



Memorandum

DATE: September 27, 2022

TO: Lindsay Hagan, City of Mountain View

FROM: Carolyn Neer, Project Manger
Kristy Weis, Principal Project Manager

SUBJECT: Final Supplemental Environmental Impact Report for the Middlefield Park Master Plan Project – Responses to Late Comment Received

One late comment letter was received on the Draft Supplemental Environmental Impact Report (Draft SEIR) for the Middlefield Park Master Plan project, subsequent to the conclusion of the 45-day public comment period on June 10, 2022 and after the publication of the Final Supplemental Impact Report (FSEIR) on August 19, 2022. The comment letter was from the Center for Public Environmental Oversight and dated August 30, 2022. A copy of this late comment letter is included in Attachment A.

This memo includes a summary of the written comments pertaining to the adequacy of the Final SEIR with responses. Comments regarding the merits of the project are not included in the summary below and do not warrant responses under the California Environmental Quality Act (CEQA).

The comments received do not raise any significant new information or substantial evidence in light of the whole record to warrant recirculation of the SEIR per CEQA Guidelines 15088.5. The comments do not raise any new significant information related to new or substantially more severe significant environmental impacts than were previously disclosed in the Final SEIR.

Summary of Comments from the Center for Public Environmental Oversight (dated August 30, 2022):

The specific issues and suggestions raised in the letter have been grouped into three related comments, with responses to each one provided below.

Comment 1:

- The draft SEIR states, “Based on recent monitoring data, the MEW plume has encroached into the western edge of the project site.” The Final SEIR should describe and map the encroachment of the MEW plume into the project site.

Comment 2:

- For any new construction, developers must not interfere with existing monitoring wells for the MEW site.
- In addition, developers should construct two or three additional shallow groundwater monitoring wells at the midpoint of the western most parcel.
- The City of Mountain View should require that the developer reduce the potential for lateral migration of volatile organic compounds along utility corridors, similar to the requirements in NASA’s Environmental Issues Management Plan (EIMP).

Comment 3:

- The City of Mountain View should require that the developer undertakes soil vapor screening, using EPA protocols for redevelopment at the MEW site, for areas adjacent to the MEW Vapor Intrusion Study Area, particularly at parcels O1, R1, and R2. Should levels exceed EPA’s interim action levels, cleanup should be required prior to construction.

Responses to Comments:

Response 1: *MEW Plume* – Page 131 of the Draft SEIR describes how the MEW plume has encroached into the western edge of the project site. This is detailed in Appendix G of the Draft EIR. EPA regularly monitors and maps the extent of the MEW plume. Because the location of the plume is not static, the most recent map showing the location of the plume is included as Figure 16 in the 2021 Annual Progress Report MEW Fairchild & Regional Groundwater Remediation Progress Report. This Progress Report is available to the public at: <https://semspub.epa.gov/work/09/100027775.pdf>. Additionally, this map has been reproduced and an outline of the proposed project site has been drawn on it to provide further clarity regarding the location of the plume in relation to the proposed project site. A copy of this map is included at the end of this response.

Response 2: *Monitoring Wells and Lateral Migration along Utility Corridors* – As discussed in Section 5.8 Hazards and Hazardous Materials, the Master Plan project is required to prepare a site-specific Phase I ESA and a Site Management Plan (SMP) for all specific development projects with Recognized Environmental Conditions within the Master Plan area (see Precise Plan EIR MM HAZ-3.1 on page 139 of the Draft SEIR). The purpose of the SMP is to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction. The

