

Final Environmental Impact Report

555 West Middlefield Road

State Clearinghouse #2019070252



Prepared by:
City of Mountain View

In Conjunction With:
ICF

October 2021

FINAL ENVIRONMENTAL IMPACT REPORT

555 WEST MIDDLEFIELD ROAD PROJECT

STATE CLEARINGHOUSE #2019070252

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OCTOBER 2021



ICF. 2021. *Final Environmental Impact Report, 555 West Middlefield Road Project*.
October. (ICF 00214.20.) San Francisco, CA. Prepared for City of Mountain View,
Mountain View, CA.

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APPENDICES

FEIR-1 Transportation Demand Management Plan

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Acronyms and Abbreviations

CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
City	City of Mountain View
dB	decibel
Draft EIR	Draft Environmental Impact Report
Final EIR	Final Environmental Impact Report
LOS	level of service
OPR	Office of Planning and Research
PM2.5	fine inhalable particulate matter with a diameter of 2.5 micrometers or less
Project	555 West Middlefield Road Project
SR	State Route
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
VMT	vehicle miles traveled
WUCOLS	Water Use Classifications of Landscape Species

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the 555 West Middlefield Road Project (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 to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of Mountain View (City) in making decisions regarding the Project. The CEQA Guidelines state that, although the information in an EIR does not control an agency's ultimate discretion on a project, agencies must respond to each significant effect identified in an EIR through written findings.

According to California Public Resources Code Section 21081, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant effects on the environment that would occur if the project were to be 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 that 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 for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects that 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 specifies that the Final EIR shall consist of:

- a) The Draft EIR or a revision to the Draft EIR;
- 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 comments made by a public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced therein will be available for public review weekdays at the City of Mountain View Community Development Department, City Hall, 1st Floor, 500 Castro Street, in Mountain View during normal business hours. The Final EIR will also be available on the City's website: <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>.

Summary of the Draft EIR Public Review Process

The Draft Environmental Impact Report (Draft EIR) for the 555 West Middlefield Road Project (Project), dated June 2021, was circulated to affected public agencies and interested parties for a 45-day review period from June 28 through August 12, 2021. The City of Mountain View (City) undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability was published on the City’s website: <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.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 June 28, 2021; it was also sent to various governmental agencies, organizations, businesses, and individuals (see Chapter 3 of this Final Environmental Impact Report for a list of agencies, organizations, businesses, and individuals that received the Draft EIR);
- The Draft EIR was published on the City’s website: <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>; and
- Copies of the Draft EIR were made available at the City of Mountain View Community Development Department, City Hall, 1st Floor, 500 Castro Street, in Mountain View during business hours, 8:00 a.m. to 4:00 p.m. Monday through Friday, and the Mountain View Public Library, 585 Franklin Street, Mountain View.

Chapter 3

Agencies, Organizations, Businesses, and Individuals that Received Notice of the Draft EIR

California Environmental Quality Act (CEQA) Guidelines Section 15086 requires the local lead agency to request comments on the Draft Environmental Impact Report (Draft EIR) prepared for a project and consult with responsible agencies (i.e., government agencies that must approve or permit some aspect of the project), trustee agencies (i.e., for information regarding resources affected by a project), adjacent cities and counties, and transportation planning agencies. The following agencies, businesses, organizations, and individuals received notice of the Draft EIR from the City of Mountain View or the State Clearinghouse:

Agencies

- Association of Bay Area Governments and Metropolitan Transportation Commission
- California Air Resources Board
- California Department of Fish and Wildlife, Region 3
- California Department of Transportation, District 4
- California Department of Transportation, Planning
- California Highway Patrol
- California Regional Water Quality Control Board, Region 2
- Department of Toxic Substances Control
- Department of Water Resources
- Native American Heritage Commission
- Office of Historic Preservation
- San Francisco Bay Conservation and Development Commission
- Santa Clara Valley Transportation Authority
- State Water Resources Control Board—Clean Water Grants
- State Water Resources Control Board—Water Quality
- State Water Resources Control Board—Water Rights

Businesses, Organizations, and Individuals

- Cypress Point Community Preservation Group
- Cypress Point Woods Homeowners Association
- Nancie Fimbel
- Diane Gazzano
- Diana Heiba
- Daniel Shane
- Terrie Rayl

Chapter 4

Draft EIR Comments and Responses

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, this document includes written responses to comments received by the City of Mountain View (City) on the Draft Environmental Impact Report (EIR) for the 555 West Middlefield Road Project (Project). Comment letters are organized under headings that include the source for the letter and the date. Specific comments from each letter and/or email are followed by a response. Copies of the letters and emails received by the City are included in their entirety in Chapter 6, *Copies of the Comment Letters Received on the Draft EIR*, of this Final Environmental Impact Report (Final EIR). Comment letters received regarding the Draft Environmental Impact Report (Draft EIR) are listed below.

<u>Comment Letter and Commenter</u>	<u>Page</u>
Federal and State Agencies	4-8
A. California Department of Transportation (dated August 11, 2021)	4-8
Regional and Local Agencies.....	4-11
B. County of Santa Clara (dated July 26, 2021).....	4-11
C. Santa Clara Valley Transportation Authority (dated August 11, 2021).....	4-13
Organizations, Businesses, and Individuals.....	4-14
D. Board of Cypress Point Drive Against Block C of Avalon’s 555 Middlefield Proposal (dated August 11, 2021).....	4-14
E. Mountain View Voice (dated July 28, 2021).....	4-14
F. Sierra Club Audubon (dated August 12, 2021).....	4-15
G. Lada Adamic (dated August 3, 2021).....	4-28
H. Patricia Albers (dated August 6, 2021).....	4-30
I. Hala Alshahwany (dated August 11, 2021).....	4-31
J. Leona Chu (dated August 12, 2021).....	4-34
K. Joel Dean (dated August 8, 2021).....	4-38
L. Gita Dev, Sierra Club Loma Prieta (dated July 29, 2021).....	4-46
M. Diane Gazzano (dated August 11, 2021).....	4-46
N. Daniel Shane (dated August 12, 2021).....	4-57
O. Daniel Shane (dated June 29, 2021).....	4-74
P. Daniel Shane (dated July 24, 2021).....	4-74
Q. Daniel Shane (dated July 29, 2021).....	4-76
R. Daniel Shane (dated July 30, 2021).....	4-76
S. Daniel Shane (dated August 8, 2021).....	4-77
T. Daniel M. Shane (dated August 12, 2021).....	4-77
U. GreenSpaces MV (dated August 12, 2021).....	4-89
V. Shani Kleinhaus, Sierra Club Loma Prieta (dated August 12, 2021).....	4-93

Comment letters were received from three public agencies, five organizations (including multiple letters from the same organization), and seven individuals (including multiple versions of a similar letter from the same individual).

Footnotes included in comment letters do not raise environmental issues that require a response. Therefore, footnotes from comment letters are not reproduced in this chapter to maintain clarity within each comment. As noted above, the original comment letters, including footnotes, received on the Draft EIR are presented in Chapter 6 of this Final EIR.

Master Response—Heritage Tree Removal

This section provides a master response in a single location to comments that were raised repeatedly concerning the removal of Heritage Trees, as well as removal of trees generally, on the Project site. The master response is presented in a comprehensive manner that clarifies and elaborates on the analysis in the Draft EIR. Several commenters raised concerns and questions about the aesthetic, biological, air quality, and noise impacts associated with removing trees, including Heritage Trees, on the Project site in order to construct the proposed new uses. Some commenters also did not appear to understand that the Project would be planting more trees than it is removing.

As stated on page 2-22 in Chapter 2, *Project Description*, of the Draft EIR, there are 417 existing trees on the Project site. Of these, 255 meet the City's criteria for Heritage Trees under Chapter 32, Article II of the City's Municipal Code. It is anticipated that a total of approximately 246 trees would remain in their current location, including 158 Heritage Trees; 36 trees would be transplanted on-site, including 35 Heritage Trees; and 135 trees would be removed, including 62 Heritage Trees. Many of the trees to be removed are Brazilian pepper trees, an invasive tree species, which have also been determined by an arborist to have low suitability for preservation due to their poor form and structure. A total of 31 of the 33 existing Brazilian pepper trees would be removed, and all of these are within the vicinity of Block C. None of the 10 existing mature trees and two existing juvenile trees within the California Department of Transportation (Caltrans) right-of-way along the portion of State Route (SR) 85 bordering the Project site would be removed.

Although the removal of trees is required, the Project proposes a tree replacement program and landscaping plan that meets the City's requirements. In addition to the approximately 246 trees that would remain on the site, the Project would plant approximately 197 trees at the site, in accordance with applicable provisions of the City's Tree Preservation and Protection Ordinance. The City will require, as a Condition of Approval, that 75 percent of all new trees and plantings on the site be native species. As also required by the City, most new trees that would be planted on-site would be in the Low Water Use category, in accordance with the Water Use Classifications of Landscape Species. This plan will support the goal of promoting the urban forest, consistent with other similarly situated properties, while accommodating much-needed housing (including a significant amount of affordable housing) on an urban infill site.

In order to feasibly attain most of the basic Project objectives for the proposed urban infill development, including the construction of at least 320 new units, retention of existing on-site units to avoid displacement of existing tenants, and dedication of approximately 1.34 acres to the City for a public park, the removal of trees between Block C Building and the eastern property line of the Project site near SR 85 is necessary. Site planning and design objectives, site constraints, density needs, and other criteria are relevant to the Project objective regarding the preservation of Heritage

Trees to the greatest extent feasible. For example, many trees are located within an area of over-excavation, which is necessary for the construction of the proposed underground parking garage. Underground parking is a critical component of the Project in that it allows for maximization of the existing acreage on the Project site for the proposed infill development and the creation new residential units. There are also existing trees on top of a sewer line (serving Block C from the street) in an area that requires grading. In addition, a substantial number of trees are located on top of a small hill or berm that would be partially graded, but not leveled, because it is inconsistent with City requirements for drainage as well as building ingress and egress, and several existing trees are blocking required fire access routes to the east side of Block C Building.

The Project is not proposing to remove any trees in the Caltrans property along SR 85.

The Draft EIR fully evaluated the potential physical environmental impacts associated with the Project's removal of trees, including potential impacts on habitat, aesthetics, air quality and greenhouse gas emissions, and noise, and determined that there would be no significant impacts, according to the City's thresholds and the CEQA Guidelines. In addition, as provided on pages 3.3-18 through 3.3-21 of the Draft EIR, the Project would comply with the City's Standard Conditions of Approval pertaining to tree removal and replacement.

The master response text that follows addresses the concerns and questions raised in numerous public comments related to the removal of the Heritage Trees.

Habitat and Wildlife

Some commenters claim that the Project's removal of trees on-site will result in impacts on wildlife species and habitat within the Stevens Creek corridor. These comments focus primarily on trees located adjacent to SR 85 within the development footprint of proposed Block C. As provided below, the trees on the Project site *are not* a part of the Stevens Creek corridor, no sensitive habitat exists on the Project site, and the Draft EIR fully evaluated potential impacts on wildlife species as a result of the Project, including the removal of trees, finding no significant impacts under CEQA.

The Project site is completely developed, surrounded by existing urban development, and physically separated from Stevens Creek and the associated riparian corridor by SR 85. The Project site does not contain any riparian habitat, wetlands, or other sensitive natural communities. Given the substantial physical barriers associated with SR 85, as well as other surrounding urban development and roadways, the vegetation on the Project site is isolated from and not a part of the Stevens Creek habitat corridor, nor does the Project site serve as a native resident or migratory wildlife corridor. Consequently, implementation of the Project would not have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations or by California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS); any federally protected wetlands defined by Section 404 of the Clean Water Act; or any established native resident or migratory wildlife corridors or access to native wildlife nursery sites. In addition, the Project would not remove any existing trees within the Caltrans right-of-way adjacent to SR 85.

The Draft EIR included a review and analysis of special-status species with moderate or greater potential to occur within 5 miles of the Project site. Based on a review of multiple data sources, no special-status birds or other wildlife species were found to have any potential to occur on the Project site (see Draft EIR, Table 3.3-2). The only bird species found to occur within the 5-mile vicinity of the Project site is the California black rail; however, occupied habitat for this species consists of coastal salt marsh. There is no coastal salt marsh on the Project site; all coastal salt marsh

habitat is more than 2 miles north of the Project site. Therefore, the Project, as a whole, including the removal of Heritage Trees, would not result in significant impacts on any sensitive habitat or any special-status wildlife species.

The removal of Heritage Trees would decrease existing nesting sites for migratory birds, but there are many other trees in and near the Project site that could be used for nesting. The newly planted trees would provide nesting areas once they are established. As discussed on page 3.3-17 in Section 3.3, *Biological Resources*, of the Draft EIR, and modified in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR, migratory bird and raptor species, such as American crow, could use the trees in and adjacent to the Project site for nesting. Active migratory bird nests are regulated by the Migratory Bird Treaty Act and Sections 3503 and 3503.5 of the California Fish and Game Code. If construction were to begin during the nesting season (January 1 to August 31), construction activities could disturb active nests of migratory birds at and/or adjacent to the Project site, which would be a significant impact. The Project would be required to adhere to Standard Condition of Approval PL-206 (Preconstruction Nesting Bird Survey), which requires, to the extent practicable, that vegetation removal and construction activities be performed from September 1 through December 31 to avoid the general nesting period for birds. Otherwise, preconstruction surveys are required to be performed. Adherence to Standard Condition of Approval PL-206 would ensure that the Project would not disturb any active nests during construction.

Given the existing urban development on and surrounding the Project site, the lack of special-status species on-site, the distance between the Project site and Stevens Creek, and the physical barrier (SR 85) separating the Project site from the Stevens Creek corridor, the proposed removal of the trees, including Heritage Trees, within the Project site would not result in significant impacts related to wildlife or habitat, and none of the Heritage Trees are within the Stevens Creek corridor.

Aesthetics

Commenters have claimed that removal of existing mature trees, including Heritage Trees, along the eastern edge of the Project site (along SR 85) will result in aesthetic impacts.

As identified on page 3.1-6 of the Draft EIR, the evaluation of aesthetic impacts is based on impacts on scenic vistas or damage to scenic resources within a state scenic highway, conflicts with applicable zoning and other regulations governing scenic quality, and impacts associated with the creation of a new source of substantial light or glare. As identified on page 3.1-7 of the Draft EIR, the Project would not result in impacts on a designated scenic vista, nor would the Project damage scenic resources within a state scenic highway. SR 85 is not a scenic highway. None of the comments identify the presence of a scenic vista or a scenic resource within a scenic highway. The comments also do not identify conflicts with applicable zoning regulations governing scenic quality.

The Project proposes the removal of 135 trees, including 62 Heritage Trees; the Project would retain 246 trees, including 158 Heritage Trees. The Project would transplant 36 trees on-site, including 35 Heritage Trees, and plant approximately 197 new trees on-site to meet the City's replacement requirements. As mentioned above, the City will require, as a Condition of Approval, that 75 percent of the new trees and plantings on the site be native species.

None of the trees and shrubs within the Caltrans right-of-way along SR 85, adjacent to the Project site, would be removed, and any trees on the SR 85 side of the Caltrans sound wall would remain. As stated on page 3.1-8 in Section 3.1, *Aesthetics*, of the Draft EIR, the trees on the Project site that would be retained would be protected during construction. The Project would be required to adhere to Standard

Condition of Approval PL-151 (effective December 15, 2020), which requires a work stop order to be issued and no construction activity to occur for 2 working days if one or more of the preserved Heritage Trees are not maintained and irrevocable damage or death occurs because of construction activity. Trees within the state right-of-way along the eastern boundary of the Project site, adjacent to SR 85, would be protected during construction. Any trees within the state right-of-way that are damaged by construction activities would require replacement, per the Caltrans Replacement Highway Planting Policy and guidance provided in Caltrans' Project Development Procedures Manual, Chapter 29. Accordingly, construction would not substantially conflict with applicable zoning or other regulations governing scenic quality, resulting in less-than-significant impacts.

As discussed on page 3.1-10 in Section 3.1, *Aesthetics*, of the Draft EIR, the principal viewer groups include motorists along West Middlefield Road, SR 85, Cypress Point Drive, Moffett Boulevard, and at the nearby residences to the north, south, and west. Under existing conditions, a large portion of the development on the Project site is blocked from view by dense, mature landscaping and setbacks. However, the Project would include buildings with limited setbacks from the streets and would remove vegetation. Therefore, the proposed buildings would most likely be visible from all immediately adjacent roadways. Along Moffett Boulevard and Cypress Point Drive, the buildings would have limited setbacks but would be partially blocked by proposed landscaping and trees. The views along West Middlefield Road would not be significantly altered because most of the existing and visible buildings would remain, with the exception of the leasing office. However, because of location and height, as well as the removal of mature trees in the area, the upper levels of the proposed building on Block C could be visible from SR 85, in areas beyond the sound wall. As provided above, SR 85 is not a state scenic highway and there are no designated scenic vistas or viewsheds in the vicinity of the Project site. Although the surrounding roadways are highly traveled, motorists have only fleeting views of the Project site because of the permitted speeds and the fact that drivers on these streets typically direct their attention to the road ahead rather than the views. Accordingly, the motorists are not considered sensitive viewers. In addition, although views from surrounding land uses are important planning considerations, the Project would not change views of significant view corridors or public visual resources and, therefore, would not result in a significant impact under CEQA.

Standard Condition of Approval PL-14 (Heritage Tree Removal Permit) outlines requirements for the removal of Heritage Trees. Standard Conditions of Approval PW-53 through PW-55 (Street Trees) require the installation of street trees along street frontages and describe requirements for the location and upkeep of the trees. Adhering to Public Works' Standard Conditions of Approval would require the planting of street trees, which would help screen views of the proposed buildings, as seen from surrounding streets. Accordingly, the Project would not conflict with applicable zoning and other regulations governing scenic quality, resulting in a less-than-significant impact. As mentioned above, the City will require, as a Condition of Approval, that 75 percent of new trees and plantings on the site be native species. In addition, as discussed on page 3.1-7, the Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. As discussed above, the closest state scenic highway is SR 9, which is approximately 9 miles south of the Project site. Interstate 280, which is approximately 4 miles south of the Project site, is designated as an eligible state scenic highway (California Department of Transportation 2019). The Project site cannot be seen from any portion of SR 9 or Interstate 280. Therefore, although the Project would remove trees, no impact related to scenic resources within a state scenic highway corridor would occur.

Based on the above and the analysis in the Draft EIR, the proposed removal of Heritage Trees within the Project site would not result in significant impacts related to aesthetics.

Air Quality and Greenhouse Gas Emissions

Commenters have generally claimed that the removal of existing trees on the Project site will result in air quality and greenhouse gas impacts. Commenters claim the existing trees provide a buffer from existing pollution associated with cars traveling on SR 85.

The Draft EIR acknowledges that trees provide carbon sequestration with respect to greenhouse gas (GHG) emissions (see Draft EIR, pages 3.7-22, -23, -26, and -28.). As provided in Section 3.7, *Greenhouse Gas Emissions*, there are no relevant measures in the 2017 Climate Change Scoping Plan for 2030 or explicit regulatory requirements related to tree planting and air quality; however, the plan has an overall goal of avoiding losses in carbon sequestration. Similarly, the Mountain View Greenhouse Gas Reduction Program (GGRP) contains a goal regarding enhancement of the urban forest for purposes of carbon sequestration (see Draft EIR, page 3.7-28). The Project would result in a net gain of 62 trees on the site, increasing carbon sequestration in the long-term compared to the existing condition. As provided in the Draft EIR, this is consistent with the scoping plan's overall goal of avoiding losses in carbon sequestration. Thus, removal and replacement of trees on the Project site would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs and would not conflict with or obstruct implementation of an applicable air quality plan. Given the regional nature of GHG emissions and dispersal, along with the physical location of land uses near the Project site, as well as the presence of trees within the vicinity of the Project site, the removal and temporary loss of trees on the Project site and along the SR 85 site frontage as a result of the Project is not anticipated to result in a quantifiable and material change in GHG emissions in the overall area. Similarly, removal a portion of existing on-site trees would not result in "exposure of sensitive receptors to substantial pollutant concentrations." CEQA generally does not require an analysis of how existing environmental conditions will affect a project's future users or residents (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 386).

Air quality impacts during construction related to localized concentrations of fine inhalable particulate matter with a diameter of 2.5 micrometers or less (PM_{2.5}) were found to be significant and unavoidable at six on-site residences after implementation of applicable mitigation measures. The industry-standard air quality dispersion model used in the analysis (AERMOD) did not include a mechanism for quantifying the potential beneficial effects of trees, which remove airborne particulate matter. Therefore, the Project's health risk assessment represents a conservative estimate of localized concentrations of PM_{2.5} at sensitive receptors on and near the Project site because the model assumes there are no trees on or adjacent to the Project site, even though the majority of on-site trees would remain during the construction period, along with surrounding trees in the vicinity of the Project. Therefore, the Draft EIR fully discloses and even over-estimates potential impacts associated with construction emissions.

As stated on page 3.2-35 of the Draft EIR, the Project is not expected to represent a significant source of operational diesel particulate matter (DPM) because traffic to and from the site would consist primarily of the light-duty vehicles of residents, site visitors, and employees; such vehicles are not substantial emitters of DPM. In addition, given the residential nature of the Project, diesel emergency backup generators or other diesel-fueled equipment would not be included as part of Project operations. Therefore, the Project would not result in any appreciable increases in health risks from DPM or PM_{2.5} during operation, and impacts would be less than significant.

Based on the above, the proposed removal of the Heritage Trees within the Project site would not result in significant impacts related to air quality and GHG emissions.

Noise

Commenters have claimed that removal of trees along the portion of the Project site closest to SR 85 will result in an increase in noise due to the reduction in noise attenuation from the trees to be removed.

