilities, and (2) Caltrans *Highway Design Manual (HDM), Chapter 1000: Bikeway Planning and Design* for multi-use trails. These bicycle facility types are described below.

- **Class I Bikeway (Bike Path)** provides a completely separate right-of-way and is designated for the exclusive use of bicycles and pedestrians with vehicle and pedestrian cross-flow minimized. In general, bike paths serve corridors not served by streets and highways or where sufficient right-of-way exists to allow such facilities to be constructed away from the influence of parallel streets and numerous vehicle conflicts.

- **Class II Bikeways (Bike Lanes)** are lanes for bicyclists adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are generally five (5) feet wide. Adjacent vehicle parking and vehicle/pedestrian cross-flow are permitted. For instance, right-turning vehicles must merge into the lane before turning. Bike lanes in Mountain View meet VTA's Bicycle Technical Guidelines, which follows all applicable local, State and Federal requirements.

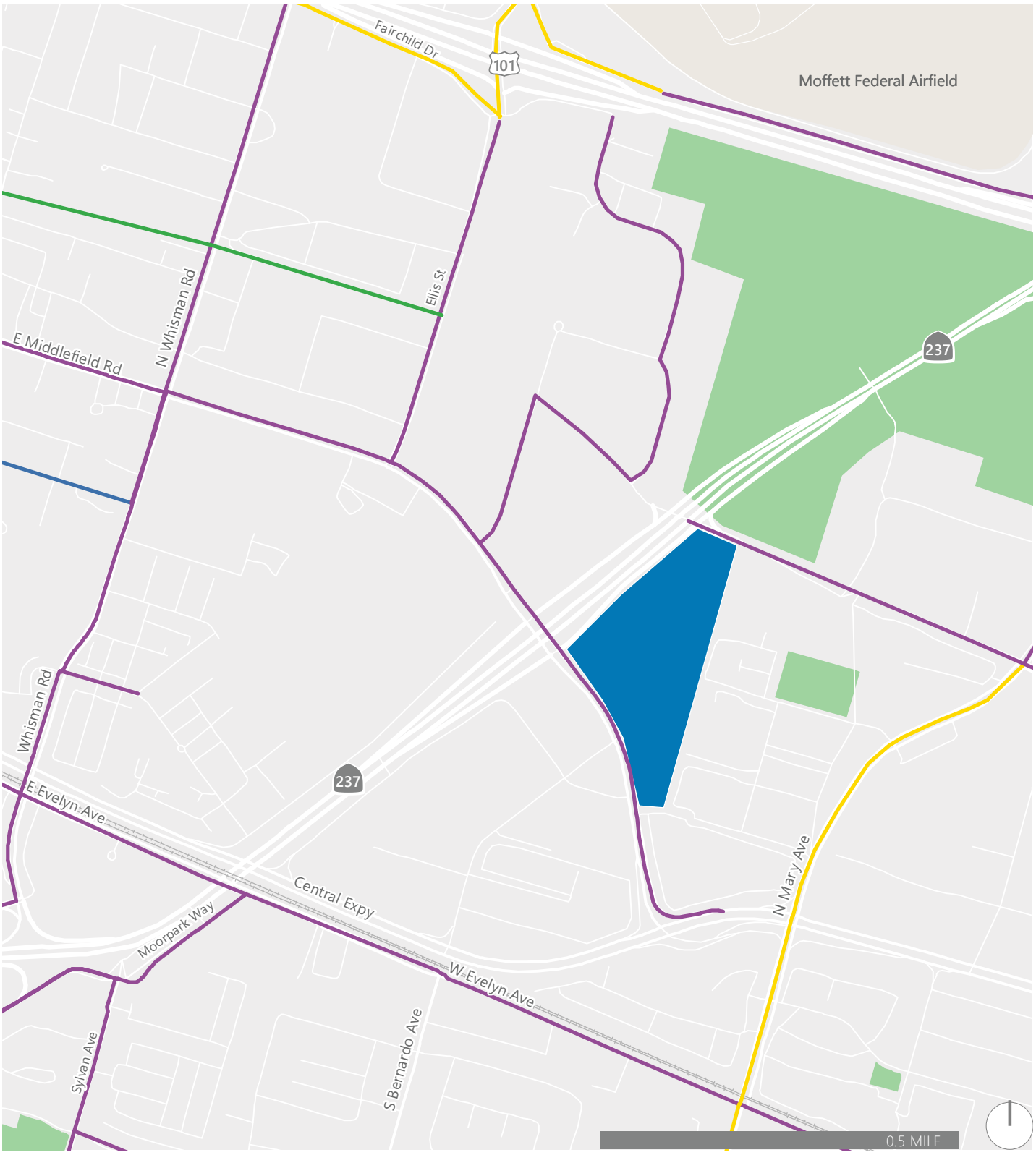
- **Class IIIa Bikeways (Bike Routes)** are designated by signs or pavement markings for shared use with pedestrians or motor vehicles, but have no separated right-of-way or lane striping. Bike routes serve either to: a) provide continuity to other bicycle facilities, or b) designate preferred routes through high demand corridors. Although some streets with high volumes of traffic have been designated as bike routes, most official bike routes in Mountain View are on low-volume streets.

- **Class IIIb Bikeways (Bike Boulevards)** are a modified Class IIIa bicycle route providing a more convenient and efficient through route for cyclists of all skill levels. A bike boulevard includes signage, pavement markings, and in some cases, and traffic calming (e.g., midblock closures to vehicles).

- **Class IV Bikeways (cycle tracks or "separated" bike lanes)** provide a right-of-way designated exclusively for bicycle travel within a roadway and are protected from other vehicle traffic with devices, including, but not limited to, grade separation, flexible posts, inflexible physical barriers, or parked cars.

Figure 3.15-3 shows existing bicycle facilities near the project. These facilities include:

- Bicycle paths on:
  - Hetch Hetchy Trail
- Bicycle lanes on:
  - Middlefield Road
  - Maude Avenue east of SR 237



EXISTING BICYCLE FACILITIES FIGURE 3.15-3

  - Mary Avenue north of Maude Avenue
  - Evelyn Avenue
  - Ellis Street
  - Whisman Road
- Bicycle routes on:
  - Mary Avenue south of Maude Avenue

The City of Mountain View is in the process of obtaining Caltrans permits to provide bicycle lanes on Maude Avenue through the SR 237 interchange and it is assumed that these bicycle lanes will be constructed by the time the Project development is occupied.

3.15.2.10 *Existing Pedestrian Facilities*

Pedestrian facilities comprise sidewalks and crosswalks. The SR 237 frontage road along the west edge of the project site has a sidewalk, and there are sidewalks along the project frontage with Maude Avenue and on both sides of Middlefield Road. There are crosswalks at major nearby intersections around the project site, including the Middlefield Road/Bernardo Avenue, Middlefield Road/SR 237 ramps, Maude Avenue/SR 237 ramps, and Maude Avenue/Macara Avenue intersections.

The project site is approximately one-half mile from the Middlefield Light Rail Station with continuous sidewalks and crosswalks between the site and station via Middlefield Road (Figure 3.15-4). There is also a local bus stop adjacent to the site on Middlefield Road. There are gaps in sidewalks near the project site on:

- The north side of Maude Avenue between the project site and SR 237, and
- The south side of Maude Avenue between SR 237 and Logue Avenue.

3.15.2.11 *Analysis Methods*

Signalized Intersections

The method described in Chapter 16 of the 2000 Highway Capacity Manual (HCM) (Transportation Research Board) was used to prepare the level of service calculation for the study intersections. This level of service method, which is approved by Santa Clara County and VTA, analyzes a signalized intersection's operation based on average control delay per vehicle. Control delay includes the initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. The average control delay is calculated using TRAFFIX 8.0 analysis software and is correlated to an LOS designation, as shown in Table 3.15-2.

Please refer to Section 3.15.3.2, below, for the specific thresholds for each jurisdiction affected by the project (Mountain View, Sunnyvale, and Santa Clara County).

EXISTING PEDESTRIAN CONNECTIONS TO TRANSIT SERVICE FIGURE 3.15-4

Table 3.15-2: Signalized Intersection Level of Service Definitions		
Level of Service	**Description**	**Average Control Delay per Vehicle (seconds)**
A	Operations with very low delay occurring with favorable progression and / or short cycle lengths.	≤ 10.0
B	Operations with low delay occurring with good progression and / or short cycle lengths.	10.1 to 20.0
C	Operations with average delays resulting from fair progression and / or longer cycle lengths. Individual cycle failures begin to appear.	20.1 to 35.0
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, and high volume-to-capacity (V / C) ratios. Many vehicles stop and individual cycle failures are noticeable.	35.1 to 55.0
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V / C ratios. Individual cycle failures are frequent occurrences.	55.1 to 80.0
F	Operations with delays unacceptable to most drivers occurring due to over-saturation, poor progression, or very long cycle lengths.	> 80.0
Source: *Traffic Level of Service Analysis Guidelines*, VTA Congestion Management Program, June 2003; and *Highway Capacity Manual*, Transportation Research Board, 2000.		

Unsignalized Intersections

The operations of the unsignalized intersections were evaluated using the method contained in Chapter 17 of the 2000 HCM. LOS ratings for stop-sign-controlled intersections are based on the average control delay expressed in seconds per vehicle. For approaches composed of a single lane, the control delay is computed as the average of all movements in that lane. Table 3.15-3 summarizes the relationship between delay and LOS for unsignalized intersections.

Table 3.15-3: Unsignalized Intersection Level of Service Definitions		
Level of Service	**Description**	**Average Control Delay Per Vehicle (Seconds)**
A	Little or no delay.	≤ 10.0
B	Short traffic delay.	10.1 to 15.0
C	Average traffic delays.	15.1 to 25.0
D	Long traffic delays.	25.1 to 35.0
E	Very long traffic delays.	35.1 to 50.0
F	Extreme traffic delays with intersection capacity exceeded.	> 50.0
Source: *Traffic Level of Service Analysis Guidelines*, VTA Congestion Management Program, June 2003; and *Highway Capacity Manual*, Transportation Research Board, 2000.		

Other jurisdictions may apply the California Manual on Uniform Traffic Control Devices (CA MUTCD) peak-hour volume signal warrant to intersections operating at LOS F.

> Warrant 3 – Peak hour vehicle volume: This warrant determines if the minor street traffic suffers undue delay when entering or crossing the major street for a minimum of one hour of an average day. This is based on the major street left-turn volume, the higher-volume minor-street approach volume, and calculated delay for vehicles on the higher-volume minor-street approach.

Freeway Segments

Santa Clara County evaluates the operations of basic freeway segments using density to evaluate existing conditions operations and volume-to-capacity ratio to evaluate future year conditions. Existing freeway segments in Santa Clara County are evaluated using VTA's analysis procedure, which is based on the density of the traffic flow during the AM and PM peak hours using methods described in the 2000 HCM. Data presented in the 2014 *Santa Clara County Annual Monitoring and Conformance Report* was used to evaluate existing freeway operations. Density is expressed in passenger cars per mile per lane. The CMP ranges of densities for each freeway segment level of service are shown in Table 3.15-4.

Table 3.15-4: Level of Service Definitions for Freeway Segments in Santa Clara County		
Level of Service	**Description**	**Density (passenger cars per mile per lane)**
A	Free Flow	≤ 11
B	Reasonably Free Flow	11.1 to 18.0
C	Stable Flow	18.1 to 26.0
D	Unstable Flow	26.1 to 46.0
E	Capacity Flow	46.1 to 58.0
F	Forced Flow	> 58.0
Source: *Traffic Level of Service Analysis Guidelines*, VTA Congestion Management Program, June 2003; and *Highway Capacity Manual*, Transportation Research Board, 2000.		

The future operations of freeway mainline segments in Santa Clara County can be evaluated using volume-to-capacity ratios with the volume-to-capacity ratio greater than 1.0 indicating a situation where vehicle demand exceeds capacity.

Transit Services

The VTA TIA Guidelines require analysis of transit network performance including transit access and facilities and transit vehicle delay. The Guidelines state that a transit vehicle delay analysis include the following components:

- **A qualitative assessment** of additional transit vehicle delay caused by any roadway or intersection geometry changes proposed by a project, taking into account unique considerations of transit vehicles compared to autos (e.g., pulling into and out of stops, longer gaps needed for left-turns). These qualitative considerations may also inform the assessment of transit vehicle delay caused by auto congestion.

- **A quantitative estimate** of additional seconds of transit vehicle delay that will result from automobile congestion caused by a project and any changes to signal operations proposed by that project. This analysis may utilize information produced by the intersection Level of Service (LOS) analysis or other sources, if available.

There is not a well-established national methodology for quantitatively evaluating transit network performance due to roadway congestion. Increased roadway congestion can affect transit vehicle travel time/speed and service reliability. For the purposes of this Draft EIR, transit network performance is analyzed during the AM and PM peak hour based on the average transit vehicle delay associated with congestion at signalized intersections along a specified corridor with and without the project.

The change in average transit vehicle delay will be determined using the following process:

- Review TRAFFIX 8.0 analysis software output for intersection delay. The average delay, by movement, at each intersection within a study corridor in the transit vehicle path of travel will be determined.

- The transit vehicle average delay due to congestion at intersections will be determined by summing the movement delay for each signalized intersection along the study transit corridor.

- Without and With Project average transit vehicle delay associated with congestion at intersections will be compared. Note that the transit vehicle dwell time at transit stops is not included in the analysis.

This analysis methodology determines changes in transit delay based on the delay at the intersections evaluated within this TIA. Not every intersection along each transit route is included in the transit delay calculation. In addition, the transit delay analysis does not account for delays associated with bus pull-out time or dwell time for boardings and alightings. Such additional delays are not anticipated to be substantial relative to delays at the major intersections studied in the traffic impact analysis.

This analysis addresses the potential for additional delay on the following bus routes:

- VTA Route 32
- VTA Route 185
- Mountain View Community Shuttle (eastbound and westbound)
- MVgo East Whisman Route

Per the VTA TIA Guidelines, if increased transit vehicle delay is found, the lead agency should work with VTA to identify feasible transit priority measures near the affected facility and include contributions to any applicable projects that improve transit speed and reliability in the TIA.

Bicycle and Pedestrian Facilities

The VTA TIA Guidelines requires analysis of bicycle and pedestrian facilities, including the effects of site development and roadway improvements on bicycle/pedestrian infrastructure, circulation, quality of service (QOS), and conformance to existing plans and policies. The Guidelines state that the analysis address the following:

> **A Quality of Service (QOS)** analysis to review how well transportation infrastructure and streetscape features support bicycling and walking. The guidelines state that any project proposing changes to intersection/roadway geometry or signal operations shall include a QOS analysis for bicyclists and pedestrians at the location of the proposed changes. A QOS analysis is also recommended along project frontages under Existing Conditions. Along with

QOS analysis, a descriptive analysis of the project's effect on pedestrian and bicycle conditions is required.

Determining Project Impacts: For the purposes of determining project impacts on bicycle and pedestrian facilities, the project's effects on those physical facilities and its consistency with applicable plans and policies will be qualitatively addressed.

Evaluating the Effect of Mitigation Measures

Per the VTA TIA Guidelines, any mitigation measures identified in the TIA that would change the roadway geometry or signal operations have been evaluated to determine their effects on the QOS for bicyclists and pedestrians. StreetScore+, developed by *Fehr & Peers*, was selected to perform this evaluation. StreetScore+ is an Excel-based tool that calculates pedestrian and bicyclist comfort-based indices based on best design practices for active transportation users.

The Bicyclist StreetScore+ scoring has a 1-4 scale, correlating with the "Four Types of Cyclists." The Pedestrian StreetScore+ has a parallel structure to the Level of Traffic Stress approach for bicyclists, also using a 1-4 scale. An explanation of how the tool operates and the methodology that guides the results is provided in Appendix A of Appendix I (TIA).

3.15.2.12 *Field Observations*

Field observations at the study area locations were conducted on Wednesday, April 26, 2017 and Thursday, May 4, 2017 to confirm the operations analysis results and observe overall transportation characteristics. In general, observations indicated that most of the study intersections are operating at or near the calculated levels of service.

The morning peak directions of travel on the freeway study segments were northbound on US 101 and SR 85, and eastbound on SR 237. The peak direction of travel reversed during the PM peak hour – southbound on US 101 and SR 85, and westbound on SR 237.

The AM and PM peak directions of travel are more balanced near the SR 237 interchanges at Maude Avenue and Middlefield Road. Signalized study intersections near SR 237 between Maude Avenue and Middlefield Road were operating at or near the calculated levels of service. No substantial queuing was observed and vehicles typically cleared each study intersection within one signal cycle.

VTA light rail transit (LRT) parallels Ellis Street through the study area. The frequency of service is 15 minutes in each direction during peak hours. At the Ellis Street intersections of Fairchild Drive and the US 101 ramps, eastbound and westbound Light rail trains have signal pre-emption and usually pass within five (5) minutes of each other. During the AM peak hour, the northbound US 101 off-ramp traffic requires two cycles to clear the queue created by the LRT. Light rail service near the Ellis Street and Middlefield Road intersection has limited effect on the nearby intersections.

The ramp metering system on the southbound US 101 on-ramp at Ellis Street is active during the PM peak hour and creates a queue. The queue was observed to extend slightly over half the available on-ramp length. Ramp metering at the northbound US 101 Ellis Street on-ramp was inactive during the field observations in both peak hours; therefore, queuing did not occur.

Pedestrian and Bicycle Observations

Widespread pedestrian and bicyclist activity was observed near the project site with some variation by intersection. The observations were performed during the weekday morning peak period (7:00 to 9:00 a.m.) and evening peak period (4:00 to 6:00 p.m.) in September 2017 on clear days with area schools in session.

The highest levels of observed pedestrian and bicyclist activity occurred along Middlefield Road around the Whisman Road, Ellis Street, and Logue Avenue intersections, likely due to the proximity of the Middlefield Light Rail station; these intersections tended to serve between 10 and 50 bicyclists and between 10 and 40 pedestrians during the peak hours. Bicycle lanes, sidewalks, and crosswalks are provided on Whisman Road, Middlefield Road, and Ellis Street.

The existing development at the project site offers free bike share to its employees. The driveways serving the project site were observed to serve approximately 30 to 40 bicyclists during both the AM and PM peak hours.

3.15.2.13 *Existing Intersection Operations*

Existing intersection lane configurations, signal timings, and peak hour turning movement volumes were used to calculate the levels of service for the key intersections during each peak hour. The results of the LOS analysis using the TRAFFIX software program for Existing Conditions are presented in Table 3.15-5.

The results of the LOS calculations indicate that all of the study intersections currently operate at acceptable levels of service according to their designated LOS standard.

Table 3.15-5:
Existing Intersection Level of Service

	Intersection	Jurisdiction (Operator)[1]	LOS Threshold[2]	Count Date	Control	Peak Hour[3]	Delay[4]	LOS[5]
1	Ellis Street and Manila Drive	Mountain View	LOS D	April 20, 2017	AWSC	AM PM	21.1 15.3	C C
2	US 101 Northbound Ramps and Ellis Street	Caltrans (MV)	LOS D	May 16, 2017	Signal	AM PM	20.0 23.1	B- C
3	US 101 Southbound Ramps and Ellis Street	Caltrans (MV)	LOS D	April 20, 2017	Signal	AM PM	18.3 12.1	B- B
4	Fairchild Drive and Ellis Street	Mountain View	LOS D	April 20, 2017	Signal	AM PM	16.3 16.9	B B
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	May 16, 2017	Signal	AM PM	31.0 39.1	C D
6	Maude Avenue and Macara Avenue	Sunnyvale	LOS D	April 18, 2017	Signal	AM PM	13.2 17.3	B B

Table 3.15-5:
Existing Intersection Level of Service

	Intersection	Jurisdiction (Operator)[1]	LOS Threshold[2]	Count Date	Control	Peak Hour[3]	Delay[4]	LOS[5]
7	Maude Avenue and North Mary Avenue	Sunnyvale	LOS D	May 16, 2017	Signal	AM PM	36.5 37.2	D+ D+
8	Maude Avenue and North Mathilda Avenue	Sunnyvale (CMP)	LOS E	April 20, 2017	Signal	AM PM	39.4 48.2	D D
9	East Middlefield Road and North Whisman Road	Mountain View	LOS D	April 18, 2017	Signal	AM PM	29.8 31.5	C C
10	East Middlefield Road and Ellis Street	Mountain View	LOS D	April 18, 2017	Signal	AM PM	15.9 19.0	B B-
11	East Middlefield Road and Logue Avenue	Mountain View	LOS D	April 18, 2017	Signal	AM PM	13.1 16.7	B B
12	East Middlefield Road and Ferguson Drive	Mountain View	LOS D	April 18, 2017	Signal	AM PM	8.0 10.4	A B+
13	East Middlefield Road and SR 237 Westbound Ramps	Caltrans (MV)	LOS D	April 18, 2017	Signal	AM PM	18.0 15.0	B- B
14	East Middlefield Road and SR 237 Eastbound Ramps	Caltrans (MV)	LOS D	April 18, 2017	Signal	AM PM	22.4 18.6	C+ B-
15	East Middlefield Road and Bernardo Avenue	Mountain View	LOS D	April 18, 2017	Signal	AM PM	10.1 17.1	B+ B
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	April 25, 2017	Signal	AM PM	11.1 16.8	B+ B
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	18.4 37.0	B- D+
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	9.9 4.7	A A
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	April 20, 2017	Signal	AM PM	7.0 10.2	A B+
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	46.8 68.1	D E
21	El Camino Real and Grant Road-SR 237	Caltrans (CMP)	LOS E	April 20, 2017	Signal	AM PM	62.1 58.3	E E+
22	West Evelyn Avenue and North Mary Avenue	Sunnyvale	LOS D	April 18, 2017	Signal	AM PM	37.9 42.8	D+ D
23	West Washington Avenue and North Mary Avenue	Sunnyvale	LOS D	April 18, 2017	Signal	AM PM	18.0 16.3	B- B

Table 3.15-5:
Existing Intersection Level of Service

Intersection	Jurisdiction (Operator)[1]	LOS Threshold[2]	Count Date	Control	Peak Hour[3]	Delay[4]	LOS[5]

Notes:
1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour
4. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections. Includes adjusted saturation flow rates to reflect Santa Clara County conditions per VTA TIA Guidelines.
5. LOS = Level of Service. LOS calculations conducted using the TRAFFIX level of service analysis software package, which applies the method described in the 2000 Highway Capacity Manual.

Bold text indicates intersection operates at a deficient Level of Service compared to the applicable standard.
Source: Fehr & Peers, 2018.

3.15.2.14 *Existing Freeway Segment Operations*

The existing AM and PM peak hour mixed-flow and HOV lanes freeway segment densities reported in VTA's *2016 Monitoring and Conformance Report* (May 2016) are shown in the TIA in Appendix I. For mixed-flow lanes, freeway segment capacities are defined as 2,200 vehicles per hour per lane (vphpl) for four-lane freeway segments and 2,300 vphpl for six-lane freeway segments. HOV lane capacities are defined as 1,650 vphpl.

The following mixed-flow freeway segments exceed VTA's LOS E standard during the specified peak hour:

- SR 85 Northbound
  - Stevens Creek Boulevard to El Camino Real (4 segments) (AM Peak Hour)
- SR 85 Southbound
  - US 101 to Fremont Avenue (4 segments) (PM Peak Hour)
  - I-280 to Stevens Creek Boulevard (PM Peak Hour)
- US 101 Northbound
  - Guadalupe Parkway to Mathilda Avenue (6 segments) (AM Peak Hour)
  - SR 237 to Moffett Boulevard (AM Peak Hour)
  - Moffett Boulevard to Rengstorff Avenue (3 segments) (AM and PM Peak Hours)
  - Rengstorff Avenue to Oregon Expressway (2 segments) (PM Peak Hour)
  - Oregon Expressway to Embarcadero Road (AM and PM Peak Hours)
- US 101 Southbound
  - Embarcadero Road to De La Cruz Boulevard (13 segments) (PM Peak Hour)
- SR 237 Westbound
  - Zanker Road to Lawrence Expressway (3 segments) (AM Peak Hour)
  - Lawrence Expressway to Mathilda Avenue (2 segments) (AM and PM Peak Hours)
  - Mathilda Avenue to SR 85 (4 segments) (PM Peak Hour)

  - SR 85 to El Camino Real (AM Peak Hour)
- SR 237 Eastbound
  - SR 85 to Central Expressway (AM Peak Hour)
  - Middlefield Road/Maude Avenue to Zanker Road (7 segments) (PM Peak Hour)
- I-280 Eastbound
  - Foothill Expressway to De Anza Boulevard (2 segments) (PM Peak Hour)
- I-280 Westbound
  - De Anza Boulevard to Foothill Expressway (2 segments) (AM Peak Hour)

The following HOV lane freeway segments exceed VTA's LOS E standard during the specified peak hour:

- SR 85 Northbound HOV
  - I-280 to Fremont Avenue (2 segments) (AM Peak Hour)
- US 101 Northbound HOV
  - Guadalupe Parkway to De La Cruz Boulevard (AM Peak Hour)
  - SR 237 to Rengstorff Avenue (4 segments) (AM Peak Hour)
  - Moffett Boulevard to SR 85 (PM Peak Hour)
- US 101 Southbound HOV
  - Oregon Expressway to San Antonio Avenue (PM Peak Hour)
  - Lawrence Expressway to Montague Expressway/San Tomas Expressway (2 segments) (PM Peak Hour)
- I-280 Westbound HOV
  - De Anza Boulevard to Foothill Expressway (2 segments) (AM Peak Hour)

3.15.2.15 *Background Conditions*

Traffic volumes for Background No Project Conditions include traffic generated by projects that are either under construction or are approved, but not yet constructed, within the project study area in the Cities of Mountain View and Sunnyvale. Information about development projects that are under construction or are approved but not yet constructed was obtained from the planning departments of the two cities (refer to Page 61 of Appendix J of the TIA for the complete list of Background Projects.) Level of Service data for background conditions is provided in Table 3.15-11.

During the time the traffic counts were conducted, all buildings on the project site were either under-utilized or vacant, but all could have been occupied without further discretionary action by the City of Mountain View. Therefore, consistent with the VTA TIA Guidelines Section 7.2, the traffic associated with full occupancy of the five existing buildings located on the project site was included under Background No Project Conditions.

There are no planned transportation improvements within the study area that would affect the geometries at the study intersections; therefore, the intersection geometries are assumed to be the same as shown in Existing Conditions. Background With Project Conditions are defined as Background No Project Conditions plus traffic generated by completion of the project.

3.15.3 Transportation/Traffic Impacts

3.15.3.1 *Thresholds of Significance*

For the purposes of this EIR, a transportation/traffic impact is considered significant if the project would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance of safety of such facilities.

The determination of significance for project impacts is based on policies, regulations, goals, and guidelines defined by the City of Mountain View and the surrounding jurisdictions of Santa Clara County and City of Sunnyvale. The detailed impact criteria presented below focuses on elements of the CEQA checklist pertaining to roadway system operations and its effects on users, including drivers, pedestrians, bicyclists, transit passengers, and first responders in emergency access vehicles.

The operations of roadway facilities are described with the term level of service (LOS), a qualitative description of traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver. Six levels are defined from LOS A, which reflects free-flow conditions where there is very little interaction between vehicles, to LOS F, where the vehicle demand exceeds the capacity and high levels of vehicle delay result. LOS E represents "at-capacity" operations. When traffic volumes exceed the intersection capacity, stop-and-go conditions result and a vehicle may wait through multiple signal cycles before passing through the intersection; these operations are designated as LOS F.

Information regarding the signalized study intersections, including the standards of significance used in each jurisdiction, is provided below. Signalized intersection operations and impacts are evaluated based on the appropriate jurisdiction's minimum threshold for acceptable operations as shown in Table 3.15-6.

Table 3.15-6: Signalized Intersection Thresholds		
Jurisdiction	**Intersection LOS Standards**	**Citation**
Santa Clara County	LOS E for all Santa Clara County intersections.	Santa Clara County General Plan, pages F-18 and F-19 (1994)
VTA Congestion Management Program (CMP)	LOS E for all VTA CMP intersections.	Santa Clara County Annual Monitoring and Conformance Report, page 9 (2014)
City of Mountain View	LOS D for all City of Mountain View intersections.	City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program EIR, page 121 (2011)
City of Sunnyvale	LOS D for all local intersections; LOS E for "regionally significant roadways."	City of Sunnyvale General Plan, consolidated in July 2011*
Caltrans	LOS C on state highway facilities**	Caltrans Guide for the Preparation of Traffic Impact Studies, page 1 (2002)

* City of Sunnyvale adopted an updated Land Use and Transportation Element in April 2017, which did not re-define a significance threshold or impact criteria. For purposes of these significance standards for local streets in Sunnyvale, we are using the LOS standards that the City adopted in 2011.

** Caltrans acknowledges that a target LOS C threshold may not always be feasible and recommends that the lead agency consult with Caltrans to determine an appropriate target LOS for a particular setting. Following typical practice in Santa Clara County, signalized intersections involving State highway facilities are evaluated using the relevant LOS thresholds set by the VTA CMP (if designated as a CMP intersection) or by the local jurisdiction.

3.15.3.2 *Thresholds for Signalized Intersections*

The signalized intersection LOS impact criteria for each jurisdiction within the study area are described below.

Santa Clara County and Congestion Management Program (CMP)

The LOS standard for Santa Clara County expressway and CMP intersections is LOS E. Traffic impacts at these intersections would occur when the addition of project traffic:

- Causes intersection operations to deteriorate from an acceptable level (LOS E or better) to an unacceptable level (LOS F); or
- Exacerbates unacceptable operations by increasing the average critical delay more than four seconds and increasing the critical volume-to-capacity (V/C) ratio by 0.01 or more at an intersection operating at LOS F; or
- Increases the V/C ratio by 0.01 or more at an intersection with unacceptable operations (LOS F) when the change in critical delay is negative (i.e., decreases). This can occur if the critical movements change.

City of Mountain View

The City of Mountain View uses a LOS D standard for local street intersections, and LOS E standard for intersections within CMP facilities and in the San Antonio and Downtown Core areas. Significant impacts at signalized City of Mountain View intersections are defined to occur when the addition of project traffic causes one of the following:

- Intersection operations to degrade from an acceptable level to an unacceptable level; or
- Exacerbate unacceptable operations by increasing the average critical delay by four seconds or more and increasing the critical volume-to-capacity (V/C) ratio by 0.01 or more; or
- An increase in the V/C ratio of 0.01 or more at an intersection with unacceptable operations when the change in critical delay is negative (i.e., decreases). This can occur if the critical movements change.

City of Sunnyvale

The City of Sunnyvale uses a LOS D standard for local street intersections and LOS E standard for "regionally significant roadways" (a designation that includes CMP facilities) such as Caribbean Drive, Mathilda Avenue, Sunnyvale-Saratoga Road, El Camino Real, Central Expressway and Lawrence Expressway, as defined under the Sunnyvale General Plan (consolidated in July 2011).

Significant impacts at signalized local City of Sunnyvale intersections are defined to occur when the addition of project traffic causes one of the following:

- Intersection (except those on designated regionally significant roads) operations to degrade from an acceptable level (LOS D or better) to an unacceptable level (LOS E or LOS F); or
- Operations for regionally significant designated intersections to deteriorate from an acceptable level (LOS E or better) to an unacceptable level (LOS F);
- Exacerbate unacceptable operations by increasing the critical delay by more than four seconds and increasing the volume-to-capacity (V/C) ratio by 0.01 or more; or
- An increase in the V/C ratio of 0.01 or more at an intersection with unacceptable operations when the change in critical delay is negative (i.e., decreases). This can occur if the critical movements change.

3.15.3.3 *Thresholds for Unsignalized Intersection Impacts*

There is one unsignalized study intersection at Ellis Street and Manila Avenue (Intersection #1).

The City of Mountain View does not have an officially adopted significance criterion for unsignalized intersections. For purposes of this Draft EIR, significant impacts are defined to occur when the addition of project traffic causes:

- The average intersection delay for all-way stop-controlled intersections to degrade to LOS F, or a project adds traffic to an unsignalized intersection already operating at LOS F; and

- The intersection satisfies the peak hour traffic signal warrant from the California Manual of Uniform Traffic Control Devices (CA MUTCD).

3.15.3.4 *Thresholds for Freeway Segment Impacts*

The study area includes a number of freeway segments. Caltrans is the owner/operator of the State highway system, including freeways, interchanges, and arterial State Routes. The *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2001) covers the information needed for Caltrans to review a project's impact on State highway facilities, including freeway segments. However, as the Congestion Management Agency, VTA is responsible for monitoring operations on Caltrans facilities within Santa Clara County. For the freeway impact analysis, the relevant jurisdiction's CMP level of service standards are used. The LOS standard for CMP freeway segments in Santa Clara County is LOS E for both mixed-flow and High Occupancy Vehicle (HOV) lanes (*Santa Clara County Annual Monitoring and Conformance Report 2014*, VTA, 2015).

Under Existing Conditions, traffic impacts on CMP freeway segments in Santa Clara County are determined based on density. Under Existing With Project Condition, a traffic impact would occur if one of the following happens:

- Freeway segment operations deteriorate from an acceptable level (LOS E or better) under Existing Conditions to an unacceptable level (LOS F); or

- An increase in traffic of more than one percent of the capacity of the segments that operate at LOS F under Existing Conditions.

The VTA CMP Guidelines do not require freeway impact analysis under Background and Near-Term Cumulative Conditions. For purposes of this CEQA evaluation, a traffic impact would occur in either of these scenarios if one of the following happens:

- The addition of project traffic causes a freeway segment V/C ratio to increase from less than or equal to one (1.0) to greater than one (1.0); or

- The freeway segment operates at an unacceptable level and the geometry remains the same as Existing Conditions and the project increases traffic demand on the freeway segment by an amount equal to one percent or more of the segment capacity; or

- The addition of project traffic increases traffic demand on the freeway segment by an amount equal to one percent or more of the segment capacity on a freeway segment already operating at a V/C ratio greater than one (1.0).

Freeway Ramps

With additional project traffic there is the potential for increased freeway ramp queuing during the peak hours. Queuing is not considered an environmental impact, but rather an operational consideration that is managed over time by Caltrans and local jurisdictions.

The project freeway ramp analysis summarizes the additional traffic and estimates the change in vehicle queue length compared to the existing available vehicle storage on each study ramp. The ramp queuing analysis is included in the TIA in Appendix J.

3.15.3.5 *Thresholds for Transit, Bicycle, and Pedestrian Facilities Impacts*

Transit Service

Public transit services in the project vicinity are provided by VTA and the City of Mountain View. Some private businesses also operate bus transit vehicles in the area.

Santa Clara County and VTA Congestion Management Program (CMP) define significant impacts to transit service occurring if the project or any part of the project:

- Creates demand for public transit services in excess of the capacity which is provided, or planned; or
- Disrupts existing transit services or facilities ; or
- Conflicts with an existing or planned transit facility; or
- Conflicts with transit policies adopted by the City of Mountain View, City of Sunnyvale, Santa Clara County, VTA, or California Department of Transportation (Caltrans) for their respective facilities in the study area.

Bicycle and Pedestrian Facilities

The Mountain View 2030 General Plan describes policies necessary to ensure that pedestrian and bicycle facilities are available and effective for City residents. Using the General Plan as a guide, significant impacts to these facilities would occur when a project or an element of the project:

- Creates a hazardous condition for pedestrians and bicyclists that currently does not exist, or otherwise interferes with pedestrian accessibility to the site and adjoining areas; or
- Conflicts with an existing or planned pedestrian or bicycle facility; or
- Conflicts with policies related to bicycle and pedestrian activity adopted by the City of Mountain View, City of Sunnyvale, Santa Clara County, VTA, or Caltrans for their respective facilities in the study area.

3.15.3.6 *Project Traffic Volumes*

Vehicle Trip Generation Estimates

Vehicle trip generation for the project was estimated using a combination of: 1) standard rates developed by the Institute of Transportation Engineers (ITE) and published in *Trip Generation Manual* (9th Edition) and 2) a City-approved trip reduction percentage of 20 percent to account for the TDM program requirements typically required within the East Whisman area of the City of Mountain View.

To calculate the vehicle trip generation attributed to the project, standard ITE trip generation rates were applied. Using these rates, the project would generate approximately 8,416 daily vehicle trips, with 1,190 occurring in the AM peak hour (1,047 inbound and 143 outbound) and 1,137 in the PM peak hour (193 inbound and 944 outbound).

ITE trip generation rates were then used to estimate the vehicle trip generation attributed to the office buildings that are planned to be demolished. These office buildings are estimated to generate approximately 1,666 daily vehicle trips, with 236 occurring in the AM peak hour (207 inbound and 29 outbound) and 225 in the PM peak hour (38 inbound and 187 outbound).

Consistent with staff direction and the City's typical practice for similar projects, the analysis assumes a 20 percent reduction in vehicle trip generation due to implementation of TDM strategies. It should also be noted that the project includes a small amount (10,000 square feet) of retail uses; this retail space is intended to primarily serve the office employees in the immediate area and not to draw substantial numbers of customers from other parts of the City; therefore, this retail space is not included in the project trip generation estimates. The net new trip generation results for the project, accounting for the demolition of the existing buildings and the application of the required TDM strategies, are summarized in Table 3.15-7.

Table 3.15-7:
Project Trip Generation

ITE	Land Use Type	Method[1]	Size	Type	Weekday Trips	AM Peak Hour Trips			PM Peak Hour Trips		
						Total	In	Out	Total	In	Out
Proposed Land Use											
710	Office	Average Rate[1]	763	ksf	8,416	1,190	1,047	143	1,137	193	944
				Subtotal (A) :	*8,416*	*1,190*	*1,047*	*143*	*1,137*	*193*	*944*
Demolished Land Use											
710	Office	Average Rate[1]	151	ksf	1,666	236	207	29	225	38	187
				Subtotal (B) :	*1,666*	*236*	*207*	*29*	*225*	*38*	*187*
				Subtotal (A-B):	6,750	954	840	114	912	155	757
				Assumed TDM Trip Reduction (-20%):	*(1,350)*	*(191)*	*(168)*	*(23)*	*(182)*	*(31)*	*(151)*
				Proposed Net New Trip Generation:	**5,400**	**763**	**672**	**91**	**730**	**124**	**606**

Notes: ksf = 1,000 square feet

1. ITE Trip Generation Manual (9th Edition) provides an average rate and a best fit curve equation for trip generation estimates. The following rates were used for ITE Land Use 710: General Office Building:
   Daily: T = 11.03 * X
   AM Peak Hour: T = 1.56 * X (88% in, 12% out)
   PM Peak Hour: T = 1.49 * X (17% in, 83% out), where T is the number of trips generated and X is the development size in 1,000 square feet.