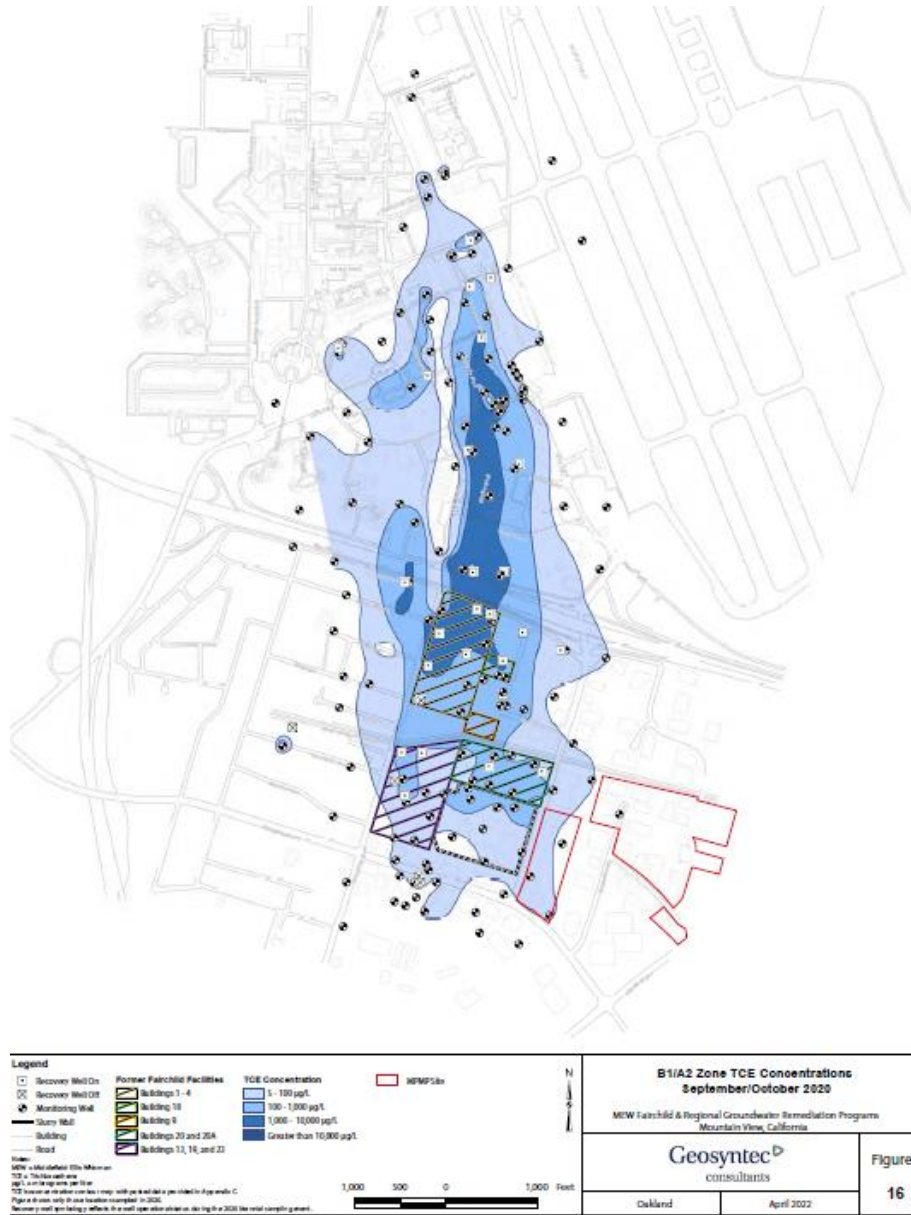
applicant submitted a Project-Specific Agency Submittal (PSAS) with a Site Management Plan (SMP) dated November 9, 2021, to both potential regulatory oversight agencies for this site, the United States Environmental Protection Agency (EPA) and the San Francisco Regional Water Quality Control Board (RWQCB). The RWQCB declined review of the SMP, and the EPA responded providing their review and acceptance of the initial SMP.

Future SMPs required for specific developments within the Master Plan will include design-level measures to prevent lateral migration of groundwater and soil vapor along utility corridors. The SMP(s) will also address protection, relocation, and decommissioning of existing monitoring wells and the need for additional wells, if appropriate. The SMPs are required to be submitted to both the EPA and the RWQCB. for review and approval prior to commencing construction activities, for which agencies can require inclusion of appropriate measures such as those identified in the NASA Environmental Issues Management Plan.

Response 3: *MEW Plume Related Soil Vapor Screening* – As discussed in Section 5.8 Hazards and Hazardous Materials of the Draft SEIR, future development within the MEW Superfund Study Area is required to comply with the EPA-required Record of Decision (ROD) Amendment for the Vapor Intrusion Pathway, MEW Superfund Study Area to minimize the potential impacts associated with vapor intrusion. The Draft SEIR acknowledges that the MEW plume has encroached into the western edge of the project site (page 131 of the Draft SEIR), which includes portions of O1, R2, and R1 as noted in the comment. The EPA-required ROD measures are outlined on pages 137-139 of the Draft SEIR. The ROD measures are applicable to sites where there is evidence of soil vapor concentrations due to the MEW plume above screening levels derived from EPA’s indoor cleanup levels. Per the ROD, vapor intrusion remedies are required to be submitted to the EPA for review and approval prior to issuance of building permits (including subsurface work and new construction).

This comment does not raise any issues with the adequacy of the Draft SEIR; therefore, no further response is required.

Figure 16 from EPA 2021 Annual Progress Report – Middlefield Ellis – Whisman Fairchild and Regional Groundwater Remediation Programs with the MPMP site boundary:



Source: Geosyntec Consultants. 2021 Annual Progress Report MEW Fairchild & Regional Groundwater Remediation Progress Report. April 15, 2022.

Attachment A: Late Comment Received



CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

A project of the Pacific Studies Center

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Voice/Fax: 650-961-8918 <lsiegel@cpeo.org> <http://www.cpeo.org>

TO: Lindsay Hagan, City of Mountain View
FROM: Lenny Siegel, Center for Public Environmental Oversight (CPEO)
SUBJECT: Middlefield Park Master Plan Final Supplemental Environmental Impact Report (SEIR)
DATE: August 30, 2022
CC: Alana Lee, U.S. Environmental Protection Agency (EPA)

CPEO supports the Middlefield Park Master Plan, but we have some concerns related to its proximity to the Middlefield-Ellis-Whisman [MEW] Superfund Study Area. I have personally have been following contamination in this part of Mountain View since the early 1980s, and through the Silicon Valley Toxics Coalition and now CPEO we have engaged a technical consultant through EPA's Superfund Technical Assistance Grant program since the 1990s.