As described on page 3.11-3 of the Draft EIR, trees and foliage generally do not result in perceptible reductions in noise levels, unless foliage is dense enough to block views along a propagation path completely (Federal Highway Administration 2019). If foliage is approximately 20 meters thick and the complete line of sight between a source and a receiver is blocked, attenuation of approximately 1 decibel (dB) would be expected to occur. (Note: A 3 dB change in noise is generally considered to be “barely perceptible” by the human ear [Federal Highway Administration 2019].) The existing tree and shrub area in the portion of the Project site closest to SR 85 varies in width and density. Most areas of trees and vegetation in this area are less than 20 meters thick and are not densely forested enough to provide perceptible sound attenuation. The Caltrans sound wall on the west side of SR 85 currently provides nearly all of the perceivable attenuation of noise from SR 85. This sound wall would remain and continue to attenuate noise from vehicle traffic on SR 85. In addition, the construction of Block C would reduce noise attributable to SR 85 on the remaining portions of the Project site, given the physical barrier created by the new buildings. Finally, CEQA generally does not require an analysis of how existing environmental conditions (e.g., existing highway noise) will affect a project's future users or residents (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 386).

Based on the above, the proposed removal of the Heritage Trees within the Project site would not result in significant impacts related to noise.

Federal and State Agencies

A. California Department of Transportation (dated August 11, 2021)

Comment A.1

Thank you for including Caltrans in the review process for the 555 West Middlefield Project. Please see the attached letter for our comments on the DEIR. If you need any additional information or clarification on any of these comments, please feel free to email me at this address or call me at the phone number listed below.

Dear Diana Pancholi,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 555 West Middlefield Road Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, and integrated and efficient transportation system. The following comments are based on our review of the June 2021 DEIR.

Project Understanding

The proposed project would demolish existing parking and facilities on site to construct an additional 324 multi-family residential units with two below-grade parking garages. This approximately 14.5-acre project site is located west of State Route (SR)-85 at the intersection of West Middlefield Road and Moffett Boulevard in the City of Mountain View.

Response A.1

The comment summarizes the role of Caltrans and summarizes the Project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.2

Travel Demand Analysis Caltrans commends the City's effort to implement Transportation Demand Management (TDM) measures to reduce resident-based vehicle miles traveled (VMT). The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR and TRA-2, this project is found to have less than significant impacts, therefore working towards meeting the state's VMT reduction goals. Caltrans acknowledges the mitigation and TDM strategies incorporated into the DEIR and supports the implementation and monitoring of these strategies.

Response A.2

The comment supports the City's efforts to implement TDM measures and summarizes the Project's less-than-significant impacts related to VMT. As discussed on page 3.14-16 in Section 3.14, Transportation and Circulation, of the Draft EIR, the Project qualifies as a transit supportive project and is consistent with CEQA Guidelines Section 15064.3 (b). Therefore, the Project is expected to have a less-than-significant impact on VMT. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.3

Aesthetics

As requested in Caltrans previous letter dated August 9, 2019, please evaluate the visual impacts of project tree removal and replacement with regards to highway travelers along SR-85. Any trees within state right of way damaged due to construction activities would require replacement per Caltrans Replacement Highway Planting Policy. See the Caltrans Project Development Procedures Manual, Chapter 29 ([link](#)).

Response A.3

The comment recommends that the visual impacts of tree removal and replacement with regards to travelers along SR 85 be evaluated in the Draft EIR. Please refer to the Master Response for a discussion of why the removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with aesthetics.

Comment A.4

Lead Agency

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

Response A.4

The comment summarizes the role of the City of Mountain View as the lead agency with respect to transportation-related impacts and mitigation measures. The Project's transportation-related impacts are addressed fully in Section 3.14, *Transportation and Circulation*, of the Draft EIR. As explained in Section 3.14, all transportation impacts as a result of Project implementation would be less than significant and would not require the City to implement mitigation measures. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.5

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Response A.5

The comment notes that any Project-related work that impacts Caltrans facilities must be compliant with ADA standards and maintain bicyclist and pedestrian circulation during construction activities. As described in Section 2.5.3, *Site Access, Circulation, and Parking*, in

Chapter 2, *Project Description*, of the Draft EIR, and as appropriate throughout various sections of the Draft EIR, existing bicycle and pedestrian paths throughout the Project site would be retained. In addition, a new pedestrian and bicycle path, approximately 580 feet in length, would be constructed through the Project site between Block B and the Park Parcel that would connect West Middlefield Road to Cypress Point Drive. Further, the Project would provide a total of 43 spaces for ADA-compliant accessible vehicles, in accordance with applicable statutory requirements.

Comment A.6

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the State Right of Way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating the State ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

To download the permit application and to obtain more information on all required documentation, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon at Llisel.Ayon@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please email LDIGR-D4@dot.ca.gov

Response A.6

The comment states that any temporary or permanent Project-related work that encroaches onto the State's ROW would require a Caltrans-issued encroachment permit. As described in Section 2.7, *Required Permits and Approvals*, of Chapter 2, *Project Description*, of the Draft EIR, the Project would require an encroachment permit from Caltrans, and would therefore be required to submit a completed encroachment permit application. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Regional and Local Agencies

B. County of Santa Clara (dated July 26, 2021)

Comment B.1

The Santa Clara County Parks and Recreation Department (County Parks Department) has received the Notice of Availability of the Draft EIR for the 555 West Middlefield Road Project (Project).

The County Parks Department functions to provide a sustainable system of diverse regional parks, trails, and open spaces that connects people with the natural environment and supports healthy lifestyles while balancing recreation opportunities with natural, cultural, historic, and scenic resource protection. The County Parks Department is also charged with the planning and implementation of the Santa Clara County Countywide Trails Master Plan Update (Countywide Trails Plan), an element of the Parks and Recreation Section of the County General Plan (adopted by the Board of Supervisors on November 14, 1995). The Countywide Trails Plan indicates the following regional trail route located in the Project vicinity:

Stevens Creek Sub-Regional Trail (S2): a hiking and off-road bicycle route along Stevens Creek, from Stevens Creek County Park to the San Francisco Bay.

The City of Mountain View's segment of the trail in the Project vicinity is complete and located approximately 270 feet east of the Project site, across Highway 85.

Response B.1

The comment states that the Stevens Creek Trail within the Project vicinity is complete and is located east of the Project site across SR 85. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment B.2

The County Parks Department recommends that the Final EIR evaluate and address any potential impacts related to the Stevens Creek Trail, including the following:

Air Quality

The Draft EIR states that the Stevens Creek Trail is one of the Air Quality Sensitive Receptors, and that air quality impacts during construction will be significant. The proposed construction duration (May 2023-August 2028) implies that approximately 64 months of significant pollutants, including the primary criteria pollutants reactive organic gas and nitrogen oxides, could circulate in the air and reach the Stevens Creek Trail. This is noted as a significant impact to the natural corridor along Stevens Creek and trail users on the Stevens Creek Trail. Signage and contact information should be provided for trail users during construction, to inform the City of Mountain View or other agencies such as the Bay Area Air Quality Management District of any concerns related to poor air quality along the Stevens Creek Trail.

Response B.2

Impacts from emissions of reactive organic gases and nitrogen dioxide during Project construction would be less than significant with implementation of the mitigation measures indicated in Section 3.2, *Air Quality*. Localized concentrations of PM2.5 would be significant and unavoidable after implementation of applicable mitigation measures. However, only existing on-site residential receptors would be exposed to significant and unavoidable levels of localized concentrations of PM2.5. Recreational receptors near Stevens Creek Trail would not be exposed to significant levels of localized concentrations of PM2.5.

Comment B.3

Noise

Noise is considered an environmental pollutant that can interfere with human activities. Any intense noise related to the Project construction may have a significant impact on the natural corridor along Stevens Creek and Stevens Creek Trail users as well. Signage and contact information should be provided for trail users to inform the City of Mountain View or other agencies such as the California Department of Transportation of any concerns related to noise issues along the Stevens Creek Trail.

Response B.3

The comment expresses concern about Project construction resulting in noise effects at Stevens Creek Trail, which is east of the Project site and SR 85. The comment requests that signage with contact information be provided should concerns arise related to noise. As stated on page 3.11-24 in Section 3.11, *Noise*, of the Draft EIR, City Condition of Approval PL-196 shall be implemented and signage shall be posted with the telephone number of a noise disturbance coordinator. Specifically, the signage shall be conspicuously posted at the construction site fence and a notification shall be sent to neighbors adjacent to the site. In addition, sound walls are located along both sides of SR 85, which would substantially reduce perceptible construction noise between the site (west of SR 85) and the trail area (east of SR 85). Furthermore, Stevens Creek Trail in the vicinity of the Project site is lower than SR 85, which results in the existing sound walls further blocking the line of sight between the Project area and the trail and, thus, further reducing noise.

In addition, according to City Condition of Approval PL-206, which would be required for the Project, vegetation removal and construction activities in areas where nesting birds may be present will generally be performed from September 1 through January 31 to avoid the general nesting period for birds. If any work takes place outside these dates, preconstruction surveys will be required no more than two (2) days prior to the work to ensure that nesting birds are not present. Adherence to Condition of Approval PL-206 would ensure that the Project would not disturb active nests during construction.

Comment B.4

The County Parks Department also recommends the City of Mountain View consider any opportunities to improve pedestrian and cycling connections between the Project site and Stevens Creek Trail, to improve public access to regional trails featured in the Countywide Trails Plan.

Response B.4

The comment recommends that the City consider improvements to the pedestrian and bicycle connections between the Project site and Stevens Creek Trail. Stevens Creek Trail is currently accessible from the Project site via bicycle lanes on East Middlefield Road. The access point is between SR 85 and Easy Street. Stevens Creek Trail can also be accessed from Moffett Boulevard at the SR 85 northbound off-ramp intersection to the north and at the end of Central Avenue to the south. The City's 2020–2021 Capital Improvement Program includes a project that would evaluate the need for a sidewalk on the south side of Middlefield Road, across SR 85. The sidewalk would provide a pedestrian connection to Stevens Creek Trail. A sidewalk on the north side of Middlefield Road already connects to the trail. A project Condition of Approval will require the on street parking along Middlefield Road to be removed and allow for the adjacent bicycle lane to be converted to a full-time bicycle lane. Parking restrictions will be placed along Middlefield Road to allow for conversion to a full-time bike lane. Additionally, parking restrictions will be placed on Moffett Boulevard for future conversion to the Class IV Bikeway between Middlefield and Clark Road (In preliminary design 20-21 CIP program).

Comment B.5

Thank you for the opportunity for County Parks Department to provide comments on the Draft EIR for the 555 West Middlefield Road Project. If you have any questions, please email me at kelly.gibson@prk.sccgov.org

Response B.5

The comment provides the commenter's contact information. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

C. Santa Clara Valley Transportation Authority (dated August 11, 2021)

Comment C.1

Just writing to let you know that VTA has no comments on the DEIR for the 555 West Middlefield Road Project.

Response C.1

The comment indicates that VTA has no comments on the Draft EIR prepared for the Project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Organizations, Businesses, and Individuals

D. Board of Cypress Point Drive Against Block C of Avalon's 555 Middlefield Proposal (dated August 11, 2021)

Comment D.1

Signatures of Board of Cypress Point Drive Against Block C of Avalon's 555 Middlefield Proposal

I agree that I could NOT vote for Avalon's proposal to take down 129 trees of which 61 are mature heritage trees.

I know the Loma Prieta Chapter of the Sierra Club's Sustainable Land Use Committee also votes NO on Block C.

Trees are a deterrent of the noise pollution from Highway 85 as well as a deterrent of air pollution.

I vote NO ON BLOCK C !

Response D.1

The comment expresses opposition to the Project because of the associated removal of heritage trees. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

E. Mountain View Voice (dated July 28, 2021)

Comment E.1

It looks like there was an intersection LOS and delay assessment that was done and included in Appendix 3.14-1. I couldn't quite tell if there's a separate appendix related to VMT, but it would be great to get that as well.

Response E.1

Appendix 3.14-1 contains the transportation analysis prepared for the Project. As stated in the comment, the transportation analysis includes an intersection level-of-service (LOS) and delay assessment. Chapter 2 of the transportation analysis contains an assessment of VMT.

Comment E.2

This is Kevin Forestieri from the Mountain View Voice. We're interested in writing a story about 555 W. Middlefield Road and the recently released DEIR for the project, and the document references numerous tables and information in the appendices. Could you provide us with a copy or a link to these documents? Thanks!

Response E.2

The appendices to the Draft EIR and the Project plan sets are available on the City's website, <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>.

F. Sierra Club Audubon (dated August 12, 2021)

Comment F.1

Regarding the proposed development project at 555 W. Middlefield Rd, I strongly urge you to oppose the removal of the tree canopy located along Hwy 85 and in close proximity to the Stevens Creek Trail. This canopy provides an important aesthetic and noise reduction barrier between our neighborhood and Hwy 85, and provides habitat for numerous wildlife species that live along Stevens Creek (see attached DEIR document). The removal of these trees will significantly degrade our neighborhood environment.

Response F.1

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment F.2

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the "No Block C" alternative provides a reasonable balance of housing and environmental impact.

Response F.2

The comment expresses opposition to the Project and support for the No Block C Alternative. These opinions will be considered by the City Council during their review of the Project. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not

meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project’s units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

Comment F.3

555 Middlefield is proposing to add housing in 3 different locations, using existing surface parking lots to insert additional housing with multi-level underground parking.

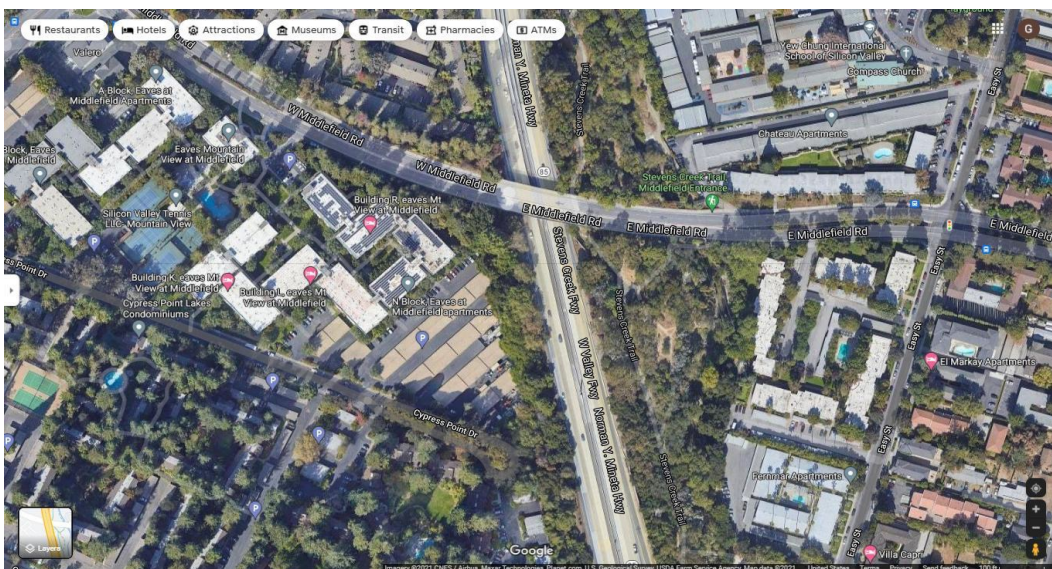
Block “C,” however, is very problematic as it has serious impacts. The proposed development here involves removal of every single tree in the existing wide tree buffer that currently exists along Hwy 85 and in close proximity to Stevens Creek Trail. This canopy is part of the unique Stevens Creek habitat corridor that extends from the Bay to the hills.

The 80’-100’ wide existing urban canopy will be lost to make place for a four-story building near Hwy 85 along with a strip of new landscaping including a few relocated olive trees.

We are strongly opposed to degradation of the urban canopy along the habitat corridor and the removal of so many trees. We support the alternative of “No Block C” because we oppose removal of the urban canopy along Hwy 85.

The existing landscaping provides an effective aesthetic barrier to Hwy 85 visually and as a barrier for freeway noise. It also helps to trap airborne toxics, such as particulates from auto exhaust and tire dust, and brake linings dust from the highway. This is important because there is clear evidence of increased incidence and severity of health problems associated with air pollution exposures related to proximity to roadway traffic.

In addition, the tree canopy is part of an important unique habitat corridor, along Stevens Creek, from the Bay to the hills. Many resident and migratory bird species, as well as mammals, including bats, amphibian life and insect pollinators, use this corridor to travel between rich habitat patches.



View showing Stevens Creek Habitat Corridor at the site along Hwy 85.



Typical view of existing tree canopy along Hwy 85, seen from the site, part of a critical habitat corridor extending from the Bay to the hills. The project proposes clear cutting of all the trees along Hwy 85 to make room for a new building close to Hwy 85.



Excerpt from Drawing L.003 ‘Tree Removal Plan’: Green hatched area shows ALL the trees along Hwy 85, on the property, are to be clear cut to make place for new buildings. Blue numbers are heritage trees, black numbers are non-heritage, and shrubs to be removed are not documented

Response F.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. All existing trees that would be removed under the Project were properly disclosed and analyzed in the EIR. In addition, the comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project's units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

Comment F.4

Stevens Creek Corridor Park

Stevens Creek is a 20-mile-long waterway that starts on the slopes of Black Mountain in the Santa Cruz Mountains and flows to the Bay.

The 4.8-mile Stevens Creek Trail, which intermittently follows along the banks of Stevens Creek, is one of the best-developed and most ambitious trails in the Bay Area. The existing trail cost around \$30 million to build, with funding from a wide range of public and private sources. Building the trail required the construction of several bridges and underpasses, the planting of thousands of trees and shrubs, and the installation of numerous amenities, such as benches, signs, and drinking fountains. Since then, many other funding sources have been utilized to fund improving the ecology of the trail and the creek, and to protect biodiversity.

Because of the extensive landscaping and amenities, the trail acts as a natural linear park and is one of the peninsula's unique habitat corridors connecting the Bay to the hills.

The Stevens Creek corridor connects several rich habitat areas, home to a variety of both aquatic and land-based wildlife. Some species found in the parks include:

- **Mammals:** Coyote, Gray Fox, Raccoon, Brush Rabbit, Merriam's Chipmunk, Fox Squirrel, Opossum, black-tailed deer, and Big brown bat.

- **Birds:** the parks and trail are great for bird watching, with over 150 different species;
- **Butterflies:** California Sister, Lorquin's Admiral, Variable Checkerspot, Northern Checkerspot, Mylitta Crescent, Unsilvered Fritillary, Sara Orangetip, Gray-veined White, Painted Lady, Mournful Duskywing, Echo Blue, Spring Azure, Umber Skipper, Tailed Copper;
- **Dragonflies/Damselflies:** Flame Skimmer, Red Rock Skimmer, Common Green Darner,
- **Variegated Meadowhawk**, Vivid Dancer, Familiar Bluet;
- Other **invertebrates** worth mentioning are California Forest Scorpion and Banana Slug.

The Stevens Creek habitat corridor connects park habitats along different areas of Stevens Creek, enabling bird, mammal, and insect migration, (re)colonization and breeding opportunities for flora and fauna, and promoting increased genetic diversity. It provides food and shelter for a variety of wildlife and helps with juvenile dispersal and seasonal migrations. We believe that as proposed, the project is likely to interfere substantially with the movement of wildlife species in this corridor.

Response F.4

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.5

Summary

We support the alternative of "No Block C" as we oppose removal of the urban canopy along Hwy 85 for all the reasons given above.

In addition, increased density should come with some positive benefits for the community.

Response F.5

The comment expresses support for the No Block C Alternative. Refer to response to comment F.2, above.

The comment expresses opposition to the removal of the urban canopy along SR 85. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment supports positive benefits for the community as a result of the increased density on the Project site proposed under the Project. Implementation of the Project would result in benefits to the community, including the dedication of 1.3 acres of park space, the

construction of affordable housing units, and improved bicycle and pedestrian connectivity, both for the Project site and surrounding neighborhood. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.6

We would propose actually improving the tree buffer and urban canopy along Hwy 85 by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's urban greening efforts.

This will improve the livability of the project for residents, including better health effects due to an improved buffer for auto exhaust, toxic dust and noise from the freeway, and a better aesthetic experience.

Importantly, it will advance Mountain View's strategic goal for improved biodiversity. In addition, added trees contribute to urban cooling, ameliorating climate change and urban heat island effects, and provide more carbon sequestration and better management of stormwater.

Response F.6

The comment supports improving the tree canopy along SR 85 by planting more trees. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.7

COMMENTS ON IMPACTS AND MITIGATION MEASURES: DEIR 555 WEST MIDDLEFIELD ROAD, MOUNTAIN VIEW

The Project would result in the significant and unavoidable impacts with respect to Project and cumulative PM2.5 concentrations at existing on-site sensitive receptors.

CEQA requires mitigation for impacts, even when mitigation does not reduce the impacts to below significance level. The mitigations offered for Impact AQ-2b are limited to construction activities, and do not address the impact associated with the loss of tree canopy buffer along Hwy 85.

Scientific evidence shows that urban trees remove fine particulate air pollution. The removal of the trees along Hwy 85 eliminates an important green infrastructure service that can help reduce PM2.5 concentrations not only during construction, but also for the operations lifetime of the project. The Project should be modified in a way that retains all the existing trees along the freeway (eliminating Block "C," for example).

Response F.7

The comment expresses support for retaining all existing trees along SR 85. Impacts related to localized concentrations of PM2.5 were found to be significant and unavoidable during the construction phase after implementation of applicable mitigation measures upon existing on-

site receptors. This construction-related impact would not be avoided or substantially reduced with preservation of all trees at the eastern end of the site along SR 85. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment F.8

The Project finds no significant impact to Aesthetic Resources. We disagree.

Hwy 85 is not considered a scenic highway at the state level, but thousands of drivers spend several hours each week on this roadway on their way to and from work at Silicon Valley companies. The value of the tree-lined highway in this section is not negligible - seeing trees improves mental health, cognition, and productivity for these drivers. Indeed, studies show that people who commute through natural environments daily report better mental health, and this association is even stronger among active commuters. The project replacement trees will take decades to grow to provide the aesthetic and health benefits that the existing trees provide.