Source: *ITE Trip Generation Manual* (9th Edition); Fehr & Peers, 2018.

Vehicle Trip Distribution Estimates

The directions of approach and departure of project trips were based on the locations of complementary land uses and existing and future travel patterns in the area. Figure 3.15-5 shows the

distribution of project traffic along the roadway network. Table 3.15-8 shows the trip distribution for each relevant link in the roadway network.

Table 3.15-8:
Trip Distribution

Destination	Trip Distribution %
US 101 North of SR 85	15
US 101 South of SR 237	20
SR 237 East of US 101	13
West SR 237 / Grant Road	8
East Maude Avenue	5
East Central Expressway	10
West Evelyn Avenue	2
South Mary Avenue	3
West Central Expressway	5
SR 85 South of El Camino Real	13
West Middlefield Road	3
West El Camino Real	3
TOTAL	**100**

Vehicle Trip Assignment Estimates

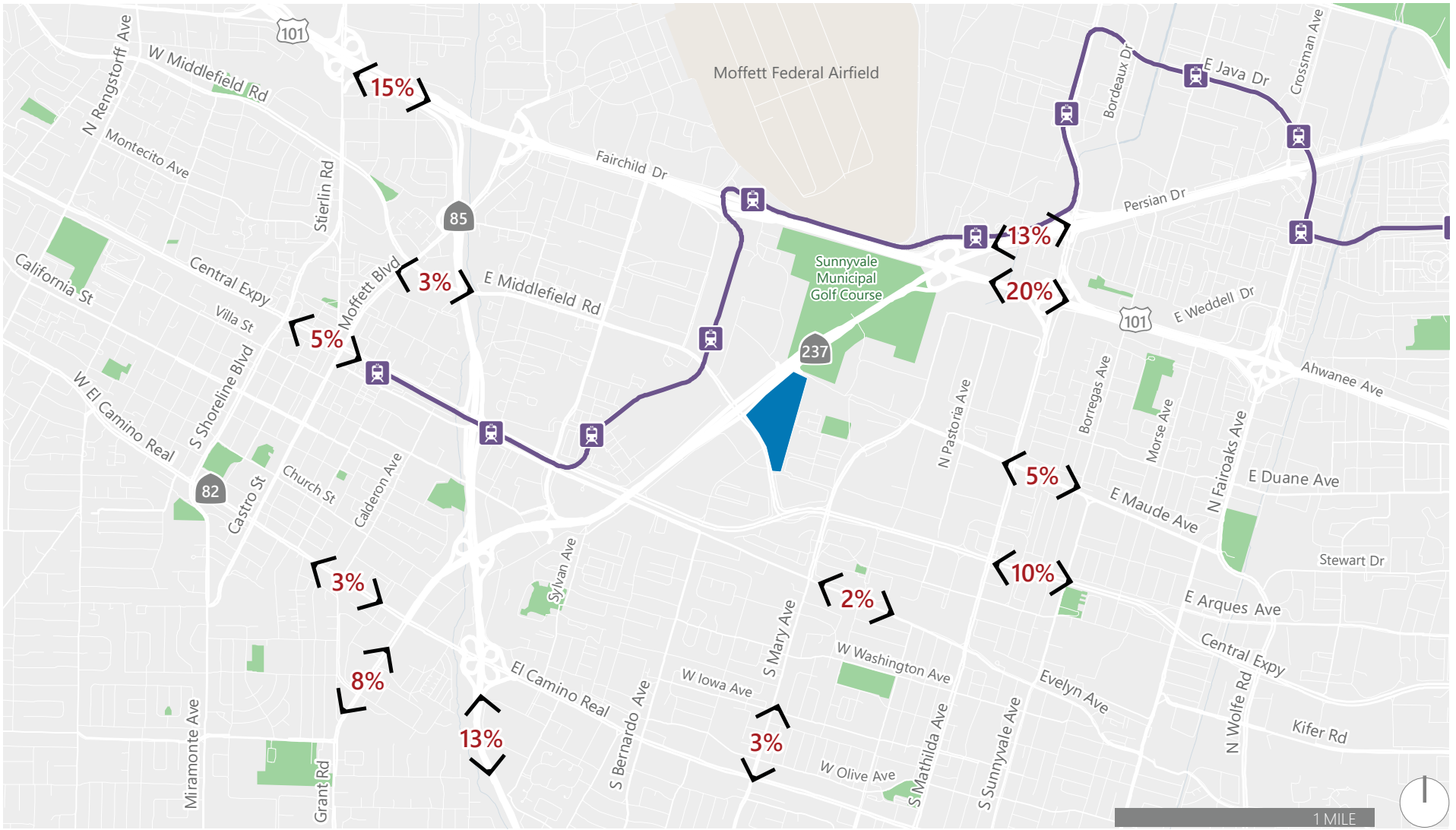
The project trips were assigned to the roadway system based on the directions of approach and departure discussed above. The project trip assignment was added to the existing traffic volumes to represent Existing with Project Conditions. Volumes for Existing with Project Conditions are shown in Appendix C of Appendix I (TIA).

3.15.3.7 *Existing With Project Conditions: Intersection Levels of Service*

Existing With Project Conditions are defined as Existing Conditions plus traffic generated by the proposed project. Intersection and freeway segment impacts under this scenario are then identified by comparing the level of service results under Existing with Project Conditions to those under Existing Conditions. Pedestrian, bicycle, and transit impacts are also addressed in this chapter.

Existing With Project Intersection Analysis

Level of service calculations were prepared using the TRAFFIX 8.0 software to evaluate signalized and unsignalized intersection operations under Existing with Project Conditions. The TRAFFIX 8.0 software uses the 2000 HCM methodology and is consistent with VTA TIA guidelines.



PROPOSED PROJECT TRIP DISTRIBUTION

FIGURE 3.15-5

Table 3.15-9 summarizes the Existing No Project and Existing With Project conditions, and the projected increases in critical delay and critical volume-to-capacity (V/C) ratios between the Existing No Project and With Project conditions. Critical delay represents the delay associated with the critical movements of the intersection, or the movements that require the most "green time" and have the greatest effect on overall intersection operations. Project impacts are identified by comparing Existing No Project to Existing with Project Conditions.

The results of the LOS calculations indicate that the project does not have a significant impact at any intersection under Existing with Project Conditions, based on the significance thresholds described above and, therefore, no mitigation measures are required.

Table 3.15-9:
Existing No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction / (Operator)[1]	LOS Thres-hold[2]	Peak Hour[3]	Existing No Project		Existing With Project			
					Delay[4]	LOS[5]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
1	Ellis Street and Manila Drive*	Mountain View	LOS D	AM PM	21.1 15.3	C C	21.1 15.3	C C	0.000 0.000	0.0 0.0
2	US 101 Northbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM PM	20.0 23.1	B- C	20.0 23.7	B- C	0.004 0.028	0.0 0.6
3	US 101 Southbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM PM	18.3 12.1	B- B	19.2 12.6	B- B	0.066 0.000	1.4 0.3
4	Fairchild Drive and Ellis Street	Mountain View	LOS D	AM PM	16.3 16.9	B B	16.2 17.1	B B	0.055 0.010	0.2 0.1
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	AM PM	31.0 39.1	C D	34.5 41.7	C- D	0.123 0.053	7.5 5.3
6	Maude Avenue and Macara Avenue	Sunnyvale	LOS D	AM PM	13.2 17.3	B B	12.8 16.7	B B	0.003 0.019	-0.1 -0.5
7	Maude Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	36.5 37.2	D+ D+	36.1 36.9	D+ D+	0.020 0.019	-0.8 -0.3
8	Maude Avenue and North Mathilda Avenue	Sunnyvale (CMP)	LOS E	AM PM	39.4 48.2	D D	40.3 48.0	D D	0.012 0.000	1.1 0.0
9	East Middlefield Road and North Whisman Road	Mountain View	LOS D	AM PM	29.8 31.5	C C	29.7 31.4	C C	0.001 0.000	0.0 0.0
10	East Middlefield Road and Ellis Street	Mountain View	LOS D	AM PM	15.9 19.0	B B-	16.4 19.6	B B-	0.041 0.033	0.8 0.3
11	East Middlefield Road and Logue Avenue	Mountain View	LOS D	AM PM	13.1 16.7	B B	13.2 16.2	B B	0.005 0.006	-0.1 -0.1
12	East Middlefield Road and Ferguson Drive	Mountain View	LOS D	AM PM	8.0 10.4	A B+	8.4 10.2	A B+	0.005 0.007	0.0 0.1
13	East Middlefield Road and SR 237 Westbound Ramps	Caltrans (MV)	LOS D	AM PM	18.0 15.0	B- B	18.4 15.3	B- B	0.004 0.054	0.0 0.6

Table 3.15-9:
Existing No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction / (Operator)[1]	LOS Thres-hold[2]	Peak Hour[3]	Existing No Project		Existing With Project			
					Delay[4]	LOS[5]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
14	East Middlefield Road and SR 237 Eastbound Ramps	Caltrans (MV)	LOS D	AM PM	22.4 18.6	C+ B-	22.2 19.5	C+ B-	0.052 0.015	-0.4 0.5
15	East Middlefield Road and Bernardo Avenue	Mountain View	LOS D	AM PM	10.1 17.1	B+ B	14.5 19.5	B B-	0.139 0.015	6.7 0.5
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM PM	11.1 16.8	B+ B	11.0 16.9	B+ B	0.001 0.002	0.0 0.0
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM PM	18.4 37.0	B- D+	18.3 36.7	B- D+	0.001 0.006	0.0 -1.0
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	9.9 4.7	A A	9.9 4.8	A A	0.001 0.009	0.1 0.1
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	7.0 10.2	A B+	8.4 10.4	A B+	0.021 0.000	1.8 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	46.8 68.1	D E	47.3 70.8	D E	0.002 0.013	0.0 4.6
21	El Camino Real and Grant Road-SR 237	Caltrans (CMP)	LOS E	AM PM	62.1 58.3	E E+	62.9 58.4	E E+	0.009 0.000	2.0 0.0
22	West Evelyn Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	37.9 42.8	D+ D	37.9 42.8	D+ D	0.005 0.003	0.0 -0.1
23	West Washington Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	18.0 16.3	B- B	17.9 16.2	B B	0.006 0.005	-0.1 -0.1

Notes:

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour
4. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections. Includes adjusted saturation flow rates to reflect Santa Clara County conditions per VTA TIA Guidelines.
5. LOS = Level of Service. LOS calculations conducted using the TRAFFIX level of service analysis software package, which applies the method described in the 2000 Highway Capacity Manual.

Bold text indicates intersection operates at a deficient Level of Service compared to the applicable standard.
Source: Fehr & Peers, 2018.

Impact TRANS-1: Implementation of the proposed project would not result in significant impacts to project study intersections under Existing With Project conditions in the AM and PM peak hours. **[Less Than Significant Impact]**

3.15.3.8 *Existing with Project Conditions: Freeway Segments*

The future operations of freeway mainline segments in Santa Clara County are evaluated using V/C ratios. The 33 freeway segments with significant project impacts under Existing with Project Conditions include:

- Northbound State Route 85
  - I-280 to West Homestead Road (AM peak hour);
  - West Homestead Road to West Fremont Avenue (AM peak hour);
  - West Fremont Avenue to El Camino Real (AM peak hour);

- Southbound State Route 85
  - El Camino Real to West Fremont Avenue (PM peak hour);

- Northbound US 101
  - Guadalupe Parkway to De La Cruz Boulevard (AM peak hour)
  - De La Cruz Boulevard to Montague Expressway (AM peak hour)
  - Montague Expressway to Bowers Avenue (AM peak hour)
  - Bowers Avenue to Lawrence Expressway, including HOV (AM peak hour)
  - Lawrence Expressway to North Fair Oaks Avenue, including HOV (AM peak hour)
  - North Fair Oaks Avenue to North Mathilda Avenue (AM peak hour)
  - Moffett Boulevard to State Route 85 (PM peak hour)
  - North Shoreline Boulevard to Rengstorff Avenue (PM peak hour)
  - Rengstorff Avenue to San Antonio Avenue (PM peak hour)

- Southbound US 101
  - State Route 237 to North Mathilda Avenue (PM peak hour)
  - North Mathilda Avenue to North Fair Oaks Avenue, including HOV (PM peak hour)
  - North Fair Oaks Avenue to Lawrence Expressway, including HOV (PM peak hour)
  - Lawrence Expressway to Bowers Avenue (PM peak hour)
  - Bowers Avenue to Montague Expressway (PM peak hour)
  - Montague Expressway to De La Cruz Boulevard (PM peak hour)

- Eastbound State Route 237
  - State Route 85 to Central Expressway (AM peak hour)
  - Maude Avenue to US 101 (PM peak hour)
  - US 101 to Mathilda Avenue (PM peak hour)
  - Mathilda Avenue to North Fair Oaks Avenue (PM peak hour)
  - North Fair Oaks Avenue to Lawrence Expressway (PM peak hour)
  - Lawrence Expressway to Great America Parkway (PM peak hour)
  - Great America Parkway to North First Street (PM peak hour)

- Westbound State Route 237
  - Zanker Road to North First Street (AM peak hour)

- North First Street to Great America Parkway (AM peak hour)
- Great America Parkway to Lawrence Expressway (AM peak hour)
- Lawrence Expressway to North Fair Oaks Avenue (AM peak hour)
- North Fair Oaks Avenue to Mathilda Avenue (AM peak hour)
- Maude Avenue to Central Parkway (PM peak hour)
- Central Parkway to State Route 85 (PM peak hour)

3.15.3.9 *Existing with Project: Transit Delay Analysis*

The project would add traffic along major transit corridors in the Cities of Mountain View and Sunnyvale, which could affect operations of VTA bus and community shuttle routes. The additional delay to transit service in the area due to implementation of the project is shown in Table 3.15-10.

Based on the delay assessment, the project does not add substantial delays on any of the transit routes assessed. The additional delay is less than five seconds on all but one of the routes, and less than fifteen seconds in all cases. The route experiencing the largest increase in delay is the VTA Route 32 eastbound in the PM peak hour; the 11 seconds of additional delay constitutes less than one-half of one percent of the total travel time on that route.

Table 3.15-10:
Existing With Project Transit Route Delay

Route		Direction	Peak Hour	Additional Route Average Delay with Project (seconds)[1]
32	San Antonio Shopping Center to Santa Clara Transit Center	Eastbound	AM PM	<5.0 11.0
		Westbound	AM PM	8.0 <5.0
185	Gilroy Transit Center to San Antonio	Northbound	AM	<5.0
		Southbound	PM	<5.0
MVgo	East Whisman Route	Northbound	AM	<5.0
		Southbound	PM	<5.0

Note:
1. The project was not considered to have a measureable change in overall transit delay if the increase in travel time was less than five seconds. In some cases the travel time under With Project conditions improved slightly (due to changes in signal timing, critical movement changes, etc.).
Source: Fehr & Peers, 2018.

3.15.3.10 *Background With Project Conditions: Intersection Levels of Service*

Project impacts were identified by comparing Background No Project to Background With Project Conditions. Significant impacts are identified based on the impact criteria presented previously,

which include changes in the LOS from an acceptable to an unacceptable level or changes in critical delay and critical V/C ratios for intersections operating unacceptably.

Table 3.15-11 shows the delays, LOS results, and changes in critical volume-to-capacity ratio and delay used to identify significant intersection impacts under Background With Project Conditions. Based on the impact criteria listed above, the project would result in significant impacts under Background With Project conditions at the following two locations:

- Intersection #5: Maude Avenue / SR 237 Ramps (AM and PM peak hours) – The addition of project traffic would degrade intersection operations from an acceptable LOS D to an unacceptable LOS E during the AM peak hour.

- Intersection #20: Central Expressway / North Mary Avenue (PM peak hour) – The addition of project traffic would exacerbate current unacceptable LOS F intersection operations during the PM peak hour, increasing critical delay and critical V/C.

Table 3.15-11:
Background No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction(Operator)[1]	LOS Threshold[2]	Peak Hour[3]	Background No Project		Background With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
1	Ellis Street and Manila Drive*	Mountain View	LOS D	AM PM	27.0 23.3	D C	27.0 23.3	D C	0.000 0.000	0.0 0.0
2	US 101 Northbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM PM	25.7 34.9	C C-	26.0 43.3	C D	0.005 0.060	0.3 10.3
3	US 101 Southbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM PM	37.4 18.4	D+ B-	48.6 18.9	D B-	0.066 0.012	18.5 1.0
4	Fairchild Drive and Ellis Street	Mountain View	LOS D	AM PM	18.2 24.9	B- C	18.9 25.3	B- C	0.054 0.010	2.0 1.3
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	AM PM	**65.8** 51.2	**E** D-	**94.1** **58.2**	**F** **E+**	**0.123** **0.053**	**51.8** **14.0**
6	Maude Avenue and Macara Avenue	Sunnyvale	LOS D	AM PM	12.2 18.2	B B-	12.0 17.7	B+ B	0.003 0.018	0.0 -0.4
7	Maude Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	39.3 41.4	D D	39.1 41.6	D D	0.019 0.018	-0.3 0.2
8	Maude Avenue and North Mathilda Avenue	Sunnyvale (CMP)	LOS E	AM PM	70.1 52.7	E D-	75.5 52.7	E- D-	0.030 0.000	11.4 0.0
9	East Middlefield Road and North Whisman Road	Mountain View	LOS D	AM PM	30.3 34.9	C C-	30.2 34.8	C C-	0.000 0.000	0.0 0.0
10	East Middlefield Road and Ellis Street	Mountain View	LOS D	AM PM	23.4 22.1	C C+	25.2 23.0	C C+	0.041 0.040	2.5 1.2
11	East Middlefield Road and Logue Avenue	Mountain View	LOS D	AM PM	13.3 14.5	B B	13.0 14.2	B B	0.004 0.006	0.0 0.0

Table 3.15-11: Background No Project and With Project Intersection Levels of Service										
ID	**Intersection**	**Jurisdiction(Operator)[1]**	**LOS Threshold[2]**	**Peak Hour[3]**	**Background No Project**		**Background With Project**			
					Delay[5]	**LOS[6]**	**Delay[5]**	**LOS[6]**	**Δ in Crit. V/C[7]**	**Δ in Crit. Delay[8]**
12	East Middlefield Road and Ferguson Drive	Mountain View	LOS D	AM PM	9.9 13.9	A B	9.8 13.9	A B	0.005 0.006	0.0 0.5
13	East Middlefield Road and SR 237 Westbound Ramps	Caltrans (MV)	LOS D	AM PM	18.2 16.7	B- B	18.5 17.4	B- B	0.004 0.049	0.1 1.1
14	East Middlefield Road and SR 237 Eastbound Ramps	Caltrans (MV)	LOS D	AM PM	23.0 19.7	C+ B-	23.1 20.4	C C+	0.052 0.014	-0.1 0.4
15	East Middlefield Road and Bernardo Avenue	Mountain View	LOS D	AM PM	13.1 18.3	B B-	17.1 22.1	B C+	0.136 0.079	5.5 4.6
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM PM	10.9 17.2	B+ B	10.9 17.2	B+ B	0.001 0.008	0.0 0.2
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM PM	19.4 50.4	B- D	19.3 50.1	B- D	0.001 0.006	0.0 -1.2
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	10.2 5.5	B+ A	10.1 5.5	B+ A	0.001 0.009	0.1 0.1
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	8.0 10.4	A B+	9.4 10.7	A B+	0.021 0.000	2.1 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	52.0 **83.1**	D- **F**	50.0 **87.7**	D **F**	0.246 **0.013**	7.4 **8.2**
21	El Camino Real and Grant Road-SR 237	Caltrans (CMP)	LOS E	AM PM	70.1 60.9	E E	71.2 61.4	E E	0.008 0.011	2.7 1.7
22	West Evelyn Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	38.5 42.8	D+ D	38.5 42.8	D+ D	0.005 0.004	0.0 -0.1
23	West Washington Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	17.0 15.4	B B	16.9 15.4	B B	0.006 0.005	-0.1 0.0

Table 3.15-11:
Background No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction(Operator)[1]	LOS Threshold[2]	Peak Hour[3]	Background No Project		Background With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]

Notes: **Bold text** indicates intersection operates at unacceptable level of service. **Bold and highlighted text** indicates a significant impact.
*Indicates unsignalized intersection.

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour.
4. Existing presents the delay and LOS for intersections using existing intersection geometry and existing traffic counts.
5. Whole intersection weighted average control delay expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections.
6. LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software packages, which applies the methods described in the 2000 *Highway Capacity Manual*.
7. Change in critical volume to capacity ratio between Background No Project and Background With Project Conditions.
8. Change in average critical movement delay between Background No Project and Background With Project Conditions.

Source: Fehr & Peers, 2018.

Impact TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours. **[Significant Impact]**

Mitigation Measure for Intersection Impacts: Background with Project Conditions

Where feasible physical capacity improvements or operational improvements are possible, they have been identified and are described below, along with the post-mitigation level of service and resulting impact level of significance. Table 3.15-12 summarizes the affected intersections, potential mitigation measures, and the levels of service for the intersections following mitigation. These measures are described in more detail following the table.

Table 3.15-12:
Background With Project Mitigation Measures – Intersection LOS and Bicycle and Pedestrian QOS Results

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Threshold[2]	Mitigation Description	Peak Hour[3]	Background No Project Conditions		Background With Project Conditions				Background With Project and Mitigation Conditions				Impact Significance With Mitigation[8]
						Delay[4]	LOS[5]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	Contribute fair share funding toward a potential reconfiguration of the interchange.	AM PM	**65.8** 51.2	**E** D-	**94.1** **58.2**	**F** **E+**	4	2.3	-	-	-	-	SU
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	Contribute fair share funding toward adding a fourth through lane in the eastbound direction.	AM PM	52.0 **83.1**	D- **F**	50.0 **87.7**	D **F**	4	3.3	49.7 69.7	D E	4	3.3	LTS

Notes: **Bold text** indicates intersection operates at unacceptable level of service. **Bold and highlighted text** indicates a significant impact.

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour.
4. Whole intersection weighted average control delay expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
5. LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software packages, which applies the methods described in the 2000 *Highway Capacity Manual*.
6. Average pedestrian StreetScore+ Quality of Service of all intersection legs. See Appendix I of the TIA for calculations.
7. Average bicycle StreetScore+ Quality of Service of all intersection legs. See Appendix I of the TIA for calculations.
8. LTS = less-than-significant with mitigation; SU = significant and unavoidable.

Source: Fehr & Peers, 2018.

- **#5: Maude Avenue and SR 237 Ramps (Caltrans/Mountain View)** – The addition of project traffic under Background With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the AM and PM peak hours. SR 237 is an important access route to the site, allowing travelers to connect to US 101 to the north and SR 85 to the south. Under Background No Project Conditions, this intersection functions at an unacceptable LOS E during the AM peak hour and an acceptable LOS D in the PM peak hour. With the addition of project traffic, the operations degrade further, meeting the significance criteria set by the City of Mountain View.

  The Maude Avenue/SR 237 interchange is configured as a single-point urban interchange (SPUI). There are currently no bicycle facilities through the interchange area, and the pedestrian accessibility is somewhat limited due to the SPUI geometry. As shown in Table 3.15-12, the pedestrian and bicycle QOS scores are 4 and 2.3, respectively, denoting a facility that is relatively uncomfortable for most pedestrians and cyclists. The City of Mountain View is in the process of obtaining Caltrans permits to provide bicycle lanes on Maude Avenue through the SR 237 interchange and it is assumed that these bicycle lanes will be constructed by the time the project development is occupied.

  The constraints of the SPUI interchange configuration and its limited right-of-way mean there are few options for expanding the capacity of the interchange in its current configuration. Consideration might be given to redesigning the interchange to a tight diamond configuration, which could provide greater levels of vehicular capacity and may therefore reduce the project impact to a less than significant level. A tight diamond configuration would also allow for the addition of bicycle facilities through the interchange area, and would offer more options for pedestrian accommodation.

  Any modification to the interchange would require an engineering study to look at the current and future travel patterns to determine the proper size of the approach and departure lanes along the ramps and Maude Avenue to accommodate the vehicle demand. Because of the close proximity of the project driveway on Maude Avenue, the interchange design will need to account for potential queuing into the interchange area from the project driveway.

  Given the project driveway's proximity to the interchange and the environmental review required to build a new interchange, there may be a need to account for queuing at the project driveway to accommodate the additional vehicle demand on Maude Avenue. As a partial, near-term mitigation for the Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended, as shown in Figure 3.15-6. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. This improvement is not anticipated to adversely affect bicycle and pedestrian quality of service. There is currently no pedestrian crossing on the east leg of the interchange and the proposed bike lanes along Maude Avenue through the interchange may still be implemented.

The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. The proposed mitigation would therefore require coordination with Caltrans. Since it cannot be assured that Caltrans would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant would diligently pursue these measures to fully mitigate the Project's impact. **[Significant Unavoidable Impact]**

- **Intersection #20: Central Expressway and North Mary Avenue (Santa Clara County/CMP)** – The addition of project traffic under Background With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the PM peak hour. Under Background No Project Conditions, it functions at an unacceptable LOS F during the PM peak hour. With the addition of project traffic, the operations degrade further, meeting the significance criteria set by Santa Clara County. The significant impact is the result of adding project traffic to an already-congested intersection.

  The following physical improvements could reduce this impact:

  – Intersection #20 Mitigation: Contribute fair-share funding toward constructing a fourth lane in the eastbound direction.

  Adding a fourth lane in the eastbound direction would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact.

  It should be noted that there are improvements identified for this intersection in the Santa Clara County's *Draft Expressway Plan 2040*. The improvement, which is a Tier 2 improvement, would add an auxiliary lane in each direction on Central Expressway between Mary Avenue and Lawrence Expressway. This improvement is not anticipated to change the intersection configuration, but instead continue the existing third westbound through lane to the next upstream intersection.

  In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The mitigation would not have a substantial adverse effect on bicycle QOS; the bicycle StreetScore+ result would remain at QOS 3.3. The pedestrian QOS score is also at 4, both without and with the mitigation. As noted above, a score of 4 denotes a facility that is uncomfortable for most pedestrians, due to high travel speeds and wide crossings at intersections. The mitigation would increase the crossing distance for pedestrians crossing Central Expressway, and could shrink or eliminate the existing median that pedestrians can use for refuge. **[Significant Unavoidable Impact]**

MAUDE AVENUE DRIVEWAY ENHANCEMENTS - OPTION 2

FIGURE 3.15-6

3.15.3.11 *Background With Project Conditions: Freeway Segment Analysis*

The project would result in impacts to 46 freeway segments under Background with Project Conditions. Refer to Section 3.15.3.15 for a discussion of mitigation measures for freeway impacts.

- Northbound State Route 85
  - I-280 to West Homestead Road (AM peak hour)
  - West Homestead Road to West Fremont Avenue (AM peak hour)
  - West Fremont Avenue to El Camino Real (AM peak hour)
  - El Camino Real to State Route 237 (AM peak hour)

- Southbound State Route 85
  - El Camino Real to West Fremont Avenue (PM peak hour)
  - West Fremont Avenue to West Homestead Road (PM peak hour)

- Northbound US 101
  - Guadalupe Parkway to De La Cruz Boulevard (AM peak hour)
  - De La Cruz Boulevard to Montague Expressway (AM peak hour)
  - Montague Expressway to Bower Avenue (AM peak hour)
  - Bowers Avenue to Lawrence Expressway – including HOV (AM peak hour)
  - Lawrence Expressway to North Fair Oaks Avenue – including HOV (AM peak hour)
  - North Fair Oaks Avenue to North Mathilda Avenue – including HOV (AM peak hour)
  - Ellis Street to Moffett Boulevard (PM peak hour)
  - Moffett Boulevard to State Route 85 (PM peak hour)
  - North Shoreline Boulevard to Rengstorff Avenue (PM peak hour)
  - Rengstorff Avenue to San Antonio Avenue (PM peak hour)

- Southbound US 101
  - Oregon Expressway to San Antonio Avenue (AM peak hour)
  - San Antonio Avenue to Rengstorff Avenue (AM peak hour)
  - Rengstorff Avenue to North Shoreline Boulevard (AM peak hour)
  - North Shoreline Boulevard to State Route 85 (AM peak hour)
  - Moffett Boulevard to Ellis Street (AM peak hour)
  - State Route 237 to North Mathilda Avenue (PM peak hour)
  - North Mathilda Avenue to North Fair Oaks Avenue – including HOV (PM peak hour)
  - North Fair Oaks Avenue to Lawrence Expressway – including HOV (PM peak hour)
  - Lawrence Expressway to Bowers Avenue (PM peak hour)
  - Bowers Avenue to Montague Expressway (PM peak hour)
  - Montague Expressway to De La Cruz Boulevard (PM peak hour)

- Eastbound State Route 237
  - El Camino Real to State Route 85 (AM peak hour)

- State Route 85 to Central Expressway (AM peak hour)
- Central Expressway to Maude Avenue (AM peak hour)
- Maude Avenue to US 101 (PM peak hour)
- US 101 to Mathilda Avenue (PM peak hour)
- Mathilda Avenue to North Fair Oaks Avenue (PM peak hour)
- North Fair Oaks Avenue to Lawrence Expressway (PM peak hour)
- Lawrence Expressway to Great America Parkway (PM peak hour)
- Great America Parkway to North First Street (PM peak hour)

- Westbound State Route 237
  - Zanker Road to North First Street (AM peak hour)
  - North First Street to Great America Parkway (AM peak hour)
  - Great America Parkway to Lawrence Expressway (AM peak hour)
  - Lawrence Expressway to North Fair Oaks Avenue (AM peak hour)
  - North Fair Oaks Avenue to Mathilda Avenue (AM peak hour)
  - Mathilda Avenue to US 101 (AM peak hour)
  - US 101 to Maude Avenue (AM peak hour)
  - Maude Avenue to Central Expressway (PM peak hour)
  - Central Expressway to State Route 85 (PM peak hour)
  - State Route 85 to El Camino Real (PM peak hour)

3.15.3.12 *Background With Project Conditions: Transit Delay Analysis*

The project will add traffic along major transit corridors in the Cities of Mountain View and Sunnyvale, which could affect operations of VTA bus and community shuttle routes. The additional delay to transit service in the area due to implementation of the project is shown in Table 3.15-13.

Based on the delay assessment, the project adds some delay on the transit routes assessed. The additional delay is less than ten seconds on all but one of the routes, and less than twenty seconds in all cases. The route experiencing the largest increase in delay is the VTA Route 32 eastbound in the PM peak hour; the roughly 17 seconds of additional delay constitutes less than one-half of one percent of the total travel time on that route.

Table 3.15-13: Background With Project Transit Route Delay				
Route		**Direction**	**Peak Hour**	**Additional Route Average Delay with Project (seconds)[1]**
32	San Antonio Shopping Center to Santa Clara Transit Center	Eastbound	AM PM	<5.0 22.1
		Westbound	AM PM	<5.0 <5.0
185	Gilroy Transit Center to San Antonio	Northbound	AM	<5.0
		Southbound	PM	<5.0
MVgo	East Whisman Route	Northbound	AM	6.4
		Southbound	PM	<5.0

Note:
1. The project was not considered to have a measureable change in overall transit delay if the increase in travel time was less than five seconds. In some cases the travel time under With Project conditions improved slightly (due to changes in signal timing, critical movement changes, etc.).
Source: Fehr & Peers, 2018.

3.15.3.13 *Near-Term Cumulative Impacts: Intersection Levels of Service*

The Near-term Cumulative scenario was estimated by applying an annual growth factor (two percent per year for five years) to existing (2017) traffic volumes to account for regional growth associated with development outside the City of Mountain View and other approved and pending projects in the City of Mountain View.

Table 3.15-14 shows the delays, LOS results, and changes in critical volume-to-capacity ratio and delay used to identify significant intersection impacts under Near-Term Cumulative With Project Conditions. Based on the impact criteria listed in Table 3.15-14 below, the project has significant impacts at five intersections under Near-term Cumulative Conditions. (Two of the intersections, #5 and #20, are also project impacts under Background With Project Conditions.)

1. Intersection #2: US 101 Northbound Ramps / Ellis Street (PM peak hour)
2. Intersection #3: US 101 Southbound Ramps / Ellis Street (AM peak hour)
3. Intersection #5: Maude Avenue / SR 237 Ramps (AM & PM peak hour)
4. Intersection #8: Maude Avenue and North Mathilda Avenue
5. Intersection #20: Central Expressway / North Mary Avenue (PM peak hour)

Table 3.15-14:
Near-Term Cumulative No Project and With Project Intersection LOS

ID	Intersection	Jurisdiction/(Operator)[1]	LOS Threshold[2]	Peak Hour[3]	Near-Term Cumulative No Project		Near-Term Cumulative With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
1	Ellis Street and Manila Drive*	Mountain View	LOS D	AM	**40.6**	**E**	**40.6**	**E**	0.000	0.0
				PM	30.5	D	30.5	D	0.000	0.0
2	US 101 Northbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM	29.7	C	30.1	C	0.005	0.5
				PM	43.5	D	**55.8**	**E+**	**0.060**	**15.3**
3	US 101 Southbound Ramps and Ellis Street	Caltrans (MV)	LOS D	AM	47.1	D	**61.1**	**E**	**0.066**	**23.2**
				PM	20.2	C+	20.8	C+	0.012	1.3
4	Fairchild Drive and Ellis Street	Mountain View	LOS D	AM	19.6	B-	20.9	C+	0.054	3.4
				PM	28.9	C	29.6	C	0.010	2.0
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	AM	**77.4**	**E-**	**107.2**	**F**	**0.123**	**54.6**
				PM	**60.6**	**E**	**68.7**	**E**	**0.053**	**16.5**
6	Maude Avenue and Macara Avenue	Sunnyvale	LOS D	AM	12.4	B	12.2	B	0.003	0.0
				PM	18.2	B-	17.8	B	0.018	-0.3
7	Maude Avenue and North Mary Avenue	Sunnyvale	LOS D	AM	39.9	D	39.9	D	0.019	-0.2
				PM	43.3	D	43.7	D	0.018	0.6
8	Maude Avenue and North Mathilda Avenue	Sunnyvale (CMP)	LOS E	AM	81.1	F	**86.9**	**F**	**0.030**	**12.3**
				PM	59.8	E+	59.8	E+	0.000	0.0
9	East Middlefield Road and North Whisman Road	Mountain View	LOS D	AM	30.8	C	30.7	C	0.001	0.0
				PM	36.1	D+	36.0	D+	0.000	0.0
10	East Middlefield Road and Ellis Street	Mountain View	LOS D	AM	29.2	C	31.5	C	0.041	3.4
				PM	23.3	C	24.6	C	0.040	1.7
11	East Middlefield Road and Logue Avenue	Mountain View	LOS D	AM	14.0	B	13.7	B	0.004	0.0
				PM	15.0	B	14.7	B	0.006	0.0
12	East Middlefield Road and Ferguson Drive	Mountain View	LOS D	AM	10.2	B+	10.1	B+	0.005	0.0
				PM	17.0	B	17.4	B	0.006	1.1
13	East Middlefield Road and SR 237 Westbound Ramps	Caltrans (MV)	LOS D	AM	18.9	B-	19.1	B-	0.004	0.1
				PM	17.4	B	18.4	B-	0.049	1.4
14	East Middlefield Road and SR 237 Eastbound Ramps	Caltrans (MV)	LOS D	AM	23.4	C	23.7	C	0.052	0.0
				PM	20.0	B-	20.7	C+	0.014	0.4
15	East Middlefield Road and Bernardo Avenue	Mountain View	LOS D	AM	13.1	B	17.2	B	0.136	5.8
				PM	18.7	B-	21.9	C+	0.066	3.7
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM	11.7	B+	11.6	B+	0.001	0.0
				PM	20.1	C+	20.3	C+	0.008	0.4
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM	20.8	C+	20.7	C+	0.001	0.0
				PM	56.6	E+	56.2	E+	0.006	-1.2

Table 3.15-14:
Near-Term Cumulative No Project and With Project Intersection LOS

ID	Intersection	Jurisdiction/(Operator)[1]	LOS Threshold[2]	Peak Hour[3]	Near-Term Cumulative No Project		Near-Term Cumulative With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	14.0 5.9	B A	14.0 6.0	B A	0.001 0.009	0.2 0.1
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	9.1 11.3	A B+	10.6 11.5	B+ B+	0.021 0.000	2.3 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	52.3 **102.1**	D- **F**	53.0 **107.5**	D- **F**	0.015 **0.013**	0.9 **9.3**
21	El Camino Real and Grant Road-SR 237	Caltrans (CMP)	LOS E	AM PM	**87.5** 69.6	**F** E	**85.9** 70.7	**F** E	0.008 0.011	3.4 3.1
22	West Evelyn Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	39.4 43.9	D D	39.4 43.9	D D	0.005 0.004	0.0 0.0
23	West Washington Avenue and North Mary Avenue	Sunnyvale	LOS D	AM PM	17.3 15.9	B B	17.3 15.8	B B	0.006 0.005	-0.1 0.0

Notes: **Bold text** indicates intersection operates at unacceptable level of service **Bold and highlighted text** indicates a significant impact.

*Indicates unsignalized intersection.

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour.
4. Existing presents the delay and LOS for intersections using existing intersection geometry and existing traffic counts.
5. Whole intersection weighted average control delay expressed in seconds per vehicle calculated using methods described in the 2000 Highway Capacity Manual, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections.
6. LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software packages, which applies the methods described in the 2000 Highway Capacity Manual.
7. Change in critical volume to capacity ratio between Near-Term Cumulative and Near-Term Cumulative With Project Conditions.
8. Change in average critical movement delay between Near-Term Cumulative and Near-Term Cumulative With Project Conditions.

Source: Fehr & Peers, 2018.