Mountain View, in cooperation with environmental regulatory agencies, has shown that it is possible to develop both housing and commercial projects on and near sites with substantial subsurface contamination. We look forward to continuing this tradition at Middlefield Park.

Our consultant, Peter Strauss, has made a series of recommendations that we believe will allow this development to proceed safely. We were only able to finalize these recommendations today, one day beyond the official comment period, but we hope you will take these recommendations under consideration, in anticipation of U.S. EPA's review of the project.

While the eastern portion of Middlefield Park is beyond EPA's jurisdiction, and thus beyond the scope of Strauss's recommendations, I suggest that similar considerations be applied there in anticipation of oversight by the Bay Area Regional Water Quality Control Board.

RECOMMENDATIONS FROM PETER STRAUSS

The controls for vapor intrusion are referenced in the final Supplemental Environmental Impact Report. While this is reassuring, I recommend the following be added to the SEIR:

1. The draft SEIR states, “Based on recent monitoring data, the MEW plume has encroached into the western edge of the project site.” **The Final SEIR should describe and map that encroachment.**
2. **For any new construction, developers must not interfere with existing monitoring wells for the MEW site.**
3. **In addition, developers should construct 2 or 3 additional shallow groundwater monitoring wells at the midpoint of the western-most parcel.**
4. **The City of Mountain View should require that the developer undertake soil vapor screening, using EPA protocols for redevelopment at the MEW site, for areas adjacent to the MEW Vapor Intrusion Study Area, particularly at parcels O1, R1, and R2. Should levels exceed EPA’s interim action levels, cleanup should be required prior to construction.** Elsewhere in the area, EPA has required that remedial action be taken where trichloroethylene (TCE) soil vapor concentrations were found to exceed 20,000 $\mu\text{g}/\text{m}^3$ (micrograms per cubic meter) because it believes that TCE soil vapor concentrations above that level indicate that building vapor mitigation (both passive and active) may be insufficient to ensure long-term protectiveness. Based upon such soil vapor exceedances, EPA required additional cleanup prior to development at both 277 Fairchild Drive and 870 Leong Drive.
5. **The City of Mountain View should require that the developer reduce the potential for lateral migration of volatile organic compounds along utility corridors, similar to the requirements in NASA’s Environmental Issues Management Plan (EIMP).**



To: Environmental Planning Commission
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Sent via email to: epc@mountainview.gov

October 12, 2022

Re: Google Middlefield Park Master Plan

Dear Chair Cranston, Vice Chair Yin, and EPC Commissioners,

The undersigned environmental organizations are pleased to support Google's Middlefield Park Master Plan (Plan). The Plan realizes the vision of the East Whisman Precise Plan for innovation and sustainability, for increased canopy and native vegetation, and for ecological connectivity and resiliency. We appreciate the effort to transform an area that today consists of parking lots and older office buildings into a mixed-use neighborhood with parks, trees and habitat.

Our organizations have been following the Middlefield Park project since the Plan was submitted to the City of Mountain View in fall 2020. In our September 2021 letter to Council, we supported the project and asked clarifying questions focusing on ecological, mobility and sustainability elements of the plan. Google has since provided answers to our questions, and we expect to engage with Google further in the design phase.

We believe Middlefield Park will align with Mountain View's Biodiversity Strategy and sustainability goals and contribute to the broader ecological and human health of the city and its residents. We appreciate the Plan has incorporated the following features:

- A focus on site ecology through aggregation of open space areas, creating habitat corridors and using native plant species with high value to birds and pollinators
- Green spaces include a significant expansion of the existing tree canopy with thought given to planting water-wise and native tree species, expanding on a regional "re-oaking" strategy

- Plants and green spaces incorporated in public as well as private spaces such as courtyards
- Consideration of bird-safe design to reduce bird collisions
- Consideration of light pollution reduction strategies to support human and ecological health
- Locating housing and shopping near public transit and prioritizing improvements for pedestrians and bikes to reduce car dependency

We recommend that the district utility system be included to ensure efficiency and resilience in Phase One, which is entirely residential.

We respectfully ask members of the Environmental Planning Commission to support Google's Middlefield Park Project. We plan to follow the project as it is implemented, delivering a mixed-use project that truly weaves nature into the urban landscape.

Sincerely yours,

Gita Dev, Co-Chair, Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter

Rani Fischer, Environmental Advocacy Assistant
Santa Clara Valley Audubon Society

Linda Ruthruff, Conservation Chair
California Native Plant Society, Santa Clara Valley Chapter

Alice Kaufman, Policy and Advocacy Director
Green Foothills