Trees (and the urban forest) are also important to community health. The loss of the trees along Hwy 85 should be recognized as a significant, unavoidable impact to the environment and the health of residents and drivers alike. This impact can be avoided if the "No Block C" alternative is adopted, or another configuration is offered that retains the existing trees along the freeway.

Views from Hwy 85, looking towards the project site:



Response F.8

The comment states that the loss of the trees along SR 85 should be considered a significant and unavoidable aesthetics impact and a significant impact on the health of residents and motorists. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment also expresses support for the No Block C Alternative. Refer to response to comment F.2, above.

The comment expresses opposition to the removal of the urban canopy along SR 85. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.9

Biological impacts must address and mitigate the impacts of nighttime lighting on human health and on the Stevens Creek riparian ecosystem.

Artificial Light at Night (ALAN) is an emerging global environmental concern, and light pollution is an under-recognized problem. In recent years, there has been a remarkable increase in scientific articles showing devastating effects of ALAN on species and ecosystems, and on human health.

The most devastating ecological impacts have been on insects and insect populations, including aquatic insects, and the ecosystems that depend on insects for pollination, or as a food source. Because the project site is so close to Stevens Creek, attracting aquatic insects to light can cause adverse impacts to the aquatic and riparian ecosystem of the Creek.

Response F.9

This comment states that artificial light affects insects and insect populations, including aquatic insects. The Project site is located approximately 0.25 mile west of Stevens Creek and is west of SR 85. It is not anticipated that light generated by the Project within the Project site would be transmitted to the Stevens Creek corridor due to the distance between the Project site and Stevens Creek as well as intervening objects (e.g., SR 85 roadway and sound walls, trees along Stevens Creek). No substantial light spillover from the site would extend beyond SR 85.

Comment F.10

Outdoor lighting has also been implicated in adverse impacts to teen mental health and to human physical health, including thyroid cancer and sleeping disorders.

Response F.10

The comment expresses concern about the health impacts of outdoor lighting. See response to comment F.11 for a discussion of the Project's less-than-significant impacts related to lighting. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment F.11

The International Dark-sky Association provides sound recommendations for addressing light pollution including:

- Shield lights and direct light downward;
- Use only as much light as needed;
- Use light only when necessary;
- Install control systems such as dimmers, motion sensors, and timers;
- Light close to ground;
- Prevent light spillage.

In addition, please limit the Correlated Color Temperature (CCT) of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout the Project. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife, and ecosystems.

Response F.11

The comment identifies recommendations for addressing light pollution. As stated on page 3.1-13 in Section 3.1, *Aesthetics*, of the Draft EIR, the Project would most likely include accent and security lighting at the entrances to buildings and in the open spaces/courtyards. Pedestrian-scale lights could be mounted on poles and/or installed as bollard lights. Overall, because of the height and mass of the proposed buildings, the Project would increase the amount of ambient light radiating into the night sky. However, the Project proposes infill residential development on an urban site currently developed with residential apartments. The Project would add more walkway and security lighting, similar to the existing lighting on the site, and would not create substantial light spillover to nearby areas.

The Project would be subject to the City's development approval process prior to submittal of construction drawings. This review and approval process includes a DRC public hearing to receive recommendations on the design as well as public hearings before the Environmental Planning Commission and City Council. These reviews would ensure that the proposed lighting would be consistent with the City's community standards for residential development and would not significantly adversely affect the visual quality of the area or create a substantial new source of light or glare. Per Standard Condition of Approval PL-121 (Lighting Plan), a lighting plan would be required with the application for a building permit. Specifically, Standard Condition of Approval PL-121 requires the applicant to submit a lighting plan with the application for building permit that includes photometric contours, manufacturer's specifications on the fixtures, and mounting heights. At the time of final design review, the DRC would review the lighting plan to ensure that lighting would be directed downward and would not spill over on adjacent properties or be highly visible, as required under applicable standards and guidelines. Therefore, impacts related to new sources of substantial light during Project operation are expected to be less than significant.

Comment F.12

Plant and tree palette

The City of Mountain View has adopted a strategic plan that prioritizes biodiversity in the City. To support biodiversity, mature trees (especially oaks) should be retained, especially in areas where they function as a wildlife movement corridor (along Hwy 85). In addition, a native plant palette would support native fauna and flora, especially local birds, and pollinators.

Almost all the species in the plant palette for the Project are not native to California and to our region and the vast majority has no habitat value beyond providing some structure.

Trees

There are no California native trees in the plan! The only oak, holly oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western, redbud. Some of the species on the list should not be planted here. For example, in California, London plane trees tend to hybridize with local sycamores in riparian corridors, threatening the genetic integrity of the local population.

The plan should be revised to use trees from the North Bayshore plant palette, even where the chosen non-native is consistent with existing trees onsite. This will result in less consistency visually, but much higher biodiversity value, which is a key priority of the City.

Shrubs

The plan is predominantly non-native despite the fact that California is blessed with an extensive diversity of native shrubs that are drought tolerant, aesthetically lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options.

The plan should be revised to replace most of the shrubs with natives in accordance with the City priority for improving biodiversity.

The landscaping plan allows “minor planting revisions [to] occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability.” All the plants should be selected from the North Bayshore plant palette with no substitution.

Response F.12

The comment states that native trees and shrubs that support native fauna and flora should be planted in lieu of non-native trees and shrubs. As shown in Table 3.3-3 on page 3.3-18 in Section 3.3, *Biological Resources*, of the Draft EIR, the majority of the tree removals under the Project would be non-native species. As required by the City, most of the new trees that would be planted under the Project would be in the “low water use” category, in accordance with the Water Use Classifications of Landscape Species.

Comment F.13

Biological Resources: nesting birds

Large trees near waterways are often used by nesting birds, including raptors such as the Redshouldered hawk, Great-horned owl, and Red-tailed hawk. The nesting season for large birds is longer, and thus a nesting raptor survey is needed for the trees along Hwy 85 in the months of January through September.

Response F.13

The comment states that raptors could be nesting in trees along waterways from January through September. The discussion of construction activities during the nesting season in Section 3.3.4.4 in Section 3.3, *Biological Resources*, of the Draft EIR was revised to include a nesting bird survey if any construction were to begin in January rather than February. This text change to the Draft EIR is documented in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR.

Comment F.14

Energy

Net Zero Energy

Mountain View's Climate Action Plan (CAP) requires the City to move towards electrification to reduce GHG emissions. We note that some of the existing buildings have solar panels on their roofs. However, the proposed development does not include rooftop solar and the roof design may possibly preclude rooftop solar.

In order to achieve the City's Climate Action goals, proposed new development should be encouraged to be Net Zero energy for new construction and include rooftop solar.

Response F.14

The comment states that the Project should be encouraged to include rooftop solar in order to achieve the City's Climate Action Goals and Net Zero energy consumption. As described on pages 3.7-26 to 3.7-29 of Section 3.7, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would be consistent with all applicable measures in the City's Greenhouse Gas Reduction Plan. Eleven of the CAP measures, including rooftop solar, are not applicable to the Project; therefore, consistency with these measures is not required for the Project. However, per the MV Green Building Code, the Project would be required to include 50 percent solar roof cover and this will be a City Condition of Approval. Furthermore, as described on page 3.6-12 of Section 3.6, *Energy*, the Project would include a variety of sustainable design features, energy efficient measures, and transportation demand management features to reduce energy consumption consistent with the City's Greenhouse Gas Reduction Plan.

Comment F.15

EV Charging Stations

This project will be operational for the next 50 years and climate change is driving the movement from gas powered vehicles to electric powered vehicles. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor's Executive Order established a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045.

We believe more EV charging stations are needed than the 10% currently proposed. The project should provide closer to 25% charging stations or include documented capacity for easily expanding the number of charging stations to 25% within the next decade.

Response F.15

The comment states that the 25 percent of parking provided under the Project should be EV charging stations instead of the 10 percent that is currently proposed. The provision of 10 percent of the proposed parking spaces, or 99 parking spaces, with power outlets for EV charging is consistent with the City's EV parking requirements. The proposed spaces with power outlets for EV charging as part of the Project would help the City achieve its primary climate objective of reducing greenhouse gas emissions by 80 percent by 2050 by expanding EV charging opportunities in multi-family residential developments.

Comment F.16

Transportation

Parking and Car Share

The parking ratio is difficult to determine as it is not clear from the documents whether the parking count includes the parking spaces that will be replaced by the new construction.

The DEIR documents indicate 997 parking spaces (there may be a math error in the DEIR which lists 987 spaces) including garage spaces and surface parking. This yields a parking ratio of 1.37 spaces per unit. These numbers need to be clarified to explain whether existing spaces are included in this count or excluded.

A parking ratio of 1 space per unit should be the maximum for a transit-oriented housing development in order to encourage transit use. Please clarify the parking count of existing versus new parking spaces.

Car Share, in addition, is a critical element in making it convenient to have access to a car when transit is not available. The number of Car Share spaces is not listed anywhere. Since this is a critical element in the parking design, the proposed number of car share spaces needs to be part of the development proposal. Please include the minimum number of Car Share units that will be included even though the TDM plan is not part of the DEIR.

Response F.16

The comment requests an explanation of the parking ratio identified in the Draft EIR and supports a parking ratio of 1 space per unit. The City supports and uses a "model parking standard" of one space per studio/one-bedroom unit and two spaces per unit for units with more than one bedroom. The Project would provide a total of 970 parking spaces for the 402 existing units and the 323 new units, a total of 725 units, which would meet the model parking standard. The Project does not propose excessive parking which might deter transit use. The proposed number of parking spaces would be less than the maximum allowed under the City Zoning Code. As indicated in the TDM plan, the development would provide at least two parking spaces for carshare operators.

Comment F.17

Noise

Green space has the ability to mitigate noise in urban areas. Planting "noise buffers" composed of trees and shrubs can reduce noise by five to ten decibels for every 30m width of woodland, especially sharp tones, and this reduces noise to the human ear by approximately 50%.

For this reason, with the intensification of development on this site, the tree buffer along Hwy 85 is an important element that needs to be preserved and augmented. We recommend improving the tree buffer and urban canopy along Hwy 85, by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's Urban Greening efforts.

Response F.17

The comment states that the tree buffer along SR 85 should be preserved and augmented with more trees using California native species. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. In addition, the comment states that greenspace has the ability to mitigate noise in urban areas. The commenter cites an article that states that noise can supposedly be reduced by 5 to 10 dB for every 30-meter width of woodland. As mentioned in the Master Response, according to information from the Federal Highway Administration, trees and foliage generally do not result in perceptible reductions in noise levels unless the foliage is dense enough to block views along the propagation path completely (Federal Highway Administration 2019). If the foliage is approximately 20 meters thick and the complete line of sight between the source and the receiver is blocked, attenuation of approximately 1 decibel (dB) would be expected to occur. (Note: A three (3) dB change in noise is generally considered to be "barely perceptible" by the human ear [Federal Highway Administration 2019].)

The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required. Although noise can be somewhat reduced by forested areas, the complete line of sight between a source of noise and a receiver would need to be blocked (as discussed above) to result in perceptible noise attenuation.

Comment F.18

Alternatives

The EIR suggests that the "No Block C" alternative would have "similar but slightly lesser" environmental impacts for most resource topics (particularly air quality, greenhouse gas emissions, noise, and traffic) because of the reduced scale of the alternative compared with the Project, although there would be no change in the impact conclusion for any of the foregoing resource areas.

Based on the evidence provided above, we believe we have a fair argument showing that the "No Block C" alternative reduces aesthetic and air pollution impacts and improves noise impacts enough to provide additional housing while balancing environmental considerations and the need for housing.

Thank you for the opportunity to comment on the DEIR.

Response F.18

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project's units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

G. Lada Adamic (dated August 3, 2021)

Comment G.1

Apologies for the second email. It just occurs to me that current utilization of bikes at the site may be indicative of the potential for biking. Since there are already hundreds of apartment units at 555 W. Middlefield, one could observe people biking there. However, in my weekly visits for tennis lessons I have not observed anyone exiting or entering the complex by bike (except for my son and me), and the bike racks inside the gate by the parking garage (they are probably not the only ones, but still...) have no bikes locked there except for a while there was a stripped bike frame locked to one of them.

For this to improve, one would need one or probably actually both of these

1. a legit way to access Stevens Creek trail
2. bike lanes on Moffet

Thanks and sorry for the multiple emails!

Response G.1

The comment refers to a second email. The first email is addressed in responses to comments G.2 and G.3.

The comment also suggests that providing bicycle access to Stevens Creek Trail and bicycle lanes on Moffett Boulevard would improve bicycle use at the Project site. Stevens Creek Trail is currently accessible from the Project site via bicycle lanes on East Middlefield Road. The access point is between SR 85 and Easy Street. Stevens Creek Trail can also be accessed from Moffett Boulevard at the SR 85 northbound off-ramp intersection. There are currently no bicycle lanes on Moffett Boulevard between the Project site and the trail access points. However, the City's 2020–2021 Capital Improvement Program includes a project that would evaluate the need for a Class IV bikeway on Moffett Boulevard between Middlefield Road and Clark Road, within NASA Ames. The Project anticipates these improvements by relocating the curb and gutter to allow for a wider bicycle lane, incorporating a VTA bus stop with integrated bicycle lane and removal of on-street parking.

Comment G.2

I would like to suggest this project be reviewed by the Mountain View B/PAC if it is claiming to have significant environmental benefits for providing bike facilities. Though the improvements are laudable, e.g. providing 300+ bike parking spots + a cut-through path connecting Cypress Point and Middlefield (this is great! as long blocks are the enemy of good pedestrian circulation), they gloss over the reality that this development is on an island unreachable by bikes, since Moffet does not have bike lanes (and this project makes no accommodation for e.g. a bike lane along Moffet, as the facade/landscaping goes right up to the sidewalk), no access to the Stevens Creek Trail except by cutting through private property in order to get to Central (unless one again would like to brave Moffet with no bike lanes). Getting back from Stevens Creek trail (if one were to not cut through the condo complex), one ends up on the sidewalk on Middlefield. Moffet is a 40mph road and without bike lanes it is not suitable for most people.

So even though the report advertises that residents could take their bikes to the lightrail or Caltrain station, this is not the case. Without being able to bring their bikes on public transit, the range of endpoints accessible to the residents without cars is more limited. Either the city, or the project planners, need to figure out how bikes would actually be able to access this complex where hundreds of people would be living with 300+ bikes.

Response G.2

The comment expresses concern about a lack of bicycle access to the Project site. The Project would provide 323 bicycle parking spaces for residents as well as 33 short-term bicycle parking spaces, which would comply with the City's bicycle parking requirements. Bike lanes currently exist on Middlefield Road. Although there is no bike lane on Moffett Boulevard between SR 85 and the Mountain View Transit Center, it is designated as a bike route. In addition, the City's Bicycle Transportation Plan Update (2015) includes a project that would evaluate the need for a Class IV bikeway on Moffett Boulevard. Refer to the response G.1, above regarding the future Capital Improvement Program improvements.

Comment G.3

Separately (and less of an environmental concern, more for parks & rec future planning), the loss of the tennis courts (where Silicon Valley Tennis holds classes and lessons -- one of the few outfits in the city besides Mountain View Tennis) is a casualty, as park tennis courts are frequently fully booked, especially on evenings and weekends.

Response G.3

The comment expresses concern of the loss of the existing tennis courts as a result of Project construction. As described under Impact PSR-4 in Section 3.13, *Public Services and Recreation*, while the Project would remove the tennis courts, a number of new amenities would be provided on site in the form of future City-owned park space, private open space, and a new pedestrian and bicycle path. In addition, the Project would involve payment of an in-lieu fee for development of public parks in the Project planning area, in compliance with the City of Mountain View Parkland Dedication Ordinance and Standard Condition of Approval PW-19 (Park Land Dedication Fee), which would offset any physical deterioration of recreational resources that may result from Project implementation.

H. Patricia Albers (dated August 6, 2021)

Comment H.1

I live on Central Avenue near the corner of Orchard Avenue, and I'm deeply concerned about the 555 Middlefield Road Project currently under consideration by the city.

I understand that the proposed development would involve taking down one hundred-and-some trees, over half of them heritage trees, including those at the end of Cypress Point Drive. Those trees protect all of us in this neighborhood from the intense noise and pollution from highway 85. They're also a refuge for birds and other wildlife along Stevens Creek, badly needed storehouses for carbon, and a small oasis in our overbuilt city.

Response H.1

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment H.2

I understand that emissions from transportation are a major problem for Mountain View and that, in theory, people who will live in this project will take advantage of public transportation or at least be closer to their offices. But to develop the end of Cypress Point Drive is to throw the baby out with the bath water. Actually, the developer should be required to plant more trees there to compensate for those they will remove for the rest of the project.

Response H.2

The comment expresses concern about the emissions that would be generated by transportation uses under the Project. As stated on page 3.7-20 in Section 3.7, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would designate approximately 10 percent of the proposed parking spaces for electric vehicles (99 spaces). The Project would also implement a TDM plan which would reduce daily trips (and VMT) by 6%. As discussed in Section 3.14, *Transportation and Circulation*, of the Draft EIR, the Project would meet the City's VMT reduction target, which is designed to meet statewide VMT reduction goals. Therefore, it would not conflict with the state's long-term emissions reduction trajectory for mobile sources. In addition, implementation of the Project would optimize public transit as well as bicyclist and pedestrian access to the site by locating additional residential uses near public transit and constructing a new pedestrian and bicycle path through the Project site. The Project would also be within 3 miles of two Caltrain stations, adjacent to local bus routes, and adjacent to routes that provide safe and convenient access for bicyclists and pedestrians. In addition, the comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

I. Hala Alshahwany (dated August 11, 2021)

Comment I.1

The following are my comments and concerns regarding 555 Middlefield project's DEIR.

Pp. 5 - 6 & 5 - 7 section 5.3.5, **Environmentally Superior Alternative** states that *"The CEQA Guidelines require that an environmentally superior alternative be identified... Because the No Block C Alternative would result in 34 percent of the residential units proposed under the Project, the impacts would be similar to but less than those of the Project. Therefore, the No Block C Alternative is considered the environmentally superior alternative."*

I completely agree with the EIR's statement above. Exposing neighboring residents to harmful air particulates during construction period, estimated to last 5+ years, is a great and unreasonable burden to inflict on the community. The report highlights this in p. ES - 3 under **Significant and Unavoidable Impacts** (Impact AQ - 3a) stating that despite mitigations measures, *"cumulative PM2.5 concentrations would remain above BAAQMD's PM2.5 concentration significance threshold at all receptor locations; therefore, the cumulative impact would be significant and unavoidable."*

Response I.1

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project's units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

In addition, the comment expresses concern about the Project's significant and unavoidable impacts on air quality during construction. Impacts related to localized concentrations of PM2.5 were found to be significant and unavoidable after implementation of applicable mitigation measures. However, only existing on-site residential receptors would be exposed to significant and unavoidable levels of localized concentrations of PM2.5. All other pollutants would be emitted at less-than-significant levels.

Comment I.2

The EIR report, however, missed a very critical long term cumulative impact, namely the proposed removal of 62 mature heritage trees. Most of these trees are currently positioned between the project site and HWY 85 (where Block C units to be built) functioning as the best natural and highly effective buffer to air pollution from cars' exhaust and airborne toxic dust formed by tires and brakes particulates. There's well documented and tracked scientific evidence that negative health impacts along our freeways are significant and affects human health adversely (respiratory problems, asthma, etc.). The EIR fails to state that. Moreover, this natural tree buffer being in close proximity to Steven's Creek Trail (275 feet from site per EIR p. 3-2-9 Table 3.2-3) acts as an extension to the trail's natural habitat corridor from the hills all the way to the bay shorelines. In addition to protecting human health and sustaining natural habitats, the trees are also highly effective as a sound barrier to noise pollution. The removal of these trees may require sound walls to achieve acceptable decibel levels from freeway. The EIR does not adequately address this and all other long term impacts caused by elimination of the heritage trees.

Response I.2

The comment expresses concern about the proposed tree removal under the Project, including the cumulative impact of the heritage tree removal. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

In addition, as stated on page 4-4 in Chapter 4, *Other CEQA-Required Sections*, of the Draft EIR, other reasonably foreseeable projects could result in the removal of existing trees, including heritage trees. However, the Project site and the immediately surrounding area are fully developed. They are highly disturbed and retain little or no natural habitat. The Project area does not contain any of the significant ecological resources identified in the General Plan EIR; therefore, the Project would not result in a considerable contribution to this cumulative impact. The Project would be required to adhere to the City's Standard Conditions of Approval related to trees and migratory bird species. The Standard Conditions of Approval require preconstruction nesting bird surveys for impacts to migratory bird species, as well as tree replacement and tree protection measures for impacts to trees. Given that the Project is required to comply with the Standard Conditions of Approval, the Project would not result in a considerable contribution to this cumulative impact.

Comment I.3

Replanting 197 trees to compensate for the removal of 135 trees, 62 of which are heritage (p. 2-22, section 2.5.5 **Landscaping and Heritage Trees**), is not a realistic nor is it an equivalent solution, considering current climate change and GHGe we're facing today. The IPCC (Intergovernmental Panel on Climate Change) released their 6th assessment report on August 9th, 2021, stating that human activities are the primary source for our planet degradation of natural habitats, and it's leading to dangerous warming of oceans and climate extremes. It is in our power to act now to save our natural resources-habitats and plan a sustainable growth so we can have a future.

Response I.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with GHG emissions.

Comment I.4

Additionally, the EIR p. 2-1, section 2.1, **Project Overview** states that project "*seeks approval of an amendment to the Mountain View 2030 General Plan (General Plan) from the existing designation of Medium - Density Residential to a new land use designation referred to as the High - Low Density Residential; the Project would retain the existing Planned Community ("P") zoning*". This amendment should not be made without clear vision by the city and the community as to what Moffett Blvd area should look like in the future. In other words, a precise plan is essential for that area (considering all the old buildings with potential developments surrounding this project site). Providing housing near transit is very desirable, however not at the expense of degrading livability and the infrastructure for the existing community.