Impact C-TRANS-1: Implementation of the proposed project would result in significant impacts to three project study intersections under Near-Term Cumulative With Project conditions in the AM and PM peak hours. **[Significant Impact]**

Mitigation Measure for Intersection Impacts: Near-Term Cumulative With Project Conditions

Where feasible physical capacity improvements or operational improvements are possible, they have been identified and are described below, along with the post-mitigation level of service and resulting impact level of significance. Table 3.15-15 summarizes the affected intersections, potential mitigation measures, and the levels of service for the intersections following mitigation. These measures are described in more detail following the table.

Table 3.15-15:
Near-Term Cumulative + Project Mitigation/Bicycle and Pedestrian QOS

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Threshold[2]	Mitigation Description	Peak Hour[3]	Near-Term Cumulative No Project Conditions		Near-Term Cumulative With Project Conditions				Near-Term Cumulative With Project and Mitigation Conditions				Impact Significance With Mitigation[8]
						Delay[4]	LOS[5]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	
2	US 101 Northbound Ramps and Ellis Street	Caltrans (MV)	LOS D	Contribute fair share funding toward adding a dedicated southbound right-turn lane.	AM PM	29.7 43.5	C D	30.1 **55.8**	C **E+**	4	1	30.1 42.2	C D	3.3	1.5	LTS
3	US 101 Southbound Ramps and Ellis Street	Caltrans (MV)	LOS D	Contribute fair share funding toward adding a second eastbound right-turn lane.	AM PM	47.1 20.2	D C+	**61.1** 20.8	**E** C+	4	2	23.1 15.9	C B	3.3	2	LTS
5	Maude Avenue and SR 237 Ramps	Caltrans (MV)	LOS D	Contribute fair share funding toward a potential reconfiguration of the interchange.	AM PM	**77.4** **60.6**	**E-** **E**	**107.2** **68.7**	**F** **E**	4	2.3	-	-	-	-	SU
8	Maude Avenue and Mathilda Avenue	Sunnyvale (CMP)	LOS E	No feasible mitigation identified.	AM PM	81.1 59.8	F E+	**86.9** 59.8	**F** E+	4	3.3	-	-	-	-	SU
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	Contribute fair share funding toward adding a fourth through lane in the eastbound direction.	AM PM	52.3 **102.1**	D- **F**	53.0 **107.5**	D- **F**	4	3.3	52.7 **80.2**	D- **F**	4	3.3	LTS

Notes: **Bold text** indicates intersection operates at unacceptable level of service. **Bold and highlighted text** indicates a significant impact.

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour.
4. Whole intersection weighted average control delay expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
5. LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software packages, which applies the methods described in the 2000 *Highway Capacity Manual*.
6. Average pedestrian StreetScore+ Quality of Service of all intersection legs. See Appendix I of the TIA for calculations.
7. Average bicycle StreetScore+ Quality of Service of all intersection legs. See Appendix I of the TIA for calculations.
8. LTS = less-than-significant with mitigation; SU = significant and unavoidable.

Source: Fehr & Peers, 2018.

- **Intersection #2: Ellis Street / US 101 Northbound Ramps (Caltrans/Mountain View)** The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the PM peak hour. Ellis Street provides access to the closest US 101 interchange to the project site for travelers going northbound on US 101. Under Near-Term Cumulative No Project Conditions, this intersection functions at an acceptable LOS D during the PM peak hour. With the addition of project traffic, the operations degrade to LOS E, meeting the significance criteria set by the City of Mountain View.

  The following physical improvements could reduce this impact:

  – Contribute fair-share funding toward constructing a dedicated southbound right-turn lane.

  Adding a dedicated southbound right-turn lane would likely require additional right-of-way, but may be able to shift and/or narrow the existing lane configuration to accommodate a right-turn lane. Adding a dedicated southbound right-turn lane would not result in any modifications to the roadway over the light-rail tracks. With this mitigation, the impact would be reduced to a less than significant level. This interchange, however, is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

  In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The bicycle QOS score is at 1 without the mitigation. With the proposed mitigation, the bicycle QOS degrades to 1.5. Both QOSs denote facilities that are comfortable and low stress for most bicyclists. The mitigation would add a southbound right-turn lane on Ellis Street, which complicates bicyclist navigation through the intersection. Thus, the bicycle QOS degrades with the mitigation.

  The pedestrian QOS score improves from a 4 to 3.3 with the mitigation measure. As part of the mitigation measure, the northwest corner will need to be re-aligned. With this re-alignment, new ramps and pedestrian push buttons should be included which increases the quality of service at this intersection for pedestrians.

- **Intersection #3: Ellis Street / US 101 Southbound Ramps (Caltrans/Mountain View)** The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the AM peak hour. Ellis Street provides access to the closest US 101 interchange to the project site for travelers going northbound on US 101. Under Near-Term Cumulative No Project Conditions, this intersection functions at an acceptable LOS D during the PM peak hour. With the addition of project traffic, the operations degrade to LOS E, meeting the significance criteria set by the City of Mountain View.

  The following physical improvements could reduce this impact:

– Contribute fair-share funding toward constructing a second eastbound right-turn lane.

Adding a second eastbound right-turn lane would likely require the acquisition of additional right-of-way given the close proximity to the freeway overcrossing on one side and a development on the other. Adding a second eastbound right-turn lane would not result in any modifications to the roadway over the light-rail tracks. However, some signal pole modifications may be necessary that may result in modifications to the concrete island adjacent to the light-rail tracks on the east leg of the intersection. With this mitigation, the impact would be reduced to a less than significant level. However, the interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The mitigation would not have a substantial adverse effect on bicycle QOS; the bicycle StreetScore+ result would remain at QOS 2. A bicycle QOS of 2 denotes a facility that is comfortable for some cyclists, but may be uncomfortable for young, elderly, or less experienced cyclists.

The pedestrian QOS score improves from a 4 to 3.3 with the mitigation measure. As part of the mitigation measure, the northwest corner will need to be re-aligned. With this re-alignment, new ramps and pedestrian push buttons should be included which increases the quality of service at this intersection for pedestrians.

- **Intersection #5: Maude Avenue / SR 237 Ramps (Caltrans/Mountain View)**
The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the AM and PM peak hours. SR 237 is an important access route to the site, allowing travelers to connect to US 101 to the north and SR 85 to the south. Under Near-Term Cumulative No Project Conditions, this intersection functions at an unacceptable LOS E during the AM and PM peak hours. The addition of project traffic would exacerbate delays during the AM and PM peak hours such that the impact significance criteria are met.

  The Maude Avenue/SR 237 interchange is configured as a single-point urban interchange (SPUI). There are currently no bicycle facilities through the interchange area, and the pedestrian accessibility is somewhat limited due to the SPUI geometry. As shown in Table 3.15-15, the pedestrian and bicycle QOS scores are at 4 and 2.3, respectively, denoting a facility that is relatively uncomfortable for most pedestrians. The City of Mountain View is in the process of obtaining Caltrans permits to provide bicycle lanes on Maude Avenue through the SR 237 interchange and it is assumed that these bicycle lanes would be constructed by the time the project development is occupied.

The constraints of the SPUI interchange configuration and its limited right-of-way mean there are few options for expanding the capacity of the interchange in its current configuration. Consideration might be given to redesigning the interchange to a tight diamond configuration, which could provide greater levels of vehicular capacity and may therefore reduce the project impact to a less-than-significant level. A tight diamond configuration would also allow for the addition of bicycle facilities through the interchange area, and would offer more options for pedestrian accommodation. Any modification to the interchange would require an engineering study to look at the current and future travel patterns to determine the proper size of the approach and departure lanes along the ramps and Maude Avenue to accommodate the vehicle demand. Because of the close proximity of the project driveway on Maude Avenue, the interchange design will need to account for potential queuing into the interchange area from the project driveway.

Given the project driveway's proximity to the interchange and the environmental review required to build a new interchange, there may be a need to account for queuing at the project driveway to accommodate the additional vehicle demand on Maude Avenue. As a partial, near-term mitigation for the Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended as seen in Figure 3.15-6. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. This improvement is not anticipated to adversely affect bicycle and pedestrian quality of service. There is currently no pedestrian crossing on the east leg of the interchange and the proposed bike lanes along Maude Avenue through the interchange may still be implemented.

The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. The proposed mitigation would therefore require coordination with Caltrans. Since it cannot be assured that Caltrans would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant would diligently pursue these measures to fully mitigate the Project's impact. **[Significant Unavoidable Cumulative Impact]**

- **Intersection #8: Maude Avenue / Mathilda Avenue (Sunnyvale/CMP)**
  The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a CMP signalized intersection during the AM peak hour. Under Near-Term Cumulative No Project Conditions, it functions at an acceptable LOS F during the AM peak hour. The addition of project traffic would exacerbate delays during the AM peak hour such that the impact significance criteria are met.

  This intersection is already configured to provide substantial capacity for vehicles, with free right-turn lanes and dedicated single or dual left-turn lanes on all approaches. There

are bicycle lanes on Mathilda Avenue, but no bicycle facilities on Maude Avenue. The width of the intersection makes for long pedestrian and bicycle crossing distances, and the pedestrian and bicycle QOS scores are 4 and 3.3, respectively, denoting a facility that is relatively uncomfortable for both pedestrians. No further physical expansion that would reduce the project's traffic impact is considered feasible at this location, and no mitigation is proposed. Therefore, the impact would remain significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

- **Intersection #20: Central Expressway/North Mary Avenue (Santa Clara County/CMP)**
  The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the PM peak hour. Under Near-Term Cumulative No Project Conditions, it functions at an unacceptable LOS F during the PM peak hour. With the addition of project traffic, the operations degrade further, meeting the significance criteria set by Santa Clara County. The significant impact is the result of adding project traffic to an already-congested intersection.

  The following physical improvements could reduce this impact:

  – Contribute fair-share funding toward constructing a fourth lane in the eastbound direction.

  Adding a fourth lane in the eastbound direction would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

  The City and project applicant, however, should diligently pursue measures to fully mitigate the project's impact. It should be noted that there are improvements identified for this intersection in the Santa Clara County's *Draft Expressway Plan 2040*. The improvement, which is a Tier 2 improvement, would add an auxiliary lane in each direction on Central Expressway between Mary Avenue and Lawrence Expressway. This improvement is not anticipated to change the intersection configuration, but instead continue the existing third westbound through lane to the next upstream intersection.

  In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The mitigation would not have a substantial adverse effect on bicycle QOS; the bicycle StreetScore+ result would remain at QOS 3.3. The pedestrian QOS score is also at 4, both without and with the mitigation. As noted above, a score of 4 denotes a facility that is uncomfortable for most pedestrians, due to high travel speeds and wide crossings at intersections. The mitigation would increase the

crossing distance for pedestrians crossing Central Expressway, and could shrink or eliminate the existing median that pedestrians can use for refuge.

3.15.3.14 *Near-Term Cumulative With Project: Freeway Segment Analysis*

The project would result in impacts to 49 freeway segments under Near-Term Cumulative With Project Conditions. Refer to Section 3.15.3.15 for a discussion of mitigation measures for freeway impacts.

- Northbound State Route 85
  - I-280 to West Homestead Road (AM peak hour)
  - West Homestead Road to West Fremont Avenue (AM peak hour)
  - West Fremont Avenue to El Camino Real (AM peak hour)
  - El Camino Real to State Route 237 (AM peak hour)

- Southbound State Route 85
  - El Camino Real to West Fremont Avenue (PM peak hour)
  - West Fremont Avenue to West Homestead Road (PM peak hour)

- Northbound US 101
  - Guadalupe Parkway to De La Cruz Boulevard (AM peak hour)
  - De La Cruz Boulevard to Montague Expressway (AM peak hour)
  - Montague Expressway to Bowers Avenue (AM peak hour)
  - Bowers Avenue to Lawrence Expressway – including HOV (AM peak hour)
  - Lawrence Expressway to North Fair Oaks Avenue – including HOV (AM peak hour)
  - North Fair Oaks Avenue to North Mathilda Avenue – including HOV (AM peak hour)
  - North Mathilda Avenue to State Route 237 (AM peak hour)
  - Ellis Street to Moffett Boulevard (PM peak hour)
  - Moffett Boulevard to State Route 85 (PM peak hour)
  - North Shoreline Boulevard to Rengstorff Avenue (PM peak hour)
  - Rengstorff Avenue to San Antonio Avenue (AM and PM peak hours)
  - Oregon Expressway to Embarcadero Road (PM peak hour)

- Southbound US 101
  - Oregon Expressway to San Antonio Avenue (AM peak hour)
  - San Antonio Avenue to Rengstorff Avenue (AM peak hour)
  - Rengstorff Avenue to North Shoreline Boulevard (AM peak hour)
  - North Shoreline Boulevard to State Route 85 (AM peak hour)
  - State Route 85 to Moffett Boulevard (AM peak hour)
  - Moffett Boulevard to Ellis Street (AM peak hour)
  - State Route 237 to North Mathilda Avenue (PM peak hour)
  - North Mathilda Avenue to North Fair Oaks Avenue – including HOV (PM peak hour)

- North Fair Oaks Avenue to Lawrence Expressway – including HOV (PM peak hour)
- Lawrence Expressway to Bowers Avenue (PM peak hour)
- Bowers Avenue to Montague Expressway (PM peak hour)
- Montague Expressway to De La Cruz Boulevard (PM peak hour)

- Eastbound State Route 237
  - El Camino Real to State Route 85 (AM peak hour)
  - State Route 85 to Central Expressway (AM peak hour)
  - Central Expressway to Maude Avenue (AM peak hour)
  - Maude Avenue to US 101 (PM peak hour)
  - US 101 to Mathilda Avenue (PM peak hour)
  - Mathilda Avenue to North Fair Oaks Avenue (PM peak hour)
  - North Fair Oaks Avenue to Lawrence Expressway (PM peak hour)
  - Lawrence Expressway to Great America Parkway (PM peak hour)
  - Great America Parkway to North First Street (PM peak hour)

- Westbound State Route 237
  - Zanker Road to North First Street (AM peak hour)
  - North First Street to Great America Parkway (AM peak hour)
  - Great America Parkway to Lawrence Expressway (AM peak hour)
  - Lawrence Expressway to North Fair Oaks Avenue (AM peak hour)
  - North Fair Oaks Avenue to Mathilda Avenue (AM peak hour)
  - Mathilda Avenue to US 101 (AM peak hour)
  - US 101 to Maude Avenue (AM peak hour)
  - Maude Avenue to Central Expressway (PM peak hour)
  - Central Expressway to State Route 85 (PM peak hour)
  - State Route 85 to El Camino Real (PM peak hour)

3.15.3.15 *Freeway Segment Impacts and Mitigation Measures*

Freeway impacts were evaluated under Existing With Project, Background With Project, and Near-Term Cumulative With Project Conditions, as described above. Implementation of the project would increase vehicle traffic, resulting in either unacceptable freeway segment LOS or increases in traffic volumes that would exceed the allowable percent increase threshold. This would be considered a significant impact on the following number of segments under each "With Project" condition:

- Existing with Project Conditions - 33 segments
- Background with Project Conditions- 46 segments
- Near-Term Cumulative with Project Conditions - 49 segments

There are limited options to widen the impacted freeway segments due to right-of-way constraints. Additionally, the widening of roadways can lead to other effects, such as induced travel demand (e.g., more vehicles on the roadway due to increased capacity on a particular route), air quality

degradation, increases in noise associated with motor vehicles, and reductions in transit use (less congestion or reduced driving time may make driving more attractive than transit travel).

Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to acquire right-of-way for or to fully fund a freeway mainline improvement. Freeway improvements require approval by VTA and Caltrans, and it is outside the jurisdiction of a local agency to guarantee implementation of any improvement in the freeway right-of-way. To provide adequate funding, many sources are typically needed, which may include State Transportation Improvement Program funds for projects identified in the VTP, local agency impact fees, and/or a future regional impact fee. The City of Mountain View could potentially participate in development of a regional fee should it be proposed by regional agencies, such as VTA. For these reasons, the project's freeway impacts would remain significant and unavoidable.

Impact C-TRANS-2: Implementation of the proposed project would result in significant impacts to 53 freeway segments under Near-Term Cumulative With Project conditions. **[Significant Unavoidable Cumulative Impact]**

3.15.3.16 *Near-Term Cumulative With Project: Transit Delay Analysis*

VTA's "Next Network Transit Plan" is scheduled to be implemented in 2018. This redesigned transit network strives for better balance between the service frequency and coverage in VTA's service area. In the project area under the near-term cumulative condition, Next Network Route 21 will replace and extend the existing Route 32. Route 185 will remain unchanged in the Next Network.

The project, together with other cumulative growth, would add traffic along transit corridors in the Cities of Mountain View and Sunnyvale, which could affect operations of VTA bus and community shuttle routes. The additional delay to transit service in the area due to implementation of the project is shown in Table 3.15-16.

Based on the delay assessment, the cumulative projects add some delay on the transit routes assessed. The additional delay will be less than ten seconds on all but one route. The route experiencing the largest increase in delay is the new VTA Route 21, at 66 seconds westbound in the AM peak hour and 24 seconds eastbound in the PM peak hour. There is no service schedule yet available for the Next Network plan, so the total travel time of this route is not known at this point. However, based on the current travel times of the two routes that will be replaced by the new Route 21, the additional delay shown below should constitute less than one percent of the total travel time.

Table 3.15-16: Near-Term Cumulative With Project: Transit Route Delay				
Route		**Direction**	**Peak Hour**	**Additional Route Average Delay with Project (seconds)[1]**
32	San Antonio Shopping Center to Santa Clara Transit Center	Eastbound	AM PM	8.0 21.9
		Westbound	AM PM	69.5 <5.0
185	Gilroy Transit Center to San Antonio	Northbound	AM	<5.0
		Southbound	PM	<5.0
MVgo	East Whisman Route	Northbound	AM	8.4
		Southbound	PM	<5.0

Note:
1. The project was not considered to have a measureable change in overall transit delay if the increase in travel time was less than five seconds In some cases the travel time under With Project conditions improved slightly (due to changes in signal timing, critical movement changes, etc.).
Source: Fehr & Peers, 2018.

3.15.3.17 *Transit, Bicycle, and Pedestrian Facilities*

Transit Service Impacts

Generally, a project causes a significant impact to transit facilities and services if an element of it conflicts with existing or planned transit services. The project does not propose infrastructure changes outside the immediate project site and, thus, would not interfere with transit agencies' ability to modify or expand service.

As described previously, the traffic generated by the project results in additional delay on nearby transit routes of less than one percent of route travel time on all evaluated transit routes. There is no adopted numerical standard for determining an acceptable level of additional delay. Per the VTA TIA Guidelines, in response to increases in transit vehicle delay, the lead agency should work with VTA to identify feasible transit priority measures near the affected facility.

The City can support transit usage by encouraging project sponsors to provide amenities such as seating, lighting, and signage at bus stops near the site to increase rider comfort and safety. This is in line with the following policies of the Mountain View 2030 General Plan:

- **MOB 1.1: Accommodating all modes.** Plan, design and construct new transportation improvement projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists and persons of all abilities.

- **MOB 5.1: Transit agencies.** Coordinate with local and regional transit agencies including the Metropolitan Transportation Commission, VTA, JPB (Caltrain), SamTrans and the

California High-Speed Rail Authority to improve transportation service, infrastructure and access in the city.

- **MOB 5.5: Access to transit services.** Support right-of-way design and amenities consistent with local transit goals to make it easier to get to transit services and improve transit as a viable alternative to driving.

The project would comply with the General Plan polices, and provide access to transit services and would accommodate all modes of transit. Therefore, the project's impact on transit services would be less than significant.

Impact TRANS-3: The project would not result in a significant impact to transit systems. **[Less Than Significant Impact]**

Bicycle Facilities Impacts

A significant impact to bicycle facilities occurs when the project creates a hazardous condition that currently does not exist for bicyclists, or conflicts with planned facilities or local agency policies regarding bicycle facilities. The proposed project does not create a hazardous condition for bicyclists that does not currently exist, nor does it conflict with existing or planned bicycle facilities. Thus, the impact of the project on bicycle facilities is considered to be less than significant.

In addition, the intersection capacity mitigation measures discussed earlier in this section would not adversely affect quality of service for pedestrians and bicyclists. In one case, the mitigations add another vehicle lane to cross or navigate; however, these changes do not affect the QOS rating because it is already at 4 (the worst rating). The implementation of traffic mitigation measures would ultimately be the decision of the responsible jurisdiction, and considerations for bicyclist and pedestrian comfort and convenience may enter into those decisions.

The Mountain View 2030 General Plan includes the following policies to enhance bicycle connectivity:

- **MOB 1.3: Pedestrian and Bicycle Placemaking.** Promote pedestrian and bicycle improvements that improve connectivity between neighborhoods, provide opportunities for distinctive neighborhood features and foster a greater sense of community.

- **MOB 4.1: Bicycle Network.** Improve facilities and eliminate gaps along the bicycle network to connect destinations across the city.

To improve bicycle connectivity and eliminate bicycle network gaps, a connected bicycle facility will be provided between the project site and adjacent land uses, including transit stops on Middlefield Road and the Middlefield Light Rail station. There are already bicycle lanes on Middlefield Road between the project site and the Middlefield LRT station. In addition, bicycle lanes were recently installed on Maude Avenue west of Clyde Avenue and on Logue Avenue south of Maude Avenue, which provides another route between the project site and the Middlefield LRT station. On-site bicycle facilities such as bicycle parking will be located in visible, well-lit areas and

conveniently located next to the building's front doors. All bicycle facilities will be noted on the final site plan. The extensive bicycle facilities will also include some outside racks (mainly for inter-campus bikes) near the building entrances, and will include bicycle storage in bike rooms within each building.

Impact TRANS-4: The project would not result in a significant impact to bicycle facilities. **[Less Than Significant Impact]**

Pedestrian Facilities Impacts

A significant impact to pedestrian facilities occurs when the project creates a hazardous condition that currently does not exist for pedestrians, or conflicts with planned facilities or local agency policies regarding pedestrian facilities. The proposed project does not create a hazardous condition that does not currently exist, nor does it conflict with existing or planned pedestrian facilities. Thus, the impact of the project on pedestrian facilities is considered to be less than significant.

The Mountain View 2030 General Plan includes the following policy to enhance access to/from transit routes:

- **MOB 5.5: Access to transit services.** Support right-of-way design and amenities consistent with local transit goals to make it easier to get to transit services and improve transit as a viable alternative to driving.

To accommodate all users of the street system, a complete and connected pedestrian facility will be provided between the project site and light rail station. The grand arc pathway, located at the southern boundary of the LinkedIn quad, will include, campus benches, and unique pedestrian lighting. Additional pathways made of contrasting materials will be added to complete the campus green character, and provide additional pathways between the new and old buildings. Continuous sidewalks and crosswalks exist between the project site and the Middlefield LRT station, both along Middlefield Road and along Maude Avenue to Logue Avenue. Furthermore, crosswalks and pedestrian signals are provided at all signalized study intersections in the study area.

Impact TRANS-5: The project would not result in a significant impact to pedestrian facilities. **[Less Than Significant Impact]**

3.15.3.18 *Site Access, Internal Circulation, and Parking*

Driveway Queuing Analysis

Vehicular access to the project site will be provided via four driveways: 1) a full access driveway at the intersection of Middlefield Road and Bernardo Avenue, 2) a right-turn in and out driveway on Middlefield Road south of Bernardo Avenue, 3) a right-turn in and out driveway on the SR 237 northbound frontage road, and 4) a full access driveway along the project's northern frontage on Maude Avenue.

The addition of project traffic at the two full-access driveways will add left-turning vehicles at those locations, which could cause left-turn queues to exceed turn pocket storage lengths. Queues that

exceed left-turn pocket storage length have the potential to impede adjacent through traffic movements.

Consistent with typical industry practice, the driveway operations were evaluated using the traffic volumes from the Background No Project and Background with Project scenarios. The 95th percentile queues from the TRAFFIX LOS analysis (Appendix J of the TIA) were used to evaluate the projected maximum left-turn queues at the two full-access driveways.

Several turn pocket lengths are exceeded in future volume conditions. Recommended improvements are summarized below in Table 3.15-16 for intersections where queue length is exceeded in the Plus Project condition.

Table 3.16-16:
Driveway Left-Turn Queue Analysis

Intersection		Mvt.	Available Storage Length[1] (ft)	Peak Hour	Number of U-Turn & Left-Turn Trips[2]	95th Percentile Queue Length (feet)[3]	
						Bg. No Project	Bg. Plus Project
15	Middlefield Road / Bernardo Avenue	SBL	175	AM PM	16 149	50 **200**	75 **450**
		EBL	175	AM PM	294 67	150 50	**275** 75
		WBL	190	AM PM	72 83	50 25	50 75
-	Maude Avenue Driveway	NBL	50	AM PM	25 167	25 **425**	**118** **945**
		WBL	-	AM PM	70 13	25 25	30 25

Note: **Bold** text indicates projected queue length exceeds available storage length.
1. Storage length is the length of the longest left turn lane.
2. The total number of trips from the proposed project and other developments on-site.
3. Queue length is obtained from the Traffix 8.0 software outputs and is measured in feet for one lane.

Source: Fehr & Peers, 2018.

Vehicle Access and Recommended Improvements

Based on the evaluation described above, the following are draft recommendations; the final improvements will require coordination with City staff and a refined operations analysis to address the practical steps of implementing physical improvements.

- **East Middlefield Road / Bernardo Avenue (Intersection #15)**
  This signalized intersection will operate at acceptable levels during the AM and PM peak hours under all study scenarios; however, vehicle queues are projected to exceed the left-turn

storage capacity on both the southbound and eastbound legs with the addition of project traffic. To serve the AM peak hour traffic, the eastbound left-turn lane should be modified in one of two ways:

- Option 1: Extend the eastbound left-turn pocket to a minimum 275 feet, or

- Option 2: Construct a second eastbound left-turn lane and provide 175 feet of storage in each lane, and ensure there are two receiving lanes for the inbound traffic into the project site.

To serve the outbound traffic during the PM peak hour, the southbound and northbound approaches should be modified to include a separate left-turn lane and a shared through/right-turn lane with protected phasing. This would require the existing signal to be upgraded to an eight-phase signal. The southbound approach may require a second southbound left-turn lane to accommodate the estimated 400 feet of vehicle queuing within the available driveway throat length.

- **Middlefield Road Project Driveway (south of Bernardo Avenue)**
  This driveway will be limited to right-turns inbound and outbound only. It is projected that approximately 225 vehicles will exit the project site using this driveway in the PM peak hour. This driveway extends to provide access to the southern proposed parking garages and, although not anticipated, may result is blocked access into or out of the garage. However, it is not recommended to have two or more right-turn lanes and therefore any queuing on-site would need to be managed through garage access location or diverting traffic to another driveway.

- **SR 237 Frontage Road Project Driveway (between Middlefield Road and Maude Avenue)**
  This driveway will be limited to right-turns inbound and outbound only, because the frontage road is one-way in the northbound direction. It is projected that approximately 164 vehicles will exit the project site using this driveway in the PM peak hour. This driveway provides adequate storage capacity between the parking garage and the driveway exit.

- **Maude Avenue Project Driveway**
  It is projected that approximately 123 westbound vehicles will turn left into this driveway in the AM peak hour to access the project site. A left-turn pocket may be advisable along westbound Maude Avenue so that vehicles waiting to enter the project site would not block the westbound through traffic.

  It is projected that approximately 400 outbound vehicles (293 left-turn, 107 right-turn) will exit the project site using this driveway in the PM peak hour. Currently, vehicles are allowed to make a left-turn out of the project site driveway onto Maude Avenue and this is anticipated to continue to occur with the addition of the project. Because Maude Avenue is an important arterial carrying relatively high volumes of traffic to and from SR 237, drivers exiting the project site and wanting to turn left onto Maude Avenue may experience delays as they wait for adequate gaps in the through traffic on Maude. As shown on the site plan, this driveway

provides direct access to the northern proposed parking garage and will likely result in a queue spillback that extends beyond the first garage driveway.

To accommodate outbound queuing during the PM peak hour, the project should consider one of the following options:

- Option #1: Prohibit outbound left-turns by constructing a raised median along Maude Avenue or a center median on the project driveway that directs drivers to turn right.
    - Drivers would still have the ability to access SR 237 by using the driveway along the SR 237 frontage road.
- Option #2: Signalize the driveway access.
    - Due to the close proximity of the driveway access to the east of the project driveway, the project may consider joining the two driveways to provide one signalized access point.
    - The new signal would need to be coordinated with the SR 237/Maude Avenue SPI interchange due to the close proximity of a new signalized driveway to the interchange.

There is currently only one eastbound through lane between the SR 237 ramps and the City limits where eastbound Maude Avenue widens to two lanes. To accommodate additional project traffic, there may be a need to account for queuing at the project driveway. As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. Figure 3.15-6 shows the enhancements on Maude Avenue if Option #2, above, is selected to improve egress.

Internal Circulation

The internal circulation system for the proposed site was reviewed for issues related to accommodation of and potential conflicts among vehicles, bicyclists, and pedestrians. The following observations were noted:

- Building 1 is separated from the other office buildings by an internal roadway. Care should be given to locating pedestrian access routes between Building 1 and the other buildings in ways that limit potential conflicts between pedestrians and motor vehicles.
- It is recommended that all pedestrian crossings across driveways or internal roadways be enhanced with high-visibility crosswalk markings and signage.

- The site plan shows a traffic circle on the internal roadway in front of Building 1. The function of or need for a traffic circle at this location is not clear. As drawn on the site plan, vehicles circulating in the circle could conflict with vehicles exiting the project site toward the Middlefield/Bernardo intersection.

- If it is intended that buses would circulate through the site, the bus circulation routes should be clearly defined, and the turn radii tested to ensure that the internal roadways can accommodate large vehicles.

- To accommodate the increasing usage of ridesharing services such as Lyft and Uber, drop-off/pick-up areas should be designated at each office building and parking structure, with appropriate curb markings and signage.

- Traffic calming features that are supportive of bicyclists should be considered along the internal roadway that borders the east side of the project site to moderate vehicle speeds.

- Bicycle parking facilities are not shown on the current site plan, and should be delineated.

3.15.3.19 *Construction-Related Transportation Impacts*

Construction Activities

Construction activities are expected to commence in 2019 and be completed by 2021. Construction will occur in three phases, with each phase focusing on one of the three new buildings. The phases will all begin at the same time and will progress concurrently. The project will provide on-site staging, and construction materials will be delivered as needed.

Construction Traffic Estimates

As described previously, all of the study intersections near the project site currently operate at acceptable LOS or better during peak hours under Existing Conditions. Nevertheless, it is recommended that truck access to the site not be allowed during peak commute times (7:00 to 9:00 a.m. and 4:00 to 6:00 p.m.) to reduce potential impacts to the operations of the signalized intersections. The number of workers, construction duration and number of trucks estimated by phase is listed below:

- **Make Ready:** Demolition & Temporary Parking Grading
  - Duration – 2 months
  - 30 average daily construction workers
  - 1,728 truckloads to remove fill

- **Phase 1:** Building 1, Parking Structure 1, & Sitework
  - Duration – 18 months
  - 67 average daily construction workers
  - 4,006 truckloads to remove fill

- 1,554 truckloads delivering construction materials

- **Phase 2:** Parking Structure 2 & Sitework
  - Duration – 11 months
  - 74 average daily construction workers
  - 218 truckloads to remove fill
  - 1,475 truckloads delivering construction materials

- **Phase 3:** Building 5, Building 6, & Sitework
  - Duration – 21 months
  - 227 average daily construction workers
  - 2,217 truckloads to remove fill
  - 1,272 truckloads delivering construction materials

Approximately 8,200 truckloads of fill will be removed from the project site, and 4,300 truckloads of building materials and supplies are anticipated to be delivered over a two-year period. This results in approximately 25,000 total truck trips (inbound and outbound combined). Based upon an estimate of 760 working days (not factoring in holidays), there will be an average of 30 to 35 truck trips per day for materials delivery and removal of fill. It was assumed that 25 percent of truck traffic will occur during each peak hour, or approximately nine peak hour truck trips.

The number of workers on-site will range from 30 to 227, up to 400 during peak construction activities between Phase 2 and Phase 3. The workers will generate between 15 and 115 trips during the AM and/or PM peak hour, up to 200 trips during peak construction activities, assuming that 50 percent will travel during the peak hour. Therefore, the maximum number of vehicle trips in the peak hour, from both workers and trucks, would be approximately 209 trips (200 workers plus nine trucks). This would be less than the peak hour trips anticipated to be generated by the project once it is completed and operational.

At this point, temporary lane closures are not expected along either Middlefield Road or Maude Avenue as a result of construction activity.

Effect on Pedestrian, Bicycle, and Transit Circulation

Pedestrian, bicycle and transit facilities would be maintained as is along the project frontage during construction. If needed, a temporary ADA-accessible pedestrian sidewalk will be constructed along the project frontage.

Construction Management Plan

Prior to the issuance of each building permit, the project applicant and construction contractor should meet with the Public Works department to determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project. The project applicant should develop a construction management plan for review and approval by the Public Works department. The plan should include at least the following items:

- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak periods of vehicular and pedestrian activity, detour signs if required, lane closure procedures, sidewalk closure procedures, signs, cones for drivers, and designated construction access routes.
- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
- Location of construction staging areas for materials, equipment, and vehicles (must be located on the project site).
- Identification of haul routes for movement of construction vehicles that would minimize impacts on vehicular and pedestrian traffic, circulation and safety; and provision for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the project applicant. Construction vehicles should be required to use designated truck/haul routes wherever possible.
- Provisions for removal of trash generated by project construction activity.
- A process for responding to and tracking complaints pertaining to construction activity.
- Provisions for monitoring surface streets used for truck routes so that any damage and debris attributable to the trucks can be identified and corrected.
- Construction vehicles would not be allowed to park in adjacent residential neighborhoods. Construction vehicles will be required to park either in the construction zone or in designated temporary parking lots to the extent possible.
- It is anticipated that these measures will be incorporated into a comprehensive Construction Management Plan, which would address other issues such as hours of construction on site, limitations on noise and dust emissions, and other applicable items.
- Because the level of construction-related vehicular activity will be less than that anticipated after completion of the project, and because the Construction Management Plan will address and reduce localized adverse effects of construction-related traffic, this project's construction-related traffic impacts are considered to be less than significant.

3.15.4 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
TRANS-1: Implementation of the proposed project would not result in significant impacts to project study intersections under Existing With Project conditions in the AM and PM peak hours.	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours.	Significant Impact	Mitigation available for Intersections #20. No mitigation available for Intersection #5.	Significant Unavoidable Impact
C-TRANS-1: Implementation of the proposed project would result in significant impacts to five project study intersections under Near-Term Cumulative With Project conditions in the AM and PM peak hours.	Significant Impact	Mitigation available for Intersections #2, #3, and #20. No mitigation available for Intersections #5 and #8.	Significant Unavoidable Cumulative Impact
C-TRANS-2: Implementation of the proposed project would result in significant impacts to 53 freeway segments under Near-Term Cumulative With Project conditions.	Significant Impact	No mitigation available.	Significant Unavoidable Cumulative Impact
TRANS-3: The project would not result in a significant impact to transit systems.	Less Than Significant	No mitigation required	Less Than Significant
TRANS-4: The project would not result in a significant impact to bicycle facilities.	Less Than Significant	No mitigation required	Less Than Significant
TRANS-5: The project would not result in a significant impact to pedestrian facilities.	Less Than Significant	No mitigation required	Less Than Significant

3.16 UTILITIES AND SERVICE SYSTEMS

The water supply discussion in this section is based on a Water Supply Assessment prepared by *Schaaf & Wheeler* in April 2018. This report is included in this Draft EIR as Appendix K.

The water and wastewater facilities discussion in this section is based on a Utility Impact Study prepared by *Schaaf & Wheeler* in April 2018. This report is included in this Draft EIR as Appendix L.

3.16.1 Introduction and Regulatory Background

3.16.1.1 *Federal*

Drinking water is regulated by federal and state laws. The federal government sets minimum standards for water quality, including for drinking water and bodies of water. The Safe Drinking Water Act (SDWA) of 1974 and subsequent amendments gave the EPA authority to establish standards for contaminants in drinking water supplies. The National Primary Drinking Water Standards establish the maximum contaminant levels (MCLs) allowed in public distribution systems. The National Secondary Drinking Water Standards establish the MCLs that apply to potable water supplies at the point of delivery to the customer. The EPA administers the SDWA at the federal level and establishes MCLs for bacteriological, inorganic, organic, and radiological contaminants.

3.16.1.2 *State of California*

Urban Water Management Plans pursuant to State Water Code requirements, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. The State Water Code requires water agencies to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, and to address a number of related subjects including water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The Mountain View City Council adopted its most recent 2015 Urban Water Management Plan in June 2016. An addendum to the 2015 UWMP was prepared in September 2017 following a transfer of 1.0 MGD of the City's water supply rights from the San Francisco Regional Water System to the City of East Palo Alto.

SB 610 – Water Supply

The California Water Code (Section 10910 et. seq.), based on Senate Bill 610 of 2001 (SB 610), requires a project proponent to assess the reliability of a project's water supply as part of the CEQA process. If the City or District providing potable water supply does not have sufficient existing water supply to meet the project demands of the project, the development of additional water supplies must be addressed in the WSA and in the project Environmental Impact Report.

Under the California Government Code (Section 66473.7), based on Senate Bill 221 of 2001, proposed subdivisions adding 500 dwelling units are also required to receive written verification of the available water supply from the project's water supplier. This project does not include the

creation of a subdivision or a subdivision tract map, so a written verification of supply is not required.

Assembly Bill 341 -- Recycling

Assembly Bill 341 (AB 341) sets forth the requirements of the statewide mandatory commercial recycling program in the Public Resources Code. All businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. The purpose of the law is to reduce garbage sent to landfills and reduce greenhouse gas emissions. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

3.16.1.3 *Regional*

San Francisco Bay Regional Water Quality Board

The San Francisco Bay RWQCB includes regulatory requirements that each wastewater collection system agency shall, at a minimum, develop goals for the Sewer System Management Plan (SSMP) to provide adequate capacity to convey peak flows. Other RWQCB regulatory requirements include the General Waste Discharge Requirements (GWDR), which regulates the discharge from wastewater treatment plants.

3.16.1.4 *Local*

City of Mountain View

The City of Mountain View promotes the sustainable use of its water resources through outreach and education programs, financial incentive programs, and by implementing water conservation measures at City properties. Many of the City's water conservation measures are implemented in partnership with the SCVWD and the Bay Area Water Supply & Conservation Agency (BAWSCA). Some of the City's conservation measures include incorporating water waste prohibitions into the City Code, monitoring water losses, providing public information and outreach programs, and implementing plumbing and rebate and retrofit programs for residential and business customers.