Response I.4

The comment expresses support for the development of a precise plan for the Moffett Boulevard area. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment I.5

Finally, great consideration should be given to surrounding streets such as Cypress Point Dr (a substandard less than 40' wide, dead-end street) where most of the generated traffic by this project will take place. Parking and traffic issues especially when the Adult Education Center was operating at full capacity (located at corner of Moffett & Cypress), do not seem to be addressed adequately in the EIR (p. 3.14.4.2 section **Traffic Analysis Scenarios**). As a daily driver on that street for the last 4 years, and prior to Covid restrictions, I have experienced many near accidents at the intersection mentioned above, as well as great difficulty parking on the street. The report assessment of traffic and parking impacts do not reflect the reality I experienced.

Response I.5

The comment states that existing parking and traffic issues were not adequately addressed in the Draft EIR. The adult education center was operating when the counts were taken at the Moffett Boulevard/Cypress Point Drive intersection. Therefore, the transportation analysis reflects traffic associated with the adult education center. As discussed in Section 3.14, *Transportation and Circulation*, of the Draft EIR, although the Project would increase traffic on Cypress Point Drive, the increase would not be substantial and would not be expected to degrade operations at the Moffett Boulevard/Cypress Point Drive intersection. This is because most residents of the existing apartments park their vehicles in the Block A garage, although some park in Block C. The majority of Project traffic would be directed to Middlefield Road via

the driveway in Block A. In addition, the Project would reduce the number of driveways on Cypress Point Drive from seven to three, thereby reducing the number of conflict points along the street and improving pedestrian/bicycle access. In addition, the number of on-site parking spaces provided by the Project would be enough to meet City parking requirements.

Therefore, the Project is not expected to significantly increase the demand for street parking on Cypress Point Drive. In addition, CEQA does not consider the lack of availability of street parking as an environmental impact.

Comment I.6

In summary, I believe that “No Block C” alternative will allow this project to provide 111 units (with 15% affordable), save our most valuable natural resources, the heritage trees for human and habitat health, minimizes the construction duration which will lessen the impacts of air contaminants, retain traffic and parking issues at a reasonable level, and continue the medium density zoning until the precise plan for Moffett area is completed.

Thank you for supporting the community and myself in how we imagine our city progresses into the future.

Response I.6

The comment expresses support for the No Block C Alternative. Refer to response to comment I.1, above.

The comment also expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project’s replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

J. Leona Chu (dated August 12, 2021)

Comment J.1

As a resident of Mountain View living on Cypress Point Drive, I have read the Draft Environmental Impact Report (DEIR) and I am concerned about some of the developer’s plans for building more apartment units at 555 Middlefield Road.

Discrepancy re Units to be Constructed

The DEIR of June 2021 and the Architect’s schematic drawings of July 2021 list different numbers of units to be built. The DEIR states 324 apartments will be constructed. The Architect’s schematic drawings show that 345 units will be built. There is a discrepancy of 21 apartment units to be built. Which number is correct?

Response J.1

The comment questions the number of new units to be constructed under the Project. Subsequent to the preparation of the Draft EIR, the applicant prepared a revised site plan in July 2021. The number of residential units that would be constructed under the Project decreased

from 324, which was analyzed in the Draft EIR, to 323 (a reduction of 1 unit). This text change to the Draft EIR and the revised site plans are documented in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. As with the previous change to the number of residential units that would be constructed under the Project and as stated on page 2-1 in Chapter 2, *Project Description*, of the Draft EIR, this change occurred after completion of specified quantitative analysis and technical reports that were based on 329 units. As a result, Chapter 3, *Setting, Impacts, and Mitigation Measures*, in the Draft EIR analyzes impacts associated with 329 net new residential units consistent with the quantitative analysis and technical reports that were already prepared and thus reflects a more conservative analysis of impacts than what is currently proposed. The total square footage identified for the new residential units throughout the Draft EIR is still based on 329 units and will decrease incrementally when site plans are finalized for the Project. The decrease of 6 residential units, and associated reduction in square footage, does not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Comment J.2

Trees in Block C

There are serious issues regarding the trees located in Block C on the developer's property and what the developer plans to do with them.

Current trees vs replacement trees

Currently there are many heritage trees located in Block C. They are mature and native to California. The developer intends to replace them with non-native and immature olive trees. The replacement olive trees are not equal to the quality of heritage trees which will be destroyed. These olive trees are a poor substitute.

The landscape replacement plan in the DEIR will also remove a green buffer of heritage trees which absorb carbon dioxide and release oxygen. Olive trees don't provide those healthy benefits. The tree replacement plan in the DEIR would also remove a wildlife habitat corridor. And it would destroy trees that currently provide shade for urban cooling.

Response J.2

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment also expresses concern about the Project's effect on urban cooling. As stated on page 2-22 in Chapter 2, *Project Description*, of the Draft EIR, many of the new trees that would be planted under the Project would be evergreen, allowing for year-round shade and screening of the Project site. The City will also require, as a Condition of Approval, that 75 percent of new trees and plantings on the site be native species.

Comment J.3

Preserve Heritage Trees

We need to preserve the mature native heritage trees and shrubs located in Block C, especially those on the wide swath located at the border of Block C and Highway 85. We need this green buffer to:

- ** Preserve healthy air quality and reduce noise levels,
- ** Provide a wildlife habitat corridor for birds and animals

And

- ** Protect residents of Avalon Bay Communities and Cypress Point Drive

from airborne toxic dust which comes from the tire and brake dust generated by the cars and trucks driven on HWY 85 located on the other side of the Block C property. It has been proven these toxic dusts cause asthma and other respiratory illnesses.

In fact, the developer intends to plant fewer trees to replace those removed. One aerial overview also shows the size of new trees **15 years after construction**.

Conclusion Preserve Heritage Trees in Block C

We need to preserve, even increase, the heritage trees in Block C. We need to preserve the healthy environmental benefits these trees provide. These mature trees remove unhealthy carbon dioxide and release oxygen! They serve as a wildlife habitat corridor, and they provide shade for urban cooling, especially so in a time of higher temperatures and increasing wildfires in California.

Response J.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment J.4

Choose No Block C Alternative

This is the environmentally healthy alternative. It allows both the construction of additional rental units **and** the preservation of trees and shrubs in Block C, vital to maintaining a healthy quality of life.

Response J.4

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project's units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

The comment mentions the loss of trees under the proposed Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment J.5

Consider Other Alternative

Another alternative is to build more units on Block A and move the park (public or private) to Block C. This alternative will allow more apartment units to be built, reduce the amount of time needed for construction, and preserve the trees and shrubs growing in Block C.

I hope this alternative will receive serious consideration. It has many benefits meeting housing and environmental needs.

Response J.5

The comment suggests that the City and applicant should evaluate an additional alternative to the Proposed Project that would shift residential units from Block C to Block A and the Park Parcel and move the public park to Block C.

Block C is designed to include 212 units in a four-story building on 3.53 acres, equivalent to a density of 60 units per acre. Block A is designed to include 111 units in a four-story building on 2.24 acres, equivalent to a density of 49.5 units per acre. The Park Parcel is 1.34 acres. If the units from Block C were shifted to be evenly distributed on Block A and the Park Parcel, there would be 323 units on 3.58 acres, equivalent to a density of 90 units per acre. This would be a 50 percent increase in density compared to the current design on Block A and require multiple six-story buildings and very different and significantly more costly construction techniques compared to those proposed for the Project's podium-style buildings; however, it would not increase the overall unit count on the Project site.

These six-story buildings would be infeasible and impractical to design and implement for a variety of reasons. "Feasible" is defined under CEQA "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Res. Code, § 21061.1.) Alternatives

may be rejected where they do not meet project objectives or are “impractical or undesirable from a policy standpoint.” (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The suggested alternative would result in a significant densification on Block A and the Park Parcel, which would substantially exceed the maximum allowable height of 62 feet and result in building massing and height to which the community has expressed strong opposition. The suggested alternative would require an additional floor of concrete construction to be added to the wood-frame building design, resulting in a project that would result in significant increases in the costs of construction making the project economically infeasible. In addition, accommodating the additional buildings on the Park Parcel would very likely require the removal of a large stand of at least 19 existing heritage redwoods that currently runs along the edge of the Park Parcel, between the park and Building A. These trees are substantially more ecologically beneficial than most of the trees and shrubs slated for removal around Block C, many of which are invasive Brazilian Pepper trees in fair-to-poor condition.

The Draft EIR considered a reasonable range of feasible alternatives to the Project that could feasibly attain most of the basic Project objectives and avoid or substantially lessen the significant impacts of the Project, in accordance with the CEQA requirements. Specifically, the Draft EIR analyzed four alternatives to the Project, including the No-Project Alternative, the Reduced-Intensity Alternative, the No Block C Alternative, and the Full Redevelopment Alternative.

The additional alternative suggested by the commenter is noted and will be provided to decision makers, along with the information above regarding infeasibility of the alternative, for their consideration during the decision-making process.

K. Joel Dean (dated August 8, 2021)

Comment K.1

Attached are my comments on the subject TIA.

555 West Middlefield DEIR, Transportation Impact Analysis

Public comments by Joel Dean

This TIA, aided and abetted by the Mountain View Voice, has sown confusion among the public over how expansion of the Eaves complex could result in minimal traffic impacts on Cypress Point Drive. Stripping away irrelevant topics and hairsplitting statistics reduces the traffic forecasting process to a few pages of text, a pair of tables, one chart and one photo. Decision makers and the public can review these in a fraction of the time it takes to wade through the TIA, leaving them more time to evaluate what they are reading.

Response K.1

The comment expresses concern about the complexity and details in the transportation impact analysis prepared for the Project. The transportation analysis has been completed in accordance with the CEQA requirements as well as the City's and the VTA's thresholds and methodologies. No further response is required.

Comment K.2

Irrelevant topic 1: Vehicle Miles of Travel (VMT)

VMT analysis is not required because the Eaves is within half a mile of the Caltrain station, the importance of which is greatly exaggerated. Why do it at all? VMT would not have changed the assessments of traffic impacts if it had been applied.

Response K.2

The comment states that a VMT analysis is not required for the Project. Impact TRA-2 in Section 3.14, *Transportation and Circulation*, of the Draft EIR, followed the City's VMT policy, which establishes screening criteria for developments that are expected to result in a less-than-significant transportation impact under CEQA. Such developments are therefore not required to conduct further VMT analysis. The Project meets the screening criterion regarding proximity to transit and in accordance with the State and City methodology, and therefore, is expected to have a less-than-significant impact on VMT.

Comment K.3

Irrelevant topic 2: Level of Service (LOS)

The importance of LOS in the real world is equal to the number of times you hear the term "Level of Service" used in a mass media traffic report.

Response K.3

The comment states that a level of service analysis for the Project is not relevant or important. While no longer necessary under CEQA, a level-of-service analysis for the Project is required in accordance with the City's transportation study guidelines.

Comment K.4

Irrelevant topic 3: Forecasts of traffic on Moffett Boulevard which use 2019 as the base condition

2019 traffic counts do not show the impact on Moffett of the planned closing of Castro Street at Central Expressway. The number of crossings of the expressway in 2019 exceeded the total volume of traffic which would be generated by a 731-unit Eaves. Most of the crossings which won't be made at Moffett will be diverted to Shoreline Boulevard. Moffett will see considerable relief, its intersections will operate more efficiently, and the effects of Eaves traffic will be less pronounced than they are today. Using 2019 traffic to generate the existing-plus-project estimates is unavoidable. Using it for longer-range forecasts would cause them to overestimate traffic on Moffett.

Response K.4

The comment states that the planned closing of Castro Street at Central Expressway should have been accounted for in the transportation impact analysis prepared for the Project. The closing of Castro Street at the Central Expressway is a long-range roadway project and not expected to be implemented in the near future (i.e., when the Project would be completed). Therefore, the analysis in the Draft EIR is based on the existing roadway configuration on Moffett Boulevard and at the Central Expressway intersection.

Comment K.5

Relevant topics

Traffic forecasting is not rocket science. It's barely even considered engineering. Digging up a few facts, making a few assumptions, doing some elementary arithmetic, and documenting all the digging, assuming, and pencil-pushing are its essentials. The process consists of three steps: trip generation, trip distribution, and traffic assignment.

Trip generation

A DIY version of the trip generation step is shown in Attachment 1 on page 6. The results were computed on a 50-year-old hand-held calculator. The grunt and groan method's bottom line is virtually identical to the TIA's.

Inputs to trip generation include:

(1) Base-year traffic counts. While the base traffic counts were taken on one day only, they are quite consistent with counts taken in 2017 -- 3% lower in the AM peak hour, 4% higher in the PM peak hour. There is no reason to believe they are inaccurate and there are no better sources of this information.

(2) The number of trips generated per dwelling unit. The per-unit trip rates are national averages taken from an Institute of Transportation Engineers manual. They produce plausible estimates of total peak traffic at CP Drive when compared to the actual counts. They differ in the proportion of trips which are incoming to the project site (26% estimated vs. 31% counted in the AM, 61% estimated vs. 73% counted in the PM), with a corresponding overestimate of outgoing trips. If, instead of the ITE percentages, the count percentages had been applied to all forecasts, there would be shifts of trips from outgoing to incoming as follows: At CP Drive, 1 or 2 trips in the AM, 3 in the PM; at Middlefield, 3 or 4 trips in the AM, 12-13 in the PM. These numbers are too small to require Hexagon to modify the TIA. Counts were not taken at all Eaves driveways to determine trip rates specific to the project. Lacking those, the ITE rates are the most acceptable substitute.

(3) The numbers of dwelling units existing and to be added by the project. So far, no one has denied that Eaves currently has 402 units. The number of units to be added is a subject of debate. 329 was the number the consultant on the TIA used, and is used here. Anyone who wants to dispute that can easily patch a different number into the table and recalculate trips generated.

Response K.5

The comment describes a method for calculating the Project's trip generation. For item (2), the commenter calculated the inbound and outbound trip split using the intersection counts from the Moffett Boulevard/ Cypress Point Drive intersection, which also include traffic generated by the adult education center. Therefore, the counts do not represent the inbound and outbound trip split solely from the existing apartments at Project site. In addition, subsequent to the preparation of the Draft EIR, the applicant prepared a revised site plan in July 2021. The number of residential units that would be constructed under the Project decreased from 324, which was analyzed in the Draft EIR, to 323 (a reduction of 1 unit). See response to comment J.1 for a discussion of this text change to the Draft EIR and the revised site plans. The existing number of units is 402; the proposed number of additional units is 323, for a total of 725 units at the Project site.

Comment K.6

The percent reduction in per-unit trips due to Transportation Demand Management measures. The benefits of TDM are purely notional, and our governmental authorities tend to overestimate the effectiveness of the local mass transportation system. If brownie points for TDM have to be injected into the trip forecasts, then TIA's should publish projections both with and without the TDM bonus. Attachment 1 does this. It shows the effects of the 6% reduction in trips attributed to TDM are minimal.

Response K.6

The comment indicates that the benefits of TDM measures are typically overestimated and suggests that a project's transportation impact analysis should calculate trip generation with and without accounting for a project's TDM measures. This is shown in Table 6 of the transportation analysis in Appendix 3-14-1 of the Draft EIR.

Comment K.7

The percentages of trips allocated to Cypress Point Drive and to Middlefield Road. Lacking base-year trip counts at the Eaves driveways, Hexagon somewhat arbitrarily assumed 90% used CP Drive and 10% used Middlefield. If they had used the proportions of spaces in the parking lots, which is currently 626 (93.4%) Cypress Point and 44 (6.6%) Middlefield, they would have assigned 4 more trips to CP Drive in the AM and 6 more in the PM. The difference is too trivial to worry about. Post-expansion, the parking space split will be 602 (60.6%) CP Drive and 391 (39.4%) Middlefield. Hexagon used splits of 61/39 inbound and 60/40 outbound. 60.6% is used for all trips in Attachment 1. These splits seem reasonable, but there is one element of uncertainty, which will be discussed later.

Response K.7

The comment suggests that the trip allocation prepared for the Project was based on arbitrary assumptions. The 10 percent assumption considers the location of land uses, existing travel patterns, and the presence of parking lots on Middlefield Road, which were fully used based on field observations conducted for the Project. In addition, there were many unoccupied spaces in the parking lots on Cypress Point Drive based on field observations. The difference in trip numbers cited in the comment is minimal and would not materially affect the analysis results.

Comment K.8

Trip distribution and traffic assignment

Once trips generated by a project are estimated, they are distributed into a matrix by assigning destinations to outgoing trips and origins to incoming ones. Documentation of how this was done for Eaves expansion consists of a short paragraph on page 25 of the TIA stating that distribution was "based on existing travel patterns and complementary land uses." That sounds reasonable enough, but is too vague to permit critiquing Hexagon's methods.

After the origin/destination matrix is created, each cell is assigned to the road network. Documentation of this step is as sketchy as that for the previous one: a short paragraph on page 25 saying it is based on "directions of approach and departure, roadway connections, and locations of project driveways." That also sounds reasonable, and probably means trips are assigned to whatever route from origin to destination a computer algorithm decides is quickest.

Attachment 2 on page 7 shows an origin/destination matrix for project-generated trips in the immediate vicinity of The Eaves. Thanks to the paucity of information about the trip distribution method, this matrix had to be derived by working backwards from the traffic assignments shown in TIA Figure 9 and the inset to Figure 8, with 2019 trips subtracted from the latter for the sake of consistency. Most notable is that U-turns are minimized in some ways. First, outgoing Block A trips which would have been assigned to southbound Moffett had they originated at Cypress Point are assigned to southbound Easy Street instead. The opposite movement is assigned to eastbound Middlefield or northbound Moffett because left turns from eastbound Central Expressway to Easy Street are prohibited. Second, eastbound trips from Block A are assigned to Middlefield rather than U-turning at Easy Street and taking the freeway. The opposite movement mostly avoids a U-turn at Moffett by being assigned to the freeway, exiting at Moffett and making a left from a supposedly overloaded pocket onto Middlefield.

Attachment 3 on page 8 is derived from TIA Figure 9. It is composed of diagrams of expansion-generated trips assigned to the Moffett/CP Drive, Moffett/Middlefield, and Middlefield/Easy intersections, with the addition of the Middlefield/Eaves inset from TIA Figure 8. These have been arranged according to their actual physical relation to each other, instead of the Picasso-like jumble of Figure 9. There were a few small bloopers in Figure 9. Two were corrected, one was not, as noted in Attachment 2.

The 2019 traffic data in the TIA looks reasonable, the modeling process is boilerplate, and the arithmetic errors are minimal. Anyone who accepts those statements is apt to agree that the TIA makes a reasonable case for claiming that Eaves expansion will have less than significant impact on the operation of the Moffett/Cypress Point intersection.

Response K.8

The comment compares the trip assignment for the Project in Figure 9 to the data in Table 6 and finds that one additional trip was assigned to the street network in Figure 9. The discrepancy identified by the comment is due to rounding and does not result in any substantive changes to the environmental impact analysis or conclusions in the Draft EIR.

Comment K.9

Issues the TIA does not address

Block A driveway at Middlefield. This is the location with the heaviest impact from Eaves expansion. The expected increase in vehicle trips is concentrated there. Middlefield already carries considerably more traffic than Moffett and will not get any relief from Castro Street closing. In common with TIA's for other large residential projects (777 West Middlefield, 1001 North Shoreline) this one does not have much to say about operations at driveways. The Eaves driveways on Middlefield are not huge problems currently, thanks to their low hourly trip counts -- 15 in the AM, 18 in the PM. That could change with the construction of a 363-space garage in Block A, with sevenfold increases in trip counts during peak hours. One car every minute in the AM and one every minute and a half in the PM are forecast to be trying to exit the Block A garage onto eastbound Middlefield. Queues at the downstream intersection at Easy street are not likely to extend far enough (+/- 1000') to obstruct the Eaves driveway. But there may be long waits for breaks in the traffic, especially in the evening, which could lead to queuing in the driveway and impatient motorists blocking the bike lane. Attachment 4 on page 9 shows the defects of the existing eastern driveway, including a car parked in the bike lane and vegetation obstructing the vision of drivers

exiting Eaves. Removal of that vegetation should be added to Hexagon's suggestion to paint the curb red. Hexagon also suggests transitioning the slopes of the garage ramps to prevent bottoming out. Reducing the threat of bottoming out might encourage more drivers going up a ramp with a 16-degree incline to accelerate, which some will do anyway, thus endangering passing bicyclists. Assuming that the lives of cyclists are at least as important as preventing scraped undercarriages, adding a speed hump before cars exiting the Block A garage reach the bike lane would be advisable. That goes double if a sidewalk is added to the south side of the SR85 overpass, adding pedestrians to the list of potential victims. Based on the bicycle counts on Middlefield at Moffett and Easy, it would be difficult to justify an expensive upgrade of the SR85 overpass. If there are no bicycle improvements, there will be no pedestrian improvements. Though pedestrians outnumber cyclists, they are stepchildren who subsist on table scraps from shared bike/ped projects. They even have to compete for the scraps with unscrupulous cyclists. The effort and expense of improving the SR85 overpass would be better spent on a pedestrian crossing on the west side of the Shoreline/Central Expressway interchange, with barriers to keep cyclists from encroaching. Ditto the planned bike/ped bridge over US101 on Shoreline.

Response K.9

The comment expresses concern about the analysis of the Project's impact of the Block A driveway on Middlefield Road. Attachment 4 shows that exiting drivers would have clear sight distance with respect to eastbound traffic. However, on-street parking could obstruct the view of exiting drivers. Therefore, the transportation analysis recommends that the Project provide red curb markings or signage along the entire Project frontage to prohibit on-street parking on Middlefield Road.

The site plan shows that exiting vehicles at the Block A driveway would need to turn within the surface parking lot before reaching the driveway. Therefore, because vehicles would be expected to be traveling at low speeds when approaching the driveway, a speed hump would not be necessary.