3.16.2 Existing Setting

The project site is located in a developed area within the City of Mountain View and is currently served by existing phone, electrical, water, recycled water, stormwater, wastewater, and solid waste service systems. Phone service is provided to the project site by AT&T, and electrical service is provided by Pacific Gas and Electric (PG&E).

3.16.2.1 *Water Supply*

The City of Mountain View municipal water system serves 98 percent of the City of Mountain View, including the project site. The City is the water retailer for the area in which it serves and purchases water from both the Santa Clara Valley Water District (SCVWD) and the San Francisco Public Utilities Commission (SFPUC), which are water wholesalers. The remaining two percent of Mountain View's population is served by the California Water Service Company.

The City of Mountain View's UWMP forecasts that water supplies will be available to meet the City's projected future water demands during normal and wet years through at least 2040, based on General Plan growth estimates and supplier projections. During single- and multiple-drought years, the City expects reductions in available supply from the SFPUC and SCVWD. This decrease in imported water is anticipated to be made up through implementation of drought-year water conservation measures, the potential increased use of recycled water, and an increase in groundwater production (as the groundwater basin allows).

The 2015 UWMP was prepared in accordance with the City's 2030 General Plan Strategy, and thereby includes increases in "Commercial, Irrigation, and Industrial" water demand over the 25-year implementation horizon.

Recycled Water

The Palo Alto Regional Water Quality Control Plan (RWQCP) provides recycled water to the City of Mountain View for the North Bayshore Area. The Mountain View recycled water system does not currently serve the project site.

Water Conservation

As described in the 2015 UWMP, recent updates to the plumbing code (which include requiring more water-efficient features) are expected to reduce Mountain View's water use by two percent in 2020, and up to nine percent in 2040. Additionally, the UWMP projects that implementation of new conservation measures would reduce water use by eight percent in 2020 and 2040, from the base-case scenario.

Current and near-term water conservation measures, as identified in the UWMP, include water waste prohibitions in the Municipal Code, water system audits, leak detection and repair, metering with commodity rates and conservation pricing, public information and education programs. Other City of Mountain View water conservation programs include residential water surveys, rebates and free equipment, turf audits, plumbing retrofits, and washing machine incentives. The Mountain View City Council also adopted *Water Conservation in Landscaping Regulations* in May 2010 (updated in 2016).

Water Use by Existing Development

The project site is currently developed with five one- and two-story office buildings, surface parking, a basketball court, and landscaped ground containing 466,000 square feet of office space. The existing uses on-site consume water for light industrial and commercial operations, and irrigation.

Domestic water and fire service for the site is provided by a 12-inch public water main that travels through the middle of the project site, connecting to the existing water mains in Bernardo Avenue to the south and West Maude Avenue to the north.

The average daily water demand in the 2015 UWMP model was calibrated against 2005 and 2006 billing records. Average daily demand from 2005 and 2006 was spatially assigned to individual parcels where possible and approximated when specific street addresses are known.

Based on factors used in the City's UWMP, the existing site developed with office uses requires approximately 60,657 gallons per day of water, or 68 acre feet per year (AFY), which is generally consistent with the averaged metering records for the site.

3.16.2.2 *Wastewater Services*

The City of Mountain View maintains its own wastewater collection system. Sanitary and storm drains in the City of Mountain View are operated and maintained by the Wastewater Section of the Public Works Department. The City pumps its wastewater to the RWQCP for treatment. The RWQCP has an overall 40 million gallons per day (mgd) average annual treatment capacity. The City of Mountain View has an average annual flow capacity right of 15.1 mgd at the RWQCP. As of 2015, approximately nine (9) mgd of wastewater from Mountain View was collected and treated by the RWQCP.[59] The terms of Mountain View's Basic Agreement with the City of Palo Alto require that when the City of Mountain View reaches 80 percent of the 15.1 mgd allowed by the agreement (approximately 12.08 mgd), an engineering study would be required of the City to redefine the future needs of the RWQCP and potentially assist in future plant expansions or upgrades outlined in the Long Range Facilities Plan.

Mountain View's sanitary sewer system is a gravity system with two sewer lift stations; one located in Shoreline Park and the other is a localized station on Pastel Lane. The system consists of gravity pipelines, pressure pipelines, and pump stations. The Shoreline Sewer Pump Station, located within the North Bayshore area conveys the majority of sanitary sewer flow generated within the City to the RWQCP. Based on rates included in the City's Sewer Master Plan (2010) the existing site developed with light industrial land use generates approximately 28,543 gallons of wastewater per day. According to the City Sewer Master Plan, wastewater flow rates were developed on an individual parcel level using the 2005 and 2006 water billing records and applying a return to sewer ratio calculated for land use type. The project site currently connects to existing eight (8)-inch sanitary sewer main traversing the site that flows north towards the sewer main in Fairchild Drive, which ultimately conveys flows to the Shoreline Sewer Pump Station (SSPS).

3.16.2.3 *Storm Drainage*

The City of Mountain View Public Works Department operates and maintains the storm drainage system in the City. The project site is within the Stevens Creek watershed, discharging to Stevens Creek near SR 85. Local flow is collected and flows towards the large diameter storm drain trunk line flowing east to west parallel to US 101. According to project plans, stormwater flow from the project would be discharged to the City system at the SR 237 Frontage Road and West Maude Avenue.

3.16.2.4 *Solid Waste*

Solid waste collection and recycling services for residents and businesses in Mountain View are provided by Recology Mountain View. Commercial waste pick up (including compostables) and recycling services are provided, and Recology provides weekly residential waste pick up and recycling services to the East Whisman area.

[59] City of Mountain View. *2015 Urban Water Management Plan.* June 2016.

Once collected, solid waste and recyclables are transported to the SMaRT station in Sunnyvale for sorting, and commercial compostables (food scraps) are transported to a composting facility located in Vernalis, California. Non-recyclable waste is transported to Kirby Canyon Sanitary Landfill in south San José (which is contracted to the City through 2021). Additional small quantities of waste may be transported to other landfills within the area by private contractors. Kirby Canyon Landfill has a total estimated permitted capacity of 36.4 million cubic yards, a remaining estimated capacity of approximately 16.2 million cubic yards, and a stated closing date of December 31, 2022. The landfill is permitted to receive a maximum disposal of 2,600 tons of garbage per day.[60]

The City of Mountain View is working to maintain a waste diversion goal of 50 percent as required by a 1989 state law. Progress towards this goal is expressed as a per capita disposal rate for both residential and commercial waste. The per capita targets for Mountain View are 7.8 pounds per day per resident (which is equivalent to a 50 percent diversion rate) and 10.9 pounds per day per employee. In 2016, as reported by CalRecycle, Mountain View's per capita disposal rates were well below the targets (the maximum allowed) at 3.5 pounds per resident and 3.1 pounds per employee. The equivalent diversion rate, which can be calculated from the resident per capita rate, was 78 percent.[61]

3.16.3 Utilities and Service Systems Impacts

3.16.3.1 *Thresholds of Significance*

For the purposes of this EIR, a utilities and service systems impact is considered significant if the project would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new waste or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- Comply with federal, state, and local statutes and regulations related to solid waste.

[60] CalRecycle. "Facility/Site Summary Details: Kirby Canyon Recycle.& Disp. Facility (43-AN-0008)." http://www.calrecycle.ca.gov/SWFacilities/Directory/43-AN-0008/Detail/ Accessed April 19, 2018.
[61] Lori Topley. City of Mountain View. Email communication. April 19, 2018.

3.16.3.2 *Water Services Impacts*

The project site is currently designated *High-Intensity Office* in the City's 2030 General Plan and zoned *Limited Industrial (ML)*. The proposed project would require rezoning to *Planned Community (P)* in order to support the project, in advance of adoption of the East Whisman Precise Plan. The proposed project would redevelop the site and construct three new six-story office buildings and two parking structures containing approximately 763,000 square feet of office space.

The net increase in development space (approximately 612,000 square feet) would intensify the demand for water use on the project site over exiting conditions. The project proposes to remove and relocate the 12-inch diameter City water main which currently goes through the center of the site, to align with the east boundary of the site, in a new utility easement.

Water Supply

Based on factors used in the City's Water Master Plan, the existing site developed with light industrial uses could require approximately 88,790 gallons per day of water, or 99 AFY. Based on the square footage of the proposed building, current land use designation, and land use duty factors used in the City's General Plan, the proposed project could require approximately 193,820 gallons per day of water, or 217 AFY. This would be an increase in water use of approximately 105,030 gallons per day, or a new net demand of 118 AFY. These estimates are conservative as the historic on-site usage based on water meter data, is lower than estimates for existing conditions using unit duty factors. In addition, the project proposes water-conservation measures in compliance with the intended LEED Platinum designation.

The City's 2015 Urban Water Management Plan projects current water demands of 10,528 AFY (average over the period 2010 - 2015). The projected water supply in Mountain View increases from approximately 8,610 AFY in 2015 to 13,509 AFY in 2040, a net increase of 4,899 AFY (approximately 57 percent). These values account for plumbing code updates (two percent use reduction in 2020 to nine percent in 2040). Conservation measures are not included and could result in an additional eight percent (2020-2040) reduction from the base-case scenario. These projections do not include the project site.

The proposed project would include sustainable and green building design features, as required by Mountain View policies and regulations. The Mountain View City Council adopted Water Conservation in Landscaping Regulations in May 2010 and the California Green Building Code in 2011. These regulations include water efficiency requirements for new and renovated landscapes and construction.

Since the project intends to construct to LEED Platinum standards, water efficiency will be achieved through the use of drought-tolerant landscaping. The project also intends to use recycled water for landscaping and dual plumbing for indoor flush fixtures to reduce the on-site use of potable water. Landscaping on the project site will allow for capture and treatment for rainfall and will feature drought-tolerant species. The project site is currently designated *High-Intensity Office* in the City's 2030 General Plan. Redevelopment of the site is consistent with this designation.

As the 2030 General Plan did not account for the development on the project site, the increase in water use at the site has not been accounted for in the projected growth in water use shown in the 2015 UWMP. The proposed project and the other approved project that was not accounted for in the 2015 UWMP, include the North Bayshore housing addition. The demands from this project, together with the demand from the proposed project, represent a 0.9 percent increase in demand (approximately 1,414 AFY), over the 2015 UWMP projected demand and North Bayshore Precise Plan housing additional demand in all years. While there is sufficient supply for the proposed project's water demands, there have been discussions between the applicant, the City of Mountain View, and the City of Sunnyvale to provide recycled water to the project site, but no formal agreements have been made. The project plans to use recycled water for irrigation and dual plumbing to indoor flush fixtures, so a portion of the water demand estimated here may potentially be met with recycled water instead of potable water.

The City of Mountain View water service has sufficient existing water supply to fully support the proposed project and approved projects under normal, single dry, or multiple dry water years. Under normal conditions, the City is not projected to experience supply shortfalls. Shortfalls of up to 12 percent are projected for single dry years and up to 14 percent for multiple dry years. Under all dry conditions, the City may need to impose water conservation measures, to achieve 10 to 20 percent reductions, per Mountain View Municipal Code, Section 35.28.

Based on the incremental increase in water demand anticipated by the project on the overall water demand in the City and the conservation measures required of the project, the project would not result in a significant impact on water services or system demand.

Impact UTIL-1: Sufficient supplies of water are available to serve the project during normal and drought years, and the proposed project would not result in significant water supply impacts. **[Less Than Significant Impact]**

Water Facilities

Hydraulic performance and deficiencies resulting from the proposed project were analyzed for a 2010 Existing Conditions and a 2030 Future Cumulative Condition to include projects near completion. Two scenarios, with and without project development, were simulated under each condition in the water model to evaluate impacts from the proposed redevelopment. The water model indicated that the project does not significantly impact the water systems in the 2010 Exiting Condition or the 2030 Future Cumulative Condition.

The existing site developed with light industrial land use requires a fire flow requirement at 3,500 gallons per minute. The proposed project with a *High Intensity Office* use is anticipated to have a reduced required fire flow rate at 3,375 gallons per minute, after applying a 50 percent reduction for having an approved automatic fire sprinkler system. This is a conservative reduction assumption, as buildings have the potential for a 75 percent reduction when equipped with an automatic fire sprinkler system, with approval from the City Fire Protection Engineer. The reduced fire flow was used in the Utility Impact Study based on the direction from the City Fire Protection Engineer. The proposed project would not impact available fire flow (refer to Figures 4-11 of Appendix L)

The project would not exceed available or projected water supplies, and would have a less than significant effect on water services. The project would not require construction of new or expanded water supply facilities other than the installation of water lines included in the project.

Impact UTIL-2: With implementation of the automatic sprinkler system identified in the utilities impact prepared for the project, the proposed project would not result in an impact to water facilities. **[Less Than Significant Impact]**

3.16.3.3 *Wastewater Services Impacts*

Based on rates included in the City's Sewer Master Plan (2010) and return-to-sewer (RTS) ratios, the existing site developed with light industrial land use generates approximately 66,359 gallons of wastewater per day.

Based on the square footage of the proposed building, *High Intensity Office* land use designation, and factors used in the City's 2030 General Plan Update Utility Impact Study (GPUUIS), the proposed project could generate approximately 143,689 gallons of wastewater per day. This would be an increase in wastewater of approximately 77,330 gallons per day.

Sanitary sewer services would be provided for the project by removing the existing eight-inch diameter sewer pipe traversing the site and relocate the pipe on the eastern site boundary in an easement, and upsizing to a 10-inch diameter pipe. Flows from the project site would flow north from this line towards the sewer main in Fairchild Drive, which conveys flows to the Shoreline Sewage Pump Station (SSPS).

The Utility Impact Study prepared for this project (Appendix L) studied the impact of the proposed project wastewater generation on this system. Flows from future approved development in the area, including the proposed project and other 2030 General Plan build-out in the vicinity were considered in the modeling.

The Utility Impact Study indicated that under 2010 Existing Conditions, the increased wastewater flows from the project would contribute to an existing deficiency at a 500 foot segment of Pipe 1363, located in the easement between Ellis Street and B Street. Pipe 1363 was already identified as deficient, and was recommended for upsizing from 10 inches to 12 inches in the City's GPUUIS, that analyzed the impact that the updated General Plan would have on the City's utility system. Upsizing Pipe 1363 to 12 inches was included in the City's Capital Improvement Program, and would be funded through the existing rate system.

The Utility Impact Study in Appendix L indicated that under 2030 Future Cumulative Conditions, the project would generate wastewater that would still exceed the capacity of Pipe 1363, even when factoring in the upsizing of the pipe to 12 inches. Upsizing of Pipe 1363 to a 15-inch diameter is recommended to meet Future Cumulative Conditions capacity. This upgrade would be accomplished by a fair share project contribution to the City's CIP.

Impact UTIL-3: Sewer flows generated by the proposed project under 2030 Future Cumulative Conditions would contribute flows that would cause performance and capacity deficiencies at one segment of the sanitary sewer system. The

project would pay a fair share contribution to the City for upsizing sanitary sewer pipelines in the system to achieve appropriate hydraulic capacity, or alternately construct and upsize the affected sanitary sewer Pipe 1363 segment to 15-inches. **[Less Than Significant Impact]**

3.16.3.4 *Storm Drainage Impacts*

As discussed in *Section 3.9, Hydrology and Water Quality* of this EIR, the proposed project would decrease impervious surfaces on the site from approximately 76 to 56 percent. And increase pervious surface area from 24 to 44 percent (not including landscaped roofs and terraces). With increased pervious area, more water can be infiltrated and retained on site, thereby decreasing the stormwater runoff from the site.

The project proposes a variety of on-site stormwater management strategies to reduce and treat stormwater runoff before it enters the City system. Per the preliminary Conceptual Stormwater Management Plan, the project includes green roofs, self-retaining areas, permeable asphalt, and bioretention areas. The project would connect to the City stormwater system at Bernardo Avenue and flow through the project site to the SR 237 Frontage Road, as in existing conditions. The stormwater piping network on the site, however, would differ from existing conditions; the approximate location of the relocated City storm drain piping is shown on Figures 16 and 17 of Appendix L.

Based on the inclusion of stormwater collection and treatment facilities on site, and the implementation of C.3 construction and post-construction measures, runoff on the site would not exceed the capacity of the City's existing storm water drainage system. The project would be required to implement upgrades to the storm drain facilities on site and connections to the storm drainage system as conditions of project approval.

Impact UTIL-4: New development under the proposed project would contribute runoff to the storm drain system, however the capacity of the storm drainage system is adequate to accommodate runoff from new development planned for the area. The stormwater management standards and guidelines identified in the General Plan would minimize runoff from the proposed project. Therefore, the proposed project development would not exceed the capacity of the storm drainage system, alter existing drainage patterns or degrade water quality from excess flows. **[Less Than Significant Impact]**

3.16.3.5 *Solid Waste Impacts*

The proposed project is the development of a corporate campus with a total of 1,078,000 square feet of office uses on the site, a net increase of approximately 612,000 square feet of office space. The employees at the project site would be expected to produce an increased quantity of solid waste and recyclables over the existing site.

Large amounts of construction waste would be generated during construction and demolition activities. At least 65 percent of this construction waste would be recycled or reused, in compliance with the City Municipal Code. Through recycling measures proposed for construction and post-

construction periods, the project would not adversely affect the City's compliance with the waste diversion requirements under state law.

The City of Mountain View has secured landfill disposal capacity for the City's solid waste until 2021 at Kirby Canyon Landfill in San José. The proposed project would not result in a substantial increase in waste landfilled at Kirby Canyon, or be served by a landfill without sufficient capacity.

Impact UTIL-5: Solid waste from the proposed project would be disposed at the Kirby Canyon Landfill in San José through 2021. Kirby Canyon Landfill has capacity until 2022. Therefore, the proposed project would not result in a substantial increase in waste landfilled at Kirby Canyon, or be served by a landfill without sufficient capacity. **[Less Than Significant Impact]**

3.16.4 Cumulative Utilities Impacts

3.16.4.1 *Cumulative Water Supply Impacts*

With the exception of the groundwater supply, the majority of potable water supplies in Mountain View originate from outside the City. In addition to Santa Clara County, the water supply from the SFPUC is distributed to other wholesale customers in Alameda and San Mateo counties. The SCVWD is Santa Clara County's principal water wholesaler, and serves surrounding communities, like Palo Alto and Sunnyvale. Most new urban land uses within the surrounding area and development associated with implementation of the East Whisman Precise Plan and the 2030 General Plan would be dependent on these two water supply sources.

As described in the 2015 Urban Water Management Plan, which encompasses the likely growth in water demand, and as described in the Water Supply Assessment for the proposed project, the City's available potable and non-potable water supplies are expected to be sufficient to meet demands of existing uses and future uses under normal, single dry, or multiple dry water years. The project has included measures to minimize water use through water conservation measures required for LEED Platinum. For this reason, implementation of the proposed project would not make a significant cumulative contribution to impacts on water supply, and cumulative water supply impacts would be less than significant.

3.16.4.2 *Cumulative Wastewater Impacts*

The total future cumulative wastewater generated within the City of Mountain View would be 14.3 mgd, which is more than 80 percent of the 15.1 mgd capacity at the RWQCP. The City of Mountain View would be required to conduct an engineering study define the future needs of the treatment plant (per the RWQCP Basic Agreement with the City of Mountain View and consistent with the RWQCP's Facility Plan) when their respective service area reaches 80 percent of their contractual capacity rights. Preparation of the engineering study and implementation of improvements as part of the RWQCP's Facility Plan would reduce cumulative wastewater impacts to a less than significant level.

3.16.4.3 *Cumulative Stormwater System Impacts*

Future development within Mountain View and surrounding communities must comply with the NPDES MRP regulations currently in place, which regulate storm drainage facilities. New stormwater infrastructure that would be required to serve expected growth under the 2030 General Plan would be developed in compliance with existing local, state, and federal regulations, and would be appropriately sized for each development. Therefore, implementation of the project would not make a significant cumulative contribution to impacts on the stormwater drainage systems, and cumulative stormwater system impacts would be less than significant.

Impact C-UTIL-1: The proposed project, together with the other projects in the cumulative scenario, would not make a cumulatively considerable contribution to a significant cumulative utilities impact. **[Less Than Significant Cumulative Impact]**

3.16.5 Conclusion

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
UTIL-1: Sufficient supplies of water are available to serve the project during normal and drought years, and the proposed project would not result in significant water supply impacts.	Less Than Significant	No mitigation required	Less Than Significant
UTIL-2: With implementation of the automatic sprinkler system identified in the utilities impact prepared for the project, the proposed project would not result in an impact to water facilities.	Less Than Significant	No mitigation required	Less Than Significant
UTIL-3: Sewer flows generated by the proposed project under 2030 Future Cumulative Conditions would contribute flows that would cause performance and capacity deficiencies at one segment of the sanitary sewer system. The project would pay a fair share contribution to the City for upsizing sanitary sewer pipelines in the system to achieve appropriate hydraulic capacity, or alternately construct and upsize the affected sanitary sewer Pipe 1363 segment to 15-inches.	Less Than Significant	No mitigation required	Less Than Significant
UTIL-4: New development under the proposed project would contribute runoff	Less Than Significant	No mitigation required	Less Than Significant

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
to the storm drain system, however the capacity of the storm drainage system is adequate to accommodate runoff from new development planned for the area. The stormwater management standards and guidelines identified in the General Plan would minimize runoff from the proposed project. Therefore, the proposed project development would not exceed the capacity of the storm drainage system, alter existing drainage patterns or degrade water quality from excess flows.			
UTIL-5: Solid waste from the proposed project would be disposed at the Kirby Canyon Landfill in San José through 2021. Kirby Canyon Landfill has capacity until 2022. Therefore, the proposed project would not result in a substantial increase in waste landfilled at Kirby Canyon, or be served by a landfill without sufficient capacity.	Less Than Significant	No mitigation required	Less Than Significant
C-UTIL-1: The proposed project, together with the other projects in the cumulative scenario, would not make a cumulatively considerable contribution to a significant cumulative utilities impact.	Less Than Significant	No mitigation required	Less Than Significant

SECTION 4.0 GROWTH-INDUCING IMPACTS

As stated in the CEQA Guidelines, Section 15126.2(d), a project is considered growth-inducing if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment.

- Remove obstacles to population growth or tax community service facilities to the extent that the construction of new facilities would be necessary.

- Encourage or facilitate other activities that would cause significant environmental effects.

The project site is located within the incorporated limits of the City of Mountain View, and the redevelopment of the project site would not result in an expansion of urban services or the pressure to expand beyond the City's existing Sphere of Influence.

The project would result in employment growth in the City, as it would increase the intensity of office uses on the site. The project applicant estimates that the proposed buildings, when fully occupied, could contain approximately 4,312 employees (based on a density range of one employee per 200 square feet). This number of employees would be approximately 411 more than could be employed within the current buildings. The project site has an FAR of 1.0 under the adopted Mountain View 2030 General Plan, and the proposed project proposes development at an FAR of 0.86. The General Plan assumed that properties within the East Whisman area designated *High Intensity Office* would be developed in a manner similar to the proposed project.

The project would not open additional undeveloped land to further growth, or provide expanded utility capacity that would be available to serve future unplanned development. Instead, it would facilitate the reuse of office/light industrial land in an existing urban setting. For these reasons, the project would not result in a significant growth-inducing impact.

Impact GRO-1: Based on the above discussion, the project would not result in significant growth-inducing impacts. **[Less Than Significant Growth-Inducing Impact]**

SECTION 5.0 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

This section was prepared pursuant to CEQA Guidelines Section 15126.2(c), which requires a discussion of the significant irreversible changes that would result from the implementation of a proposed project. Significant irreversible changes include the use of nonrenewable resources, the commitment of future generations to similar use, irreversible damage resulting from environmental accidents associated with the project, and irretrievable commitments of resources.

5.1 USE OF NONRENEWABLE RESOURCES

The demolition of the existing industrial buildings on the project site and construction of three larger office buildings would require the use and consumption of nonrenewable resources. Nonrenewable resources include fossil fuels and metals, and cannot be regenerated over time.

As discussed in *Section 3.6, Energy*, energy will be consumed during both the construction and operational phases of the office uses. The demolition and construction phase will require energy for the manufacture and transportation of building materials, preparation of the site (e.g., demolition of the existing buildings and grading), and the actual construction of the buildings. The operation of the proposed uses would consume energy (in the form of electricity and natural gas) for building heating and cooling, lighting, water heating, and the operation of appliances, electronic equipment, and commercial machinery. Operational energy will also be consumed during each vehicle trip associated with these proposed uses.

5.2 CHANGE IN LAND USE

Implementation of the proposed project would result in the intensification of commercial office uses within an already urbanized area that was designated in the 2030 General Plan as a Change Area. The intensification of development on the site would serve several purposes, including utilization of underutilized land and efficient use of existing roadways and infrastructure within the City limits.

Although the project would commit future generations to a more intensive development on this site, the project would benefit the City and the region by providing a sustainably-developed and well-planned commercial development within an existing urban area.

5.3 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Implementation of the project would result in the redevelopment of a previously developed office and industrial property. Associated irreversible environmental changes associated with the modification of the project site include: the potential degradation of existing biological and cultural features, loss of aesthetic integrity, and the installation of utility and roadway infrastructure. Although it is unlikely that a major hazardous waste release would occur as a result of implementation of the project, such a release would also constitute a significant irreversible change from an environmental action. The mitigation measures outlined in this Draft EIR would reduce all such irreversible or nearly irreversible effects to less than significant levels.

SECTION 6.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project would result in the significant unavoidable impacts discussed below. All other impacts of the proposed project would be mitigated to a less than significant level with incorporation of applicable project-level mitigation measures identified in this EIR.

(Although mitigation is available for several of the intersection impacts, and the applicant would be willing to contribute fair share toward the identified improvements, because the mitigation is outside the City's control, the City cannot guarantee its implementation and therefore the impacts remain significant and unavoidable.)

- **Intersection Impacts:**

  Under Background With Project Conditions, implementation of the proposed project would result in significant unavoidable impacts to two intersections:

  - Intersection #5: Maude Avenue / SR 237 Ramps (AM and PM peak hours)
  - Intersection #20: Central Expressway / North Mary Avenue (PM peak hour)

  Under Near-term Cumulative With Project Conditions, the project would result in significant unavoidable impacts to five intersections:

  - Intersection #2: US 101 Northbound Ramps / Ellis Street (PM peak hour)
  - Intersection #3: US 101 Southbound Ramps / Ellis Street (AM peak hour)
  - Intersection #5: Maude Avenue / SR 237 Ramps (AM & PM peak hour)
  - Intersection #8: Maude Avenue and North Mathilda Avenue (AM peak hour)
  - Intersection #20: Central Expressway / North Mary Avenue (PM peak hour)

- **Freeway Impacts:** Project traffic would add more than one percent of the freeway's capacity in either/both the AM or PM peak hour to segments currently operating at LOS F under Background With Project (46 segments), and Near-Term Cumulative With Project (49 segments).

  Although identifiable mitigation exists for these impacts, the mitigation would not add mainline capacity to the freeways, and therefore the project's impact to these freeway segments is considered significant and unavoidable.

SECTION 7.0 ALTERNATIVES

7.1 INTRODUCTION

The CEQA Guidelines give extensive direction on identifying and evaluating EIR alternatives to a proposed project (Section 15126.6). The purpose of analyzing alternatives in an EIR is to identify ways to substantially lessen or avoid the significant effects a proposed project may have on the environment. The range of alternatives selected for analysis is governed by the "rule of reason," which requires the EIR to discuss only those alternatives necessary to permit a reasoned choice. Although the alternatives do not have to meet every goal and objective set for the proposed project, they should "feasibly attain most of the basic objectives of the project."

The CEQA Guidelines (Section 15126.6) do not require that all possible alternatives be evaluated, only that a range of feasible alternatives be discussed so as to encourage both meaningful public participation and informed decision making. In selecting alternatives to be evaluated, consideration may be given to their potential for reducing significant unavoidable impacts, reducing significant impacts that are mitigated by the project to less than significant levels, and further reducing less than significant impacts.

The three critical factors to consider in selecting and evaluating alternatives are, therefore: (1) the significant impacts from the proposed project which could be reduced or avoided by an alternative, (2) the project's objectives, and (3) the feasibility of the alternatives available. Each of these factors is described below.

7.1.1 Significant Impacts of the Project

As mentioned above, the CEQA Guidelines advise that the alternatives analysis in an EIR should be limited to alternatives that would avoid or substantially lessen any of the significant effects of the project, and would achieve most of the project objectives. As discussed previously in this EIR, the project would result in significant, unavoidable impacts to local intersections under background and near-term cumulative with project conditions and to freeway segments under all three With Project scenarios.

Alternatives may also be considered if they would further reduce impacts that are already less than significant because of required or proposed mitigation. Impacts that would be significant, and for which the project includes mitigation to reduce them to less than significant levels include:

- Health risks associated with exposure to TACs during temporary construction activities.
- Impacts of mechanical equipment noise on nearby noise-sensitive uses.
- Temporary construction noise impacts.

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project.

The stated primary objectives of the project proponent, LinkedIn, Inc., are:

- To provide LinkedIn a corporate headquarters location in the City of Mountain View of sufficient size of approximately one million square feet to accommodate its anticipated growth and reflective of its business.

- To provide high-quality, highly sustainable office space near public transit, with increased intensity of up to a floor area ratio (FAR) of 1.0 that targets LEED Platinum standards and incorporates a TDM Plan, consistent with the 2030 General Plan and the Mountain View Greenhouse Gas Reduction Program.

- To develop a site with new high visibility office buildings that are compatible with the surrounding uses and are located close to major roadways.

- To develop office space that provides pedestrian and bicycle access to transit, and is located close to public transit and major roadways.

- To develop denser office space on the site at an increased FAR of up to 1.0 that will help the City of Mountain View both retain jobs and foster on-going job growth.

- To develop a headquarters campus location for a high-technology corporation in Mountain View, consistent with the General Plan land use planning principles of generating revenue for the City and supporting a larger, more diversified tax base in the City.

- To provide a sizeable corporate campus that supports 2030 General Plan Policies, including:

  - **LUD 3.8**: Preserved land use districts. Promote and preserve commercial and industrial districts that support a diversified economic base; and

  - **LUD 14.3:** Business attraction. Attract innovative and emerging technology businesses to the city.

- To further the 2030 General Plan's East Whisman Change Area policies, including:

  - **LUD 19.2:** Highly sustainable development. Provide incentives to encourage new or significantly rehabilitated development to include innovative measures for highly sustainable development; and

  - **LUD 19.6:** Residential transitions. Require development to provide sensitive transitions to adjacent residential uses.

- To support the VTA's investment in light rail transit by providing transit-supported development that facilitates pedestrian and bicycle access to transit.

- To incorporate several existing buildings, currently occupied by LinkedIn, into its campus development plans.

7.1.2 Feasibility of Alternatives

CEQA, the CEQA Guidelines, and case law on the subject have found that feasibility can be based on a wide range of factors and influences. The Guidelines advise that such factors *can* include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can "reasonably acquire, control or otherwise have access to the alternative site" [Section 15126.6(f)(1)].

7.1.2.1 *Alternatives Considered But Rejected*

Location Alternative

The CEQA Guidelines encourage consideration of an alternative site when significant effects of the project might be avoided or substantially lessened (Section 15126.6(f)(2)(A)). Only locations that would avoid or substantially lessen any of the significant impacts of the project and meet most of the project objectives need be considered for inclusion in the EIR.

The project proposes a rezoning of approximately 28.7 acres of land currently zoned *Limited Industrial (ML)* into a *Planned Community (P)* zoning district that would allow office uses on the site at an FAR of up to 0.86 and a maximum development of up to 1,078,000 square feet in size. An alternative site would need to be at least of comparable size, within the urbanized area of Mountain View, and have adequate transit access, roadway access, and utility capacity to serve the development proposed.

The project site is an existing campus of LinkedIn, Inc., and the company recently invested in tenant upgrades and remodeling of the three central buildings and exterior areas, containing approximately 315,000 square feet of office space. An alternative site may also require the existing uses to relocate to accommodate these uses, which the applicant intends to continue on site during construction. An appropriate alternative site might also include developed industrial or commercial properties, but could require adequate space for both the proposed and current employees on site.

In order to identify an alternative site that might be reasonably considered to "feasibly accomplish most of the basic purposes" of the project, and would also reduce significant impacts, it was assumed that such a site would ideally have the following characteristics:

- Approximately twenty-five (25) acres in size;
- Located near transit facilities;
- Located near freeways and/or major roadways;
- Served by available infrastructure;
- Available for development;
- Allow high intensity office development at an intensity up to a 1.0 FAR.

A review of sites in Mountain View was completed in order to identify potentially suitable locations for the proposed project. Potential alternative sites were evaluated in terms of whether they would: 1) reduce or avoid some or all of the environmental impacts of the proposed project; 2) be of

sufficient size to meet most of the basic project objectives; and 3) be immediately available to be acquired or controlled by the applicant.

Location alternatives that could fulfill these requirements must currently permit high intensity office development up to a 1.0 FAR. This potential development intensity is currently permitted for large areas within the North Bayshore and East Whisman Change Areas in the Mountain View 2030 General Plan, which have been identified with the land use designation *High Intensity Office*, and therefore a number of sites within the City could potentially be a location alternative. Some of these sites may be farther from residential uses than the project site, which could result in reduced noise and air quality impacts. Many of these sites could have a higher level of hazardous materials contamination than the project site; and consequently development on these sites could result in greater impacts from accidental exposure.

Any project of this size and intensity within Mountain View could be expected to have similar freeway impacts (as discussed in the EIR for the Mountain View 2030 General Plan, and the North Bayshore Precise Plan EIR), and other traffic impacts (such as intersection impacts), as well as impacts associated with project construction. In addition, a location alternative would not fulfill the objective of increasing the density on an existing campus for LinkedIn, since the company already has hundreds of employees located there and has invested in the current site. Therefore, since no suitable alternative site was found that could meet the basic objectives of the project, and where significant impacts would be reduced, a feasible location alternative was not identified and it is not evaluated further.

Alternative Land Use

The East Whisman Precise Plan land use map and alternatives have been under study by the City Council and Environmental Planning Commission since two map alternatives were selected in February 2017. The proposed project site is located in the East Whisman Precise Plan area, in a sub-area known as the "South Plan Area." This portion of the Precise Plan area is located to the east of State Route 237, separated from the rest of the Plan area by the roadway. The project site is also located within an area designated for office uses, and the existing and proposed office development on the 700 East Middlefield site has been considered in the planning and design of the draft Precise Plan.

Other areas of the East Whisman Precise Plan west of SR 237 are designated for residential, mixed-use, and commercial development. The environmental review process for the preferred East Whisman Precise Plan land use alternative is currently underway.

A project alternative could consider different uses on site, such as residential or mixed use. This type of use could reduce vehicle trips to and from the site, by providing housing near jobs. This type of development, however, would not fulfill any of the stated objectives of the project applicant to create a modern corporate campus for the LinkedIn Corporation. Since the East Whisman Precise Plan land use planning and environmental review process is underway, residential or mixed-use development on the site would require a substantial amendment to the draft East Whisman Precise Plan. For these reasons, this alternative is not considered further.

7.1.3 Selection of Alternatives

In addition to the "No Project Alternative," the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that "would avoid or substantially lessen any of the significant impacts of the project, or in the case of the proposed project, would further reduce impacts that are considered less than significant with the incorporation of identified mitigation [§15126.6(f)]. The discussion below includes two version of a reduced scale alternative which could reduce project impacts.

The project would result in a significant unavoidable impact from traffic to local intersections under background and near-term cumulative with project conditions, and freeway segments under all With Project scenarios, and therefore, this analysis focuses on project scenarios that would result in a decrease in the number of project trips is evaluated.

7.2 PROJECT ALTERNATIVES

7.2.1 No Project Alternative

The CEQA Guidelines stipulate that an EIR specifically include a "No Project" alternative. The purpose in including a No Project Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment [Section 15126.6(e)(3)(B)]."

Since the project site is currently developed with five existing office buildings (two vacant), the "No Project" alternative could include the reoccupancy of the two vacant buildings on site. The project site is currently built out with approximately 466,000 square feet of existing uses, which represents an FAR of approximately 0.37, which is slightly more than the permitted maximum FAR of 0.35 under the existing *Limited Industrial (ML)* zoning. A "No Project – Existing Zoning" Alternative, which would study the maximum potential buildout under the existing zoning district was not analyzed, therefore, since the existing development on the site is essentially already built at that intensity.

The No Project Alternative would avoid most of the environmental impacts of the project, assuming the continued occupancy or reoccupancy of the existing buildings (the buildings proposed to remain on site contain approximately 315,000 square feet, the buildings proposed for demolition contain approximately 151,000 square feet). The No Project Alternative scenario would avoid the significant impacts on local intersections and freeway segments. Since the project site would not be redeveloped under this alternative, the project would also avoid construction noise and air quality impacts to neighboring residential uses.

Relationship to Project Objectives

The No Project Alternative scenario does not include rezoning of the site to allow increased development intensity and, therefore, the No Project Alternative does not meet the objectives of the

proposed project. The No Project Alternative would not fulfill any of the project's specific objectives, including those of redeveloping the site, developing high quality, highly sustainable office space, or increasing the size of the LinkedIn, Inc. campus.

Conclusion: No Project Alternative

The No Project Alternative would avoid the project's significant intersection and freeway impacts. The No Project Alternative would also avoid the other less than significant (with mitigation incorporated) noise and air quality impacts of the proposed project.

The No Project Alternative would not meet any of the project's primary objectives, including those of redeveloping the site, developing high quality, highly sustainable office space, or increasing the size and employment capacity of the LinkedIn, Inc. campus.

7.2.2 Reduced Intensity Alternative

The project currently proposes a vehicle trip reduction of 20 percent off of standard ITE trip rates through implementation of a TDM Plan. This 20 percent reduction was included in the trip generation estimates used to calculate the project's total trips and resulting traffic intersection and freeway impacts. To determine how much additional trip reduction would be required of the project to avoid local intersection impacts under Background With Project and Near-Term Cumulative With Project conditions, a sensitivity test was completed by the project traffic consultant, Fehr & Peers.[62]

This supplemental analysis was completed with the following steps, for both the Background With Project and Near-Term Cumulative With Project scenarios:

1. The level of service (LOS) calculations for intersections with significant project impacts were reviewed to identify the amount of Project traffic being added to the critical movements.

2. The project trip generation was reduced in 10 percent increments (starting with a 30 percent trip reduction off of standard ITE rates), and the LOS for each intersection was recalculated to determine if it still triggered a significant impact.

3. The incremental trip reduction stopped once it reached a level where no significant impact was triggered.

Table 7.2-1 shows the intersections with significant Background With Project impacts and Near-Term Cumulative With Project Conditions. For each intersection, the percentage of project trip reduction required to avoid that impact is shown, as well as the net project trips that would be generated in that peak hour if that percentage trip reduction were achieved (note that the project as addressed in the TIA would generate 763 net new trips in the AM peak hour and 730 net new trips in the PM).

[62] Fehr & Peers. Memorandum. "700 Middlefield Road – Supplemental Analysis of Additional Trip Reduction Needed to Avoid Significant Intersection Impacts." February 6, 2018. Additional information, May 9. 2018.

The results of the analysis show that the peak hour project trips would have to be reduced by 40-80 percent (an additional 20-60 percent reduction in trips beyond the 20 percent trip reduction proposed by the project) under Background With Project Conditions in order to avoid the significant impacts identified in this scenario. Under Near-Term Cumulative With Project Conditions, the peak hour project trips would have to be reduced by 30-80 percent (an additional 10-60 percent reduction in trips beyond what is proposed) in order to avoid the significant impacts identified in this scenario. It is extremely unlikely that TDM measures alone could achieve the high levels of trip reduction needed, given the nature and location of the site. For this reason, the maximum project size in square feet that could be constructed with the proposed 20 percent trip reduction without resulting in a significant intersection impact is also shown in the last column of Table 7.2-1 (as compared to the proposed new construction of 763,000 square feet).

The analysis found that substantial additional trip reduction would be needed to reduce intersection impacts to less than significant, as shown in the following table.

Table 7.2-1:
Supplemental Analysis Results

Int. #	Intersection	Impact Peak Hour	Background With Project: % Trip Reduction (Net Project Trips)	Near-Term Cumulative With Project: % Trip Reduction (Net Project Trips)	Equivalent Project Size (square feet) with 20% Trip Reduction
2	US 101 Northbound Ramps and Ellis Street (Caltrans-MV)	PM	N/A	30% (620 trips)	667,600
3	US 101 Southbound Ramps and Ellis Street (Caltrans-MV)	AM	N/A	50% (410 trips)	476,800
5	Maude Avenue/ SR 237 Ramps (Mountain View)	**AM**[1] PM	80% (50 trips)	80% (50 trips)	190,700
8	Maude Avenue/ North Mathilda Avenue (Santa Clara County)	AM	N/A	70% (170 trips)	286,100
20	Central Expressway/ North Mary Avenue (Santa Clara County)	PM	40% (500 trips)	40% (500 trips)	572,200

Notes:

[1.] For the intersection with impacts in both peak hours, **bold** text indicates the peak hour when the largest trip reduction percentage is required to mitigate the impact.
[2.] The total project size (not including the buildings proposed to be demolished) that would equate to the maximum project trips allowed based on the 20 percent trip reduction proposed by the project. The original project size is 763,000 square feet, and assumes 20 percent TDM included in the project.
Source: Fehr & Peers. 2018.

7.2.2.1 *Reduced Intensity Alternative – 80 Percent Trip Reduction*

To avoid all significant project intersection impacts under both the Background With Project and the Near-Term Cumulative With Project scenarios, the project would have to reduce trips by 80 percent. Achieving a trip reduction of 80 percent at this location is not considered to be feasible, and therefore, this alternative would likely involve reducing the square footage of the project, potentially to as low as 190,700 square feet (assuming the proposed 20 percent trip reduction), or approximately 25 percent of the proposed project.

Under the maximum reduced intensity scenario, the site would be developed to an FAR of 0.40, which, similar to the proposed project, would require a rezoning from the *Limited Industrial (ML)* zoning district to a *Planned Community (P)* district to allow a slightly increased FAR above 0.35. Under this 80 percent Reduced Intensity Alternative, the building footprints or building heights could be substantially reduced, or possibly only one new building would be constructed. This would further reduce the LTS construction-related Air Quality and Noise impacts.

7.2.2.2 *Reduced Intensity Alternative – 50 Percent Trip Reduction*

Reducing the project trips by 50 percent would avoid impacts at Intersections #2, #3, and #20 under Near-Term Cumulative With Project. Achieving a trip reduction of 50 percent at this location would also likely involve a combination of additional TDM measures and reduction of the proposed square footage of the project. If additional trip reduction is not considered feasible, then the square footage under this scenario could potentially be reduced to as low as 476,800 square feet (assuming the proposed 20 percent trip reduction), or approximately 50 percent of the proposed project.

Under this scenario, the site could be developed to an FAR of 0.63, which, similar to the proposed project, would require a rezoning from the *Limited Industrial (ML)* zoning district to a *Planned Community (P)* district to allow an FAR above 0.35. Under a Reduced Intensity Alternative, the building footprints or building heights would be reduced, or possibly two building would be constructed. This would further reduce the LTS construction-related Air Quality and Noise impacts.

Under this scenario, it is assumed that site clearing activities would be reduced and less intense, but would be generally similar to the proposed project, with older buildings torn down to construct newer office space. To the extent that construction activities could occur over a shorter period due to construction of smaller buildings, less than significant construction impacts such as construction air quality emissions and construction noise would be incrementally reduced.

7.2.2.3 *Reduced Intensity Alternative – 30 or 40 Percent Trip Reduction*

Reducing the project trips by 30 percent would avoid impacts at Intersection #2 under Near-Term Cumulative With Project conditions, and reducing the project trips by 40 percent would also avoid impacts at Intersection #20 under both the Background With Project and Near-Term Cumulative With Project conditions, as shown in Table 7.2-1, above. Development under either of these scenarios would likely increase TDM measures combined with a more modest reduction in square footage. Therefore, it is anticipated that site clearing activities and construction Air Quality and Noise impacts under these scenarios would generally be comparable to the proposed project.

Relationship to Project Objectives

The Reduced Intensity Alternative would partially achieve the basic objectives of the project in terms of intensifying office uses on the site and providing for more employment space on the LinkedIn campus, but none of the scenarios would meet the basic objective of providing a campus of approximately one million square feet. It would not conform to the denser land use intensities envisioned in the City of Mountain View 2030 General Plan for the project area, which are reflected in the project objectives.

The Reduced Intensity Alternative would not fulfill the East Whisman vision from the 2030 General Plan for highly sustainable development.

Conclusion: Reduced Intensity Alternative

To determine the percentage reduction in traffic trips that would be needed to avoid the significant intersection impacts, a TDM sensitivity test was completed. The analysis determined that the project would need to reduce trips by 80 percent to avoid all significant traffic impacts. Certain impacts, but not all, would be reduced at 30, 40, 50, and 70 percent reductions, as shown in Table 7.2-1, above and Table 7.2-2 below. The project site, however, is located within an area that has multiple access points, in location that has a lot of through traffic, and it is geographically different than other areas where higher TDM percentages are typically achieved. For these reasons, it is highly unlikely that trip reductions of 40 to 80 percent could be achieved without substantial reductions in the square footage proposed on the site.

Because of the substantially reduced square footage under the 80 percent reduction scenario, the amount of new building area would be much less, and it is anticipated that the construction air quality and noise impacts of the project could be greatly reduced. Under the other reduction scenarios, however, site clearing and disturbance would likely be similar to the proposed project.

The Reduced Intensity Alternative scenarios at 50, 70, or 80 percent would result in project sizes that would not meet the project objectives and may not be economically viable. The Reduced Intensity Alternative scenarios at 30 or 40 percent reduction would require less of a reduction in the proposed square footage, however, these amounts would also not achieve the objective of providing a headquarters campus of approximately one million square feet.

Table 7.2-2: Comparison of Impacts from Alternatives to the Proposed Project				
Significant Impacts of the Proposed Project	**Level of Impact**			
	No Project	**Reduced Intensity Alternative – 80% Trip Reduction**	**Reduced Intensity Alternative – 50% Trip Reduction**	**Reduced Intensity Alternative – 30 or 40% Trip Reduction**
Transportation: Intersections	Avoided	Avoided	Less	Less
Transportation: Freeways	Avoided	Less	Less	Less
Construction Air Quality (TACs)	Avoided	Less	Less	Less
Construction Noise	Avoided	Less	Less	Less
Operational Noise	Avoided	Similar	Similar	Similar
Similar: Similar to the proposed project. Less: Substantial impact reduction compared to the proposed project, but not to a less than significant level. Greater: Substantially greater impact than proposed project.				

7.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE(S)

The *CEQA Guidelines* state than an EIR shall identify an environmentally superior alternative. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)).

Based upon the previous discussion, the environmentally superior alternative would be the No Project Alternative, which would avoid the significant unavoidable impacts to intersection and freeway segments, and the impacts to nearby residential uses from construction. This alternative would not fulfill the project's objectives of redeveloping highly sustainable office space up to an FAR of 1.0 on a site served by transit and near major roadways.

Apart from the No Project Alternative, the other alternatives considered would also reduce the significant traffic impacts. The maximum Reduced Intensity Alternative would reduce the significant impacts under Near-Term Cumulative With Project Conditions, and would partially fulfill the development objectives of the project. Since it is slightly larger than the No Project Alternative, and allows more development on the site, the Reduced Intensity Alternative would be the environmentally superior alternative.

SECTION 8.0 REFERENCES

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8.1 PERSONS AND ORGANIZATIONS CONSULTED

Don Young, D. R. Young Associates
David A. Grunat, Principal Consultant, RPS Iris Environmental
Lori Topley. City of Mountain View. Email communication. April 19, 2018.

8.2 ACRONYMS AND ABBREVIATIONS

Acronym	Definition
µg/m^3	Micrograms per Cubic Meter
ABAG	Association of Bay Area Governments
ACM	Asbestos-containing materials
AFY	Acre Feet per Year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
ARB	Air Resource Board
AST	Aboveground Storage Tank
BAAQMD	Bay Area Air Quality Management District
BCDC	San Francisco Bay Conservation and Development Commission
bgs	Below Ground Surface
BMP	Best Management Practice
Btu	British Thermal Unit
CAA	Clean Air Act
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAAQS	California Ambient Air Quality Standards
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code
C/CAG	City/County Association of Governments
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CE	Conditionally Exempt
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESA	California Endangered Species Act
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations

Acronym	Definition
CGP	Construction General Permit
CGS	California Geological Survey
CHRIS/NWIC	California Historical Resources Information System, Northwest Information Center
CLUP	Comprehensive Land Use Plan
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Equivalent Noise Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	Decibel
dBA	A-weighted Decibel
DDT	Dichloro-diphenyl-trichloroethane
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPR	California Department of Pesticide Regulation
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EMS	Emergency Medical Service
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment (Phase I)
ESL	Environmental Screening Level
FAA	Federal Aviation Administration
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program

Acronym	Definition
FTA	Federal Transit Administration
GCC	Global Climate Change
GGRP	Greenhouse Gas Reduction Program
GHG	Greenhouse Gas
GP	General Plan
GPUUIS	General Plan Update Utility Impact Study
GW	Gigawatt
GWDR	General Waste Discharge Requirement
HAZWOPER	Hazardous Waste Operations and Emergency Response
HCM	Highway Capacity Manual
HCP/NCCP	Habitat Conservation Plan/Natural Community Conservation Plan
HDM	Highway Design Manual
HFC	Hydrofluorocarbon
HM	Hydromodification Management
HMBP	Hazardous Materials Business Plan
HMCD	Hazardous Materials Compliance Division
HMP	Hydrograph Modification Management Plan
HMZ	Hazardous Materials Zone
HOT	High Occupancy Toll
HOV	High Occupancy Vehicle
HOZ	Habitat Overlay Zone
HSP	Health and Safety Plan
ISZ	Inner Safety Zones
ITE	Institute of Transportation Engineers
ITS	Intelligent Transportation Systems
kWh	Kilo-watt Hour
Ldn	Day-Night Level
LEED	Leadership in Energy and Environmental Design
Leq	Noise Equivalent Level
LID	Low Impact Development
LOS	Level of Service
LUD	Land use and Design
LRT	Light Rail Transit

Acronym	Definition
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
MEP	Maximum Extent Practicable
Mg/kg	Milligrams per Kilogram
MGD	Million Gallons per Day
ML	Limited Industrial (Zoning District)
MND	Mitigated Negative Declaration
MPG	Miles per Gallon
MRP	Municipal Regional Stormwater Permit
MSL	Mean Sea Level
MT	Metric Tons
MTC	Metropolitan Transportation Commission
MVFD	Mountain View Fire Department
MVGBC	Mountain View Green Building Code
MVPD	Mountain View Police Department
MVTMA	Mountain View Transportation Management Association
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NO_2	Nitrogen Dioxide
NOD	Notice of Determination
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	Office of Environmental Health Hazard Assessment

Acronym	Definition
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OSZ	Outer Safety Zones
PCB	Polychlorinated Biphenyls
PCE	Tetrachloroethylene (also known as perchloroethylene)
PDA	Priority Development Area
PG&E	Pacific Gas and Electric Company
PM	Particulate Matter
PPB	Parts per Billion
PPM	Parts per Million
RCRA	Resource Conservation and Recovery Act
R&D	Research and Development
ROG	Reactive Organic Gases
RPS	Renewables Portfolio Standard
RWQCB	Regional Water Quality Control Board
RWQCP	Palo Alto Regional Water Quality Control Plant
SB	Senate Bill
SCS	Sustainable Communities Strategy
SCV	Santa Clara Valley
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SCVWD	Santa Clara Valley Water District
SDWA	Safe Drinking Water Act
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SLIC	Spills, Leaks, Investigations and Cleanup
SMARA	State Surface Mining and Reclamation Act
SMaRT	Sunnyvale Materials Recovery and Transfer Station
SMP	Site Management Plan
SOV	Single Occupant Vehicle
SPS	Sewage Pump Station
SPUI	Single-Point Urban Interchange

Acronym	Definition
SSMP	Sewer System Management Plan
SUV	Sport Utility Vehicle
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCE	Trichloroethene
TCM	Transportation Control Measures
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TMDL	Total Maximum Daily Load
TPZ	Traffic Pattern Zones
TSCA	Toxic Substances Control Act
TSZ	Turning Safety Zones
USACE	U.S. Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
V/C	Volume to Capacity (ratio)
VCP	Voluntary Cleanup Program
VHP	Santa Clara Valley Habitat Plan
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VTA	(Santa Clara) Valley Transportation Authority
VTP	Valley Transportation Plan
WSA	Water Supply Assessment

SECTION 9.0 LEAD AGENCY AND CONSULTANTS

9.1 LEAD AGENCY

City of Mountain View
Community Development Department
Randal Tsuda, Community Development Director
Diana Pancholi, Senior Planner
John Schwarz, Project Consultant

9.2 CONSULTANTS

9.2.1 EIR Consultants

David J. Powers & Associates, Inc.
Environmental Consultants and Planners
Judy Shanley, Principal
Judy Fenerty, Senior Project Manager
Pooja Nagrath, Project Manager
Zach Dill, Graphic Artist

Fehr & Peers, Inc.
Transportation Consultants
Julie Morgan, AICP; Principal-in-Charge
Ashley Brooks, PE; Project Manager
Ryan Caldera
Elynor Zhou
JY Guo

Illingworth & Rodkin, *Inc*.
Air Quality and Greenhouse Gas Emissions
Joshua Carman, Senior Consultant
Acoustics
Michael Thill, Principal Consultant
Carrie Janello, Senior Consultant

Schaaf & Wheeler
Leif Coponen, P.E., Vice President

Final Environmental Impact Report
700 East Middlefield Road LinkedIn Office Project
State Clearinghouse # 2017092025

CITY OF MOUNTAIN VIEW

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

October 2018

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

1.3 PUBLIC REVIEW

In accordance with CEQA and the CEQA Guidelines, the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. 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: http://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp.

SECTION 2.0 SUMMARY OF DRAFT EIR PUBLIC REVIEW PROCESS

The Draft EIR for the 700 East Middlefield Road LinkedIn Office project, dated May 2018, was circulated to affected public agencies and interested parties for a 45-day review period from May 31, 2018 to July 16, 2018. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of Draft EIR was published on the City's website (https://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp)
- Notification of the availability of the Draft EIR was mailed to project-area residents and other members of the public who had indicated interest in the project;
- The Draft EIR was delivered to the State Clearinghouse on May 31, 2018 as well as sent to various governmental agencies, organizations, businesses, and individuals (see *Section 3.0* for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (https://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp), City of Mountain View Community Development Department, 500 Castro Street, 1st Floor, Mountain View, during business hours, Monday to Friday, 8:00 AM to 4:00 PM and at the Mountain View Public Library, 585 Franklin Street, Mountain View.

SECTION 3.0 AGENCIES, ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS THAT RECEIVED THE DRAFT EIR

CEQA Guidelines Section 15086 requires that a local Lead Agency consult with and request comments on the Draft EIR prepared for a project of this type 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 or via the State Clearinghouse:

- Bay Area Air Quality Management District
- California Department of Transportation, District 4
- California Department of Toxic Substances Control
- California Regional Water Quality Control Board, Region 2
- City of Sunnyvale
- Santa Clara County Roads and Airports Department
- Santa Clara Valley Transportation Authority
- Santa Clara Valley Water District

Businesses and Organizations

- North Whisman Neighborhood Association
- Wagon Wheel Neighborhood Association
- Pacific Gas and Electric Company (PG&E)
- Carpenter's Local 405 Counties Conference Board
- Northern California Carpenter's Regional Council
- Campaign For Jobs Local 104
- Building Industry Association of the Bay Area
- Los Altos School District
- Lozeau Drury LLP
- Adams Broadwell Joseph & Cardozo

SECTION 4.0 RESPONSES TO DRAFT EIR COMMENTS

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of Mountain View on the Draft EIR.

Comments are organized 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 Appendix A of this document. Comments received on the Draft EIR are listed below.

Comment Letter and Commenter **Page of Response**

Comment letters were received from four public agencies. CEQA Guidelines Section 15086(c) require that:

> A Responsible Agency or other public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency or which are required to be carried out or approved by the Responsible Agency. Those comments shall be supported by specific documentation.

Regarding mitigation measures identified by commenting public agencies, the CEQA Guidelines Section 15086(d) state that:

> Prior to the close of the public review period, a Responsible Agency or trustee agency which has identified what the agency considers to be significant environmental effects shall advise the Lead Agency of those effects. As to those effects relevant to its decisions, if any, on the project, the responsible or trustee agency shall either submit to the Lead Agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the Lead Agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible or trustee agency is not aware of mitigation measures that address identified effects, the responsible or trustee agency shall so state.

FEDERAL AND STATE AGENCIES

A. California Department of Transportation (dated July 16, 2018)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 700 East Middlefield Road LinkedIn Office Project. 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) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the May 31, 2018 DEIR.

Project Understanding

The project site abuts the State Route (SR) 237 frontage road, located in the eastern quadrant of the SR 237/East Middlefield Road intersection. State Routes 82 and 85 are located approximately 1.5 miles southwest of the project site, while US Route (US) 101 is located approximately 1.25 miles northeast of the project site. Vehicular access to the project site would be provided via four driveways: 1) a full access driveway at the intersection of East Middlefield Road and Bernardo Avenue would be the main site entrance, 2) a right-turn in and out driveway on East Middlefield Road south of Bernardo Avenue, 3) a right-turn in and out driveway on the SR 237 northbound frontage road, and 4) a full access driveway along the project's frontage on Maude Avenue. Existing driveways are located on E. Middlefield Road, Maude Avenue, and the SR 237 frontage road.

Two existing buildings would be demolished, and three six-story office buildings and two seven-level parking structures would be built on the site. The three renovated two-story buildings in the central portion of the site would be retained. All surface parking lots would be removed as part of site development. Both parking structures would include one level of below-grade parking and six above-grade levels. The parking structures would provide a total of approximately 2,913 total parking spaces. The project will also include at least 177 bicycle parking spaces, consistent with City of Mountain View Zoning Ordinance.

The three proposed six-story office buildings would contain approximately 763,000 square feet (sf.) of office space. The completed campus would be approximately 1,078,000 sf. in size, representing a net increase in development on the site of approximately 612,000 sf. Two of the three proposed buildings would be located along the SR 237 Frontage Road, and one building would be located at the main entrance at Middlefield Road and Bernardo Avenue, on the south end of the project site. This building would contain approximately 3,000 square feet of ground floor retail space along Middlefield Road, which would be open to the public.

The applicant proposes to construct the project in three phases, maintaining occupancy in the three central buildings during the construction period. All building materials and construction parking would be staged on site.

The proposed project site has a *High-Intensity Office* land use designation in the Mountain View 2030 General Plan. The project proposes a floor area ratio (FAR) of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline allowed within the

High-Intensity Office designation. The proposed project would be consistent with this land use designation, and would not require a General Plan amendment. The existing zoning district is *ML: Limited Industrial*, and the project would require a rezoning to the P: Planned Community zoning district to increase the allowed FAR on the site.

The City of Mountain View is currently preparing the East Whisman Precise Plan; a zoning document that will provide standards and guidelines for the East Whisman Change Area, including the project site. The site will be rezoned to East Whisman Precise Plan following the Plan's adoption, anticipated in 2019.

Response A.1: The above comment summarizes the proposed project, as described in Section 2.0 of the Draft EIR. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.2: A Transportation Demand Management (TDM) plan that would provide at least a 20 percent reduction in vehicle trips has been prepared by the applicant, as described, it would provide at least a 20 percent reduction in vehicle trips to the project site. The TDM plan will include the components below, and the applicant may consider additional measures if required to meet trip reduction goals.

- Priority parking for shared ride vehicles
- On-site transportation coordinator
- Bicycle parking, showers, and lockers
- Bicycle sharing
- Telecommuting/flexible work schedule program
- Guaranteed ride home program
- Membership in the Mountain View Transportation Management Association (MVTMA)
- Rideshare match services
- Transit shuttle services (long and short haul)
- Marketing and information

Response A.2: The comment describes the TDM plan proposed by the project and included in the Draft IR (Page 20). The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.3: Clarification

The DEIR states that the project is 28.7 acres, but the Assessor's Parcel Numbers (APNs) listed total to 28.17 acres. There is a discrepancy between the project limits and the APNs listed. Assessor's Parcel Numbers 165-38-001, -005, -006 and -007 total to 28.17 acres, not all areas/APNs have been accounted for in the project description (APNs 165-38-008 and N. Bernardo Avenue). Furthermore, better quality plats needed, especially at the corner of Maude and SR 237 frontage road, to fully assess the impacts on State's right-of-way (ROW).

Response A.3: According to the final survey of the property, the area of the project site parcels are:

165-38-001 4.484 acres
165-38-005 0.705 acres

165-38-006 5.056 acres
165-38-007 18.02 acres
165-38-008 0.229 acres
Total: 28.494 acres

Revisions to the text of the Draft EIR (pages 4, 29, 98, 120, 128, 157 and 249) to correct the APNs listed and the total acreage of the project site are provided in *Section 5.0 Draft EIR Text Revisions*. Refer to Response A.4 below regarding State right-of-way.

Comment A.4: Also, the existing easement plan shows N. Bernardo Avenue as an existing easement to be abandoned per California Government Code Section 66445 (J) and the project description labels APN 165-38-005 as a Caltrans Easement. The continued existence of landscaping within State ROW would require either a maintenance agreement with Caltrans or the sale of State land to the developer. For more information about maintenance agreements, please contact Art Duffy in the Office of Maintenance Agreements at (510) 622-8712 for more information. Any landscape elements within Caltrans right-of-way (ROW) are subject to standard safety and setback requirements. These requirements can be found in the Highway Design Manual, Chapter 900 and the Encroachment Permit Manual, Chapter 500 at the following link: http://www.dot.ca.gov/design/manuals/hdm.html

Response A.4: APN 165-38-005 is owned by the project applicant, LinkedIn Inc., and there is an arrow-shaped access easement for Caltrans equipment near the corner of the site. There is no Caltrans or state land on other parcels. Therefore, no land sale or transfer is necessary. The project will maintain the existing Caltrans easement on APN 165-38-005 and will obtain and comply with the Caltrans encroachment permit process as necessary.

Comment A.5: Multimodal Planning
This project is located within approximately 0.25 miles of Middlefield Station serving the Santa Clara Valley Transportation Authority (VTA) Light Rail Route 902, and is adjacent to a VTA Bus Route 32 stop at E. Middlefield Rd. and Bernardo Ave. We encourage fair share contributions toward multi-modal and regional transit improvements. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Contributing to VTA's transit operating and capital improvement program, or contributions to improve nearby bus stop facilities if project generated travel demand increases ridership at these stops to meet VTA's thresholds for bus stop improvements can help increase sustainable mode shares and meet trip reduction goals.

The project's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. Any impacts to bicycle or pedestrian facilities caused by other mitigations should be fully mitigated. These smart growth approaches are consistent with MTC's Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

Response A.5: Caltrans encourages fair share contributions toward multi-modal and regional transit improvements, VTA's transit operating and capital improvement

project, and/or contributions to improve nearby bus stop facilities. While fees provided towards regional improvements would fund worthwhile transportation improvements, they would not be applicable as mitigation measures unless a fair share funding mechanism was in place (e.g., regional impact fee) to impose/collect the fee. To provide adequate funding for the improvement project, funding sources in addition to the project fair share contribution would be needed, which may include State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee. The City will continue to explore ways to participate in funding opportunities in order to further regional transportation improvements that can be implemented through a State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee.

Comment A.6: Travel Demand Analysis

Caltrans comment letter on the NOP for this project, dated October 13, 2017 requested a VMT analysis. The Traffic Impact Analysis discussion of VMT provided with this DEIR includes limited discussion and an estimate of project-generated VMT table, please consider the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA, http://www.opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf.

Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Furthermore, please provide clarification regarding the points listed below, noting that operational issues such as turning movement conflicts, inadequate vehicle storage, and speed differentials are not exempt under CEQA and should be mitigated.

- SR 237 / Maude Avenue Westbound diagonal off-ramp: The Traffic Impact Analysis (TIA) shows that left-turning project-generated-trips, in the AM-peak hour, will create a queue that will extend beyond the available left-turn storage. This may block the right/through movement vehicles from reaching their respective turning movement storage lengths. This may delay the right/through movements from getting through the intersection at the ramp terminal. How will the project mitigate this impact?

Response A.6: The City of Mountain View has not yet switched to a VMT-based analysis for identifying traffic impacts under CEQA. Lead agencies have until July 2020 to implement SB 743 and begin using VMT as a CEQA impact threshold. The Project's VMT was estimated for informational purposes in the traffic analysis, and the project's contributions to greenhouse gas emissions, based in part on VMT, were presented in *Section 3.8* of the Draft EIR.

The comment requests clarification on an operational issue. The left-turn queue extends beyond the available storage. At the SR 237 Westbound Off-Ramp / Maude Avenue intersection, the comment asks how the project will mitigate this impact. According to the Traffix output sheets, the Cumulative AM queue for the left-turn movement from the SR 237 westbound off-ramp shows that the queue is

approximately 1,200 feet long, already exceeding the available storage capacity. The introduction of Project traffic worsens the queuing but is not the sole reason why the queue exceeds the storage capacity. The suggested measure at this intersection to mitigate the LOS impact is to consider reconfiguring the interchange, with a goal of reducing existing and future queuing and providing adequate storage capacity for the SR 237 westbound off-ramp left-turn lanes.

Comment A.7: Please provide analysis demonstrating the effectiveness of the proposed mitigations at the Maude Avenue and SR 237 interchange. If the reconfiguration does mitigate the impact, the mitigation can be pursued by the project sponsor through Caltrans' permit process.

Response A.7: The reconfiguration of the interchange is a large roadway project that is outside the scope of any single land use project to accomplish. The City may consider requiring that the project contribute to funding a future study of configuration alternatives at the Maude Avenue/SR 237 interchange, with the goal of identifying an alternative that accommodates existing and future demand while minimizing queuing.

Comment A.8: The project should mitigate its impact to project-impacted freeway segments along US 101, SR 237 and SR 85, as noted in the TIA, by paying its fair share contribution fee toward the planned construction of the US 101 Express Lane Project and the SR 237 Express Lane Project, which are sponsored by VTA.

Response A.8: While fees provided towards regional improvements would fund worthwhile transportation improvements, they would not be applicable as mitigation measures unless a fair share funding mechanism was in place (e.g., regional impact fee) to impose/collect the fee. Furthermore, the significant impact would not be reduced or eliminated until the improvement project is constructed. To provide adequate funding for the improvement project, funding sources in addition to the project fair share contribution would be needed, which may include State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee. For these reasons, feasible measures are not available to reduce the project freeway impact to a less than significant level, and the addition of project traffic results in a significant and unavoidable freeway segment impact.

Comment A.9: Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4c: Suburban Communities (Dedicated Use Areas)** where location efficiency factors, such as community design, are weak and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. We applaud the inclusion of a TDM program with a 20 percent trip reduction. We strongly encourage the implementation of further TDM strategies proposed in the DEIR in addition to those proposed to be implemented.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

Response A.9: The comment is noted. The project includes a robust TDM program, which commits to a trip reduction of 20 percent. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.10: Hydraulics
Caltrans will need to review the drainage plan, when available, specifically the site drainage discharge connections to the State drainage facilities, to assure that there will be no impact to State facilities by this project.

Response A.10: The City will provide the necessary information to Caltrans as it becomes available. As described in *Sections 3.10 and 3.16* of the Draft EIR, the proposed project would reduce impervious surfaces on the site from 76 to 56 percent, resulting in a proportionate reduction in site runoff. Through implementation of the City's Standard Conditions of Approval, including on-site stormwater collection and treatment facilities and C.3 construction and post-construction measures, the project would not result in impacts to State drainage facilities.

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. Since this project meets the criteria to be deemed of statewide, regional or area wide significance per CEQA Section 15206, the DEIR should be submitted to both the Santa Clara Valley Transportation Authority, Association of Bay Area Governments (ABAG), and MTC for review and comment.

Response A.11: A Mitigation Monitoring or Reporting Program (MMRP) will be reviewed and adopted by the Mountain View City Council when considering adoption of the 700 East Middlefield LinkedIn Office project and approval of the project. This document describes all significant project impacts, proposed mitigation measures, and significance after mitigation of these impacts. The MMRP will also list the agencies or departments responsible for implementing and monitoring the project's mitigation measures.

The Draft EIR was submitted for review to the relevant agencies as a part of the public circulation process. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.12: Encroachment Permit
Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans

during the encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits/.

Response A.12: The Draft EIR addresses the need to acquire permits in *Section 2.4*. The City will obtain an encroachment permit from Caltrans for any work or traffic control that encroaches onto the State ROW.

REGIONAL AND LOCAL AGENCIES

B. City of Sunnyvale (dated July 16, 2018)

Comment B.1: Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Linkedln Office Project (Project) in Mountain View. This letter includes all City of Sunnyvale comments.

> **Response B.1:** Comment is noted. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment B.2: General Comment
The Project site immediately abuts a medium-density residential neighborhood and is in proximity to a mobile home park within the City of Sunnyvale. We request that the City of Mountain View continue to provide outreach to Sunnyvale residents, and that the notice area include these neighborhoods in their entirety.

> **Response B.2:** Comment is noted. The City will continue to provide notices to this neighborhood regarding the EIR and the project.

Comment B.3: Encinal Park is near the East Whisman Precise Plan area, and is heavily used by nearby residents and businesses. We are concerned that additional density proposed in the Precise Plan area would have significant impacts to existing City of Sunnyvale services and facilities, especially related to Encinal Park.

> **Response B.3:** As discussed in *Section 3.14.3.4* of the Draft EIR, since the project does not propose residential development, it would not substantially increase the number of people using nearby park facilities. Increased use of parks by approximately 3,060 additional employees would be incremental and would not cause significant physical deterioration such that it would result in an environmental impact. The impacts of future growth envisioned as part of the EWPP will be evaluated and disclosed as part of the environmental analysis to be completed for the Precise Plan.

Comment B.4: Noise
The mitigation measures NOISE-4.1 and NOISE-4.2 states that the City of Sunnyvale permits construction activities on Saturdays between 8:00 a.m. and 5:00 p.m.; however, this is not entirely correct. The City of Sunnyvale only allows construction on Saturdays with approval from the Building Official, and usually only in circumstances where a project is not adjacent to residential uses. Please modify the Noise mitigation measures to remove reference of allowances for weekend construction by the City of Sunnyvale. In addition, the City of Sunnyvale strongly urges the City of Mountain View to prohibit construction activities on weekends for this project due to the project's proximity to residential uses within the City of Sunnyvale.

> **Response B.4:** City of Sunnyvale confirmed that the construction hours in the DEIR were worded correctly and that this comment is not valid. No response is necessary.

Comment B.5: Traffic and Transportation Input for the Notice of Preparation:
If you have questions on the following traffic related items, please contact Lillian Tsang, Principal Traffic Engineer, at ltsang@sunnyvale.ca.gov or (408) 730- 7556.

Response B.5: Comment is noted. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment B.6: In the Transportation Impact Analysis Report:
2. When referring to Interstate 280, please change the direction from Eastbound to Southbound (global change).
3. When referring to Interstate 280, please change the direction from Westbound to Northbound (global change).

Response B.6: The City requests that the orientation of Interchange 280 (I-280) be changed from eastbound/westbound to southbound/northbound, respectively. This change was updated throughout the Revised Transportation Impact Analysis report (Attachment A of the FEIR) and revisions were made in the DEIR on pages 186 and 187, as outlined in *Section 5.0 Draft EIR Text Revisions*.

Comment B.7: 4. For Near-Term 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.

Response B.7: The Near-Term Cumulative volumes include a two percent annual growth rate, which conservatively captures historical and projected growth in the region, and accounts for pending projects in the site area.

Comment B.8: 5. On page 25, Figure 2, 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 B.8: This graphic correction has been updated in Figure 2, Figure 7, and Appendix C of the Revised Transportation Impact Analysis (Revised Appendix I of the DEIR). No text revisions to the DEIR were necessary.

Comment B.9: 6. On page 25, Figure 2, 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 B.9: This graphic correction has been updated in Figure 2, Figure 7, and Appendix C of the Revised Transportation Impact Analysis (Revised Appendix I of the DEIR). No text revisions to the DEIR were necessary.

Comment B.10: 7. On page 31, table 3-2, in the footnote, the source should be changed to "2016 Monitoring & Conformance Report, VTA, May 2016".

Response B.10: Text revisions reflecting the comment have been made in *Section 5.0 Draft EIR Text Revisions* and Revised Appendix I of the DEIR (Attachment A of the FEIR) except for a minor change to the date. The date of approval of the document is May 2017 and not May 2016 as documented in the comment above, therefore, edits were made accordingly on pages 180, 186 and 191.

Comment B.11: 8. On page 37, under the bullet points "Bicycle lanes on:", existing bicycle lanes are only available on Maude Avenue east of the Mountain View/Sunnyvale City Limits, instead of east of SR 237. There is currently no bicycle lanes on either side of Maude Avenue between SR 237 EB ramps and the Mountain View/Sunnyvale City Limits. Please make the change in wordings throughout, as well as in Figure 4.

Response B.11: The Traffic Impact Analysis and DEIR were updated to state that the Maude Avenue bicycle lanes begin at the Mountain View/Sunnyvale City Limits and continue to the east. Figure 4 was also updated in the Revised Transportation Impact Analysis (Appendix I of the DEIR). Text (page 175) and figure revisions (Figure 3.15-3) reflecting the same have been made in *Section 5.0 Draft EIR Text Revisions*.

Comment B.12: 9. On page 45, Figure 6, the project trip distribution shown on this figure are not match the distribution of vehicle trips on page 6 of the Appendix J, Transportation Demand Management Plan.

Response B.12: The Transportation Impact Analysis (TIA) developed trip distribution rates based on Journey to Work data and traffic counts, and identifies trip distribution for each roadway separately, whereas the TDM Plan presents trip distribution by city (which is less specific). The trip distribution by roadway that is presented in the TIA aligns quite closely with the trip distribution by city presented in the TDM Plan.

Comment B.13: 10. On Figure 6, Project Trip Distribution, it shows that 2% is being assigned on Evelyn Avenue east of S Mary Avenue. However, on Figure 7, Project Trip Assignment, the 2% project trips are not shown going to/from Evelyn Avenue east of S Mary Avenue at Intersection 22.

Response B.13: The trip distribution shows two percent traveling to Evelyn Avenue; however, not all two percent of trips travel through Intersection # 22 to access Evelyn Avenue. Some traffic was assumed to take Mathilda Avenue and Fair Oaks Avenue from Central Expressway to Evelyn Avenue. The trip distribution figure (Figure 3.15-5 of the Draft EIR) has been updated to show the two percent distribution further to the east. Figure revisions reflecting the change have been made in *Section 5.0 Draft EIR Text Revisions* and Figure 6 of Revised Appendix I.

Comment B.14: 11. On Figures 6 and 7, no project trips are assigned heading to/from Mathilda Avenue south of Maude Avenue. In reviewing the existing traffic pattern, there should be some trips coming from Mathilda Avenue from the south since it's a major north/south corridor within the City. In addition, the trips between intersections 7 and 8 do not add up.

Response B.14: Project traffic traveling south of El Camino Real was assumed to take two general routes: one route would use Maude Avenue to Mary Avenue and the other general route would take Middlefield Road to Central Expressway to south on Mathilda Avenue. Vehicles were assumed to take Central Expressway instead of Maude Avenue to access southbound Mathilda Avenue because there are fewer signals along Central Expressway compared to Maude Avenue and Mathilda Avenue (two signalized intersections instead of six signalized intersections).

Comment B.15: 12. City of Sunnyvale has a minimum bicycle lane width design standard of six foot- wide.

Response B.15: This comment has been noted. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment B.16: 13. On page 88, for intersection #8 Maude Avenue/Mathilda Avenue, the project shall pay a fair-share payment contribution based on City of Sunnyvale's traffic impact fee schedule.