Comment K.10

Cypress Point Drive. The "element of uncertainty" mentioned above concerns how the trip split between CP Drive and Middlefield is affected by unassigned parking spaces, of which there will be 181 in Blocks B & C. People may find being assigned spaces in the Block A garage onerous and occupy unassigned spaces in B and C instead, or park on the street. So may multicar households. At its unlikely worst, this could add 60 vehicle trips (one per minute) to Cypress Point Drive in the AM peak hour and 70 (one every 51 seconds) in the PM peak hour.

Response K.10

The comment expresses concern about how the Project trips were split between Cypress Point Drive and Middlefield Road. The transportation analysis assignment of Project trips was based on the number of parking spaces in each block; therefore, it already accounts for anticipated Project traffic on Cypress Point Drive, assuming all proposed parking garages are fully used. It is unknown how many parking spaces would be constructed within each proposed parking garage on the Project site. However, the proposed number of parking spaces would meet the City parking requirements for each block. Therefore, it is expected that the residents of Blocks B and C would fully use the parking spaces.

Comment K.11

Another issue on CP Drive is congestion due to Adult School traffic. The driveway there and the Eaves driveway across the street, are close enough to the Moffett intersection that a very short queue could obstruct both driveways and possibly all traffic on CP Drive. The TIA should include documentation of whether this occurs and how serious it is. The information should be obtained at times when the Adult School traffic is greatest, which would not necessarily be during peak hours.

Response K.11

The comment expresses concern about congestion due to the traffic generated by the adult school. Figure 8 in the transportation analysis shows the estimated trips that would occur at the Block B driveway. As discussed in the transportation analysis, traffic levels along Cypress Point Drive are low. Therefore, the delay for vehicles making a left turn into the driveway would be short. A short delay is not expected to affect the traffic flow on eastbound Cypress Point Drive or create a vehicle queue that would block the outbound driveway at the nearby school. The maximum westbound vehicle queue at the Moffett Boulevard/Cypress Point Drive intersection was estimated to be no more than two vehicles during peak hours under background plus-Project conditions. The queue is not expected to block the school's outbound driveway, which is about 100 feet east of the intersection, or the Block B driveway, which is about 350 feet east of the intersection. The study analyzed Project traffic effects during peak commute hours (i.e., when the Project would generate the most traffic).

Comment K.12

Shoreline at Middlefield. The TIA notes on page 23 that lengthy queues occur in the northbound left turn pocket in the AM and in the southbound pocket in the PM. Since these pockets are in flush medians and defined only by pavement markings, the backups do not interfere with through traffic. Hexagon also observed lengthy queues in the westbound turn pocket in the PM, and these did interfere with through traffic thanks to the pocket being carved out of the raised median. Conspicuously absent was any mention of excessive queueing in the eastbound pocket, for the simple reason that it does not occur. On page 30, when discussing background conditions, the TIA mentions that the Shoreline median between Middlefield and Terra Bella is to be converted to a reversible exclusive bus lane, which will require a preemptive signal phase to allow southbound buses to exit that lane in the PM, and thus increase delays for everyone else. It neglects to say that the bus lane will inflict the same problem on the southbound pocket that already affects the westbound pocket.

Response K.12

The comment expresses concern about traffic queues at Shoreline Boulevard and Middlefield Road. The transportation analysis states that implementation of the bus lane would increase total intersection lost time as well as the cycle length in the afternoon at the Shoreline Boulevard/Middlefield Road intersection. This would increase delay for all approaches under background conditions, including southbound and westbound left-turn movements. However, the Project would not adversely affect intersection operations under background plus-Project conditions.

Comment K.13

Also on page 30, the TIA notes that second lanes are to be added to both eastbound and westbound turn pockets. It doesn't admit that the eastbound second lane is not needed and its justification is based on fabricated data.

Response K.13

The comment suggests that second lanes do not need to be added at Middlefield Road at Shoreline Boulevard. The transportation impact analysis accounted for the eastbound left-turn lane on Middlefield Road at Shoreline Boulevard because it is a planned improvement. The analysis is not required to justify planned improvements in the City.

Comment K.14

The TIA also fails to discuss the effects of the closing of Castro Street at Central Expressway, which, as stated above, will divert considerable traffic from Moffett to Shoreline. Shoreline will have to bear another burden whenever Rengstorff is closed by grade separation construction.

Response K.14

The comment states that the planned closing of Castro Street at Central Expressway should have been accounted for in the transportation impact analysis prepared for the Project. See response to comment K.4 for a discussion of why the analysis is based on the existing roadway configuration on Moffett Boulevard and at the Central Expressway intersection.

Comment K.15

Finally, the TIA does not discuss the plan to convert Shoreline at Middlefield to a so-called 'Dutch' intersection, which is likely to backfire, with severe negative consequences for traffic operations and for pedestrian and bicycle safety. The only thing that could save Shoreline at Middlefield from this serial abuse would be Google's adopting a hybrid remote work schedule permanently.

Response K.15

The comment indicates that the transportation impact analysis prepared for the Project did not consider plans for a "Dutch" intersection at Shoreline Boulevard and Middlefield Road. The comment may be referring to the concept of a protected intersection, which creates islands within the right-of-way to add protection for bicycles and pedestrians. The implementation of a protected intersection at that location would be a safety improvement and would not affect intersection operations for motor vehicles. Thus, the transportation impact analysis prepared for the Project does not need to consider the implementation of a protected intersection.

Comment K.16

Shoreline at Terra Bella. This receives only a tiny mention in the TIA, having been excluded from the scope of study. The TIA notes that there will be a protected left-turn signal phase to cross Shoreline there in the future, which will increase delays for everyone else. At least we are spared hearing any repetition of "During the A.M. peak hour, this intersection generally operates well without significant operational issues." Thank heaven for little favors. They are all Shoreline Boulevard ever gets.

Response K.16

The comment states that the intersection of Shoreline Boulevard and Terra Bella Avenue is not studied in detail in the transportation impact analysis prepared for the Project. The transportation impact analysis analyzed traffic effects at intersections where the Project would add 10 or more peak-hour trips per lane, in accordance with VTA's *Transportation Impact Analysis (TIA) Guidelines* (October 2014). The Project is expected to add five new northbound trips and two new southbound trips in the AM peak hour and four new northbound trips and five new southbound trips in the PM peak hour at the Shoreline Boulevard/Terra Bella Avenue intersection. Therefore, the intersection was not studied further in the transportation impact analysis prepared for the Project.

L. Gita Dev, Sierra Club Loma Prieta (dated July 29, 2021)

Comment L.1

What is the reason behind for removing these critical landscape drawings - showing the existing and proposed trees on the site - from view of the public?

Response L.1

The commenter requests information concerning the Project's landscape drawings. Please refer to the revised version of the landscaping plan shown in Figure 2-9 in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

M. Diane Gazzano (dated August 11, 2021)

Comment M.1

Having lived on Cypress Point Drive CPD) for 45 years, I found the 555 Middlefield (555) DEIR, lacking in data to support certain claims, nuanced, and short on critical thinking and analysis as it pertains to the 555 Middlefield Project and the City of Mountain View. My analysis comes from a long term "boots on the ground" observation; not from boilerplate material, nor from sitting in a board room making observations.

There are many items of concern in the DEIR. I will highlight only some of them.

Note-Incorrect number of new units cited in DEIR

The footnote on page ES-1 of the DEIR explains how the project is being reduced from 329 to 324 units, and how these numbers are being used in the analysis of the project. Unfortunately, these number are incorrect. The actual number of units shown on the July 2021 project plans posted on the City's Web site is 345. (Verified by multiple people). When the initial incorrect unit count was discovered in the July 2020 project plan on the City Web Site, the Planning Department was notified and the response was that it would be corrected in the next update. There is still an error in the counting of units in the Developer's plan. All numbers and analysis in my response are based on the actual number of units as shown in the Developer's plans posted on the City's web site.

Response M.1

The comment questions the number of new units to be constructed under the Project. Subsequent to the preparation of the Draft EIR, the applicant prepared a revised site plan in July 2021. The number of residential units that would be constructed under the Project decreased from 324, which was the number analyzed in the Draft EIR, to 323 (a reduction of one unit). This text change to the Draft EIR and the revised site plans is documented in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. As with the previous change to the number of residential units that would be constructed under the Project, and as stated on page 2-1 in Chapter 2, *Project Description*, of the Draft EIR, this change occurred after completion of specified quantitative analysis and technical reports that were based on 329 units. As a result, Chapter 3, *Setting, Impacts, and Mitigation Measures*, in the Draft EIR analyzes impacts associated with 329 net new residential units, consistent with the quantitative analysis and technical reports that were already prepared, and therefore reflects a more conservative analysis of the impacts. The total square footage identified for the new residential units throughout the Draft EIR is still based on 329 units but will decrease incrementally when site plans are finalized for the Project. The decrease in the number of residential units (i.e., six fewer units), and associated reduction in square footage, would not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Comment M.2

TREES

On page 3.1.12. the DEIR boldly states 555 is in compliance with PL-14” (Removal of the tree(s) will not adversely affect the shade, noise attenuation, protection from wind damage and air pollution, historic value, or scenic beauty of the area, nor shall the removal adversely affect the general health, safety, prosperity, and general welfare of the City as a whole).” This is inaccurate for the following reasons:

The Google Map shows there is a dense forest of trees running along the side of the 85 freeway and the Stevens Creek and Trail all the way from 555 to the Bay. This buffer serves to protect the City of Mountain View from pollution, offers carbon sequestration, and provides urban cooling. The trees also provide a habitat for many species, and help in the fight against global warming. Studies have shown that there is strong evidence that tire, brake dust, and road dust resuspension, which these trees and shrubs protect against, have an adverse effect on health. Brake & Tire Wear Emissions | California Air Resources Board. The City of Mountain View should not allow the clear cutting of this buffer, but should be adding to the buffer along Highway 85 and the Stevens Creek and Trail.

Response M.2

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project’s replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment M.3

The DEIR states that as a solution for the 62 Heritage trees they are destroying, “The Project would provide approximately 62 additional trees; many of the trees would be evergreens, providing year-round shade for the Project site.” pg. 3.7-27 and pg. 3.1-10. The DEIR is in conflict with the Developers plans as no evergreen trees are shown as tree replacement in the Developer’s July 2021 Plan Set 3 pg. L.043, posted on the City’s Web site. Many of the heritage trees are being replaced by olive trees. How many olives trees does it take to replace one heritage tree? Olive trees are not native to California, will never reach the height or foliage of heritage trees, and all new trees planted will take 15 to 20 years to reach maturity, thus creating a very barren effect for many years. Along the sound wall will be ornamental trees and shrubs creating an environmental disaster both for the residents living as close as 38’ from the wall, the community, and City of Mountain View.

Response M.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project’s replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The City will also require, as a Condition of Approval, that 75 percent of new trees and plantings on the site be native species.

Comment M.4

Tree Relocation. The DEIR states that approximately 35 trees shall be relocated on the property. Some of these are heritage trees. The DEIR admits that some of these trees may be damaged in relocation. The success rate of relocating trees is low. The developer would then have the option to pay a small fee and the trees could be placed at another site. This would further reduce the number of trees at 555. Nowhere does the DEIR factored this into the calculations of number of trees on site. The Developer’s plans show the heritage trees being kept in place at the future park area, but the DEIR also states that this site could be used for a staging area. These two things are incongruent and, in all probability, this staging area would lead to the further loss of additional heritage trees.

Response M.4

The comment states that more heritage trees would be lost because of the use of a staging area that contains heritage trees. The Project would be required to comply with PL-148 (Tree Mitigation and Preservation Plan), which requires the applicant to develop a tree mitigation and preservation plan to avoid impacts on regulated trees and mitigate for the loss of trees that cannot be avoided. All affected trees would be compensated for, per City ordinances.

Comment M.5

Cypress Point Wood Drive has long been known and written about for its street tree canopy giving the street a park like feeling. I strongly take exception to the following statement made by the DEIR. “The proposed buildings would have limited street buffers and would be highly visible from surrounding areas, such as roadways and residences. However, this change would not be considered a significant impact because the Project site is not currently a visual asset to the area. Pg. 3.1-9. For

40 years I drove down the street and marveled at the wonderful landscaping of 555. Since Avalon has taken over the property the landscaping has gone downhill fast. No benefit comes to the community or the City of Mountain View by degrading the street canopy or failing to maintain an acceptable level of landscaping. (Avalon is not known for the maintenance of their property.) The City of Mountain View should demand that Avalon bring CPD back to its position where it is a visual asset to the community.

Response M.5

The comment expresses support for the Project site being considered a visual asset to the area and concern about the current state of the landscaping within the Project site. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The opinions expressed in this comment will be considered by the City Council during their review of the Project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment M.6

5 Year 4 Month Construction Plan

The following are statements taken from the DEIR.

"The Project would result in a significant and unavoidable impact related to construction air quality (cumulative PM2.5 concentrations)"pg. ES-4

"Construction materials and equipment would be staged on the Park Parcel, if permitted by the City, or, otherwise, on-site in areas that are not under construction, or potentially within Project frontage rights-of-way. Construction and associated visual degradation would be short term and temporary."pg 3.1-8

As a resident of CPD, short-term is not 5.3 years. The park area in which the construction materials and equipment would be stored, would have to be fenced in for 5.3 years. This would be a degradation to the visual asset of the community.

Response M.6

The comment expresses concern over the length of the Project's construction period. As described in Section 2.6, *Construction*, in Chapter 2, *Project Description*, of the Draft EIR, the Project would be constructed in phases. First, the tennis and basketball facilities and parking structure on the Park Parcel would be demolished and the land would be graded over a period of approximately 3 months. Then, the existing leasing office and amenity building, pool, and spa would be demolished and the proposed new leasing office and amenity building, outdoor amenities, and below-grade parking garage on Block A would be constructed over a period of approximately 15 months. Next, following occupancy of Block A, the existing surface parking lot on proposed Block B would be demolished and the proposed new building and below-grade parking garage on Block B would be constructed over a period of approximately 21 months. Then, the existing surface parking lot on Block C would be demolished and the proposed new

building and below-grade parking garage on Block C would be constructed over a period of approximately 25 months. While the new building and below-grade parking garage on Block C are being constructed, the proposed minor enhancements to the exterior of existing residential buildings would also be made. Therefore, it is likely that construction materials and equipment would not be stored for the entire 5.3 year-long construction period, but rather during certain phases of construction in which the equipment is needed. The less-than-significant aesthetic impacts during Project construction are discussed in Section 3.1, *Aesthetics*, of the Draft EIR. Construction fencing would be required as a general practice to reduce the visual impact. Any proposed fencing would be onsite and would not impact the sidewalk, which would remain open except during its reconstruction.

Comment M.7

The construction time according to the DEIR would be 7:00 am until 6:00 pm. Since this is a long-established community, there are many elder citizens in the surrounding community some of which are house bound. The noise, dust, and pollution created for 5.3 years would be a hardship and a health risk for them and the community as a whole. If the developer were truly dedicated to the project, he should be able to complete the building in a much shorter period of time. Other builders do not take 5.3 years to constructing 345 apartments.

Pg 3.12-8 states: *"The Project would not result in the loss of any housing units. Therefore, there would be no impact related to the displacement of people or housing units."* The probability of this happen is most likely zero. During the construction of Phase I and II, two parking lots will be removed (247 parking spaces). Only Block C with 217 parking spaces will remain for 402 existing units. Many residents, guests, and deliveries trucks would be without parking spaces. Cypress Points Drive is usually lined with parked cars, especially when the Adult School is in session. Delivery trucks often block one side of the narrow street. There will be no spaces for cars to park.

As the DEIR states residents will be exposed to excessive loud construction noise from 7:00 am to 6:00 pm, along with the exposure to dust and pollutants created during construction. The residents of 555 will be without amenities such as the club house, pool, and tennis courts for much of the construction. Now, especially with the work from home environment, which is expected to continue in some form after the pandemic, tenants will move. No community accommodations have been by the Developer to offset these major disruptions. If the Developer really believes there will be no displacement of tenants during construction, the Developer should offer to pay moving costs for all residents who have to move for physical or mental health reasons.

Response M.7

The comment expresses concern about displacement within the Project site. A brief summary of the anticipated construction phasing is provided on pages 2-25 and 2-26 in Chapter 2, *Project Description*, of the Draft EIR. First, the tennis and basketball facilities and parking structure on the Park Parcel would be demolished and the land would be graded (approximately 3 months). Then, the existing leasing office and amenity building, pool, and spa would be demolished and the proposed new leasing office and amenity building, outdoor amenities, and below-grade parking garage on Block A would be constructed (approximately 15 months). Next, following occupancy of Block A, the existing surface parking lot on proposed Block B would be demolished and the proposed new building and below-grade parking garage on Block B would be constructed (approximately 21 months). Then, the existing surface parking lot on Block C would

be demolished and the proposed new building and below-grade parking garage on Block C would be constructed (approximately 25 months). While the new building and below-grade parking garage on Block C are being constructed, the proposed minor enhancements to the exterior of existing residential buildings would also be made. In addition, the Project would be phased such that applicable parking ratios would be maintained throughout construction of the Project. Thus, it is not anticipated that any of the concerns suggested in the comment would result in displacement of existing residents within the Project site.

Comment M.8

Bicycle Path

The DEIR claims that 555 will :*“Improve bicycle and pedestrian connectivity for the Project and surrounding neighborhood by constructing a new pedestrian and bicycle path to connect Cypress Point Drive with West Middlefield Road; pg. ES-2* This is a spurious claim. The whole time I have lived on Cypress Point Drive, I have seen about 2 bicycles on the street. This is because it is a dangerous street to bike on. It is a narrow dead-end street with cars parked on both sides of the street. There are no bicycle paths. The proposed bicycle path near the front of the property would lead to nowhere. Since CPD is a narrow dead-end street, one would need to peddle out to Moffett Blvd or traverse through private property. Contrary to what the DEIR says, from experience, I can say Moffett Blvd is also a dangerous street to bike on. With cars parked along the street and no bike lanes I have followed many a bike down the first lane of traffic on Moffett. Moffett can be a very busy street. Only recently has a bike lane been placed in one small section. It is also dangerous to bicycle over the 85 overpass on Middlefield to the Steven Creek Trail. The bike path lane through 555, as it now shown, is dangerous especially to children as it flows out into a busy street with no bike lanes, and is not a benefit to the community.

Response M.8

The comment states that the anticipated improvement of bicycle and pedestrian connectivity under the Project is spurious. The proposed bike path within the site would provide a way for residents, as well as the neighborhood south of Cypress Point Drive, to access the bike lanes on Middlefield Road. Residents also could access Moffett Boulevard via Cypress Point Drive.

Although there are no bike lanes on Cypress Point Drive, it is a local street with low traffic volumes and low speeds. The Project would reduce the number of driveways on Cypress Point Drive from seven to three, thereby reducing the number of conflict points along the street and improving pedestrian/ bicycle access.

Although there are no bike lanes on Moffett Boulevard, it is designated as a bike route. The City's 2020–2021 Capital Improvement Plan includes a project that would evaluate the need for a Class IV bikeway on Moffett Boulevard between Middlefield Road and Clark Road, within NASA Ames.

Comment M.9

Parking /Walkability

The DEIR projects states that walking will be a major mode of transportation due to the drastic lack of parking spaces. However the DEIR on pg 3.1-10 states: *“Under existing conditions, a large portion of the development on the Project site is blocked by dense landscaping and setbacks. However, the Project would include buildings with limited setbacks from the streets and would remove vegetation.”*

Unfortunately, this creates a less desirable environment for walking. With the removal of heritage redwoods trees on Moffett Blvd, very narrow setbacks of buildings on Moffett and CPD, limited planned street tree canopy, and narrow sidewalks on both Moffett Blvd. and CPD, an inviting walking environment is not being created. The 555 developer needs to revise their design to accommodate a friendly, inviting walking environment.

Response M.9

The comment expresses concern about the pedestrian environment under the Project. See response to comment M.8 for a discussion of the proposed improvements to pedestrian connectivity under the Project. As discussed on page 2-22 in Chapter 2, Project Description, of the Draft EIR, the Project would retain portions of the existing landscaping in the areas containing the existing residential units and include new landscaping along the remaining perimeter of the Project site, between each of the buildings and within each courtyard. Proposed streetscape improvements include a combination of newly planted trees and transplanted existing trees. Shrubs and groundcover would surround the building frontages up to the streetscape. Furthermore, the number of on-site parking spaces provided by the Project would be enough to meet City parking requirements. The proposed streetscape would include a landscape strip with trees between the curb and the sidewalk along the Project site frontages. Additionally, the sidewalk along Moffett Boulevard would be widened to 6 to 8 feet wide.

Comment M.10

Most of the time parking is limited on CPD. When the Adult School is in session parking is nonexistent, with some of the students parking on Cypress Point Lakes property. There will be an addition of 835 new residents on CPD and only approximately 1.3 parking spaces per the total 747 units at 555. The residents, guests, and delivery trucks of the 555 project will have to share the 1.3 spaces. The Developer must work with the City and the citizens of the Willow Gate community to mitigate the parking crisis that is coming without careful planning. The school plays an important role in serving the Mountain View community and they must be protected from 555 residents parking in their lot or taking up all the street parking.

Response M.10

The comment expresses concern about the proposed number of parking spaces. The number of on-site parking spaces provided by the Project would be enough to meet City parking requirements and includes on-site loading and delivery spots. Therefore, the Project is not expected to substantially increase the demand for on-street parking along Cypress Point Drive. It should also be noted that, while an important planning consideration, lack of street parking is not an environmental impact under CEQA.

Comment M.11

Traffic

Pre-covid there was a dangerous traffic problem on CPD when classes ended and students were driving out of the parking lot of the Adult School. This parking lot is very close to the intersection of CPD and Moffett. Traffic, on the narrow CPD street, is going in three directions. Cars are coming onto and leaving CPD, as the students try to exit the parking lot by making a left had turn into

these two lanes of traffic. All this is taking place a few feet from the stop light on Moffett. Adding 345 new units (825 residents) on CPD will make this traffic scramble exponentially worse. The DEIR does not address this issue.