Response B.16: Because the project is located within Mountain View, the City of Mountain View is the lead agency under CEQA for this project. Therefore, the project would be required to pay traffic impact fees and other fees required by the City of Mountain View. The City of Mountain View is coordinating with the City of Sunnyvale to address the project's traffic and circulation impacts that may affect the City of Sunnyvale and its residents and businesses, and the project will pay a fair share payment based on the City of Sunnyvale's traffic impact fee schedule.

Comment B.17: 14. On page 95, "There is a short gap in the bicycle lane on Maude Avenue through the SR 237 interchange area." shall be changed to include the gap in the bicycle lane on Maude Avenue between SR 237 EB ramps and the Mountain View/Sunnyvale city limits.

Response B.17: The City requests that the text on page 95 of Appendix I: Transportation Impact Analysis of the Draft EIR be updated to state that the gap in bicycle lanes extends between SR 237 eastbound ramps and the Mountain View/Sunnyvale City Limits. Text revisions reflecting the change have been made in Revised Appendix I of the Draft EIR. No text revisions to the DEIR were necessary.

Comment B.18: 15. On page 99, Maude Avenue Project Driveway, a westbound left-turn pocket is recommended for this driveway to enter the project site. The minimum westbound left-turn pocket length of 100 feet is recommended to accommodate incoming traffic into the site.

Response B.18: This comment has been noted and additional text has been added to page 99 of Transportation Impact Analysis report and DEIR to indicate the preferred left-turn lane pocket length. Please refer to *Section 5.0 Draft EIR Text Revisions* and Revised Appendix I.

Comment B.19: 16. On page 100, the City of Sunnyvale supports Option #1: Prohibit outbound left-turns. This is due to the large amount of project trips that would be exiting via this driveway, as well

as the close proximity to the intersection of SR 237 Eastbound ramps/Maude Avenue, creating an unsafe operation condition. Even if this driveway access were to be signalized, the driveway is still in close proximity to the intersection of SR 237 Eastbound ramps/Maude Avenue. Queue from the westbound approach at the intersection of SR 237 Eastbound ramps/Maude Avenue would potentially spill back into the project driveway intersection, which would create a safety concern on the operations at this intersection.

Response B.19: This comment is noted. The City of Mountain View is working with Caltrans and VTA to coordinate the existing and proposed signals such that they operate as one and relieve the concern expressed by the comment.

Comment B.20: The City of Sunnyvale appreciates your consideration of the requested study scope elements described above. Please contact Amber Blizinski, Principal Planner, at (408) 730-2723 or ablizinski@sunnyvale.ca.gov if you have any questions or concerns about items discussed in this letter.

Response B.20: The comment is noted.

C. County of Santa Clara (dated July 16, 2018)

Comment C.1: The County of Santa Clara Roads and Airports Department appreciates the opportunity to review the Notice of Availability of Draft Environmental Impact Report for LinkedIn Office Project and is submitting the following comments:

Response C.1: No response is necessary.

Comment C.2: We have noted that existing field counts do not match base volume counts in the Traffix reports for intersections #16-20 (existing conditions). Can you please clarify why the WB through movement on Central Expressway has 200 more vehicles in the base volume in the AM analysis? Why does the WB and EB through movement on Central Expressway have 250 and 375 more vehicles in the base volume respectively in the PM analysis?

Response C.2: The intersection of Central Expressway and SR 85 Southbound Ramp (Intersection #16) was counted on a different day compared to the other Central Expressway intersections. In the interest of presenting a balanced corridor, the vehicle counts were adjusted upwards so they would balance with the adjacent Central Expressway intersections. Per the County's direction, Fehr and Peers, the project's traffic consultant, is no longer making adjustments and are using the counts as collected. The use of the original count did not result in an impact of greater severity.

Comment C.3: We have also noted that Traffix reports for intersections #16-20 were not done by County/CMP method. Please contact the County Traffic Engineer for further instruction. Also, please contact us to obtain proper signal timing info that matches the date and time of traffic counts.

Response C.3: This analysis has been updated and is incorporated in Tables 3-1, 5-1, 6-1, 7-1, 8-1 and 8-2 of the final Transportation Impact Analysis report (Revised Appendix I of the Draft EIR). Text revisions reflecting the change have also been made in Tables 3.15-5, 3.15-9, 3.15-11, 3.15-12, 3.15-14, and 3.15-15 of the Draft EIR (Please refer to *Section 5.0 Draft EIR Text Revisions).*

Comment C.4: Figure 3.15-5 Project Trip Distribution is not clear; the roadway network is not visible. It is also missing the project trip assignment diagram in the DEIR.

Response C.4: The trip assignment figure (Figure 7) is provided in Appendix I: Transportation Impact Analysis along with the trip distribution figure (Figure 6).

Comment C.5: Table 3.15-9 is missing footnotes for #6, 7, 8

Response C.5: Text revisions have been made to add the missing footnotes to Table 3.15-9 in *Section 5.0 Draft EIR Text Revisions.*

Comment C.6: The proposed project should also look into the possibilities of adding a third northbound left turn and westbound left turn lane as a local mitigation measure for the Central and Mary intersection.

Response C.6: The comment requests that the proposed mitigation measure at Intersection #20: Central Expressway and Mary Avenue change from a fourth eastbound through lane to a third northbound left-turn lane and a third westbound left-turn lane. The City asked for clarification on the mitigation request, and the commenter adjusted their request to include the fourth eastbound through lane and third westbound left-turn lane as the preferred mitigation measure. It is noted that the third westbound left-turn lane is identified as a Tier 3 improvement in the County's 2040 Expressway Plan. The fourth eastbound through lane and the third westbound left-turn lane were individually tested using the new signal timings requested by the County, and the results found that both mitigate the project's impact. Therefore, to remain in accordance with the County's 2040 Expressway Plan, the mitigation measure has been updated to include only a third westbound left-turn lane. This analysis has been updated and is incorporated in Revised Appendix I of the Draft EIR (Attachment A of the FEIR). Text revisions reflecting the change have also been made on pages 205 and 218 and Tables 3.15-12 and 3.15-15 of the Draft EIR (Please refer to *Section 5.0 Draft EIR Text Revisions* and Attachment A*).*

Comment C.7: We also would like to know if the County will be notified if TDM goals are not met relative to its proportional effects on County facilities. Specifically, how will the City address negative impacts if TDM goals remain unmet and there is an impact on County facilities?

Response C.7: The City of Mountain View will monitor the TDM program and track the effectiveness of the proposed trip reduction measures. The City does not have a program in place to notify the County if TDM goals are not met. To ensure compliance with TDM requirements that are being entitled, the City has a specific condition of approval which requires the applicant to pay penalties if the project fails to meet the TDM goals.

Comment C.8: Thank you for sending the notice our way and accepting our feedback. If I provide anything else or you have any questions or concerns about these comments, please contact me at (408) 573-2482 or Ellen.talbo@ rda.sccgov.org.

Response C.8: The comment is noted; no further response is required.

D. Santa Clara Valley Transportation Authority (dated July 16, 2018)

Comment D.1: Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for a 612,000-square foot increase in office space on a 28.7-acre site bounded by E. Middlefield Road, W. Maude Avenue, and SR 237. We have the following comments.

Transportation Demand Management CTDM)/Trip Reduction
VTA supports the commitment for a TDM Program with vehicle trip reduction targets of 20%, noted in the DEIR/TIA as a "City-approved" trip reduction percentage. VTA notes that the 20% trip reduction credit was applied to the base ITE trip estimates in the DEIR/TIA, as discussed in section 3.1 5.3.6 of the DEIR. This reduction appears to follow the Peer/Study-Based Trip Reduction approach in VTA's TIA Guidelines (Section 8.2.3) which allow projects to take a reduction larger than the Standard Reductions "based on a project's similarity to other projects with demonstrated trip reductions or a project occupant's record of reducing trips at other sites."
VTA recommends that the Developer provide the following measures:

- Data and documentation in the TIA Report in order to appropriately justify the proposed 20% trip reduction;
- Committing to periodic monitoring of trip reduction; and
- Sharing of summary level monitoring data to VTA, through the Lead Agency.

Response D.1: The information requested in the comment is provided in *Appendix J: Transportation Demand Management Plan* for the proposed Project.

Comment D.2: Additionally, VTA recommends strengthening the TDM program by adding effective TDM measures, not listed in the TDM Program - Appendix J, that may be applicable to the LinkedIn project include:

- Parking pricing, unbundled parking and parking cash-out programs;
- Transit fare incentive such as a free or discounted transit passed on a continuing basis or pre-tax commuter benefits - given the proximity to light rail; and ·
- On-site walkable services conveniently located for employees (day-care, dry-cleaning, fitness, banking, convenience store).

Response D.2: The suggestions in this comment are noted and will be considered by the City Council when evaluating this project. On October 27, 2017, LinkedIn submitted to the City of Mountain View a comprehensive Transportation Demand Management plan prepared by Fehr & Peers traffic engineers (See Appendix J of the Draft EIR). This plan contains details of various traffic reduction programs and includes many of the items listed in the VTA letter.

Comment D.3: CMP Impacts and Mitigation Measures
The DEIR/TIA identifies significant impacts to 46 freeway segments under the Background with Project analysis. VTA recommends that the City direct the developer to provide a voluntary contribution to improvements identified in VTA's VTP 2040 for freeway segments on US 101 and SR 237, including Express Lanes on US 101 and SR 237, as a mitigation measure. Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations. VTA notes that

voluntary contributions to regional transportation improvements can be included as mitigation measures in CEQA documents even in the absence of a comprehensive funding strategy, and recommends that the project provide a voluntary contribution to the US 101/SR237 Express Lanes project to help reduce the project's freeway impacts. VTA also notes that the City could also identify appropriate multimodal efforts to offset these impacts. Examples may include but are not limited to enhanced transit infrastructure, transit signal priority or improved bike facilities. VTA looks forward to working with City to identify contribution opportunities.

Response D.3: Contrary to the statement in the comment, according to CEQA, the CEQA Guidelines (Section 15126.4), and relevant case law, voluntary contributions are not an acceptable mitigation measure for the project freeway segment impact, because there is not a fair share funding mechanism in place (e.g., regional impact fee) to impose/collect the fee. Furthermore, the significant impact would not be reduced or eliminated until the improvement project is constructed. To provide adequate funding for the improvement project, funding sources in addition to the project fair share contribution would be needed, which may include State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee. For these reasons, feasible measures are not available to reduce the project's freeway impact to a less than significant level, and the addition of project traffic results in a significant and unavoidable freeway segment impact.

Comment D.4: Bus Service

In VTA's 2018 Transit Service Plan, the existing bus stop on Middlefield, adjacent to the project, will be discontinued. However, VTA is proposing a new pair of bus stops on Maude Avenue, adjacent to the project. VTA recommends the following off-site improvements:

- New bus stop on eastbound Maude Avenue, east of Frontage Road:
  - Bus stop configuration to VTA standards for 40' bus
    - Duckout or Modified Duckout with bus pad
    - Bus Shelter with bus shelter pad
- New bus stop on westbound Maude Avenue, east of Frontage Road:
  - Bus stop configuration to VTA standards for 40' bus
    - Bus pad
    - Bus bench with passenger pad
- Pedestrian crosswalk to connect the westbound bus stop to the project site.

Response D.4: The applicant will continue to work with VTA and the Cities of Mountain View and Sunnyvale to determine if there is an appropriate location for a new set of bus stops along Maude Avenue. The applicant may choose to incorporate the bus stop into an existing project under review with the City of Sunnyvale or discuss with VTA contributions to improvements along the route.

Comment D.5: Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Response D.5: The comment is noted; no further response is required.

ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

E. Lozeau Drury, LLP (dated July 16, 2018)

Comment E.1: I am writing on behalf of Laborers International Union of North America, Local Union No. 270 and its members living in and around Mountain View, California (collectively "LIUNA" or "Commenters") regarding the Draft Environmental Impact Report ("DEIR") prepared for the 700 East Middlefield Road Linkedln Office Project, State Clearinghouse No. 2017092025 ("Project"). On March 21, 2018, my office e-mailed and mailed a request to receive notice of this Project pursuant to Public Resources Code Sections 21092.2 and Government Code Section 65092. Despite that effort, we apparently did not receive any mailed or e-mailed notification that the DEIR documents had been released for the Project on May 31, 2018.

> **Response E.1:** In compliance with CEQA Section 21092.2 and Government Code Section 65092, the notice of availability was mailed to "Richard Drury" at the address listed below on May 30, 2018, because he is on the City's interested parties list for development projects. Richard Drury, Lozeau Drury LLP, 410 12th Street, Suite 250, Oakland, CA 94607, (510) 836-4200, richard@lozeaudrury.com.

Comment E.2: After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the Community Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).

> **Response E.2:** The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. Furthermore, and contrary to the allegation in this comment, the Draft EIR complied fully with all of CEQA's requirements. The comment presents no substantial evidence to the contrary about any specific impact area. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR. The general allegations in this comment will be forwarded to the decision-makers for consideration.

F. Unite Here, Local 19 (dated July 16, 2018)

Comment F.1: 1. Standing of Local 19

The following comments on the Draft EIR for 700 East Middlefield Road LinkedIn Office Project are submitted on behalf of UNITE HERE, Local 19, a union which represents hospitality workers in Silicon Valley including hotel workers and cafeteria workers serving large tech companies. Local 19 advocates for hospitality projects and other development projects that are good for service workers. Commentor represents over 4,500 members, some of whom live in Mountain View, including members who work at Levi's Stadium, Hilton Santa Clara, and Fairmont, Four Points, Hilton, Hyatt Place, Marriott, Westin Hotels in San Jose, the San Jose Convention Center as well as the cafeterias at Facebook in Menlo Park, Yahoo (now Oath) in Sunnyvale, Intel and Nvidia in Santa Clara and Cisco in north San Jose. They, along with other workers in these industries, will be directly affected by the Project's traffic, air quality, greenhouse gas ("*GHG*"), land use, cultural and biological, working conditions and other Project impacts. Local 19 therefore is a stakeholder in this Project, and worker and labor organizations like Local 19 have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that "unions have standing to litigate environmental claims." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

> **Response F.1:** The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.2: 2. The project meaningfully worsens Mountain View's job/housing imbalance.

The DEIR acknowledges that the project will worsen the city and region's jobs/housing imbalance by adding an estimated 3,060 net new jobs and no new housing.[1] The DEIR asserts that the expected increase in the jobs/housing imbalance does not exceed increases in the jobs/housing imbalance anticipated by Mountain View's 2030 General Plan, and that the project would not result in substantial displacement of people. These statements do not follow from each other. The fact that worsening of the jobs/housing imbalance is anticipated in the general plan does not mean that increasing the jobs/housing imbalance won't lead to increased housing demand, increased rents and displacement, longer commutes and increased traffic, congestion and related GHG emissions. This EIR should completely and accurately assess the environmental impacts of worsening Mountain View's jobs/housing imbalance.

> **Response F.2:** As described in the Draft EIR (pages 157-158), the project proposes redevelopment of an existing job-producing office development with a new, larger, job-producing office development. Buildout of the project would result in the potential for 411 more employees on-site than could have occupied the existing buildings on-site. The proposed increase in jobs on-site is within the overall jobs evaluated in the employment projections in the City of Mountain View 2030 General Plan. Therefore, it would not worsen the City's jobs/housing ratio beyond what was addressed in the current General Plan. It is acknowledged that a citywide jobs/housing imbalance can lead to longer commutes and associated traffic, air pollution, and GHG emissions. For this reason, the City of Mountain View is focusing on providing housing in several formerly jobs-heavy areas of the City

[1] DEIR Section 3.13.3.1, Population and Housing Impacts

through the preparation and adoption of mixed use Precise Plans. The recently adopted North Bayshore Precise Plan and the currently proposed East Whisman Precise Plan are two examples of this land use planning effort. Because: 1) the project's jobs are within the total jobs anticipated city-wide in the General Plan, 2) the area is already served by infrastructure and is proximate to transit, and 3) the project would not cause growth outside the urban envelope, the project's impact on population and housing was determined to be less than significant.

Comment F.3: The EIR should include VMT analysis.

Governor Brown signed Senate Bill (SB) 743 in 2013 which instructed California municipal jurisdictions to begin transitioning from level of service (LOS) transportation impacts analysis to vehicle miles travelled (VMT) method. VMT has been found to be better tool for the reduction of greenhouse gas emissions. As of the present, Mountain View has not switched to VMT analysis. SB 743 highlighted the importance using VMT for projects served by transit.[2] According to the DEIR, the project is a six-minute walk from the Middlefield Light Rail Station. This DEIR should include VMT analysis in order to completely and accurately account for the environmental impacts of GHG emissions created by the project.

Response F.3: The City of Mountain View has not yet switched to a VMT-based analysis for identifying traffic impacts under CEQA. Lead agencies have until July 2020 to implement SB 743 and begin using VMT as a CEQA impact threshold. The Project's VMT was estimated for informational purposes, and the project's contributions to greenhouse gas emissions, based in part on VMT, were presented in *Section 3.8* of the Draft EIR.

Comment F.4: The EIR should include a more robust TDM plan.

The DEIR's TDM plan expects to result in a 20 percent reduction in vehicle trips to the project site.[3] Google's TDM program with Mountain View has brought its single occupancy vehicle trips down to 45% of its mode share. Google proposed a parking ratio of 1.2 spaces per 1000 square feet as a method of achieving its low SOV rate, in 2015.[4] This project proposes 2,913 parking spaces and 1,078,000 total office space or 2.7 parking spaces per 1,000 square feet of office. Why should LinkedIn be held to a weaker TDM standard and weaker parking ratio than Google when this project is much closer to a light rail station?

Response F.4: The comment asks about a comparison of parking supply and TDM requirements between this project and the Google development in North Bayshore. TDM programs are targeted to a specific location and type of use. There are differences between the North Bayshore Precise Plan area, which encompasses Google's headquarters, and the LinkedIn site that warrant different TDM requirements. The North Bayshore Precise Plan area has limited access with only three entrances/exits into an area that employs roughly 36,000 employees. The very large concentration of employees in a very constrained area lends itself to robust, customized TDM strategies, most particularly the direct provision of bus services by several of the largest employers. By contrast, the 700 E. Middlefield site is located in

[2] http://opr.ca.gov/ceqa/updates/sb-743/
[3] DEIR page 85
[4] https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15823

the middle of the urban fabric of Mountain View, with various routes to access the site, and is expected to have approximately 4,312 employees. The TDM plan for this site has been developed to be reflective of its expected use and the site location.

Comment F.5: City Council is attempting to strengthen Mountain View's planning approach to the jobs-housing imbalance through the East Whisman Precise Plan.
The East Whisman Precise Plan (EWPP) is expected to be adopted in early 2019 and covers the project area. On February 27, 2018, planning staff recommended to City Council that a "Jobs/Housing Linkage Strategy" be included in the precise plan to ensure that new office developments in the plan area which worsen the jobs-housing imbalance keep pace with housing developments in the plan area.[5] The LinkedIn Project is being considered contemporaneously with the EWPP but is not being required to mitigate environmental problems caused by its worsening of the jobs/housing imbalance.

Response F.5: Please refer to Response F.2. As described in Response F.2, the project's impact on the jobs/housing balance was determined to be less than significant. The City Council will evaluate whether to place any additional requirements to address the jobs and housing balance, which may be formulated as part of the pending EWPP, when considering this proposed project.

Comment F.6: The City's planning department did not publicly post the appendices to the DEIR. According to the DEIR, copies of documents referred to in this EIR are available for review on the Mountain View planning department's active project's website.[6] The project page which is linked to in the DEIR does include a link to the DEIR itself but not to the appendices, including the Transportation Impact Analysis and Transportation Demand Management Plan.

Response F.6: It is not the practice of the City of Mountain View to post appendices on their website; rather EIR appendices are available upon request from the City's Community Development Department.

Comment F.7: Workers on tech campuses and in the hospitality industry are impacted by the housing crisis, traffic, and the related environment impacts. As the union representing workers in these industries, we believe Mountain View has an opportunity to take the jobs-housing imbalance and the environmental impacts of this project seriously. We hope the City will take the time to address the issues raised here.

Response F.7: The comment is noted; no further response is required. See responses F.2 and F.5, above.

[5] Planning Staff Memo to Council on East Whisman Precise Plan, Land Use Topics, February 27, 2018
[6] DEIR page 22, https://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp

G. Kelley Ketchmark (dated July 16, 2018)

Comment G.1: My name is Kelley and I'm writing on behalf of the board of the Wagon Wheel Neighborhood Association. My apologies for the delay on this input.

> **Response G.1:** The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment G.2: We would like to have the following input included in future revisions of the EIR. These items regard the impact to traffic in our area.
Preferred routes of buses to and from the site. This includes Linkedin buses, Google buses, and other shuttles.

> **Response G.2:** LinkedIn provides commute shuttles to locations in San Francisco, the East Bay and South Bay with routes and stops continually adjusted to promote maximum ridership. The Company also provides "last mile" shuttles from Caltrain stations which extends this service north to San Francisco and south to Gilroy and Morgan Hill. These shuttles are provided on weekdays only. Details regarding the commuter services available to employees is provided in the TDM plan (Refer to Appendix J of the DEIR).

Comment G.3: An analysis on the increase of traffic.

> **Response G.3:** The traffic technical report is provided in *Appendix I: Transportation Impact Analysis* of the Draft EIR and summarized in *Section 3.15* of the Draft EIR. This analysis evaluates the amount of additional traffic that would be generated by the project, any potential impacts associated with the project generated traffic, and identifies mitigation measure to reduce or avoid significant traffic impacts.

Comment G.4: How do they plan to achieve a 30% reduction in traffic as intended?

> **Response G.4:** The project proposes to reduce the estimated project traffic by 20 percent through implementation of a Transportation Demand Management Plan, which is included in *Appendix J: Transportation Demand Management Plan* of the Draft EIR. This plan includes items such as providing employee shuttles, incentivizing carpool or vanpool, etc.

SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the 700 East Middlefield Road LinkedIn Office Draft EIR dated May 2018. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page ES-1: **REVISE** the first paragraph of *Executive Summary*, as follows:

The ~~28.7~~ 28.5 acre project site is located in the East Whisman area of eastern Mountain View and includes the addresses 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue, on Assessor's Parcel Numbers (APNs) 165-38-001, -005, -006, ~~and~~ -007, and -008. A Caltrans easement is located on APN 165-38-005, at the corner of SR 237 and East Middlefield Road.

Page ES-6-8: **ADD** mitigation measure numbers to the five intersections having a significant impact and **REVISE** the text for Intersection # 20 in the impact summary table in *Executive Summary*, as follows:

MM TRANS-2.1: #5: Maude Avenue and SR 237 Ramps.

MM TRANS – 2.2: #20: Central Expressway and North Mary Avenue. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a ~~fourth~~ third westbound left-turn lane, consistent with the Tier 3 recommendation in ~~the eastbound direction~~ Santa Clara County's *Draft Expressway Plan 2040*.

Adding a ~~fourth~~ third westbound left-turn lane ~~in the eastbound direction~~ would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Impact]**

MM C-TRANS-1.1: #2: Ellis Street / US 101 Northbound Ramps.

MM C-TRANS-1.2: #3: Ellis Street / US 101 Southbound Ramps.

MM C-TRANS-1.3: #5: Maude Avenue and SR 237 Ramps.

MM C-TRANS-1.4: #8: Maude Avenue / Mathilda Avenue.

MM C-TRANS-1.5: #20: Central Expressway and North Mary Avenue. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a ~~fourth~~ third westbound left-turn lane, consistent with

the Tier 3 recommendation in ~~the eastbound direction~~ Santa Clara County's *Draft Expressway Plan 2040*.

Adding a ~~fourth~~ third westbound left-turn lane ~~in the eastbound direction~~ would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Cumulative Impact]**

Page ES-9: **REVISE** the impact summary table in *Executive Summary*, as follows:

MM C-TRANS-2: Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to acquire right-of-way for or to fully fund a freeway mainline improvement. Freeway improvements require approval by VTA and Caltrans, and it is outside the jurisdiction of a local agency to guarantee implementation of any improvement in the freeway right-of-way. To provide adequate funding, many sources are typically needed, which may include State Transportation Improvement Program funds for projects identified in the VTP, local agency impact fees, and/or a future regional impact fee. The City of Mountain View could potentially participate in development of a regional fee should it be proposed by regional agencies, such as VTA. For these reasons, the project's freeway impacts would remain significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

Page 4: **REVISE** the first paragraph in *Section 2.1, Project Location*, as follows:

The ~~28.7~~ 28.5 acre project site is located in the East Whisman area of eastern Mountain View and includes the addresses 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue, on Assessor's Parcel Numbers (APNs) 165-38-001, -005, -006, ~~and~~ -007, and -008. A Caltrans easement is located on APN 165-38-005, at the corner of SR 237 and East Middlefield Road.

Page 29: **REVISE** the first paragraph in *Section 3.1.2.1, Project Site*, as follows:

The ~~28.7~~ 28.5-acre project site is comprised of ~~four~~ five parcels currently developed with five one- and two-story office buildings containing 466,000 square feet of office space. The site also contains parking lots, utilities and landscaping, and numerous mature trees. Three two-story buildings in the center of site completed renovation in May 2017, along with associated site improvements for office uses. The two single-story buildings on the project site are typical 1970s R&D light-industrial buildings, with an undistinguished architectural style, common in the office/industrial areas of Mountain View. The site is largely paved for parking and driveways and is visually similar to other light industrial/R&D development in the surrounding neighborhood and the East Whisman area of the city (refer to Photos 1-8).

Page 98: **REVISE** *Section 3.8.2, Existing Setting*, as follows:

The ~~28.7~~ 28.5-acre project site is developed with office uses. These uses generate direct GHG emissions from the vehicle trips of employees and visitors, natural gas used for cooking and building heating, operation of stationary equipment (such as back-up generators), and indirect GHG emissions from operational electricity, water use, and other sources.

Page 120: **REVISE** second paragraph in *Section 3.10.3.2, Construction Water Quality Impacts*, as follows:

Implementation of the project would result in the disturbance of most of the site (apart from the central area, with continuing uses), which is approximately ~~28.7~~ 28.5 acres in size. As a result, the project would disturb more than one acre and would be required to comply with the State of California General Construction Permit. The project would also be required to comply with the City of Mountain View's requirements for reducing erosion and sedimentation during construction, which are described below.

Page 128: **REVISE** the first paragraph in *Section 3.11.2, Existing Setting*, as follows:

The ~~28.7~~ 28.5 acre project site consists of ~~four~~ five parcels (APNs 165-38-001, -005, -006, ~~and~~ -007, and -008) located at 700 East Middlefield Road, 800 East Middlefield Road and 1100 West Maude Avenue in the City of Mountain View. The project is located on the west side of the City of Sunnyvale boundary, north of East Middlefield Road and east of SR 237 and a SR 237 frontage road. The site is currently developed with five single- and double-story office buildings containing approximately 466,000 square feet of space.

Page 157: **REVISE** the first paragraph in *Section 3.13.2.2 Existing Setting – Project Site*, as follows:

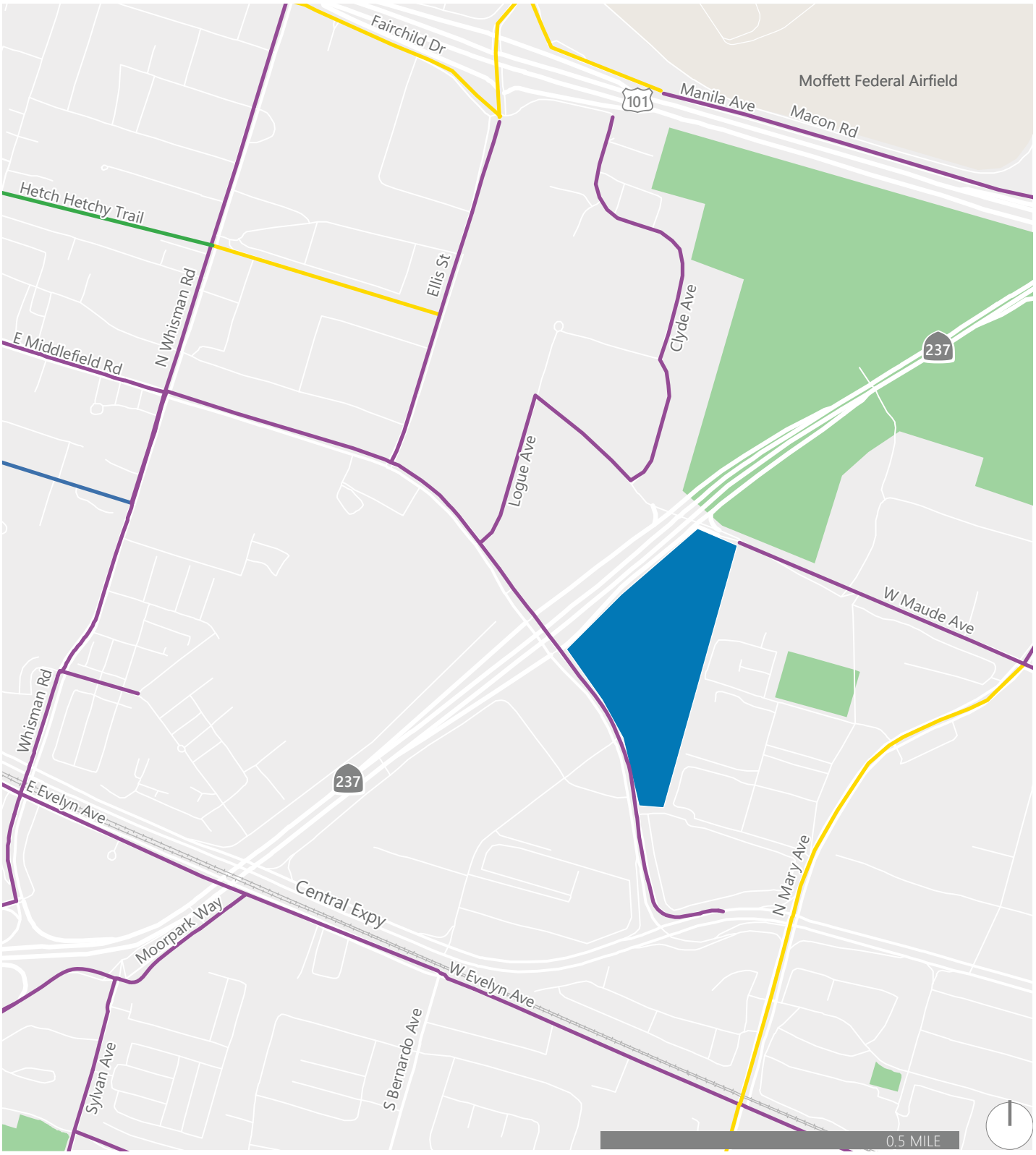
The ~~four~~ five parcels comprising the ~~28.7~~ 28.5-acre project site are currently developed with five one- and two-story office buildings containing approximately 466,000 square feet of space. The existing site buildings on site currently support approximately 1,400 employees. Although the campus could support a higher number of employees, the existing buildings were recently remodeled and contain a large amount of employee amenity space.

Page 175: **REVISE** the list of bicycle lanes in *Section 3.15.2.9, Existing Bicycle Facilities* as follows:

Bicycle lanes on:

- Middlefield Road
- Maude Avenue east of ~~SR 237~~ the Mountain View/Sunnyvale City Limits

Page 176: **REPLACE** Figure 3.15-3, Existing Bicycle Facilities with Revised Figure 3.15-3, Existing Bicycle Facilities as follows:



(REVISED) EXISTING BICYCLE FACILITIES FIGURE 3.15-3

Page 180: **Revise** text under subheading 'Freeway Segments' as follows:

Santa Clara County evaluates the operations of basic freeway segments using density to evaluate existing conditions operations and volume-to-capacity ratio to evaluate future year conditions. Existing freeway segments in Santa Clara County are evaluated using VTA's analysis procedure, which is based on the density of the traffic flow during the AM and PM peak hours using methods described in the 2000 HCM. Data presented in the ~~2014~~ 2016 *Santa Clara ~~County Annual~~ VTA 2016 CMP Monitoring and Conformance Report* was used to evaluate existing freeway operations. Density is expressed in passenger cars per mile per lane. The CMP ranges of densities for each freeway segment level of service are shown in Table 3.15-4.

Page 185: **REVISE** Table 3.15-5, Existing Intersection Level of Service, for intersections 16 through 20, as follows:

Table 3.15-5:
Existing Intersection Level of Service

	Intersection	Jurisdiction (Operator)[1]	LOS Threshold[2]	Count Date	Control	Peak Hour[3]	Delay[4]	LOS[5]
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	April 25, 2017	Signal	AM PM	~~11.~~1 7.6 ~~16.8~~ 16.0	~~B+~~ A B
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	~~18.4~~ 17.6 ~~37.0~~ 10.6	B- ~~D~~B+
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	~~9.9~~ 4.6 ~~4.7~~ 5.3	A A
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	April 20, 2017	Signal	AM PM	~~7.0~~ 8.1 ~~10.2~~ 9.1	A ~~B+~~A
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	April 20, 2017	Signal	AM PM	~~46.8~~ 48.5 ~~68.1~~ 73.6	D E

Page 186: **Revise** the first line under *Section 3.15.2.14, Existing Freeway Segment Operations* as follows:

The existing AM and PM peak hour mixed-flow and HOV lanes freeway segment densities reported in ~~VTA's~~ the Santa Clara VTA 2016 CMP Monitoring and Conformance Report (May ~~2016~~ 2017) are shown in the TIA in Appendix I.

Page 186, 187: **Revise** *Section 3.15.2.14, Existing Freeway Segment Operations* as follows:

The following mixed-flow freeway segments exceed VTA's LOS E standard during the specified peak hour:

- I-280 ~~Eastbound~~ Southbound
  - Foothill Expressway to De Anza Boulevard (2 segments) (PM Peak Hour)
- I-280 ~~Westbound~~ Northbound
  - De Anza Boulevard to Foothill Expressway (2 segments) (AM Peak Hour)

The following HOV lane freeway segments exceed VTA's LOS E standard during the specified peak hour:

- I-280 ~~Westbound~~ Northbound HOV
  - De Anza Boulevard to Foothill Expressway (2 segments) (AM Peak Hour)

Page 189: **Revise** Table 3.15-6, Signalized Intersection Thresholds, as follows:

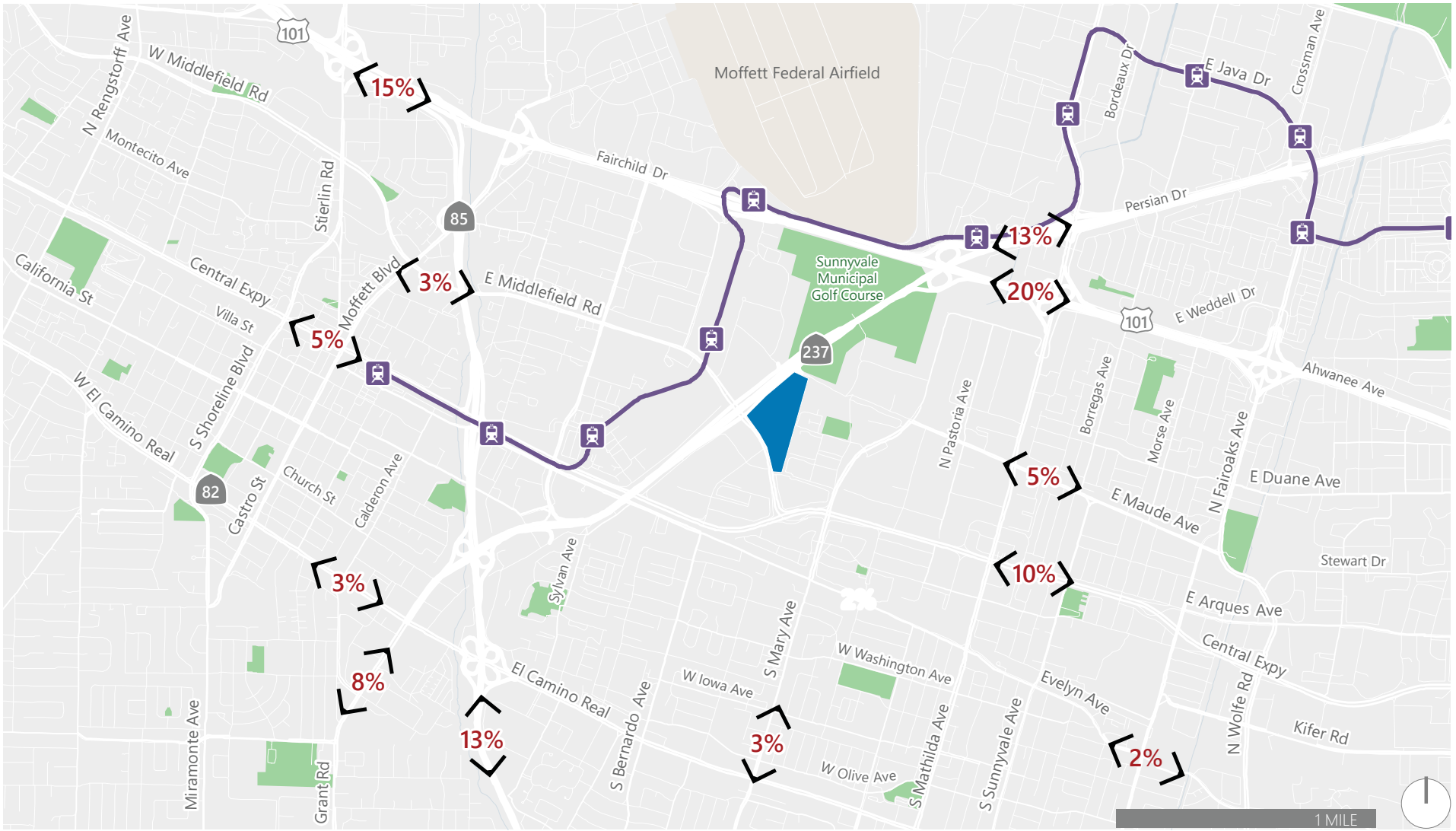
Table 3.15-6:
Signalized Intersection Thresholds

Jurisdiction	Intersection LOS Standards	Citation
Santa Clara County	LOS E for all Santa Clara County intersections.	Santa Clara County General Plan, pages F-18 and F-19 (1994)
VTA Congestion Management Program (CMP)	LOS E for all VTA CMP intersections.	Santa Clara ~~County Annual~~ VTA 2016 CMP Monitoring and Conformance Report, page ~~9~~ 8 (~~2014~~ 2017)
City of Mountain View	LOS D for all City of Mountain View intersections.	City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program EIR, page 121 (2011)
City of Sunnyvale	LOS D for all local intersections; LOS E for "regionally significant roadways."	City of Sunnyvale General Plan, consolidated in July 2011*
Caltrans	LOS C on state highway facilities**	Caltrans Guide for the Preparation of Traffic Impact Studies, page 1 (2002)

Page 191: **Revise** the first paragraph under *Section 3.15.3.4, Thresholds for Freeway Segment Impacts* as follows:

The study area includes a number of freeway segments. Caltrans is the owner/operator of the State highway system, including freeways, interchanges, and arterial State Routes. The *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2001) covers the information needed for Caltrans to review a project's impact on State highway facilities, including freeway segments. However, as the Congestion Management Agency, VTA is responsible for monitoring operations on Caltrans facilities within Santa Clara County. For the freeway impact analysis, the relevant jurisdiction's CMP level of service standards are used. The LOS standard for CMP freeway segments in Santa Clara County is LOS E for both mixed-flow and High Occupancy Vehicle (HOV) lanes (*Santa Clara ~~County Annual~~ VTA 2016 CMP Monitoring and Conformance Report ~~2014~~*, VTA, ~~2015~~ 2017).