Also, pre-covid there were problems exiting CPD during commute times. Traffic was so bad on Moffett that the City installed pavement bumps at the corner of Moffett and Central to prevent cars from forming an illegal third lane so they could make a right hand turn off Moffett toward Siterlin Court to get out of the Moffett traffic.

Response M.11

The comment expresses concern about traffic safety issues prior to the COVID-19 pandemic. As discussed in the transportation analysis (Appendix 3.14-1 of the draft EIR, Page 54), although the Project would increase traffic on Cypress Point Drive, the increase would not be substantial (i.e., 19 and 25 trips in the AM and PM peak hours, respectively) and would not be expected to degrade operations at the Moffett Boulevard/Cypress Point Drive intersection. This is because most residents of the existing apartments park their vehicles in the Block A garage, which is accessed from Middlefield Road. Also, the Project would close the apartment driveway closest to Moffett Boulevard, which would reduce conflicts with the driveway for the adult school.

The results of the transportation analysis indicate that the Project would not adversely affect traffic operations at the Moffett Boulevard/Central Expressway intersection, according to the City's "adverse effect" criteria.

Comment M.12

The City's Web site shows an extraordinary amount of recently completed, active and future large projects being constructed in the Moffett/Whisman corridor. Whether it is the Hotel/Office/Garage complex at 101 and Moffett, the 777 Middlefield construction of 716 new apartments, the Linklin garages, the future Goggle Whisman complex, a possible future school, or a host of other projects, all these projects will come with their transportation needs and traffic burdens on the Moffett-Middlefield corridor.

Response M.12

The comment states that there are numerous recently completed large projects in the Moffett/Whisman corridor. The transportation analysis accounted for vehicle trips associated with all developments that had been approved at the time when the study was prepared as well as other pending and reasonably foreseeable projects. With these approved developments, under background conditions, Project traffic would not adversely affect traffic operations within the Moffett-Middlefield corridor. Projects are required to prepare their own transportation studies, considering other approved or pending projects, in accordance with CEQA and to document whether improvements would be needed to serve them.

Comment M.13

No Block C/Precise Plan

The DEIR is correct in stating the most of the environmental and livability problems would be overcome by no new construction on Block C. The project will still be able to build 119 new units.

Response M.13

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being “impractical or undesirable from a policy standpoint.” (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project’s impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project’s units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

Comment M.14

The DEIR is not correct in its statement on pg. 5-3 “*Potential alternative sites were evaluated that would (1) reduce or avoid some or all of the environmental impacts of the 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. A review of properties in Mountain View did not find any suitable properties that are available and meet these criteria.*” By choosing the No Block C option there are properties that could accommodate the building of the 226 units that would be built at Block C. The shopping center one-half block from the 555 project, on the other side of the adult school, is for sale. This property has two street accesses, Central and Moffett Blvd. It would not cause the environmental destruction of 192 trees and place residents right on top of the 85 freeway endangering their health. Also, the shopping center across Moffett from the 555 project, has recently been sold and will be up for redevelopment.

Response M.14

The comment expresses disagreement with the Draft EIR’s discussion regarding the evaluation of alternative sites for the Project. First, the commenter claims that alternative sites were not considered. This is not correct. The discussion of potential alternative sites, on page 5-5 in Chapter 5, *Alternatives*, of the Draft EIR, describes the characteristics that a site would need to possess to be appropriate for an alternative site. The characteristics include:

- Approximately 10 acres in size,
- Located near transit facilities,
- Located near freeways and/or major roadways,
- Served by available infrastructure,
- Available for development, and
- Zoned for residential development at a density similar to what would be permitted at the Project site.

No sites were identified that meet the above mentioned criteria.

The commenter claims that the applicant and City should consider an alternative that combines the “No Block C” option plus an additional off-site property to place the 226 units that would be built on Block C, thereby splitting the development on two non-contiguous properties. The commenter also claims that two separate commercial properties with existing shopping centers should be considered for the 226 units planned for Block C. For the reasons explained below, these proposed off-site alternatives would not meet the basic Project objectives and necessary site characteristics and are not practical or feasible.

CEQA requires that an EIR describe a “range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. [. . .] An EIR is not required to consider alternatives which are infeasible.” (CEQA Guidelines, 15126.6(a).) “Feasible” is defined in the CEQA Guidelines as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines, 15364.)

“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (CEQA Guidelines, 15126.6(f)(1).)

The two commercial properties identified by the commenter do not satisfy the site criteria related to size and zoning. Specifically, the shopping center adjacent to the Adult School, is zoned as Commercial/Residential Arterial (CRA), and the site is only allowed to be developed up to a maximum of 96,442 sf, while the property across Moffett Boulevard from the project is zoned as neighborhood commercial. Moreover, the suggested alternative would require development on two separate and non-contiguous properties, significantly increasing land acquisition costs, and would also require complete reconstruction and redevelopment of existing commercial shopping centers. This would substantially increase land costs and construction costs while not generating any additional units when compared to the Project, and is thus economically infeasible. In addition, there is no indication that the proffered alternative sites for the “Block C” units would result in a lessening of any significant Project impacts. The removal of trees from Block C does not constitute a significant impact of the Project for the reasons provided in the Draft EIR and the Project would plant replacement trees at greater than a 1-to-1 ratio. See Master Response concerning tree removal. For these reasons the commenter’s proposed off-site alternatives are not considered further.

Comment M.15

I hope the City of Mountain View will not accept below market rate apartments as close as 38'-40' from the freeway where the health of the residents is endangered. For too long in our Country, the less fortunate have been forced to live in environmentally degraded housing. Mountain View should not continue this tradition, especially when there are alternatives. It would be ironic if after the City Council voted to protecting apartment dwellers from cigarette smoke, the City would endanger the

health of apartment residents and the surrounding communities by allowing the destruction of hundreds of trees along the Middlefield and 85 corridors.

Response M.15

The comment expresses concern about the potential impacts of tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment M.16

Section 3.12 of the DEIR discusses the future population and housing needs of Mountain View. It relies on data from the California Department of Finance 2020, and Association of Bay Area Governments 2019. This data is outdated. Nowhere does it analyze what the housing needs may be after the covid pandemic. Bloomberg and other news organization reported recently that Google is granting applications from employees to work out of the area, and to work from home. Google OKs thousands of staff requests to transfer or work remotely - CNET. In order for any analysis on population to be valid, the post pandemic work environment needs to be taken into consideration. There may be former office and industrial buildings which can be converted to housing.

Response M.16

The comment requests that the population and housing analysis conducted in the Draft EIR take into consideration COVID-19 pandemic conditions. An environmental topic's existing condition (also referred to as the environmental setting) is normally the baseline against which the project's impacts are measured to determine whether impacts are significant. As stated on page 3-2 in Chapter 3 of the Draft EIR, the baseline conditions for the analysis in the Draft EIR represent existing conditions as of 2020 and 2021 with the exception of transportation and noise. Section 3.12, *Population and Housing*, of the Draft EIR takes into consideration the baseline conditions at the Project site using the most recently available information at the time the Draft EIR was prepared. Population and housing data reflecting the COVID-19 pandemic was not readily available at the time the Draft EIR was prepared and therefore was not considered in the analysis.

Because the pandemic is still unfolding, it will likely be some time before the long term effects on regional population and housing are fully understood. However, in general and over the long term, it is expected that the prior growth trends and the existing need for additional housing will continue. Considering the possible future trends toward conversion of other office and industrial properties is speculative and beyond the scope of this EIR analysis.

Comment M.17

The Willow Gate neighborhood is the Gateway to downtown Castro. It should not be developed in a hodge-podge fashion. There are many other properties along Moffett Blvd and the surrounding neighborhood that will be redeveloped in the near future. There must be a vision for the community and a Precise Plan that can be used as a guideline. With proper planning all areas of Mountain View can be environmentally friendly and have good neighborhoods in which to live and work.

Response M.17

The comment expresses support for the development of a precise plan for the Moffett Boulevard area. This opinion will be considered by the City Council during their review of the Project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

N. Daniel Shane (dated August 12, 2021)

Comment N.1

As I notified you in my last email, I was unable to review and edit the first draft of my comments prior to the deadline. Please do me a favor and delete the first email and use this email which contains version 2, or the edited version, of the original I submitted earlier today.

Response N.1

The comment provides information about a secondary comment letter. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required. The specific comments submitted and their responses are provided below.

Comment N.2

The purpose of the letter is to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed 555 West Middlefield Road Project in my neighborhood. My comments begin by a broad overview of my evaluation of the report. Additionally, I have provided comments for key sections of the DEIR. I hope my comments will be incorporated into the Final EIR.

The DEIR seems to be mostly focused on the short-term environmental impacts during the 5-year construction phase. However, there are long-term impacts from this project to the future livability, quality-of-life, and neighborhood character from this high-density housing development. I know this because we have already reached maximum levels and capacities for this multi-family housing neighborhood. We have mostly townhouses, condominiums, and apartments in our neighborhood. I have listed some of the existing problems currently plaguing our neighborhood. The project, as proposed, will simply exacerbate these problems.

Response N.2

The comment expresses concern regarding the Draft EIR's analysis of long-term, operational impacts associated with the Project. Operational impacts are any potential environmental impacts that would occur after the Project is constructed. The Draft EIR does analyze both the short-term, construction-related impacts and the long-term, operational impacts of the Project for all of the CEQA Appendix G environmental topics. The analysis of each environmental topic, including both construction and operational analyses where appropriate, is provided in Chapter 3, *Setting, Impacts, and Mitigation Measures*, of the Draft EIR.

Comment N.3

The Cypress Point Community Preservation Group (CPCPG) is supporting the No Block C Alternative listed in the DEIR. The No Block C Alternative will mitigate most of our concerns about environmental impacts including increased noise levels, dust, pollution, exposure to toxic emissions

from the cars and trucks using the nearby freeway and preserve the aesthetics and visual comfort we benefit from the tree canopies. The No Block C will reduce the density and intensity of this development in our neighborhood which is medium-density multi-family townhouses, condominiums, and apartment buildings. Our neighborhood has already reached its maximum limit on several livability parameters such noise sources, availability of street parking, traffic safety, and the numbers of people (bikers, dog walkers, and joggers) who cross our property to access the Stevens Creek Trailhead. The full project without the No Block C Alternative will have significant impact on the livability, quality of life, and the character of our neighborhood. As part of the Block C development many of the mature trees including majestic Heritage trees will need to be removed to make space for the construction of a large 4-story apartment building, a 2-level underground garage, and an emergency vehicle access road next to the driveway entrance to Cypress Point Woods Townhouse parking lot and townhouse units. The No Block C Alternative will likely shorten the duration of the construction activities from 5-years and 4-months to about 2-years. A demolition and construction project that lasts 64-months cannot be tolerated by the residents of our neighborhood.

Response N.3

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being “impractical or undesirable from a policy standpoint.” (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project’s impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project’s units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

Comment N.4

The loss of the tree buffer zone in Block C and along Highway 85 will have significant impacts to the health of our families, especially our infants and children. It is a well-known, scientific fact that mature tree canopies along the freeways absorb high levels of noise, dust, and pollution and protect the health of our residents from toxic air emissions by cars and trucks. The replacement trees will not be a mature canopy for decades and will not have the capacity to provide the benefits of the existing tree buffer/barrier zone. This area in Block C has many trees including Heritage trees which are visually comforting and has aesthetic scenic qualities that are enjoyed by all the residents. It is a woodland area that supports a wildlife habitat and tall trees for nesting birds. There is a nexus between this woodland area and the Stevens Creek Trail corridor, and it provides more species and diversity to this world class urban forested trail that stretches from the coastal mountains to the Baylands.

Response N.4

The comment expresses concern about the removal of trees along SR 85 and on the Project site as well as possible increases in highway noise at nearby residences. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.5

The DEIR does not adequately address these problems.

There are already many sources of noises causing a nuisance in our neighborhood such as Highway 85 freeway noise, leaf blowers, Caltrain, freight trains, and Shoreline Park Amphitheater. The loss of many trees and Heritage trees during construction activities will eliminate the tree buffer zone that protects our homes and the health of our families from noise, dust, and pollution, especially with the construction of the large apartment building, underground garage, and emergency vehicle access roadway in Block C.

Response N.5

The comment expresses concern about the removal of trees along SR 85 and on the Project site as well as possible increases in highway noise at nearby residences. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.6

There are already too many projects in our neighborhood that are removing trees and Heritage trees, filling in open space, and having a negative impact on aesthetics, including urban forest areas, trees, and wildlife habitat. The replacement trees and vegetation will not have the benefits that a mature woodland area provides the community. The Stevens Creek Trail green corridor is a world class urban green open space and trail. The woodland area in Block C is part of the Stevens Creek Trail corridor even though it is located across the freeway from the trail. The ecosystems are interconnected.

Response N.6

The comment expresses concern about the potential impacts of tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.7

There is already a traffic safety problem for both drivers, bikers, and pedestrians. Many near misses have been reported by residents. The substandard neighborhood street has street parking on both sides which narrows the street even more and cars cannot easily maneuver and avoid collisions. Cars come out of the driveways blindly and nearly collide with oncoming traffic. If street parking is moved away from the intersection of the driveway and the street to improve visibility, the street parking spaces will be reduced even further than it is now. Cypress Point Drive is a dead-end cul-de-sac and there are no barriers to prevent wayward vehicles from entering the driveway of Cypress Point Woods townhouse parking lot and endangering children at play.

Response N.7

The comment suggests that there is an existing traffic safety problem in the Project vicinity. As discussed in the transportation impact analysis prepared for the Project, the Project would reduce the number of driveways on Cypress Point Drive from seven to three, thereby reducing the number of conflict points along the street. The transportation analysis recommends painting 15 curb segments next to the driveways on Cypress Point Drive red to indicate that no parking is allowed; this would ensure adequate sight distance. Because the Project would reduce the number of driveways, which would increase the curb length and partially offset the lost parking area, on-street parking is not expected to be reduced with the Project. The north side of Cypress Point Drive can park approximately 40 vehicles; with the Project, approximately 44 vehicles would be able to park on the north side of Cypress Point Drive.

It should also be noted that availability of street parking is not an environmental consideration under CEQA.

Comment N.8

There is already competition for street parking spaces on Cypress Point Drive. Due to the addition of more 2 and 3-bedroom, as opposed to studios that now exist, the numbers of people could double in size. This means more vehicles, less garage parking, and added pressure on street parking. According to AvalonBay, there will be more vehicles flowing to Middlefield Road compared to Cypress Point Drive. How can this be if there are a total of 602 underground garage parking spaces on Cypress Point Drive and only 363 underground garage parking spaces on West Middlefield Road. There will be 171 parking spaces in Block B and 431 parking spaces in two underground garages located on Cypress Point Drive.

Response N.8

The comment states that there are existing parking issues that would be exacerbated by the Project. The Project would provide on-site parking spaces to meet City parking requirements. Thus, the proposed parking supply would be adequate to serve the residents of the Project based on established City standards and the Project's impact on the parking supply would be less than significant. Therefore, the Project is not expected to increase the demand for on-street parking.

According to CEQA, the CEQA Guidelines, and recent case law, competition for street parking is not considered an environmental impact under CEQA. The comment does not provide any evidence that the Project would increase the demand for parking offsite in a way that would

result in significant impacts under CEQA. As discussed in the transportation analysis, the Project would increase traffic on Cypress Point Drive. However, the increase would not be substantial (i.e., 19 and 25 trips in the AM and PM peak hours, respectively) because most residents of the existing apartments would park in the Block A garage, which would be accessed from Middlefield Road.

Comment N.9

There is already a lack of access to the Stevens Creek Trailhead for dog walkers, joggers, and bike commuters who cut through our properties to get onto Central Avenue and the trailhead. The development will more than double the existing numbers of people who will cut through our properties to get to the Stevens Creek Trailhead. Security of our homes and garages have been a constant area of concern. Allowing more access to the properties will certainly increase the break-ins and thefts.

Response N.9

The comment expresses concern about increased pedestrian use of nearby properties because of the Project. Increased use of pedestrian facilities in off-site areas is not considered an environmental impact under CEQA. It is outside the purview of the EIR to speculate about the potential for trespassing or other illegal activity in the area. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.10

There is already a cumulative impact from multiple housing and commercial developments in a relatively small area north of Central Expressway. These developments are proposed, under review, under-construction, and recently completed. The cumulative impacts are not known because they have not been studied.

Response N.10

The comment incorrectly states that cumulative impacts have not been analyzed. Section 4.16, *Cumulative Impacts*, in Chapter 4, *Other CEQA-Required Sections*, of the Draft EIR provides the cumulative analysis for each of the impact topics for the Project in accordance with the CEQA Guidelines. As described in the section, the City planning staff generated a list of approved and pending projects for consideration in the cumulative impact analysis, which is included in Appendix 3.14-1 of the Draft EIR. In addition, to ensure capture of all foreseeable future development, a 2 percent-per year growth factor was applied to account for additional planned or future growth. This annual growth factor accounts for the volumes from known pending development projects, smaller ministerial activities, as well as general growth in the area, and is evaluated yearly by the City's Public Works Department.

As prescribed by CEQA, every development project reviewed under CEQA by the City of Mountain View is required to evaluate the potential cumulative impacts of that project when combined with other foreseeable development projects in the area.

Comment N.11

Equally important is the lack of a Precise Plan to guide the growth and development of this significant area that will eventually be an extension of Downtown Castro Street.

We already have the developers designing and guiding our growth through their many housing developments being allowed no matter the cost to the residents and the livability of their neighborhood. This property has never been envisioned as high-density housing and will require the city to give a large private real estate investment trust exemptions to the General Plan and the local zoning density requirements. This is called the Gate-Keeper Program which has been disbanded for good reasons. A Precise Plan is needed to guide the growth and development of our community and ensure the people reap the benefits of a green, livable, healthy, and prosperous life for all, not just more profit for the developers and their shareholders.

Response N.11

The comment expresses support for the development of a precise plan for the Moffett Boulevard area. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.12

The Draft DEIR already has a comprehensive list of alternatives to the proposed project. Many in our community support the No Block C Alternative. The No Block C Alternative will sufficiently scale-back the project to mitigate most of our concerns about the project. According to the City's consultant, ICF, the No Block C Alternative is the most environmentally superior alternative, except for the No Project Alternative. The No Block C Alternative appears to be a win-win for all the stakeholders including the developer, the homeowners and their families, retired seniors, the neighborhood, and the environment. The No Block C alternative will allow the construction of Block A and Block B. Block B construction site is distant from most of the existing multi-family housing developments compared to the construction activities in Block C. Block B will allow the development of an apartment building with 119 units and an underground garage, a leasing building as well as an amenities and recreation building. We estimate the duration of short-term environmental impacts will be reduced from 5 years to 2 years which is typical for a housing development in our area. Most of our concerns about the long-term health and environmental consequences of this project should be mitigated by the No Block C Alternative. Additionally, this will allow time to study and evaluate future growth and a vision for our community.

Response N.12

The comment expresses support for the No Block C Alternative. Refer to response to comment N.3, above.

Comment N.13

It was difficult to review and evaluate the DEIR against the Project Plan. The Project Plan was repeatedly revised by AvalonBay during the review period. The DEIR used the June 2021 project plan and was released to the public on June 28, 2021. The plan was modified by the developer and the July 2021 project plan was posted on the city website. This resulted in a lot of confusion because the July 2021 project plan became a moving target and did not always equate or agree with the June

2021 DEIR. Once a DEIR has been released to the public, there should be no modifications made by the developer to the project plan. This was not the case and created a lot of confusion. Here is an example. The number of dwelling units constantly changed during the review period.

- The original project plan had 329 units including 1-, 2-, and 3-bedroom units.
- For unknown reasons, 5 units were removed from Block B, making it a total of 324 units.
- My project metrics analysis of the June 2021 project plan revealed 32 more units than reported by AvalonBay. This made the new total 356 units. This was verified in an email message from Diana Pancholi.
- The DEIR was made available on June 28, 2021, and was based on the June 2021 project plan.
- The June 2021 project plan was again revised in July 2021. Now there were 11 less units making a new total of 345 units. But the DEIR was still based on the June 2021 project plan.
- The June 2021 project plan had 111 units in Block B and 218 units in Block C.
- In July 2021 this was changed. Block B had 119 units and Block C had 226 units. The new total was 345 units.
- Are the total number of dwelling units existing and proposed 747 units (402 units + 345 units)?

Response N.13

The comment questions the number of new units to be constructed under the Project. Subsequent to the preparation of the Draft EIR, the applicant prepared a revised site plan in July 2021. The number of residential units that would be constructed under the Project decreased from 324, which was analyzed in the Draft EIR, to 323 (a reduction of 1 unit). This text change to the Draft EIR and the revised site plans are documented in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. As with the previous change to the number of residential units that would be constructed under the Project and as stated on page 2-1 in Chapter 2, *Project Description*, of the Draft EIR, this change occurred after completion of specified quantitative analysis and technical reports that were based on 329 units. As a result, Chapter 3, *Setting, Impacts, and Mitigation Measures*, in the Draft EIR analyzes impacts associated with 329 net new residential units consistent with the quantitative analysis and technical reports that were already prepared and thus reflects a more conservative analysis of impacts than what is currently proposed. The total square footage identified for the new residential units throughout the Draft EIR is still based on 329 units and will decrease incrementally when site plans are finalized for the Project. The decrease of 6 residential units, and associated reduction in square footage, does not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Comment N.14

Executive Summary

I recommend the consultant provide a one or two-page summary table, in bullet format, the key basic project metrics. The purpose of this summary is to preclude any future confusion. This page can be revised in the future if necessary to highlight any changes made to the project plan and can be posted on the city's website. Some of the metrics should be the size of the project site, the number of units per acre (density), the allowable density for this project, the number of existing and future

studios, 1, 2 and 3-bedroom units, the number of affordable units, the estimated rent to comply with “affordability” in this area, the estimated number of existing tenants, the estimated maximum number of tenants after the addition of 345 new units, the number of dwelling units and parking spaces in Blocks A, B, and C, the number of stories and the heights for each existing and new buildings, the number of underground parking garage levels for each Building Block, the number of parking spaces in each underground garage and corresponding primary street for entering and existing traffic, the number of total trees and Heritage trees that will be lost in each Building Block, and other metrics that are deemed an important metric to keep track of during the planning process.