Page 195: **REPLACE** Figure 3.15-5, Proposed Project Trip Distribution with Revised Figure 3.15-5, Proposed Project Trip Distribution as follows:



(REVISED) PROPOSED PROJECT TRIP DISTRIBUTION

FIGURE 3.15-5

Page 197: **REVISE** Table 3.15-9, Existing No Project and With Project Intersection Level of Service, for intersections 16 through 20 and add footnote, as follows:

Table 3.15-9:
Existing No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction (Operator)[1]	LOS Thres-hold[2]	Peak Hour[3]	Existing No Project[4]		Existing With Project			
					Delay[4] [5]	LOS[5] [6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM PM	~~11.1~~ 7.6 ~~16.8~~ 16.0	~~B+~~ A B	~~11.0~~ 7.6 ~~16.9~~ 16.1	~~B+~~ A B	0.001 0.002	0.0 0.0
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM PM	~~18.4~~ 17.6 ~~37.0~~ 10.6	B- ~~D~~B+	~~18.3~~ 17.4 ~~36.7~~ 10.6	~~B~~ B B~~D~~+	0.001 0.006	0.0 ~~-1.0~~ -0.1
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	~~9.9~~ 4.6 ~~4.7~~ 5.3	A A	~~9.9~~ 4.4 ~~4.8~~ 5.2	A A	~~0.001~~ 0.006 ~~0.009~~ 0.001	~~0.1~~ -0.2 ~~0.1~~ 0.0
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	~~7.0~~ 8.1 ~~10.2~~ 9.1	A ~~B+~~A	~~8.4~~ 8.6 ~~10.4~~ 9.4	A ~~B+~~ A	~~0.021~~ 0.000 0.000	~~1.8~~ 0.0 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	~~46.8~~ 48.5 ~~68.1~~ 73.6	D E	~~47.3~~ 49.2 ~~70.8~~ 77.5	D ~~E~~ E-	~~0.002~~ 0.021 0.013	~~0.0~~ 1.0 ~~4.6~~ 7.2

Notes:

1. Intersection jurisdiction describes the right-of-way owner. Intersection operator describes the jurisdiction and LOS threshold that is used to maintain and operate the signal. CMP = Congestion Management Program.
2. LOS Threshold is the threshold between acceptable and unacceptable level of service.
3. AM = morning peak hour, PM = evening peak hour
4. Existing No Project presents the delay and LOS for intersections using existing intersection geometry and existing traffic counts.
5. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections. Includes adjusted saturation flow rates to reflect Santa Clara County conditions per VTA TIA Guidelines.
6. LOS = Level of Service. LOS calculations conducted using the TRAFFIX level of service analysis software package, which applies the method described in the 2000 Highway Capacity Manual.
7. Change in critical volume to capacity ratio between Existing No Project and Existing With Project Conditions.
8. Change in average critical movement delay between Existing No Project and Existing With Project Conditions.

Bold text indicates intersection operates at a deficient Level of Service compared to the applicable standard.
Source: Fehr & Peers, 2018.

Page 201: **REVISE** Table 3.15-11, Background No Project and With Project Intersection Level of Service, for intersections 16 through 20, as follows:

Table 3.15-11:
Background No Project and With Project Intersection Levels of Service

ID	Intersection	Jurisdiction(Operator)[1]	LOS Threshold[2]	Peak Hour[3]	Background No Project		Background With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM PM	~~10.9~~ 7.7 ~~17.2~~ 17.1	~~B+~~ A B	~~10.9~~ 7.7 17.2	~~B+~~ A B	0.001 0.008	0.0 0.2
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM PM	~~19.4~~ 20.2 ~~50.4~~ 12.8	~~B-~~ C+ ~~D~~ B	~~19.3~~ 20.1 ~~50.1~~ 12.8	~~B-~~ C+ ~~D~~ B	0.001 0.006	0.0 ~~-1.2~~ -0.1
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	~~10.2~~ 5.0 ~~5.5~~ 6.6	~~B+~~ A A	~~10.1~~ 4.9 ~~5.5~~ 6.6	~~B+~~ A A	~~0.001~~ 0.006 ~~0.009~~ 0.001	-0.1 ~~0.1~~ 0.0
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	~~8.0~~ 8.4 ~~10.4~~ 9.6	A ~~B+~~ A	~~9.4~~ 9.2 ~~10.7~~ 9.9	A ~~B+~~ A	~~0.021~~ 0.000 0.000	~~2.1~~ 0.0 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	~~52.0~~ 52.3 **~~83.1~~** **90.1**	D- **F**	~~50.0~~ 53.3 **~~87.7~~** **94.9**	D- **F**	~~0.246~~ 0.021 **0.013**	~~7.4~~ 1.5 **~~8.2~~** **8.5**

Page 203: **REVISE** Table 3.15-12, Background With Project Mitigation Measures – Intersection LOS and Bicycle and Pedestrian QOS Results, for intersection # 20, as follows:

Table 3.15-12:
Background With Project Mitigation Measures – Intersection LOS and Bicycle and Pedestrian QOS Results

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Threshold[2]	Mitigation Description	Peak Hour[3]	Background No Project Conditions		Background With Project Conditions				Background With Project and Mitigation Conditions				Impact Significance With Mitigation[8]
						Delay[4]	LOS[5]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	Contribute fair share funding toward adding a ~~fourth~~ third westbound left-turn ~~through~~ lane ~~in the eastbound direction~~.	AM PM	~~52.0~~ 52.3 **~~83.1~~** **90.1**	D- **F**	~~50.0~~ 53.3 **~~87.7~~** **94.9**	D- **F**	4	3.3	~~49.7~~ 51.5 ~~69.7~~ 88.7	D- ~~E~~ **F**	4	3.3	LTS

Page 204: **ADD** mitigation measure number as follows:

MM TRANS-2.1: Intersection#5: Maude Avenue and SR 237 Ramps (Caltrans/Mountain View)

Page 205: **ADD** mitigation measure number and **REVISE** text of the mitigation measure as follows:

MM TRANS-2.2: Intersection #20: Central Expressway and North Mary Avenue (Santa Clara County/CMP) – The addition of project traffic under Background With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the PM peak hour. Under Background No Project Conditions, it functions at an unacceptable LOS F during the PM peak hour. With the addition of project traffic, the operations degrade further, meeting the significance criteria set by Santa Clara County. The significant impact is the result of adding project traffic to an already-congested intersection.

The following physical improvements could reduce this impact:

- Intersection #20 Mitigation: Contribute fair-share funding toward constructing a ~~fourth~~ third westbound left-turn lane, consistent with the Tier 3 recommendation in ~~the eastbound direction~~ Santa Clara County's *Draft Expressway Plan 2040*.

Adding a ~~fourth~~ third westbound left-turn lane ~~in the eastbound direction~~ would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact.

It should be noted that there are additional improvements identified for ~~this intersection~~ the Central Expressway corridor in the Santa Clara County's *Draft Expressway Plan 2040*. The improvement, which is a Tier 2 improvement, would add an auxiliary lane in each direction on Central Expressway between Mary Avenue and Lawrence Expressway. This improvement is not anticipated to change the intersection configuration, but instead continue the existing third ~~westbound~~ eastbound through lane to the next upstream intersection.

In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The mitigation would not have a substantial adverse effect on bicycle QOS; the bicycle StreetScore+ result would remain at QOS 3.3. The pedestrian QOS score is also at 4, both without and with the mitigation. As noted above, a score of 4 denotes a facility that is uncomfortable for most pedestrians, due to high travel speeds and wide crossings at intersections. The mitigation would increase the crossing distance for pedestrians crossing Central Expressway, and could

shrink or eliminate the existing median that pedestrians can use for refuge. **[Significant Unavoidable Impact]**

Page 209: **REVISE** Table 3.15-13, Background With Project Transit Route Delay, as follows:

Table 3.15-13:
Background With Project Transit Route Delay

Route		Direction	Peak Hour	Additional Route Average Delay with Project (seconds)[1]
32	San Antonio Shopping Center to Santa Clara Transit Center	Eastbound	AM PM	<5.0 ~~22.1~~ 19.6
		Westbound	AM PM	~~<5.0~~ 9.2 <5.0
185	Gilroy Transit Center to San Antonio	Northbound	AM	<5.0
		Southbound	PM	<5.0
MVgo	East Whisman Route	Northbound	AM	6.4
		Southbound	PM	<5.0

Note:
1. The project was not considered to have a measureable change in overall transit delay if the increase in travel time was less than five seconds. In some cases the travel time under With Project conditions improved slightly (due to changes in signal timing, critical movement changes, etc.).
Source: Fehr & Peers, 2018.

Page 210-211: **REVISE** Table 3.15-14, Background With Project Mitigation Measures – Intersection LOS and Bicycle and Pedestrian QOS Results, for intersections 16 through 20, as follows:

Table 3.15-14:
Near-Term Cumulative No Project and With Project Intersection LOS

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Thres-hold[2]	Peak Hour[3]	Near-Term Cumulative No Project		Near-Term Cumulative With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
16	Central Expressway and SR 85 Southbound Ramp	Santa Clara County	LOS E	AM PM	~~11.7~~ 8.1 ~~20.1~~ 19.9	~~B+~~ A ~~C+~~ B-	~~11.6~~ 8.1 ~~20.3~~ 20.2	~~B+~~ A C+	0.001 0.008	0.0 0.4

Table 3.15-14:
Near-Term Cumulative No Project and With Project Intersection LOS

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Thres-hold[2]	Peak Hour[3]	Near-Term Cumulative No Project		Near-Term Cumulative With Project			
					Delay[5]	LOS[6]	Delay[5]	LOS[6]	Δ in Crit. V/C[7]	Δ in Crit. Delay[8]
17	Central Expressway and Whisman Station Drive	Santa Clara County (CMP)	LOS E	AM PM	~~20.8~~ 24.3 ~~56.6~~ 15.1	C~~+~~ ~~E+~~ B	~~20.7~~ 24.2 ~~56.2~~ 15.1	C~~+~~ ~~E+~~ B	0.001 0.006	0.0 ~~-1.2~~ -0.1
18	Central Expressway and Ferguson Drive	Santa Clara County (CMP)	LOS E	AM PM	~~14.0~~ 5.7 ~~5.9~~ 7.9	~~B~~ A A	~~14.0~~ 5.7 ~~6.0~~ 7.9	~~B~~ A A	~~0.001~~ 0.006 ~~0.009~~ 0.001	~~0.2~~ -0.1 0.0
19	Central Expressway and Bernardo Avenue	Santa Clara County	LOS E	AM PM	~~9.1~~ 9.8 ~~11.3~~ 10.7	A B+	10.6 ~~11.5~~ 11.0	B+ B+	~~0.021~~ 0.000 0.000	~~2.3~~ 0.0 0.0
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	AM PM	~~52.3~~ 55.7 **~~102.1~~** **112.0**	~~D~~ E+ **F**	~~53.0~~ 57.4 **~~107.5~~** **117.3**	~~D~~ E+ **F**	~~0.015~~ 0.021 **0.013**	~~0.9~~ 2.8 **~~9.3~~** **9.1**

Page 213: **REVISE** Table 3.15-15, Near-Term Cumulative + Project Mitigation/Bicycle and Pedestrian QOS, for intersection # 20, as follows:

Table 3.15-15:
Near-Term Cumulative + Project Mitigation/Bicycle and Pedestrian QOS

ID	Intersection	Jurisdiction/ (Operator)[1]	LOS Threshold[2]	Mitigation Description	Peak Hour[3]	Near-Term Cumulative No Project Conditions		Near-Term Cumulative With Project Conditions				Near-Term Cumulative With Project and Mitigation Conditions				Impact Significance With Mitigation[8]
						Delay[4]	LOS[5]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	Delay[4]	LOS[5]	Ped QOS[6]	Bike QOS[7]	
20	Central Expressway and North Mary Avenue	Santa Clara County (CMP)	LOS E	Contribute fair share funding toward adding a ~~fourth~~ third westbound left-turn ~~through~~ lane ~~in the eastbound direction~~.	AM PM	~~52.3~~ 55.7 **~~102.1~~** **112.0**	~~D~~ E+ **F**	~~53.0~~ 57.4 **~~107.5~~** **117.3**	~~D~~ E+ **F**	4	3.3	~~52.7~~ 59.4 **~~80.2~~** **107.8**	~~D~~ E+ **F**	4	3.3	LTS

Pages 215-218: **ADD** mitigation measure numbers to the five intersections having a significant impact and **REVISE** text for Intersection# 20 as follows:

MM C-TRANS-1.1: Intersection #2: Ellis Street / US 101 Northbound Ramps (Caltrans/Mountain View)

MM C-TRANS-1.2: Intersection #3: Ellis Street / US 101 Southbound Ramps (Caltrans/Mountain View)

MM C-TRANS-1.3: Intersection #5: Maude Avenue / SR 237 Ramps (Caltrans/Mountain View)

MM C-TRANS-1.4: Intersection #8: Maude Avenue / Mathilda Avenue (Sunnyvale/CMP)

MM C-TRANS-1.5: Intersection #20: Central Expressway/North Mary Avenue (Santa Clara County/CMP)

The addition of project traffic under Near-Term Cumulative With Project Conditions would cause a significant impact based on the significance criteria for a signalized intersection during the PM peak hour. Under Near-Term Cumulative No Project Conditions, it functions at an unacceptable LOS F during the PM peak hour. With the addition of project traffic, the operations degrade further, meeting the significance criteria set by Santa Clara County. The significant impact is the result of adding project traffic to an already-congested intersection.

The following physical improvements could reduce this impact:

- Contribute fair-share funding toward constructing a ~~fourth~~ third westbound left-turn lane, consistent with the Tier 3 recommendation in ~~the eastbound direction~~ Santa Clara County's *Draft Expressway Plan 2040*.

Adding a ~~fourth~~ third westbound left-turn lane ~~in the eastbound direction~~ would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. **[Significant Unavoidable Cumulative Impact]**

The City and project applicant, however, should diligently pursue measures to fully mitigate the project's impact. It should be noted that there are additional improvements identified for ~~this intersection~~ the Central Expressway corridor in the Santa Clara County's *Draft Expressway Plan 2040*. The improvement, which is a Tier 2 improvement, would add an auxiliary lane in each direction on Central

Expressway between Mary Avenue and Lawrence Expressway. This improvement is not anticipated to change the intersection configuration, but instead continue the existing third ~~westbound~~ eastbound through lane to the next upstream intersection.

In terms of the mitigation's effect on bicyclists and pedestrians, a bicycle and pedestrian QOS analysis was completed. The mitigation would not have a substantial adverse effect on bicycle QOS; the bicycle StreetScore+ result would remain at QOS 3.3. The pedestrian QOS score is also at 4, both without and with the mitigation. As noted above, a score of 4 denotes a facility that is uncomfortable for most pedestrians, due to high travel speeds and wide crossings at intersections. The mitigation would increase the crossing distance for pedestrians crossing Central Expressway, and could shrink or eliminate the existing median that pedestrians can use for refuge.

Page 221: **ADD** mitigation measure number to the text in second paragraph and **REVISE** text for Impact C-TRANS-2 as follows:

MM C-TRANS-2: Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to acquire right-of-way for or to fully fund a freeway mainline improvement. Freeway improvements require approval by VTA and Caltrans, and it is outside the jurisdiction of a local agency to guarantee implementation of any improvement in the freeway right-of-way. To provide adequate funding, many sources are typically needed, which may include State Transportation Improvement Program funds for projects identified in the VTP, local agency impact fees, and/or a future regional impact fee. The City of Mountain View could potentially participate in development of a regional fee should it be proposed by regional agencies, such as VTA. For these reasons, the project's freeway impacts would remain significant and unavoidable.

Impact C-TRANS-2: Implementation of the proposed project would result in significant impacts to ~~53~~ 49 freeway segments under Near-Term Cumulative With Project conditions. **[Significant Unavoidable Cumulative Impact]**

Page 226: **REVISE** *Section 3.15.3.18, Site Access, Internal Circulation, and Parking* as follows:

Maude Avenue Project Driveway
It is projected that approximately 123 westbound vehicles will turn left into this driveway in the AM peak hour to access the project site. A left-turn pocket may be advisable along westbound Maude Avenue so that vehicles waiting to enter the project site would not block the westbound through traffic. If a left-turn pocket were to be incorporated, it should be between 100 and 125 feet in length.

Page 231: **REVISE** Section 3.15.4 as follows:

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours.	Significant Impact	~~Mitigation available for~~ **MM TRANS - 2.1**, Intersections #20. ~~No mitigation available for~~ **MM TRANS 2.2,** Intersection #5.	Significant Unavoidable Impact
C-TRANS-1: Implementation of the proposed project would result in significant impacts to five project study intersections under Near-Term Cumulative With Project conditions in the AM and PM peak hours.	Significant Impact	~~Mitigation available for Intersections #2, #3, and #20. No mitigation available for Intersections #5 and #8.~~ **MM C-TRANS 1.1,** Intersection#2; **MM C-TRANS 1.2,** Intersection #3; **MM C-TRANS 1.3** Intersection #5, **MM C-TRANS 1.4** Intersection #8, **MM C-TRANS 1.5** Intersection #20.	Significant Unavoidable Cumulative Impact
C-TRANS-2: Implementation of the proposed project would result in significant impacts to ~~53~~ 49 freeway segments under Near-Term Cumulative With Project conditions.	Significant Impact	~~No mitigation available~~. **MM C-TRANS-2**	Significant Unavoidable Cumulative Impact

Page 249: **REVISE** the second paragraph under 'Location Alternatives' subheading in *Section 7.1.2.1, Alternatives Considered But Rejected,* as follows:

The project proposes a rezoning of approximately ~~28.7~~ 28.5 acres of land currently zoned *Limited Industrial (ML)* into a *Planned Community (P)* zoning district that would allow office uses on the site at an FAR of up to 0.86 and a maximum development of up to 1,078,000 square feet in size. An alternative site would need to be at least of comparable size, within the urbanized area of Mountain View, and have adequate transit access, roadway access, and utility capacity to serve the development proposed.

Appendix I Replace Appendix I with the report in Attachment A of the Final EIR

SECTION 6.0 COPIES OF THE COMMENT LETTERS RECEIVED ON THE DRAFT EIR

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
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

July 16, 2018

SCH # 2017092025
GTS # 04-SCL-2017-00425
GTS ID: 7818
PM: SCL – 237 – 1.6

Diana Pancholi, Senior Planner
City of Mountain View
500 Castro Street
Mountain View, CA 94039-7540

700 East Middlefield Road LinkedIn Office Project- Draft Environmental Impact Report (DEIR)

Dear Ms. Pancholi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 700 East Middlefield Road LinkedIn Office Project. 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) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the May 31, 2018 DEIR.

Project Understanding

The project site abuts the State Route (SR) 237 frontage road, located in the eastern quadrant of the SR 237/East Middlefield Road intersection. State Routes 82 and 85 are located approximately 1.5 miles southwest of the project site, while US Route (US) 101 is located approximately 1.25 miles northeast of the project site. Vehicular access to the project site would be provided via four driveways: 1) a full access driveway at the intersection of East Middlefield Road and Bernardo Avenue would be the main site entrance, 2) a right-turn in and out driveway on East Middlefield Road south of Bernardo Avenue, 3) a right-turn in and out driveway on the SR 237 northbound frontage road, and 4) a full access driveway along the project's frontage on Maude Avenue. Existing driveways are located on E. Middlefield Road, Maude Avenue, and the SR 237 frontage road.

Two existing buildings would be demolished, and three six-story office buildings and two seven-level parking structures would be built on the site. The three renovated two-story buildings in the central portion of the site would be retained. All surface parking lots would be removed as

part of site development. Both parking structures would include one level of below-grade parking and six above-grade levels. The parking structures would provide a total of approximately 2,913 total parking spaces. The project will also include at least 177 bicycle parking spaces, consistent with City of Mountain View Zoning Ordinance.

The three proposed six-story office buildings would contain approximately 763,000 square feet (sf.) of office space. The completed campus would be approximately 1,078,000 sf. in size, representing a net increase in development on the site of approximately 612,000 sf. Two of the three proposed buildings would be located along the SR 237 Frontage Road, and one building would be located at the main entrance at Middlefield Road and Bernardo Avenue, on the south end of the project site. This building would contain approximately 3,000 square feet of ground-floor retail space along Middlefield Road, which would be open to the public.

The applicant proposes to construct the project in three phases, maintaining occupancy in the three central buildings during the construction period. All building materials and construction parking would be staged on site.

The proposed project site has a *High-Intensity Office* land use designation in the Mountain View 2030 General Plan. The project proposes a floor area ratio (FAR) of 0.86 and six-story building heights, which is below the maximum 1.0 FAR and eight-story height guideline allowed within the High-Intensity Office designation. The proposed project would be consistent with this land use designation, and would not require a General Plan amendment. The existing zoning district is *ML: Limited Industrial*, and the project would require a rezoning to the *P: Planned Community* zoning district to increase the allowed FAR on the site.

The City of Mountain View is currently preparing the East Whisman Precise Plan; a zoning document that will provide standards and guidelines for the East Whisman Change Area, including the project site. The site will be rezoned to *East Whisman Precise Plan* following the Plan's adoption, anticipated in 2019.

A Transportation Demand Management (TDM) plan that would provide at least a 20 percent reduction in vehicle trips has been prepared by the applicant, as described, it would provide at least a 20 percent reduction in vehicle trips to the project site. The TDM plan will include the components below, and the applicant may consider additional measures if required to meet trip reduction goals.

- Priority parking for shared ride vehicles
- On-site transportation coordinator
- Bicycle parking, showers, and lockers
- Bicycle sharing
- Telecommuting/flexible work schedule program
- Guaranteed ride home program
- Membership in the Mountain View Transportation Management Association (MVTMA)
- Rideshare match services

- Transit shuttle services (long and short haul)
- Marketing and information

Clarification
The DEIR states that the project is 28.7 acres, but the Assessor's Parcel Numbers (APNs) listed total to 28.17 acres. There is a discrepancy between the project limits and the APNs listed. Assessor's Parcel Numbers 165-38-001, -005, -006 and -007 total to 28.17 acres, not all areas/APNs have been accounted for in the project description (APNs 165-38-008 and N. Bernardo Avenue). Furthermore, better quality plats needed, especially at the corner of Maude and SR 237 frontage road, to fully assess the impacts on State's right-of-way (ROW).

Also, the existing easement plan shows N. Bernardo Avenue as an existing easement to be abandoned per California Government Code Section 66445 (J) and the project description labels APN 165-38-005 as a Caltrans Easement. The continued existence of landscaping within State ROW would require either a maintenance agreement with Caltrans or the sale of State land to the developer. For more information about maintenance agreements, please contact Art Duffy in the Office of Maintenance Agreements at (510) 622-8712 for more information. Any landscape elements within Caltrans right-of-way (ROW) are subject to standard safety and setback requirements. These requirements can be found in the Highway Design Manual, Chapter 900 and the Encroachment Permit Manual, Chapter 500 at the following link: http://www.dot.ca.gov/design/manuals/hdm.html

Multimodal Planning
This project is located within approximately 0.25 miles of Middlefield Station serving the Santa Clara Valley Transportation Authority (VTA) Light Rail Route 902, and is adjacent to a VTA Bus Route 32 stop at E. Middlefield Rd. and Bernardo Ave. We encourage fair share contributions toward multi-modal and regional transit improvements. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Contributing to VTA's transit operating and capital improvement program, or contributions to improve nearby bus stop facilities if project generated travel demand increases ridership at these stops to meet VTA's thresholds for bus stop improvements can help increase sustainable mode shares and meet trip reduction goals.

The project's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. Any impacts to bicycle or pedestrian facilities caused by other mitigations should be fully mitigated. These smart growth approaches are consistent with MTC's Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

Travel Demand Analysis
Caltrans comment letter on the NOP for this project, dated October 13, 2017 requested a VMT analysis. The Traffic Impact Analysis discussion of VMT provided with this DEIR includes

limited discussion and an estimate of project-generated VMT table, please consider the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA, http://www.opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf.

Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Furthermore, please provide clarification regarding the points listed below, noting that operational issues such as turning movement conflicts, inadequate vehicle storage, and speed differentials are not exempt under CEQA and should be mitigated.

- SR 237 / Maude Avenue Westbound diagonal off-ramp: The Traffic Impact Analysis (TIA) shows that left-turning project-generated-trips, in the AM-peak hour, will create a queue that will extend beyond the available left-turn storage. This may block the right/through movement vehicles from reaching their respective turning movement storage lengths. This may delay the right/through movements from getting through the intersection at the ramp terminal. How will the project mitigate this impact?

- Please provide analysis demonstrating the effectiveness of the proposed mitigations at the Maude Avenue and SR 237 interchange. If the reconfiguration does mitigate the impact, the mitigation can be pursued by the project sponsor through Caltrans' permit process.

- The project should mitigate its impact to project-impacted freeway segments along US 101, SR 237 and SR 85, as noted in the TIA, by paying its fair share contribution fee toward the planned construction of the US 101 Express Lane Project and the SR 237 Express Lane Project, which are sponsored by VTA.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4c: Suburban Communities (Dedicated Use Areas)** where location efficiency factors, such as community design, are weak and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. We applaud the inclusion of a TDM program with a 20 percent trip reduction. We strongly encourage the implementation of further TDM strategies proposed in the DEIR in addition to those proposed to be implemented.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

Hydraulics
Caltrans will need to review the drainage plan, when available, specifically the site drainage discharge connections to the State drainage facilities, to assure that there will be no impact to State facilities by this project.

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. Since this project meets the criteria to be deemed of statewide, regional or areawide significance per CEQA Section 15206, the DEIR should be submitted to both the Santa Clara Valley Transportation Authority, Association of Bay Area Governments (ABAG), and MTC for review and comment.

Encroachment Permit
Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits/.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at (510)-286-5518 or jake.freedman@dot.ca.gov.

Sincerely,

Jeanette Ramirez

for PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Sunnyvale

July 16, 2018

Diana Pancholi, Senior Planner
City of Mountain View
Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94041-7540
E-Mail: diana.pancholi@mountainview.gov

Re: Comments on the Notice of Preparation for the 700 East Middlefield Road LinkedIn Office Project

Dear Ms. Pancholi:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed LinkedIn Office Project (Project) in Mountain View. This letter includes all City of Sunnyvale comments.

General Comments:

1. The Project site immediately abuts a medium-density residential neighborhood and is in proximity to a mobile home park within the City of Sunnyvale. We request that the City of Mountain View continue to provide outreach to Sunnyvale residents, and that the notice area include these neighborhoods in their entirety.

2. Encinal Park is near the East Whisman Precise Plan area, and is heavily used by nearby residents and businesses. We are concerned that additional density proposed in the Precise Plan area would have significant impacts to existing City of Sunnyvale services and facilities, especially related to Encinal Park.

Noise

1. The mitigation measures NOISE-4.1 and NOISE-4.2 states that the City of Sunnyvale permits construction activities on Saturdays between 8:00 a.m. and 5:00 p.m.; however, this is not entirely correct. The City of Sunnyvale only allows construction on Saturdays with approval from the Building Official, and usually only in circumstances where a project is not adjacent to residential uses. Please modify the Noise mitigation measures to remove reference of allowances for weekend construction by the City of Sunnyvale. In addition, the City of Sunnyvale strongly urges the City of Mountain View to

prohibit construction activities on weekends for this project due to the project's proximity to residential uses within the City of Sunnyvale.

Traffic and Transportation Input for the Notice of Preparation:

If you have questions on the following traffic related items, please contact Lillian Tsang, Principal Traffic Engineer, at ltsang@sunnyvale.ca.gov or (408) 730-7556.

In the Transportation Impact Analysis Report:

2. When referring to Interstate 280, please change the direction from Eastbound to Southbound (global change).

3. When referring to Interstate 280, please change the direction from Westbound to Northbound (global change).

4. For Near-Term 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.

5. On page 25, Figure 2, 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.

6. On page 25, Figure 2, 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.

7. On page 31, table 3-2, in the footnote, the source should be changed to "2016 Monitoring & Conformance Report, VTA, May 2016".

8. On page 37, under the bullet points "Bicycle lanes on:", existing bicycle lanes are only available on Maude Avenue east of the Mountain View/Sunnyvale City Limits, instead of east of SR 237. There is currently no bicycle lanes on either side of Maude Avenue between SR 237 EB ramps and the Mountain View/Sunnyvale City Limits. Please make the change in wordings throughout, as well as in Figure 4.

9. On page 45, Figure 6, the project trip distribution shown on this figure are not match the distribution of vehicle trips on page 6 of the Appendix J, Transportation Demand Management Plan.

10. On Figure 6, Project Trip Distribution, it shows that 2% is being assigned on Evelyn Avenue east of S Mary Avenue. However, on Figure 7, Project Trip Assignment, the 2% project trips are not shown going to/from Evelyn Avenue east of S Mary Avenue at Intersection 22.

11. On Figures 6 and 7, no project trips are assigned heading to/from Mathilda Avenue south of Maude Avenue. In reviewing the existing traffic pattern, there should be some trips coming from Mathilda Avenue from the south since it's a major north/south corridor within the City. In addition, the trips between intersections 7 and 8 do not add up.

12. City of Sunnyvale has a minimum bicycle lane width design standard of six-foot-wide.

13. On page 88, for intersection #8 Maude Avenue/Mathilda Avenue, the project shall pay a fair-share payment contribution based on City of Sunnyvale's traffic impact fee schedule.

14. On page 95, "There is a short gap in the bicycle lane on Maude Avenue through the SR 237 interchange area." shall be changed to include the gap in the bicycle lane on Maude Avenue between SR 237 EB ramps and the Mountain View/Sunnyvale city limits.

15. On page 99, Maude Avenue Project Driveway, a westbound left-turn pocket is recommended for this driveway to enter the project site. The minimum westbound left-turn pocket length of 100 feet is recommended to accommodate incoming traffic into the site.

16. On page 100, the City of Sunnyvale supports Option #1: Prohibit outbound left-turns. This is due to the large amount of project trips that would be exiting via this driveway, as well as the close proximity to the intersection of SR 237 Eastbound ramps/Maude Avenue, creating an unsafe operation condition. Even if this driveway access were to be signalized, the driveway is still in close proximity to the intersection of SR 237 Eastbound ramps/Maude Avenue. Queue from the westbound approach at the intersection of SR 237 Eastbound ramps/Maude Avenue would potentially spill back into the project driveway intersection, which would create a safety concern on the operations at this intersection.

County of Santa Clara

Roads and Airports Department

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

July 16, 2018

Diana Pancholi
Senior Planner,
Community Development Department
City of Mountain View
500 Castro Street
Mountain View, CA 94041

SUBJECT: Notice of Availability of Draft Environmental Impact Report for LinkedIn Office Project

Dear Ms. Diana:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review the Notice of Availability of Draft Environmental Impact Report for LinkedIn Office Project and is submitting the following comments:

- We have noted that existing field counts do not match base volume counts in the Traffix reports for intersections #16-20 (existing conditions). Can you please clarify why the WB through movement on Central Expressway has 200 more vehicles in the base volume in the AM analysis? Why does the WB and EB through movement on Central Expressway have 250 and 375 more vehicles in the base volume respectively in the PM analysis?
- We have also noted that Traffix reports for intersections #16-20 were not done by County/CMP method. Please contact the County Traffic Engineer for further instruction. Also, please contact us to obtain proper signal timing info that matches the date and time of traffic counts.
- Figure 3.15-5 Project Trip Distribution is not clear; the roadway network is not visible. It is also missing the project trip assignment diagram in the DEIR.
- Table 3.15-9 is missing footnotes for #6,7,8.
- The proposed project should also look into the possibilities of adding a third northbound left turn and westbound left turn lane as a local mitigation measure for the Central and Mary intersection.
- We also would like to know if the County will be notified if TDM goals are not met relative to its proportional effects on County facilities. Specifically, how will the City address negative impacts if TDM goals remain unmet and there is an impact on County facilities?

LOZEAU DRURY LLP

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Oakland, Ca 94607

www.lozeaudrury.com
michael@lozeaudrury.com

July 16, 2018 *Via Email*

Diana Pancholi, Senior Planner
City of Mountain View Community Development Dept.
500 Castro Street
Mountain View, CA 94041
diana.pancholi@mountainview.gov

Re: Comment on Draft Environmental Impact Report, 700 East Middlefield Road LinkedIn Office Project (State Clearinghouse # 2017092025)

Dear Ms. Pancholi:

I am writing on behalf of Laborers International Union of North America, Local Union No. 270 and its members living in and around Mountain View, California (collectively "LIUNA" or "Commenters") regarding the Draft Environmental Impact Report ("DEIR") prepared for the 700 East Middlefield Road LinkedIn Office Project, State Clearinghouse No. 2017092025 ("Project"). On March 21, 2018, my office e-mailed and mailed a request to receive notice of this Project pursuant to Public Resources Code Sections 21092.2 and Government Code Section 65092. Despite that effort, we apparently did not receive any mailed or e-mailed notification that the DEIR documents had been released for the Project on May 31, 2018.

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the Community Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

Michael R. Lozeau

Michael R. Lozeau

Santa Clara Valley Transportation Authority

July 16, 2018

City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94039

Attention: Diana Pancholi

Subject: LinkedIn

Dear Ms. Pancholi:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for a 612,000-square foot increase in office space on a 28.7-acre site bounded by E. Middlefield Road, W. Maude Avenue, and SR 237. We have the following comments.

Transportation Demand Management (TDM)/Trip Reduction

VTA supports the commitment for a TDM Program with vehicle trip reduction targets of 20%, noted in the DEIR/TIA as a "City-approved" trip reduction percentage. VTA notes that the 20% trip reduction credit was applied to the base ITE trip estimates in the DEIR/TIA, as discussed in section 3.15.3.6 of the DEIR. This reduction appears to follow the Peer/Study-Based Trip Reduction approach in VTA's TIA Guidelines (Section 8.2.3) which allow projects to take a reduction larger than the Standard Reductions "based on a project's similarity to other projects with demonstrated trip reductions or a project occupant's record of reducing trips at other sites." VTA recommends that the Developer provide the following measures:

- Data and documentation in the TIA Report in order to appropriately justify the proposed 20% trip reduction;
- Committing to periodic monitoring of trip reduction; and
- Sharing of summary level monitoring data to VTA, through the Lead Agency.

Additionally, VTA recommends strengthening the TDM program by adding effective TDM measures, not listed in the TDM Program - Appendix J, that may be applicable to the LinkedIn project include:

- Parking pricing, unbundled parking and parking cash-out programs;
- Transit fare incentive such as a free or discounted transit passed on a continuing basis or pre-tax commuter benefits – given the proximity to light rail; and
- On-site walkable services conveniently located for employees (day-care, dry-cleaning, fitness, banking, convenience store).

CMP Impacts and Mitigation Measures

The DEIR/TIA identifies significant impacts to 46 freeway segments under the Background with Project analysis. VTA recommends that the City direct the developer to provide a voluntary

contribution to improvements identified in VTA's VTP 2040 for freeway segments on US 101 and SR 237, including Express Lanes on US 101 and SR 237, as a mitigation measure. Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations. VTA notes that voluntary contributions to regional transportation improvements can be included as mitigation measures in CEQA documents even in the absence of a comprehensive funding strategy, and recommends that the project provide a voluntary contribution to the US 101/SR237 Express Lanes project to help reduce the project's freeway impacts. VTA also notes that the City could also identify appropriate multimodal efforts to offset these impacts. Examples may include but are not limited to enhanced transit infrastructure, transit signal priority or improved bike facilities. VTA looks forward to working with City to identify contribution opportunities.

Bus Service

In VTA's 2018 Transit Service Plan, the existing bus stop on Middlefield, adjacent to the project, will be discontinued. However, VTA is proposing a new pair of bus stops on Maude Avenue, adjacent to the project. VTA recommends the following off-site improvements:

- New bus stop on eastbound Maude Avenue, east of Frontage Road:
  - Bus stop configuration to VTA standards for 40' bus
    - Duckout or Modified Duckout with bus pad
    - Bus Shelter with bus shelter pad
- New bus stop on westbound Maude Avenue, east of Frontage Road:
  - Bus stop configuration to VTA standards for 40' bus
    - Bus pad
    - Bus bench with passenger pad
- Pedestrian crosswalk to connect the westbound bus stop to the project site.