Response N.14

The comment recommends that the Project team develop a summary of key metrics. See response to comment N.13 for a detailed response regarding the number of units to be constructed under the Project. The requested summary information is provided in the Draft EIR’s executive summary and in Table 2-1, which was revised and is included in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR.

Comment N.15

ES-3 Significant and Unavoidable Impacts

Impact AQ-3a: This impact description addresses construction emissions involving diesel particulate matter and PM2.5 concentrations. These are emissions from trucks and heavy equipment. Why does this impact element not address dust emissions from the construction site? Significant and unhealthy dust emissions are typically generated by construction activities including demolition, excavation, vehicle, and heavy equipment driving over on-site dirt roads, moving and stockpiling soils, loading and transporting soils and demolition debris off-site in trucks.

Response N.15

The comment summarizes the Project’s significant and unavoidable impacts related to air quality. Fugitive dust emissions from Project construction activities were quantified and modeled as part of the health risk assessment discussed in Impact AQ-3a. Dust emissions are reflected in the annual PM2.5 concentration results. In addition, implementation of Standard Condition of Approval PL-199 would ensure that impacts from construction-related fugitive dust emissions are less than significant. Standard Condition of Approval PL-199 requires exposed surfaces to be watered twice a day, haul trucks with loose materials to be covered, visible mud or dirt track-out onto adjacent public roads to be removed using wet-power vacuum street sweepers at least once a day, vehicle speeds on unpaved roads to be limited to 15 mph, anticipated paved surfaces to be paved as soon as possible, and a publicly visible sign to be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints.

Comment N.16

Additionally, due to the age of the existing apartment complex and its buildings there is a potential for asbestos in building materials and insulations, and lead in painted surfaces. I do not see this addressed as a potential impact nor any sampling and test results for these highly toxic substances. Is there an asbestos and/or lead problem at this old apartment complex and does public health need to be protected?

Response N.16

The comment expresses concern regarding the potential to encounter asbestos and lead during Project construction. Hazardous building materials are discussed under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*, of the Draft EIR. The Project would be required by the City to comply with standard measures to ensure no impacts from asbestos or lead-based paint in building materials. Compliance with applicable regulations and implementation of Mitigation Measure HAZ-2, Conduct a Comprehensive Building Materials Survey, would address issues related to the potential presence of such materials and would reduce impacts related to asbestos and lead to a less-than-significant level.

Comment N.17

ES-4 Project Alternatives

The report downplays the significance of the No Block C Alternative. It diminishes the benefits of the No Block C Alternative by not addressing the preservation of the urban woodland, the trees including Heritage Trees, the tree buffer zone that protects the health and welfare of the homeowners and their families by absorbing the noise, dust, and pollution from Highway 85. This is a well-known scientific fact. Other benefits include bird and wildlife habitat and it being integrated with the Stevens Creek Trail corridor. It is our desire that this area in Block C be even better integrated into the Stevens Creek Trail Corridor with the addition of trees and native water-resistant plants, landscape maintenance, watering, and habitat restoration. The Stevens Creek Trail corridor is a jewel, and we are very fortunate to have this in our community. We desire this area be deeded to the City in exchange for project approval in Blocks A and B. This would be a greater benefit to neighborhood, the city, and the environment compared to a small manicured public park surrounded by apartment units. We are constantly losing the aesthetics and other benefits provided by the natural environment which is as important as the air we breathe.

Response N.17

The comment expresses support for the No Block C Alternative. Refer to response to comment N.3, above.

The comment also expresses opposition to the removal of the urban canopy along SR 85. In addition, the comment expresses concern for the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.18

2.1 Project Overview

The total number of units is incorrect when compared to the June 2021 and July 2021 Project Plan.

Response N.18

The comment states that the number of new units to be constructed under the Project is incorrect. See response to comment N.13 for a detailed response to the specific comment regarding units to be constructed under the Project.

Comment N.19

The reference to the new “High-Low Density” designation needs more explanation. It is implied in the DEIR the new designation is necessary to allow the developer to move forward with the development and meet the regulatory requirements. The new designation will apply only to this project site or developer and to no other project site or developer. Has there been a legal opinion for this type of special treatment or “gift” to a private corporation?

I can find no description or reference for “High-Low Density”. This density classification needs to be described in more detail.

Response N.19

The commenter asks for more information on the proposed High-Low Density Residential designation for the Project site. As described in Section 2.5.2, *General Plan Amendment*, in Chapter 2, *Project Description*, and Section 3.10, *Land Use and Planning*, of the Draft EIR, the High-Low Density Residential designation would be a new designation that allows for multi-family housing such as apartments and condominiums with shared open space provided for common use, close to transit, shopping and public facilities. The allowed land uses under the High-Low Density Residential designation would be multi-family residential, parks, and open space. The allowable density under the High-Low Density Residential designation would be 36–50 dwelling units/acre, approximately 75-105 residents/acre. The height guideline under the High-Low Density Residential would be up to 5 stories. In addition, the existing High-Density Residential designation in the General Plan would be revised. The allowable density under the High-Density Residential designation would be revised from 35-80 dwelling units/acre, approximately 75-170 residents/acre, to 51-80 dwelling units/acre, approximately 105-170 residents/acre. In addition, the existing High-Density Residential designation in the General Plan would be revised. The allowable density under the High-Density Residential designation would be revised from 35-80 dwelling units/acre, equating to approximately 75-170 residents/acre, to 50-80 dwelling units/acre, equating to approximately 105-170 residents/acre.

The City has been reviewing this Project application in accordance with City and State procedures and has not provided any special treatment or “gifts” to the applicant.

Comment N.20

Is the demolition and non-replacement of the tennis and basketball courts, the pool and spa consider a benefit of the project? The tennis courts are used by the Silicon Valley Tennis Academy as is a significant benefit to the young tennis players.

Is the city considering the building of a 1.3-acre public park a benefit to the public or to the tenants of the apartment complex? I believe, the developer will get most of the benefit from the park because it will increase the value of his property. The park will be constructed, maintained and watered at the taxpayers’ expense. The other multi-family townhouses and condominiums have their own green open space, picnic and barbeque areas. How can the public park be seen as a benefit when there will be a loss of a woodland area, trees including Heritage Trees? I consider the small public park a much lesser benefit to the neighborhood compared to the wooded wildlife area in Block C that will be lost to the development.

Response N.20

The comment includes questions about the loss of the existing tennis courts as a result of Project construction, as well as the proposed public park. The comment expresses concern of the loss of the existing tennis courts as a result of Project construction. As described under Impact PSR-4 in Section 3.13, *Public Services and Recreation*, while the Project would remove the tennis courts, a number of new amenities would be provided on site in the form of future City-owned park space, private open space, and a new pedestrian and bicycle path. In addition, the Project would involve payment of an in-lieu fee for development of public parks in the Project planning area, in compliance with the City of Mountain View Parkland Dedication Ordinance and Standard Condition of Approval PW-19 (Park Land Dedication Fee), which would offset any physical deterioration of recreational resources that may result from Project implementation. The Park Parcel, which consists of approximately 1.3 acres of land along Cypress Point Drive, would be offered for dedication to the City for use as a future public park space. The specific park uses and facilities are not known at this time, and would be determined in the future by the City, in its discretion, with input from the public as part of a separate planning process. The future public park space would be available for use by the general public as well as residents and guests of the Project as a public improvement. Prior to offering the Park Parcel for dedication, the Project developer would grade the land in a manner suitable for the future public park uses, which would then be designed, approved, and implemented by the City in its discretion. The comment regarding the benefit of removing the existing tennis courts and providing the Park Parcel does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.21

There is no access to the Project Site from Moffett Blvd as far as I know (page 2-2).

Response N.21

The comment states that there is no access from the Project site to Moffett Boulevard. As stated on page 2-19 in Chapter 2, *Project Description*, vehicular access to the Project site would continue to be provided from West Middlefield Road and Cypress Point Drive, similar to existing conditions. The Project would include three entrances to the three proposed below-grade garages. Access to the Block B below-grade garage would be provided along Cypress Point Drive in the southeastern portion of Block B. Access to the Block A below-grade garage would be provided along West Middlefield Road in the center portion of the Project site. Access to the Block C below-grade garage would be provided along Cypress Point Drive in the southwestern portion of Block C. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.22

2.2 Project Objectives

I do not agree that AvalonBay has taken adequate measures to preserve Heritage Trees to the greatest extent feasible. I believe the No Block C Alternative would preserve Heritage Trees to the greatest extent feasible and allow the developer to build 119 units in Block B.

Response N.22

The comment states that adequate measures have not been taken to preserve heritage trees. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.23

2.3 Project Location

Although the Project Site has an address of 555 West Middlefield Road, most of the demolition, construction of apartment buildings and underground garages, and the public park will occur on Cypress Point Drive. Since 2015, the public was unaware of the potential impacts of this project to their Cypress Point Drive neighborhood because the project site was referred to as "555 West Middlefield Road". This was misleading because the residents believed the project was located on West Middlefield Road when, in fact, the project was going to extend to Cypress Point Drive and most of the construction activity and traffic would occur on our street and in our neighborhood. If there had been more outreach, our neighborhood would have likely opposed this high-density housing project from being voted into the Gate-Keeper Program at that time and prevented a massive high-density construction project in proximity to their homes.

Response N.23

The comment expresses concern about the Project site's proximity to Cypress Point Drive and about the outreach associated with the Project. As discussed in Draft EIR Chapter 1, Section 1.1, a Notice of Preparation (NOP) was published on alerting agencies and the public that the City would be preparing this EIR, and the Project's scoping period was from July 10 to August 9, 2019. On July 24, 2019, a public meeting was held, providing an opportunity for attendees to comment on environmental issues of concern. Comments submitted during the scoping period or received at the public scoping meeting were considered and incorporated during development of the EIR, as feasible. More information about the Project, including all of the environmental review documents, is provided on the City of Mountain View website at: <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>. In addition, public input has been requested during numerous public meetings, including study sessions with the Environmental Planning Commission on March 15, 2017, and February 3, 2021; study sessions with City Council on April 18, 2017, and February 23, 2021; and the Development Review Committee on October 6, 2021. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.24

2.4.3 Surrounding Land Uses

This sentence is incorrect "South of Cypress Point Drive are professional offices". On the southside of Cypress Point Drive are several multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums. There is also an Adult School and parking lot on the southside of Cypress Point Drive. The area between Cypress Point Drive and Central Expressway are more multi-family housing developments and single-family homes.

Response N.24

The comment incorrectly states that the Section 2.4.3 in Chapter 2, *Project Description*, of the Draft EIR does not describe all of the surrounding land uses. As stated in Section 2.4.3 of the Draft EIR, surrounding existing land uses to the Project site include, among others, are other medium density multi-family land uses. Immediately north of the Project site is a gas station (Valero). Farther north of the Project site and across West Middlefield Road are multi-family land uses (Willow Park). East of SR 85 and Stevens Creek Trail are multi-family land uses. South of Cypress Point Drive are professional offices and multi-family land uses (Cypress Point Lakes Condominiums). West of Moffett Boulevard is the Moffett Mobile Home Park and Moffett Plaza (a small shopping center). In addition, the Mountain View-Los Altos Adult School, located at 3333 Moffett Boulevard, is described and analyzed in section 3.13, *Public Services and Recreation*, of the Draft EIR.

Comment N.25

Figure 2-3: Proposed Site Plan

The diagram labeled figure 2.3 should illustrate the locations of the multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums on the southside of Cypress Point Drive, and Willow Park Apartments on the northside of West Middlefield Road. These are the nearest targets for environmental impacts and should be displayed on all project site diagrams in the DEIR.

The diagram should also show the proximity of the Stevens Creek Trail Corridor to Block C. I will attach a Google Map on page 8 that displays the proximity of this very important feature of Mountain View. The map displays the Stevens Creek Trail Corridor in green. The surface parking lot in Block C is marked with a "C" and is located at the end of Cypress Point Drive. The woodland area in Block C is visible as a green area to the north and east of Block C.

Response N.25

The comment requests that the Figure 2-3, *Proposed Site Plan*, from the Draft EIR be revised to include surrounding land uses. Figure 2-3 is provided in Chapter 2, *Project Description*, of the Draft EIR for purposes of providing a depiction of the proposed site plan, not surrounding land uses. Figure 2-2, *Project site*, on page 2-5 of the Draft EIR provides the location of the Project site within the larger City of Mountain View context, which includes those uses listed in the comment above. In addition, Figure 3.1-1 in Section 3.1, *Aesthetics*, provides images of the existing conditions in the vicinity of the Project site.

Comment N.26

A new diagram is needed. It is very important to illustrate the footprint of the new apartment building and underground garage in Block C. This footprint would be overlaid by the existing location of the trees including Heritage trees that AvalonBay plans to cut down and remove to construct the apartment building, underground garage, and the emergency vehicle access road. Without this diagrammatic overlay it is not possible to fully assess the environmental impacts in Block C and surrounding lands.

Response N.26

The comment requests that additional diagrams be provided to illustrate impacts of the Project's footprint on the existing trees on the Project site. Please refer to the revised version of the landscaping plan shown in Figure 2-9 in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.27

2.5.2 General Plan Amendment

The new High-Low Density Residential designation would only apply to this Project Site. This is not a City-wide new zoning designation, and it appears to be a special gift to a private real estate investment trust company?

The High-Low designation would allow a height limit of up to 5 stories. What is to stop AvalonBay or the new landowner to get approval to continuing adding stories to their buildings in the future? The Project Plan currently has a 4-story building in Block C.

Response N.27

The comment requests more information on the proposed High-Low Density Residential designation for the Project site. See response to comment N.19 for a detailed response to the specific comment prepared by Daniel Shane on this issue. Should another project within the City seek the same land use designation, they would have to acquire a General Plan Amendment like the Proposed Project. The comment regarding the "special gift" does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.28

2.5.3 Site Access, Circulation, and Parking

The number of total parking spaces in Blocks B & C is 624 parking spaces (584 underground and 40 surface spaces). This parking facilities will be accessed from Cypress Point Drive, a substandard, narrow, dead-end, cul-de-sac. There is currently parking on both sides of the street making it a very narrow roadway for cars, trucks, and bikers. The use of this small neighborhood street for traffic and parking will have competition from a townhouse complex, a condominium, and an adult school. There are no bike lanes and there is no space for bike lanes. This is a formula for disaster in terms of car and bike safety, traffic jams at the intersection of Moffett Blvd and Cypress Point Drive, and wayward vehicles entering the driveway and parking lot at Cypress Point Woods Townhouse because they are unaware that street dead-ends at the entrance to the townhouse parking lot.

There are a total of 363 parking spaces in Block A (341 underground and 22 surface spaces). This will generate much less traffic entering and exiting Middlefield Ro which is a standard primary road for through traffic. Why are there not more vehicles entering and exiting Middlefield Road as compared to Cypress Point Drive. Middlefield Road has much more capacity to handle the number of vehicles and traffic safely and efficiently compared to Cypress Point Drive. Clearly, Cypress Point Drive cannot handle this vehicle load safely and efficiently.

Response N.28

The comment expresses concern about parking and access to the Project site. There are 670 existing parking spaces in Blocks C and B within the Project site; 626 existing spaces have access to Cypress Point Drive. With the Project, there would be 970 spaces; of that total, 579 spaces in Blocks B and C would have access to Cypress Point Drive. Blocks B and C would not have any frontage on Middlefield Road; therefore, they would not have access. Only Block A would have access to Middlefield Road.

In addition, see responses to comments N.7 and N.8, which describe how although the Project would increase traffic on Cypress Point Drive, the increase would not be substantial and is not expected to degrade the operation of the Moffett Boulevard/Cypress Point Drive intersection or traffic flow on Cypress Point Drive. The Project would also reduce the driveways on Cypress Point Drive from seven to three, which would greatly reduce conflict points at driveways along the street.

Comment N.29

The DEIR states an emergency access along SR 85's building frontage (see figure 2-3) will be provided. What does "SR 85's building frontage" referred to? According to the figure, this area is for an emergency vehicle access road. The area is located between Cypress Point Woods parking garages and surface parking lot in Block C. It is very close to the property lines separating the two properties. It is also very close to the driveway entrance to Cypress Point Woods. There is a steep vegetated hill with trees with a path to the top of the hill. The path ends at the end of the Cypress Point Woods perimeter wall on top of the hill. This is a low security wall along the freeway that was not constructed by Caltrans as a sound wall. The wall was constructed in 1977 by the developer of Cypress Point Woods (CPW). The CPW HOA has been trying for years to have Caltrans build a proper sound wall. But for the present, the tall trees and canopy along the low perimeter wall, as well as the taller sound wall behind Block C, provide protection from the noise, dust, and pollution from the freeway. According to statements by AvalonBay, this hill will be leveled to ground surface and the soil and debris will be trucked away. The DEIR does not address the property lines, the hill, the leveling of the hill, and impacts to the environment and to Cypress Point Woods property, if any.

Response N.29

The "SR 85's building frontage" text refers to the eastern façade and area to the east of the proposed Block C building, between the new building and the SR 85 right-of-way (see Figure 2.3 on page 2-9 of the Draft EIR). The comment expresses concern about the tall trees and the taller sound wall behind Block C being removed as part of the Project and the hill or berm in the area being leveled. The berm in this area would be partially graded, but would not be leveled, as part of the Project. As part of their ongoing design refinements, the applicant is planning to partially preserve part of this berm. In addition, the Caltrans sound wall, which reduces noise from SR 85, would remain. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment N.30

Diagrams are needed to be expanded to display the relationship and distance of other multi-family housing developments to this project site. These existing residential developments are cut-off in the diagrams. For example, Figure 2-3, Project Site Plan, and Figure 2-9, Proposed Landscape Plan do not display or identify major housing developments in proximity to the project site. The diagrams need to display the footprint of Cypress Point Woods Townhouse, Cypress Point Lakes, and the Adult School buildings and driveway entrances in relationship to the opposing project site across Cypress Point Drive.

Response N.30

Refer to the response to comment N.25, above. Figure 2-3 is provided in Chapter 2, *Project Description*, of the Draft EIR for purposes of providing a depiction of the proposed site plan, not surrounding land uses. Figure 2-2, *Project site*, provides the location of the Project site within the larger City of Mountain View, which includes those uses listed in the comment above. In addition, Figure 3.1-1 in Section 3.1, *Aesthetics*, provides images of the existing conditions in the vicinity of the Project site.

Comment N.31

Have highly visible property perimeter stakes been placed between Cypress Point Woods property and 555 West Middlefield property so it is clear where the properties lie? Very visible perimeter stakes driven into the ground should also be used to outline the perimeter or footprint of the apartment building, underground garage, and the emergency access road in Block C.

Response N.31

This comment suggests clearly marking property line borders. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.32

We support the No Block C Alternative. We believe the No Block C Alternative to be a win-win for all the key stakeholders including the residents, the neighborhood, the city, the developer, and the environment in the following ways:

- The resident's health & safety will be protected and there will be less disturbances and impacts to the quality of life. The aesthetic value of the trees, the urban forest canopy, and wildlife will continue to be enjoyed at the pleasure of the residents.
- The neighborhood as a functioning community will be less impacted by the project if there is no Block C.
- The city will gain 119 or possibly more dwelling units to help meet the housing demand and help abate the housing shortage problems in Mountain View.
- The developer will be permitted to improve and expand the old apartment building complex by adding Blocks A and B. This will include a new apartment and leasing building, two underground garages, and a new amenities building on their property.

- The environment will benefit because the urban forest woodland area, Heritage Trees and wildlife habitat will be preserved. These areas are endangered and are dwindling at a rapid pace in our cities. Trees should be added to these areas and the accumulated and competitive undergrowth be removed to improve the health of our prized urban forested areas right in our backyards. This area in Block C is a prime example.
- The No Block C Alternative is a good compromise. A good compromise is when no one party gets all they want but it still results in a win-win for all the parties.

Response N.32

The comment explains why the commenter supports the No Block C Alternative, including the benefit related to preserving trees. These opinions will be considered by the City Council during their review of the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment N.33

Thank you for the opportunity to review, evaluate, and comment on the DEIR. I hope my comments will improve upon the work already accomplished by the consultant, ICF. I hope my comments will inform the consultant with best practices to use to communicate this project to the audience. In this case, the audience is primarily the public. These are the residents, homeowners, tenants, shopkeepers, and other people living or working near the project site. Although I understand there are certain rules and requirements that must be followed under CEQA in the drafting of the DEIR and Final EIR, there is no reason why the DEIR had to be over 400 pages. This was too overwhelming even for me and I have been in the environmental protection business for nearly 40 years. This document could be reduced, condensed, and distilled down to the most important project details, problems, and solutions. This report could be more concise and transparent. As it is, I am not sure it will have the practical utility it was intended for and that was communicate to the community (1) accurate details about project, (2) the environmental impacts of this project both short-term and long-term and, (3) feasible alternatives and solutions that would mitigate these impacts. Also importantly, the DEIR was supposed to thoroughly address the pre-DEIR comments submitted by the public. I believe this was not accomplished. I believe this DEIR could have been more focused on the interests and needs of the neighborhood and the environment by scheduling pre-DEIR meetings with representatives from the developer, the city, the community, and the environmental advocacy groups.