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans

MV1712

July 16, 2018

City of Mountain View
Community Development Department
Attention: Diana Pancholi, Senior Planner
500 Castro Street
Mountain View, CA 94039

Dear Ms. Pancholi,

Subject: Draft Environmental Impact Report (DEIR) for the 700 East Middlefield Road LinkedIn Office Project

1. **Standing of Local 19**

The following comments on the Draft EIR for 700 East Middlefield Road LinkedIn Office Project are submitted on behalf of UNITE HERE, Local 19, a union which represents hospitality workers in Silicon Valley including hotel workers and cafeteria workers serving large tech companies. Local 19 advocates for hospitality projects and other development projects that are good for service workers. Commentor represents over 4,500 members, some of whom live in Mountain View, including members who work at Levi's Stadium, Hilton Santa Clara, and Fairmont, Four Points, Hilton, Hyatt Place, Marriott, Westin Hotels in San Jose, the San Jose Convention Center as well as the cafeterias at Facebook in Menlo Park, Yahoo (now Oath) in Sunnyvale, Intel and Nvidia in Santa Clara and Cisco in north San Jose. They, along with other workers in these industries, will be directly affected by the Project's traffic, air quality, greenhouse gas ("*GHG*"), land use, cultural and biological, working conditions and other Project impacts. Local 19 therefore is a stakeholder in this Project, and worker and labor organizations like Local 19 have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that "unions have standing to litigate environmental claims." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

2. **The project meaningfully worsens Mountain View's job/housing imbalance.**

The DEIR acknowledges that the project will worsen the city and region's jobs/housing imbalance by adding an estimated 3,060 net new jobs and no new housing.[1] The DEIR asserts that the expected increase in the jobs/housing imbalance does not exceed increases in the jobs/housing imbalance anticipated by Mountain View's 2030 General Plan, and that the project would not result in substantial displacement of people. These statements do not follow from each other. The fact that worsening of the jobs/housing imbalance is anticipated in the general plan does not mean that increasing the jobs/housing imbalance won't lead to increased housing demand, increased rents

[1] DEIR 3.13.3.1, Population and Housing Impacts.

and displacement, longer commutes and increased traffic, congestion and related GHG emissions. This EIR should completely and accurately assess the environmental impacts of worsening Mountain View's jobs/housing imbalance.

3. **The EIR should include VMT analysis.**

Governor Brown signed Senate Bill (SB) 743 in 2013 which instructed California municipal jurisdictions to begin transitioning from level of service (LOS) transportation impacts analysis to vehicle miles travelled (VMT) method. VMT has been found to be better tool for the reduction of greenhouse gas emissions. As of the present, Mountain View has not switched to VMT analysis. SB 743 highlighted the importance using VMT for projects served by transit.[2] According to the DEIR, the project is a six-minute walk from the Middlefield Light Rail Station. This DEIR should include VMT analysis in order to completely and accurately account for the environmental impacts of GHG emissions created by the project.

4. **The EIR should include a more robust TDM plan.**

The DEIR's TDM plan expects to result in a 20 percent reduction in vehicle trips to the project site.[3] Google's TDM program with Mountain View has brought its single occupancy vehicle trips down to 45% of its mode share. Google proposed a parking ratio of 1.2 spaces per 1000 square feet as a method of achieving its low SOV rate, in 2015.[4] This project proposes 2,913 parking spaces and 1,078,000 total office space or 2.7 parking spaces per 1,000 square feet of office. Why should LinkedIn be held to a weaker TDM standard and weaker parking ratio than Google when this project is much closer to a light rail station?

5. **City Council is attempting to strength Mountain View's planning approach to the jobs-housing imbalance through the East Whisman Precise Plan.**

The East Whisman Precise Plan (EWPP) is expected to be adopted in early 2019 and covers the project area. On February 27, 2018, planning staff recommended to City Council that a "Jobs/Housing Linkage Strategy" be included in the precise plan to ensure that new office developments in the plan area which worsen the jobs-housing imbalance keep pace with housing developments in the plan area.[5] The LinkedIn Project is being considered contemporaneously with the EWPP but is not being required to mitigate environmental problems caused by its worsening of the jobs/housing imbalance.

6. **The City's planning department did not publicly post the appendices to the DEIR.**

According to the DEIR, copies of documents referred to in this EIR are available for review on the Mountain View planning department's active project's website[6]. The project page which is linked to in the DEIR does include a link to the DEIR itself but not to the appendices, including the Transportation Impact Analysis and Transportation Demand Management Plan.

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[2] http://opr.ca.gov/ceqa/updates/sb-743/
[3] DEIR page 85
[4] https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15823
[5] Planning Staff Memo to Council on East Whisman Precise Plan, Land Use Topics, February 27, 2018
[6] DEIR page 22, https://www.mountainview.gov/depts/comdev/planning/activeprojects/linkedin.asp

Workers on tech campuses and in the hospitality industry are impacted by the housing crisis, traffic, and the related environment impacts. As the union representing workers in these industries, we believe Mountain View has an opportunity to take the jobs-housing imbalance and the environmental impacts of this project seriously. We hope the City will take the time to address the issues raised here.

Sincerely,

Nate Horrell
Senior Research Analyst
UNITE HERE, Local 19
nhorrell@unitehere.org

From:	Pancholi, Diana
To:	John Schwarz; Pooja Nagrath
Subject:	FW: Input on the Draft EIR for 700 E. Middlefield
Date:	Tuesday, July 17, 2018 8:57:41 AM

Fyi!

From: Kelley Ketchmark [mailto:kelleyketchmark@gmail.com]
Sent: Monday, July 16, 2018 6:53 PM
To: Pancholi, Diana
Subject: Input on the Draft EIR for 700 E. Middlefield

Hello Diana,

My name is Kelley and I'm writing on behalf of the board of the Wagon Wheel Neighborhood Association. My apologies for the delay on this input.

We would like to have the following input included in future revisions of the EIR. These items regard the impact to traffic in our area.

- Preferred routes of buses to and from the site. This includes Linkedin buses, Google buses, and other shuttles.
- An analysis on the increase of traffic.
- How do they plan to achieve a 30% reduction in traffic as intended?

thank you,
Kelley
WWNA President

700 EAST MIDDLEFIELD ROAD OFFICE PROJECT

CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS
Pursuant to Sections 15091 and 15093 of the
State CEQA Guidelines and Section 21081 of the Public Resources Code

The Final Environmental Impact Report (Final EIR) prepared by the City of Mountain View (City) for the 700 East Middlefield Road Office Project (project) consists of the Draft EIR and Response to Comments Document on the Draft EIR. The Final EIR identifies significant environmental impacts that will result from implementation of the project. The City finds that the inclusion of certain mitigation measures as part of project approval will reduce all but impact to 46 freeway segments under Existing With Project conditions, 2 intersections under Background With Project conditions and 5 intersections and 49 freeway segments under Near-Term Cumulative With Project conditions. These impacts will be overridden due to specific considerations that are described within this document.

As required by CEQA, the City, in adopting these CEQA Findings and Statement of Overriding Considerations, also adopts a Mitigation Monitoring or Reporting Program (MMRP) for the project. The City finds that the MMRP, which is incorporated by reference, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project. In accordance with CEQA and the *CEQA Guidelines*, the City adopts these findings as part of the certification of the Final EIR for the project. Pursuant to Public Resources Code Section 21082.1(c)(3), the City also finds that the Final EIR reflects the City's independent judgment as the lead agency for the project.

TABLE OF CONTENTS

SECTION 1: INTRODUCTION

1.1 Statutory Requirements for Findings

Section 15091 of the *CEQA Guidelines* states that:

> *(a) No public agency shall approve or carry out a project for which an EIR has been certified which 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 possible findings are:*
>
> *(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.*
>
> *(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.*
>
> *(3) 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 final EIR.*

In short, CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to avoid or mitigate significant environmental impacts that will otherwise occur with implementation of the project.

For those significant effects that cannot be mitigated to a less-than-significant level, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.[1] The *CEQA Guidelines* state in section 15093(a) that:

> *"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."*

1.2 Record of Proceedings

For purposes of CEQA and the findings set forth herein, the record of proceedings for the City's decision on the Project consists of: a) matters of common knowledge to the City, including, but

[1] Public Resources Code Section 21081(b).

not limited to, federal, State and local laws and regulations; and b) the following documents which are in the custody of the City:

- Notice of Preparation and other public notices issued by the City in conjunction with the Project (see Appendix A of the Draft EIR for the Notice of Preparation);
- The Public Review Draft EIR and supporting documentation prepared for the proposed project (Draft EIR dated May 31, 2018 and Appendix A through L), and all documents cited, incorporated by reference, or referred to therein;
- All written and verbal comments and documents submitted to the City by agencies, organizations and members of the public (before, during, and after the close of the public comment period up through the close of the public testimony portion of the City Council's public hearing on the Project);
- The Mitigation Monitoring or Reporting Program;
- The Final EIR for the 700 East Middlefield Road Office Project dated October 2018 and all documents cited, incorporated by reference, or referred to therein;
- All findings and resolutions adopted by the City in connection with the Project, and all documents cited or referred to therein;
- The City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program, adopted by the City Council on July 10, 2012;
- The City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report (SCH No. 2011012069), including all appendices thereto (General Plan EIR), certified by the Mountain View City Council on July 10, 2012, and all findings and resolutions adopted by the City in connection with the General Plan EIR;
- Any minutes or verbatim transcripts of all information and study sessions, workshops, public meetings and public hearings held by the City in connection with the Project; and
- Any other materials required to be in the record of proceedings by public Resources Code section 21167.6, subdivision (e).

The location and custodian of the documents and other materials that constitute the record of proceedings are:

City of Mountain View Community Development Department
500 Castro Street
Mountain View, CA 94041
Contact: Diana Pancholi, 650.903.6306.

SECTION 2: THE PROJECT

This section lists the objectives of the proposed project, provides a brief description of the Project, and lists the project alternatives evaluated in the Draft EIR.

2.1 Project Objectives

The objectives of the Project are to:

- Provide high-quality, highly sustainable office space, with increased development intensity of up to a floor area ratio (FAR) of 1.0 that targets LEED Platinum standards and incorporates a Transportation Demand Management (TDM) Plan, consistent with the Mountain View 2030 General Plan and the Greenhouse Gas Reduction Program.
- Redevelop an underutilized area, currently developed at a floor area ratio of less than 0.37, into a more efficient, economically viable office campus.
- Develop higher intensity office space on the site at an increased FAR of up to 1.0 that will help LinkedIn Corporation provide for and foster on-going job growth on its Mountain View campus.
- Provide sustainable development convenient to public transportation and bicycle/pedestrian facilities.

2.2 Project Description

The Project would develop an existing approximately 28.7-acre office site located on the eastern edge of the Mountain View City limit, adjacent to the City of Sunnyvale. site is comprised of three parcels—700 East Middlefield Road, 800 East Middlefield Road, and 1100 West Maude Avenue—and currently contains five 1- and 2-story office buildings. The Project includes demolition of two existing buildings, construction of three new 6-story office buildings, two new six-level above-grade parking structure, a publicly accessible landscaped open space area along the site's Middlefield road frontage. The three proposed six-story office buildings would contain approximately 763,000 square feet of office space. The completed campus would be approximately 1,078,000 square feet in size, representing a net increase in development on the site of approximately 612,000 square feet.

2.3 Alternatives

Based on the Project objectives and anticipated environmental consequences, and pursuant to Section 15126.6 of the *CEQA Guidelines*, the following project alternatives were selected for analysis:

- No Project Alternative; and
- Reduced Intensity Alternative;

A more detailed description of these alternatives, and required findings, are set forth in Section 4: Feasibility of Project Alternatives.

SECTION 3: EFFECTS DETERMINED TO BE MITIGATED TO LESS-THAN-SIGNIFICANT LEVELS

The Draft EIR identified certain potentially significant effects that could result from the Project. However, the City finds, for the reasons stated in the Final EIR, that mitigation identified in the Draft EIR would reduce all but impacts impact to 46 freeway segments under Existing With Project conditions, 2 intersections under Background With Project conditions and 5 intersections and 49 freeway segments under Near-Term Cumulative With Project conditions (addressed in Section 5 below) to less-than-significant levels. The City finds that all of the mitigation measures described below are feasible and agrees to adopt them as conditions of approval to the Planned Community Permit, Development Review Permit and Heritage Tree Removal Permit for the Project. Accordingly, changes or alterations have been required or incorporated into the Project which avoid or substantially lessen the significant effects as identified in the Final EIR2 and adoption of the mitigation measures set forth below will reduce these significant or potentially significant effects to less-than-significant levels. Adoption of the conditions of approval will effectively make the mitigation measures part of the Project.

Air Quality

Impact AQ-3: Health risks associated with exposure to Toxic Air Contaminants (TACs) during temporary construction activities could significantly impact sensitive receptors.

MM AQ-3.1: The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average of at least 81 percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

- All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days shall meet, at a minimum, United States Environmental Protection Agency (EPA) particulate matter emissions standards for Tier four (4) engines or equivalent.

Note that the construction contractor could use other measures to minimize construction period DPM emission to reduce the estimated cancer risk below the thresholds. The use of equipment that includes Tier two (2) engines and CARB-certified Level three (3) Diesel Particulate Filters* or alternatively-fueled equipment (i.e., non-diesel) could meet

[2] *CEQA Guidelines*, Section 15091.

this requirement. Other measures may be the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to less than significant.
(*See http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm)

NOISE AND VIBRATION IMPACTS

Impact NOISE-2: The impacts of mechanical equipment noise on nearby noise-sensitive uses is conservatively considered a potentially significant impact.

- **MM NOISE-2.1: MECHANICAL EQUIPMENT:** Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's 55 dBA daytime threshold and 50 dBA nighttime threshold at the property line of the adjacent residences. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as the rooftop of the buildings away from the building's edge nearest the noise-sensitive receptors, where feasible.

Impact NOISE-4: Short-term construction activities during implementation of the proposed project could result in significant temporary construction noise impacts.

- **MM NOISE-4.1:** While most construction activities will be conducted in accordance with the provisions of the City of Mountain View's General Plan and the Municipal Code, which limits temporary construction work to between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and prohibits construction on weekends and holidays, certain shutdowns and work that would interrupt utilities and major roadways may need to be completed outside the allowable hours. A condition of approval from the City must be included as part of the proposed project to allow for work to be conducted outside of these allowable hours. Additionally, the City of Sunnyvale permits construction activities between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and on Saturdays between 8:00 a.m. and 5:00 p.m.

- **MM NOISE-4.2**: The City shall require the construction crew to adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity.

Construction Best Management Practices

Develop and implement a construction noise control plan, including, but not limited to, the following construction best management controls:

- Where construction work along the eastern boundary of the project site would be required outside the City of Mountain View's allowable construction hours, all efforts should be made to conduct the work on Saturdays between the hours of 8:00 a.m. and 5:00 p.m., in accordance with the City of Sunnyvale's allowable hours to minimize annoyance to adjacent residences located in the City of Sunnyvale.

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.

- Unnecessary idling of internal combustion engines should be strictly prohibited.

- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors.

- Utilize "quiet" air compressors and other stationary noise sources where technology exists.

- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.

- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.

- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.

- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

  The implementation of the reasonable and feasible controls outlined above would reduce construction noise levels emanating from the site by five to 10 dBA in order to minimize disruption and annoyance. With the implementation of these measures, the temporary increase in ambient noise levels at the site would result in a less than significant impact.

Transportation

Impact TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background with Project Conditions in the AM and PM peak hours.

- **MM TRANS 2.1: Intersection #5: Maude Avenue and SR 237 Ramps (Caltrans/Mountain View).** Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the project is considered to be significant and unavoidable.

  As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City

limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange.

- **MM TRANS 2.2: Intersection #20: Central Expressway and North Mary Avenue (Santa Clara County/CMP)** - The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a third westbound left-turn lane, consistent with the Tier 3 recommendation in Santa Clara County's Draft Expressway Plan 2040.

Adding a third westbound left-turn lane would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact.

Impact C-TRANS-1: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours.

- **MM C-TRANS-1.1: #2: Ellis Street / US 101 Northbound Ramps.** The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a dedicated southbound right-turn lane.

Adding a dedicated southbound right-turn lane would likely require additional right-of-way, but may be able to shift and/or narrow the existing lane configuration to accommodate a right-turn lane. With this mitigation, the impact would be reduced to a less than significant level. This interchange, however, is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable.

- **MM C-TRANS-1.2: #3: Ellis Street / US 101 Southbound Ramps.** The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a second eastbound right-turn lane.

Adding a second eastbound right-turn lane would likely require the acquisition of additional right-of-way given the close proximity to the freeway overcrossing on one side and a development on the other. With this mitigation, the impact would be reduced to a less than significant level. However, the interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable.

- **MM C-TRANS-1.3: #5: Maude Avenue and SR 237 Ramps.** Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the project is considered to be significant and unavoidable.

As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange.

- **MM C-TRANS-1.4: #8: Maude Avenue / Mathilda Avenue**. This intersection is already configured to provide substantial capacity for vehicles, with free right-turn lanes and dedicated single or dual left-turn lanes on all approaches. No further physical expansion that would reduce the project's traffic impact is considered feasible at this location, and no mitigation is proposed. Therefore, the impact would remain significant and unavoidable

- **MM C-TRANS-1.5: #20: Central Expressway and North Mary Avenue**. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a third westbound left-turn lane, consistent with the Tier 3 recommendation in Santa Clara County's Draft Expressway Plan 2040.

Adding a third westbound left-turn lane would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact.

SECTION 4: FEASIBILITY OF PROJECT ALTERNATIVES

4.1 Project Alternatives

The Draft EIR included several project alternatives. The City hereby concludes that the Draft EIR sets forth a reasonable range of alternatives to the proposed project so as to foster informed public participation and informed decision making. The City finds that the alternatives identified and described in the Draft EIR were considered and further finds three of them to be infeasible for the specific economic, social, or other considerations set forth below pursuant to CEQA Section 21081.

In addition to the project, the following alternatives were evaluated in the DEIR, and are more fully described in Section 7.0 of the DEIR.

4.1.1 No Project Alternative.

The CEQA Guidelines stipulate that an EIR specifically include a "No Project" alternative. The purpose in including a No Project Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "...create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment [Section 15126.6(e)(3)(B)]." Since the project site is currently developed with five existing office buildings (two vacant), the "No Project" alternative could include the reoccupancy of the two vacant buildings on site. The project site is currently built out with approximately 466,000 square feet of existing uses, which represents a FAR of approximately 0.37, which is slightly more than the permitted maximum FAR of 0.35 under the existing Limited Industrial (ML) zoning. A "No Project – Existing Zoning" Alternative, which would study the maximum potential buildout under the existing zoning district was not analyzed, therefore, since the existing development on the site is essentially already built at that intensity.

Findings: The No Project Alternative would avoid the project's significant intersection and freeway impacts. The No Project Alternative would also avoid the other less than significant (with mitigation incorporated) noise and air quality impacts of the proposed project. The No Project Alternative would not meet any of the project's primary objectives, including those of redeveloping the site, developing high quality, highly sustainable office space, or increasing the

size and employment capacity of the LinkedIn, Inc. campus. For all these reasons, the No Project Alternative is considered infeasible and is not adopted.

4.1.2 Reduced Intensity Alternative.

In order to avoid the project intersection impacts under both Background With Project and Near-Term Cumulative With Project conditions, an 80 percent trip reduction alternative would involve reducing the square footage of the project, potentially to as low as 190,700 square feet (assuming the proposed 20 percent trip reduction), or approximately 25 percent of the proposed project. Under this 80 percent Reduced Intensity Alternative, the building footprints or building heights could be substantially reduced, or possibly only one new building would be constructed. Under a 50 percent trip reduction alternative, the site could be developed to a FAR of 0.63, which, similar to the proposed project, would require a rezoning from the Limited Industrial (ML) zoning district to a Planned Community (P) district to allow a FAR above 0.35. Under the 50 Percent Trip Reduction Reduced Intensity Alternative, the building footprints or building heights would be reduced, or possibly two building would be constructed. A 50 Percent Trip Reduction would avoid one impact under Background With Project and three intersection impacts under the Near-Term Cumulative With Project conditions. Reducing project trips by 40 percent would avoid one impact under Background With Project and two intersection impacts under the Near-Term Cumulative With Project conditions. Reducing project trips by 30 percent would avoid one impact under Near-Term Cumulative with Project conditions. Under the 30, 40 and 50 percent reductions, it is assumed that site clearing activities would be reduced and less intense, but would be generally similar to the proposed project, with older buildings torn down to construct newer office space.

Findings: Reducing the project trips by 80 percent would avoid all significant project intersection impacts under both the Background With Project and the Near-Term Cumulative With Project scenarios. Reducing the project trips by 50, 40, or 30 percent would have lesser effects on avoiding intersection impacts. Development under the 50, 40, or 30 Percent Trip Reduction Alternatives would likely involve a combination of additional TDM measures combined with a more modest reduction in square footage, which would further reduce the LTS construction-related Air Quality and Noise impacts. The Reduced Intensity Alternative would partially achieve the basic objectives of the project in terms of intensifying office uses on the site and providing for more employment space on the LinkedIn campus, but none of the scenarios would meet the basic objective of providing a campus of approximately one million square feet. It would not conform to the denser land use intensities envisioned in the City of Mountain View 2030 General Plan for the project area, which are reflected in the project objectives. The Reduced Intensity Alternative would not fulfill the East Whisman vision from the 2030 General Plan for highly sustainable development. For all these reasons, the Reduced Intensity Alternative is considered infeasible and is not adopted.

4.2 Environmentally Superior Alternative(s)

The CEQA Guidelines state than an EIR shall identify an environmentally superior alternative. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)).

Based upon the previous discussion, the environmentally superior alternative would be the No Project Alternative, which would avoid the significant unavoidable impacts to intersection and freeway segments, and the impacts to nearby residential uses from construction. This alternative would not fulfill the project's objectives of redeveloping highly sustainable office space up to a FAR of 1.0 on a site served by transit and near major roadways.

Apart from the No Project Alternative, the other alternatives considered would also reduce the significant traffic impacts. The maximum Reduced Intensity Alternative would reduce the significant impacts under Near-Term Cumulative With Project Conditions, and would partially fulfill the development objectives of the project. Since it is slightly larger than the No Project Alternative, and allows more development on the site, the Reduced Intensity Alternative would be the environmentally superior alternative.

SECTION 5: SIGNIFICANT EFFECTS THAT CANNOT BE MITIGATED TO A LESS-THAN-SIGNIFICANT LEVEL

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the Project is implemented, because no feasible mitigation has been identified. Except for the impact described below, all significant impacts associated with the proposed project would be reduced to a less-than-significant level with incorporation of mitigation measures identified in the Final EIR. The Project would result in the following significant unavoidable impact:

- **Transportation: Intersection Impacts:** Under Background With Project Conditions, implementation of the proposed project would result in significant and unavoidable impacts to local intersections.

- **Transportation: Freeway Impacts:** Project traffic would result in significant impacts to freeway segments during the AM and PM peak hours.

- **Transportation: Cumulative Transportation Impacts:** The cumulative projects, including the 700 East Middlefield Road LinkedIn Office Project, would result in cumulatively significant and unavoidable impacts to intersections and freeway segments.

No mitigation measures have been identified that would reduce this impact to a less than significant level. A freeway improvement - an express lane from the San Mateo County line to Cochrane Road in Morgan Hill - has been identified that has the potential to improve freeway options on the affected segment. There is, however, no funding mechanism in place for this improvement, which would require funding sources in addition to fair share contributions. Accordingly, there is currently no reasonable plan of actual mitigation that the relevant agencies have committed themselves to implementing. For this reason, this impact would remain significant and unavoidable. The significant and unavoidable impact is outweighed and overridden by the economic, social, and other benefits detailed in Section 6.

SECTION 6: STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable risks when determining whether to approve a project. If the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered acceptable.[3] CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record.[4] The proposed project would result in a significant unavoidable impact related to one freeway segment. No feasible mitigation measures have been identified that would reduce this impact to less than significant. This significant unavoidable impact is identified and discussed in Section 5 of these Findings. The City further specifically finds that the significant unavoidable impact to one freeway segment is outweighed by the proposed project's benefits and is acceptable in light of the benefits of the project, based on the findings below:

- The City has made a reasonable and good faith effort to eliminate or substantially mitigate the potential impacts resulting from the project, as described above.
- All Mitigation Measures recommended in the Final EIR have been incorporated into the project and will be implemented through the MMRP, incorporated by reference herein.
- In accordance with CEQA Guidelines Section 15093, the City has, in determining whether or not to approve the project, balanced the economic, legal, social, technological, and other benefits, including region-wide or statewide environmental benefits of the project against these unavoidable environmental risks, and has found that the benefits of the project outweigh the unavoidable adverse environmental effects. The following statements specify the reasons why, in the City's judgment, the benefits of the project outweigh its unavoidable environmental risks. The City also finds that any one of the following reasons for approval cited below is sufficient to justify approval of the project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the City's Findings and the benefits described below can be found in the Record of Proceedings.

[3] *CEQA Guidelines*, Section 15093(a).

[4] *CEQA Guidelines*, Section 15093(b).

Economic Benefits

- The project redevelops an underutilized site with a greater land-use intensity office development that supports business growth in the City, and specifically, continued growth in East Whisman Change Area
- The project would include a high quality office development located adjacent to SR 237, attracting regional enterprises to the City.
- The project would establish a gateway into Mountain View by promoting Middlefield Road as a vital corridor and connection to rest of the City, encouraging a diverse land use mix, assembling parcels to spur new development, and improving the supply and management of parking.
- The project would capitalize on the *High Intensity Office* General Plan land use designation which promotes higher-intensity office uses in the East Whisman Change Area, recognized as a key area that will support future jobs expected to be concentrated in the information, professional, scientific and technical services categories.
- The project would provide for beneficial, City revenue-generating infill in support of the City's long-term fiscal health.
- The project would advance the vision of the East Whisman Change Area by providing a sustainable, transit oriented employment center.
- The project would generate revenue for the City through increased property tax revenue and Community Benefit Contribution from the Project.
- Development of the project would create approximately 3050 new jobs.

Social Benefits

- The proposed project would lead to the redevelopment of an underutilized site served by existing transportation and utility infrastructure adjacent to SR 237 by allowing the construction of approximately 763,397 square feet of Class-A office space constructed to meet the intent of LEED Platinum standards.
- The development project would expand and enhance open space options within the City by providing a large publicly accessible open space along Middlefield Road.

- The development project would also meet the City's General Plan land use planning goals and development strategies which promotes pedestrian and bicyclist connections to services and employers, by creating on-site pedestrian and bicycle amenities.
- The development project would improve the overall aesthetic and visual quality of the East Whisman Change Area and has the potential to encourage further redevelopment activity and revitalization within the area.
- The project would extend city-wide pedestrian and bicycle pathways to connect neighborhoods, open space resources, and major destinations within the City and across cities.
- The project would provide a landscaped site and includes new landscape amenities and open active areas, well-designed publicly visible and accessible open space areas adjacent to the public right-of-way, preservation of heritage trees, replacement of 138 designated-to-be removed heritage trees on a 5.2:1 ratio, and planting of approximately 1000 new trees on site.

Region-Wide or Statewide Environmental Benefits

- The project would establish LinkedIn Corporation as a member of a non-profit public benefit entity Transportation Management Association (TMA) that would operate a shuttle program linking the project site to VTA and Caltrain (TMA Project Shuttle) and that would allow for additional shuttle destinations, landowner participants, revenue sources, programs, and areas served to be added over time. The TMA would: mitigate traffic congestion both locally and regionally by providing alternatives to single-occupancy vehicle trips; develop a transportation system and management strategies; improve accessibility to transit; and provide transportation services.
- The TMA would provide regional benefits by allowing for additional shuttle destinations, landowner participants, revenue sources, programs, and areas served to be added over time.
- The development project would promote compact growth by increasing job opportunities at a location near existing transportation and utility infrastructure, with the goal of reducing the region's overall greenhouse gas emissions by focusing development near transit and infrastructure with a TDM program.

- The development project is consistent with the greenhouse gas reduction measures in the Mountain View Greenhouse Gas Reduction Program and thus supports the City's efforts to reduce dependency on fossil fuels and nonrenewable energy, to decrease its share of GHG emissions and contributions to global climate change, and to help make Mountain View a more attractive place to live through implementation of the GGRP by adding density on an underutilized site served by existing transportation and infrastructure, by developing a project that will be constructed to meet the intent of LEED Platinum standards, and by implementing a TDM program.
- The project's TDM program would be designed to reduce parking, driving, and pollution by at least 22% during peak periods, and would encourage workers to commute using transit and other alternatives to single-occupancy vehicles by maintaining membership in the Mountain View Transportation Management Association and providing any combination of the following:
    - o Priority parking for carpools and vanpools.
    - o On-site transportation Coordinator
    - o Bicycle parking, showers, and changing facilities.
    - o Telecommuting/Flexible Work Schedule Program.
    - o Guaranteed Ride Home Program.
    - o Rideshare matching services.
    - o Parking Cash-Out Public transit shuttle services.
    - o Marketing and information.
    - o Commuter shuttle services.
    - o Pretax commuter benefits.
    - o Subsidized or free vanpools or carpools.
    - o Biking financial incentives.
    - o Subsidized or free Transit Passes.
    - o On-site bicycle repair facilities.
    - o Bike Buddy program
- The project's TDM program would be enforceable through:
    - Conditions of approval adopted and enforced by the City; and
    - Creation of a third-party monitoring and enforcement mechanism with monetary penalties for non-performance.

The foregoing benefits provided to the public through approval and implementation of the project outweigh the identified significant adverse environmental impact of the Project that cannot be mitigated; and

Each of the Project benefits separately and individually outweighs the unavoidable adverse environmental impact identified in the Final EIR and therefore finds those impacts to be acceptable.

Economic, social and other considerations and benefits derived from the development of the Project override and make infeasible any alternatives to the Project or further Mitigation Measures beyond those incorporated into the Project.

On balance, the City finds that there are specific considerations associated with the Project that serve to override and outweigh the Project's significant unavoidable effect. Therefore, pursuant to CEQA Guideli3nes Section 15093(a), this adverse effect is considered acceptable.

SECTION 7: CONCLUSION; NO RECIRCULATION OF THE FINAL EIR IS REQUIRED

The changes and new information provided in the final EIR consist of clarifications of the Draft EIR analysis and do not include identification of new significant impacts associated with the Project or mitigation measures, or new Project alternatives or mitigation measures that warrant consideration.

The City of Mountain View finds that the new information added in the Final EIR merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR and is not "significant" within the meaning of CEQA Guidelines section 15088.5. The City of Mountain View further finds that incorporating the new information does not deprive the public of a meaningful opportunity to comment on the Project or its effects, and that no information has been added to the Final EIR that would warrant recirculation pursuant to Public Resources Code section 21092.1. Finally, the City of Mountain View has reviewed and considered comments made after the Final EIR was issued and finds that those comments do not present significant new information within the meaning of CEQA Guidelines section 15088.5 or otherwise warrant recirculation of the Final EIR pursuant to Public Resources Code section 21092.1. These findings are based on all the information presented in the Final EIR and the record of proceedings.

CITY OF MOUNTAIN VIEW

MITIGATION MONITORING OR REPORTING PROGRAM
700 East Middlefield Road LinkedIn Office Project
State Clearinghouse Number: 2017092025

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
AIR QUALITY				
Impact AQ-1: Health risks associated with exposure to Toxic Air Contaminants (TACs) during temporary construction activities could significantly impact sensitive receptors.	**MM AQ-3.1:** The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average of at least 81 percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following: • All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days shall meet, at a minimum, United States Environmental Protection Agency (EPA) particulate matter emissions standards for Tier four (4) engines or equivalent. Note that the construction contractor could use other measures to minimize construction period DPM emission to reduce the estimated cancer risk below the thresholds. The use of equipment that includes Tier two (2) engines and CARB-certified Level three (3) Diesel Particulate Filters* or alternatively-fueled equipment (i.e., non-diesel) could meet this requirement. Other measures may be the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the City	Project applicant and contractors.	All measures will be required as part of development permits. All 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.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	and demonstrated to reduce community risk impacts to less than significant. (*See http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm.) **[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]**			
NOISE				
Impact NOISE-2: The impacts of mechanical equipment noise on nearby noise-sensitive uses is conservatively considered a potentially significant impact.	**MM NOISE-2.1**: MECHANICAL EQUIPMENT: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's 55 dBA daytime threshold and 50 dBA nighttime threshold at the property line of the adjacent residences. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as the rooftop of the buildings away from the building's edge nearest the noise-sensitive receptors, where feasible. **[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]**	Project applicant and contractors.	All measures will be required as part of development permits. All 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 the start of construction, following construction, and during project implementation.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
Impact NOISE-4: Short-term construction activities during implementation of the proposed project could result in significant temporary construction noise impacts.	**MM NOISE-4.1**: While most construction activities will be conducted in accordance with the provisions of the City of Mountain View's General Plan and the Municipal Code, which limits temporary construction work to between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and prohibits construction on weekends and holidays, certain shutdowns and work that would interrupt utilities and major roadways may need to be completed outside the allowable hours. A condition of approval from the City must be included as part of the proposed project to allow for work to be conducted outside of these allowable hours. Additionally, the City of Sunnyvale permits construction activities between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and on Saturdays between 8:00 a.m. and 5:00 p.m. **MM NOISE-4.2:** The City shall require the construction crew to adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity. *Construction Best Management Practices* Develop and implement a construction noise control plan, including, but not limited to, the following construction best management controls: • Where construction work along the eastern boundary of	Project applicant and contractors.	All measures will be required as a part of development permits, and the plan must be reviewed and approved prior to issuance of permits.	Prior to and during any construction and demolition activities, as specified.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	the project site would be required outside the City of Mountain View's allowable construction hours, all efforts should be made to conduct the work on Saturdays between the hours of 8:00 a.m. and 5:00 p.m., in accordance with the City of Sunnyvale's allowable hours to minimize annoyance to adjacent residences located in the City of Sunnyvale. • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • Construction staging areas shall be established at locations that will create the greatest distance between			

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule. The implementation of the reasonable and feasible controls outlined above would reduce construction noise levels emanating from the site by five to 10 dBA in order to minimize disruption and annoyance. With the implementation of these measures, the temporary increase in ambient noise levels at the site would result			

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	in a less than significant impact. **[Less Than Significant Impact with Mitigation Measures Incorporated in the Project]**			
TRANSPORTATION				
IMPACT TRANS-2: Implementation of the proposed project would result in significant impacts to two project study intersections under Background With Project Conditions in the AM and PM peak hours. **[Significant Impact]**	**MM TRANS-2.1:** <u>#5: Maude Avenue and SR 237 Ramps:</u> Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the project is considered to be significant and unavoidable. As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. **[Significant Unavoidable Impact]**	City of Mountain View Community Development and Public Works Departments with financial contribution from Applicant.	Oversight of implementation will be managed by the City's Community Development Department and Public Works Department. The City will coordinate with responsible agencies as necessary for the improvement. These agencies may include the California Department of Transportation, the Santa Clara Valley Transportation Authority, and the Santa Clara County Department of Roads and Airports.	Implementation of improvement and/or contribution of fair share funding shall take place prior to issuance of occupancy permit.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	MM TRANS – 2.2: #20: Central Expressway and North Mary Avenue The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a third westbound left-turn lane, consistent with the Tier 3 recommendation in Santa Clara County's *Draft Expressway Plan 2040.* Adding a third westbound left-turn lane would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Impact]**			
IMPACT C-TRANS-1: Implementation of the proposed project would result in significant impacts to five project study intersections under Near-Term Cumulative With Project conditions in the AM and PM peak	**MM C-TRANS-1.1:** #2: Ellis Street / US 101 Northbound Ramps. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a dedicated southbound right-turn lane. Adding a dedicated southbound right-turn lane would likely require additional right-of-way, but may be able to shift and/or narrow the existing lane configuration to accommodate a right-turn lane. With this mitigation, the	City of Mountain View Community Development and Public Works Departments with fair-share	Oversight of implementation will be managed by the City's Community Development Department and Public Works Department. The City will coordinate with responsible agencies	Implementation of improvement and/or contribution of fair share funding shall take place prior to

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
hours. **[Significant Impact]**	impact would be reduced to a less than significant level. This interchange, however, is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **MM C-TRANS-1.2:** #3: Ellis Street / US 101 Southbound Ramps. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a second eastbound right-turn lane. Adding a second eastbound right-turn lane would likely require the acquisition of additional right-of-way given the close proximity to the freeway overcrossing on one side and a development on the other. With this mitigation, the impact would be reduced to a less than significant level. However, the interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this Draft EIR, the impact of the project is considered to be significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **MM C-TRANS-1.3:** #5: Maude Avenue and SR 237 Ramps. Changing the interchange design would require a comprehensive engineering and environmental analysis involving multiple stakeholders to determine the most appropriate configuration that would best serve the needs of all users. The interchange is part of the state highway system, which is under the jurisdiction of Caltrans. Therefore, for the purposes of this EIR, the impact of the	financial contribution from Applicant.	as necessary for the improvement. These agencies may include the California Department of Transportation, the Santa Clara Valley Transportation Authority, and the Santa Clara County Department of Roads and Airports.	issuance of occupancy permit.

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	project is considered to be significant and unavoidable. As a partial, near-term mitigation for the Intersection #5: Maude Avenue/SR 237 interchange, a second eastbound through lane between the SR 237 ramps and the City limits is recommended. This mitigation will extend the existing two eastbound lanes on Maude Avenue from their current terminus at the City limit line to the interchange. While this measure will not fully mitigate the impact at this location, it will provide additional capacity for the eastbound movement given the high right-turn volume into and out of the project driveway on Maude Avenue and reduce the potential for queue spillback through the interchange. **[Significant Unavoidable Cumulative Impact]** **MM C-TRANS-1.4:** #8: Maude Avenue / Mathilda Avenue. This intersection is already configured to provide substantial capacity for vehicles, with free right-turn lanes and dedicated single or dual left-turn lanes on all approaches. No further physical expansion that would reduce the project's traffic impact is considered feasible at this location, and no mitigation is proposed. Therefore, the impact would remain significant and unavoidable. **[Significant Unavoidable Cumulative Impact]** **MM C-TRANS-1.5:** #20: Central Expressway and North Mary Avenue. The following physical improvements could reduce this impact: Contribute fair-share funding toward constructing a third westbound left-turn lane, consistent with the Tier 3 recommendation in Santa Clara County's			

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
	Draft Expressway Plan 2040. Adding a third westbound left-turn lane would not require the acquisition of additional right-of-way, but would require taking some width from the current median. With this mitigation, the impact would be reduced to a less than significant level. The proposed mitigation would require coordination with Santa Clara County. Since it cannot be assured that the County would approve this mitigation measure and the City cannot solely guarantee its implementation, this impact is designated as significant and unavoidable. However, the City and project applicant should diligently pursue measures to fully mitigate the project's impact. **[Significant Unavoidable Cumulative Impact]**			

SOURCE: City of Mountain View. *700 East Middlefield Road LinkedIn Office Project Draft EIR*. May 2018.