Response N.33

The comment expresses concern about the length of the Draft EIR. The EIR was prepared according to the City and State CEQA requirements, and the document was drafted to be readable. The CEQA Guidelines encourage lead agencies to strive to keep EIR documents to a manageable length, which was the intent on this Project as well. However, given the complexity of the site and the Project, the City understands and acknowledges that EIR document was lengthy and detailed, and the City appreciates the comments and questions raised. There will be

additional opportunity for public comment and input at the City's hearings to consider certification of the EIR and then whether the Project should be approved. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

O. Daniel Shane (dated June 29, 2021)

Comment O.1

The apartment buildings at 555 W Middlefield were built in 1969. It's unfortunate but asbestos installation was commonly used in buildings prior to 1970. EPA did not begin to ban and phase out asbestos due to its carcinogenicity until 1970. Do we know if the Amenities building and clubhouse and other structures to be demolish contain asbestos? AvalonBay should be testing their building insulation for presence of asbestos and doing geotechnical borings to assess soil properties and the depth to groundwater for their 30' deep excavations. This data is needed to understand the environmental impacts. When the consultant determines "no impact" is this based on proper data and evidence?

Response O.1

The comment expresses concern regarding the potential to encounter asbestos and other hazardous materials in the soils during Project construction. Hazardous building materials are discussed under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*, of the Draft EIR. Compliance with applicable regulations and implementation of Mitigation Measure HAZ-2, Conduct a Comprehensive Building Materials Survey, would address issues related to the potential presence of such materials and would reduce impacts related to asbestos to a less-than-significant level.

Comment O.2

Or is it just wishful thinking or guessing? Additionally, lead-based paint was not phased out until 1978. Lead was commonly used in paint prior to 1978. Has AvalonBay tested the paint in their buildings to be demolished?

Response O.2

The comment expresses concern regarding the potential to encounter lead during Project construction. Hazardous building materials are discussed under Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*, of the Draft EIR. Compliance with applicable regulations and implementation of Mitigation Measure HAZ-2, Conduct a Comprehensive Building Materials Survey, would address issues related to the potential presence of such materials and would reduce impacts related to lead to a less-than-significant level.

P. Daniel Shane (dated July 24, 2021)

Comment P.1

I do not see a list of appendices in the 435 page DEIR. Please send me the appendix that addresses the following:

- Describes the removal and replacement of trees.

Response P.1

The appendices to the Draft EIR and the Project plan sets are available on the City's website, <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>. These documents and this link were provided to the commenter on 7/29/2021. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment P.2

Diagrams and overlays that show the locations (footprints) of the apartment building and underground garage overlaying the trees that will be removed in Block C. We want to know if it is necessary to remove many or just a few trees for construction of the apartment building and underground garage. These trees are located along Highway 85 and provide a buffer between the freeway and the homes in our neighborhood. It is also a nice size woodland area that provides wildlife habitat in an urban setting. These are getting super rare.

Response P.2

The comment requests additional diagrams and overlays showing the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment P.3

Most recent Google satellite photographs with apartment building and underground garage diagram overlays to evaluate the biological, climate, noise, and air quality impacts in Block C.

Response P.3

The comment requests additional photographs and overlays of the site plan and aerial photographs. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment P.4

The landscape plan for removal, transplanting, and replacement of trees and herbaceous plants in Block C.

Response P.4

The comment requests information concerning the Project's landscape drawings. Please refer to the revised version of the landscaping plan shown in Figure 2-9 in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development,

information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment P.5

Please send me the list of appendices related to landscaping, building and underground garage footprints that support the need to remove so many trees.

Response P.5

Refer to response to comment P.1.

Q. Daniel Shane (dated July 29, 2021)

Comment Q.1

Hi Diana. Gita Dev, Diane Gazzano, Louise Katz, and myself are in need of information from the developer and the City Planning Division on the information listed below. I don't know if you responded to the others but I have not received a confirmation of receipt of my request. Can you provide this information to me this week? Thank you, Daniel Shane.

Response Q.1

The comment asks for confirmation of the Project team's receipt of the commenter's prior communication. The City confirmed receipt of the commenter's previously submitted comment letters. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

R. Daniel Shane (dated July 30, 2021)

Comment R.1

Diana, thank you for the response. Question. Can you request AvalonBay to submit a diagram and an overlay displaying the extent of the apartment building and underground garage footprint over a diagram of the locations of the existing trees, canopy, and Heritage Trees on the perimeter of Block C, inside or outside Block C? Also can the diagram include a clear property line in this woodland area separating Caltrans property from AvalonBay property?

Response R.1

The comment requests additional diagrams and overlays showing the proposed tree removal under the Project. Please refer to the revised version of the landscaping plan shown in Figure 2-9 in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment R.2

Will AvalonBay need an easement to cut down trees on Caltrans property? I believe it is very difficult to do this impact assessment for the woodland area without the diagrams, overlays, clear property lines, and locations of Heritage trees and their relationship with construction in Block C. Thank you for your timely response to my inquiry. Daniel Shane.

Response R.2

The Project would not remove any trees on Caltrans property. The comment requests additional diagrams and overlays showing the proposed tree removal under the Project. Please refer to the revised version of the landscaping plan shown in Figure 2-9 in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

S. Daniel Shane (dated August 8, 2021)

Comment S.1

I remember AvalonBay telling the residents during a community meeting that the stand of Eucalyptus trees must be removed to allow heavy equipment access, and a turn-around area for trucks, during demolition and construction activities. We do not see the loss of these trees addressed in the DEIR. These trees provide shade, cooling in the summer, bird perches and nests, and wildlife habitat. As long as the tree debris is removed by city workers they should not pose a significant fire hazard in this location. Several people have expressed their pleasure with preserving these trees and canopy. I guess they were put there for a reason.

Will the Eucalyptus trees and the island be removed as part of the construction project?

Response S.1

The comment states that eucalyptus trees would be removed to provide access for construction, but this was not addressed in the Draft EIR. Nine red ironbark (*Eucalyptus sideroxylon*) trees would be removed as part of the Project. However, the existing trees in the area mentioned in the comment would not be removed under the Project; refer to Figure 2-9, *Revised Proposed Landscape Plan*. The City has confirmed with the applicant that these trees would remain.

T. Daniel M. Shane (dated August 12, 2021)¹

Comment T.1

The purpose of the letter is to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed 555 West Middlefield Road Project in my neighborhood. My comments begin by a broad overview of my evaluation of the report. Additionally, I have provided comments for key sections of the DEIR. I hope my comments will be incorporated into the Final EIR.

¹ This comment letter is substantially similar to Letter N, which was submitted by the same commenter. Thus, many of the responses to the comments in this letter refer to response to comments in Letter N.

The DEIR seems to be mostly focused on the short-term environmental impacts during the 5-year construction phase. However, there are long-term impacts from this project to the future livability, quality- of-life, and neighborhood character from this high-density housing development. I know this because we have already reached maximum levels and capacities for this multi-family housing neighborhood. We have mostly townhouses, condominiums, and apartments in our neighborhood. I have listed some of the existing problems currently plaguing our neighborhood. The project, as proposed, will simply exacerbate these problems.

Response T.1

The comment expresses concern regarding the Draft EIR's analysis of long-term, operational impacts associated with the Project. Operational impacts are any potential environmental impacts that would occur after the Project is constructed. The Draft EIR does analyze both the short-term, construction-related impacts and the long-term, operational impacts of the Project for all of the CEQA Appendix G environmental topics. The analysis of each environmental topic, including both construction and operational analyses where appropriate, is provided in Chapter 3, *Setting, Impacts, and Mitigation Measures*, of the Draft EIR.

Comment T.2

The Cypress Point Community Preservation Group (CPCPG) is supporting the No Block C Alternative listed in the DEIR. The No Block C Alternative will mitigate most of our concerns about environmental impacts including increased noise levels, dust, pollution, exposure to toxic emissions from the cars and trucks using the nearby freeway and preserve the aesthetics and visual comfort we benefit from the tree canopies. The No Block C will reduce the density and intensity of this development in our neighborhood which is medium-density multi-family townhouses, condominiums, and apartment buildings. Our neighborhood has already reached its maximum limit on several livability parameters such noise sources, availability of street parking, traffic safety, and the numbers of people (bikers, dog walkers, and joggers) who cross our property to access the Stevens Creek Trailhead. The full project without the No Block C Alternative will have significant impact on the livability, quality of life, and the character of our neighborhood. As part of the Block C development many of the mature trees including majestic Heritage trees will need to be removed to make space for the construction of a large 4-story apartment building, a 2-level underground garage, and an emergency vehicle access road next to the driveway entrance to Cypress Point Woods Townhouse parking lot and townhouse units. The No Block C Alternative will likely shorten the duration of the construction activities from 5-years and 4-months to about 2-years. A demolition and construction project that lasts 64-months cannot be tolerated by the residents of our neighborhood.

Response T.2

The comment expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being "impractical or undesirable from a policy standpoint." (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project's impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project's units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

The comment expresses opposition to the Project. The commenter's support for the No Block C Alternative and opposition to the Project is noted and will be provided to decision makers for their consideration during the decision-making process. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment T.3

The loss of the tree buffer zone in Block C and along Highway 85 will have significant impacts to the health of our families, especially our infants and children. It is a well-known, scientific fact that mature tree canopies along the freeways absorb high levels of noise, dust, and pollution and protect the health of our residents from toxic air emissions by cars and trucks. The replacement trees will not be a mature canopy for decades and will not have the capacity to provide the benefits of the existing tree buffer/barrier zone. This area in Block C has many trees including Heritage trees which are visually comforting and has aesthetic scenic qualities that are enjoyed by all the residents. It is a woodland area that supports a wildlife habitat and tall trees for nesting birds. There is a nexus between this woodland area and the Stevens Creek Trail corridor, and it provides more species and diversity to this world class urban forested trail that stretches from the coastal mountains to the Baylands.

Response T.3

The comment expresses concern about the potential impacts of tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment T.4

The DEIR does not adequately address these problems.

Response T.4

The comment indicates that the problems identified in previous comments are not adequately addressed in the Draft EIR. See response to comments T.1 through T.3 for a response to the issues raised. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment T.5

There are already many sources of noises causing a nuisance in our neighborhood such as Highway 85 freeway noise, leaf blowers, Caltrain, freight trains, and Shoreline Park Amphitheater. The loss of many trees and Heritage trees during construction activities will eliminate the tree buffer zone that protects our homes and the health of our families from noise, dust, and pollution, especially with the construction of the large apartment building, underground garage, and emergency vehicle access roadway in Block C.

Response T.5

This comment is similar to comment N.5. See response to comment N.5.

Comment T.6

There is already a traffic safety problem for both drivers, bikers, and pedestrians. Many near misses have been reported by residents. The substandard neighborhood street has street parking on both sides which narrows the street even more and cars cannot easily maneuver and avoid collisions. Cars come out of the driveways blindly and nearly collide with oncoming traffic. If street parking is moved away from the intersection of the driveway and the street to improve visibility, the street parking spaces will be reduced even further than it is now. Cypress Point Drive is a dead-end cul-de-sac and there are no barriers to prevent wayward vehicles from entering the driveway of Cypress Point Woods townhouse parking lot and endangering children at play.

Response T.6

This comment is similar to comment N.7. See response to comment N.7.

Comment T.7

There is already competition for street parking spaces on Cypress Point Drive. Due to the addition of more 2 and 3-bedroom, as opposed to studios that now exist, the numbers of people could double in size. This means more vehicles, less garage parking, and added pressure on street parking. According to AvalonBay, there will be more vehicles flowing to Middlefield Road compared to Cypress Point Drive. How can this be if there are a total of 602 underground garage parking spaces on Cypress Point Drive and only 363 underground garage parking spaces on West Middlefield Road. There will be 171 parking spaces in Block B and 431 parking spaces in two underground garages located on Cypress Point Drive.

Response T.7

This comment is similar to comment N.8. See response to comment N.8.

Comment T.8

There is already a lack of access to the Stevens Creek Trailhead for dog walkers, joggers, and bike commuters who cut through our properties to get onto Central Avenue and the trailhead. The development will more than double the existing numbers of people who will cut through our properties to get to the Stevens Creek Trailhead. Security of our homes and garages have been a constant area of concern. Allowing more access to the properties will certainly increase the break-ins and thefts.

Response T.8

This comment is similar to comment N.9. See response to comment N.9.

Comment T.9

There is already a cumulative impact from multiple housing and commercial developments in a relatively small area north of Central Expressway. These developments are proposed, under review, under-construction, and recently completed. The cumulative impacts are not known because they have not been studied. Equally important is the lack of a Precise Plan to guide the growth and development of this significant area that will eventually be an extension of Downtown Castro Street.

Response T.9

This comment is similar to comment N.10. See response to comment N.10.

Comment T.10

We already have the developers designing and guiding our growth through their many housing developments being allowed no matter the cost to the residents and the livability of their neighborhood. This property has never been envisioned as high-density housing and will require the city to give a large private real estate investment trust exemptions to the General Plan and the local zoning density requirements. This is called the Gate-Keeper Program which has been disbanded for good reasons. A Precise Plan is needed to guide the growth and development of our community and ensure the people reap the benefits of a green, livable, healthy, and prosperous life for all, not just more profit for the developers and their shareholders.

Response T.10

This comment is similar to comment N.11. See response to comment N.11.

Comment T.11

The Draft DEIR already has a comprehensive list of alternatives to the proposed project. Many in our community support the No Block C Alternative. The No Block C Alternative will sufficiently scale-back the project to mitigate most of our concerns about the project. According to the City's consultant, ICF, the No Block C Alternative is the most environmentally superior alternative, except for the No Project Alternative. The No Block C Alternative appears to be a win-win for all the stakeholders including the developer, the homeowners and their families, retired seniors, the neighborhood, and the environment. The No Block C alternative will allow the construction of Block A and Block B. Block B construction site is distant from most of the existing multi-family housing developments compared to the construction activities in Block C. Block B will allow the development

of an apartment building with 119 units and an underground garage, a leasing building as well as an amenities and recreation building. We estimate the duration of short-term environmental impacts will be reduced from 5 years to 2 years which is typical for a housing development in our area. Most of our concerns about the long-term health and environmental consequences of this project should be mitigated by the No Block C Alternative. Additionally, this will allow time to study and evaluate future growth and a vision for our community.

Response T.11

This comment is similar to comment N.12. See response to comment N.12.

Comment T.12

It was difficult to review and evaluate the DEIR against the Project Plan. The Project Plan was repeatedly revised by AvalonBay during the review period. Once a DEIR has been released to the public, there should be no modifications made by the developer to the project plan. This was not the case and created a lot of confusion. Here is an example. The number of dwelling units constantly changed during the review period.

- The original project plan had 329 units including 1-, 2-, and 3-bedroom units.
- For unknown reasons, 5 units were removed from Block B, making it a total of 324 units.
- My project metrics analysis of the June 2021 project plan revealed 32 more units than reported by AvalonBay. This made the new total 356 units. This was verified in an email message from Diana Pancholi.
- The DEIR was made available on June 28, 2021 and was based on the June 2021 project plan.
- The June 2021 project plan was again revised in July 2021. Now there were 11 less units making a new total of 345 units. But the DEIR was still based on the June 2021 project plan.
- The June 2021 project plan had 111 units in Block B and 218 units in Block C.
- In July 2021 this was changed. Block B had 119 units and Block C had 226 units. The new total was 345 units.
- Are the total number of dwelling units existing and proposed 747 units (402 units + 345 units)?

Response T.12

This comment is similar to comment N.13. See response to comment N.13.

Comment T.13

Executive Summary

I recommend the consultant provide a one or two-page summary table, in bullet format, the key basic project metrics. The purpose of this summary is to preclude any future confusion. This page can be revised in the future if necessary to highlight any changes made to the project plan and can be posted on the city's website. Some of the metrics should be the size of the project site, the number of units per acre (density), the allowable density for this project, the number of existing and future studios, 1, 2 and 3-bedroom units, the number of affordable units, the estimated rent to comply with "affordability" in this area, the estimated number of existing tenants, the estimated maximum

number of tenants after the addition of 345 new units, the number of dwelling units and parking spaces in Blocks A, B, and C, the number of stories and the heights for each existing and new buildings, the number of underground parking garage levels for each Building Block, the number of parking spaces in each underground garage and corresponding primary street for entering and existing traffic, the number of total trees and Heritage trees that will be lost in each Building Block, and other metrics that are deemed an important metric to keep track of during the planning process.

Response T.13

This comment is similar to comment N.14. See response to comment N.14.

Comment T.14

ES-3 Significant and Unavoidable Impacts

Impact AQ-3a: This impact description addresses construction emissions involving diesel particulate matter and PM2.5 concentrations. These are emissions from trucks and heavy equipment. Why does this impact element not address dust emissions from the construction site? Significant and unhealthy dust emissions are typically generated by construction activities including demolition, excavation, vehicle, and heavy equipment driving over on-site dirt roads, moving and stockpiling soils, loading and transporting soils and demolition debris off-site in trucks.

Response T.14

This comment is similar to comment N.15. See response to comment N.15.

Comment T.15

Additionally, due to the age of the existing apartment complex and its buildings there is a potential for asbestos in building materials and insulations, and lead in painted surfaces. I do not see this addressed as a potential impact nor any sampling and test results for these highly toxic substances. Is there an asbestos and/or lead problem at this old apartment complex and does public health need to be protected?

Response T.15

This comment is similar to comment N.16. See response to comment N.16.

Comment T.16

ES-4 Project Alternatives

The report downplays the significance of the No Block C Alternative. It diminishes the benefits of the No Block C Alternative by not addressing the preservation of the urban woodland, the trees including Heritage Trees, the tree buffer zone that protects the health and welfare of the homeowners and their families by absorbing the noise, dust, and pollution from Highway 85. This is a well-known scientific fact. Other benefits include bird and wildlife habitat and it being integrated with the Stevens Creek Trail corridor. It is our desire that this area in Block C be even better integrated into the Stevens Creek Trail Corridor with the addition of trees and native water-resistant plants, landscape maintenance, watering, and habitat restoration. The Stevens Creek Trail corridor is a jewel, and we are very fortunate to have this in our community. We desire this area be

deeded to the City in exchange for project approval in Blocks A and B. This would be a greater benefit to neighborhood, the city, and the environment compared to a small manicured public park surrounded by apartment units. We are constantly losing the aesthetics and other benefits provided by the natural environment which is as important as the air we breathe.

Response T.16

This comment is similar to comment N.17. See response to comment N.17.

Comment T.17

2.1 Project Overview

The total number of units is incorrect when compared to the June 2021 and July 2021 Project Plan.

Response T.17

This comment is similar to comment N.18. See response to comment N.18.

Comment T.18

I can find no description or reference for “High-Low Density”. This density classification needs to be described in more detail.

Response T.18

This comment is similar to comment N.19. See response to comment N.19.

Comment T.19

Is the demolition and non-replacement of the tennis and basketball courts, the pool and spa consider a benefit of the project? The tennis courts are used by the Silicon Valley Tennis Academy as is a significant benefit to the young tennis players.

Is the building of a 1.3-acre public park considered a benefit to the public or to the tenants of the apartment complex? The multi-family townhouses and condominiums have their own green open space, picnic areas, and barbeques. How can the public park be seen as a benefit when there will be a loss of a woodland area, trees including Heritage Trees? I consider the small public park as a much less benefit to the neighborhood compared to the wooded area in Block C.

Response T.19

This comment is similar to comment N.20. See response to comment N.20.

Comment T.20

There is no access to the Project Site from Moffett Blvd as far as I know (page 2-2).

Response T.20

This comment is similar to comment N.21. See response to comment N.21.

Comment T.21

2.2 Project Objectives

I do not agree that AvalonBay has taken adequate measures to preserve Heritage Trees to the greatest extent feasible. I believe the No Block C Alternative would preserve Heritage Trees to the greatest extent feasible and allow the developer to build 119 units in Block B.

Response T.21

This comment is similar to comment N.22. See response to comment N.22.

Comment T.22

2.3 Project Location

Although the Project Site has an address of 555 West Middlefield Road, most of the demolition, construction of apartment buildings and underground garages, and the public park will occur on Cypress Point Drive. Since 2015, the public was unaware of the potential impacts of this project to their Cypress Point Drive neighborhood because the project site was referred to 555 West Middlefield Road. This was misleading and the residents believed the project was located on West Middlefield Road when, in fact, the project was going to extend to Cypress Point Drive and most of the construction activity and traffic would occur in our neighborhood. If there had been more outreach, our neighborhood would have likely opposed this high-density housing project from being voted into the Gate-Keeper Program at that time and prevented a massive construction project in proximity to their homes.

Response T.22

The comment expresses concern regarding the Project site's proximity to Cypress Point Drive and the published address of the Project site. Projects are often listed or referred to by their formal street address. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment T.23

2.4.3 Surrounding Land Uses

This sentence is incorrect "South of Cypress Point Drive are professional offices". On the southside of Cypress Point Drive are several multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums. There is also an Adult School and parking lot on the southside of Cypress Point Drive. The area between Cypress Point Drive and Central Expressway are more multi-family housing developments and single-family homes.

Response T.23

This comment is similar to comment N.24. See response to comment N.24.

Comment T.24

Figure 2-3: Proposed Site Plan

The diagram should illustrate the locations of the multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums on the southside of Cypress Point Drive, and Willow Park Apartments on the northside of West Middlefield Road.

The diagram should also show the proximity of the Stevens Creek Trail Corridor to Block C. I will attach a Google Map on page 8 that displays the proximity of this very important feature of Mountain View. The map displays the Stevens Creek Trail Corridor in green. The surface parking lot in Block C is marked with a "C" and is located at the end of Cypress Point Drive. The woodland area in Block C is visible as a green area on the north and east side of Block C.

Response T.24

This comment is similar to comment N.25. See response to comment N.25.

Comment T.25

Another diagram is needed and very important to illustrate the footprint of the new apartment building and underground garage in Block C. This footprint would be overlaid by the existing location of the trees including Heritage trees that AvalonBay plans to cut down and remove to construct the apartment building, underground garage, and the emergency vehicle access road. Without this diagrammatic overlay it is not possible to fully assess the environmental impacts in Block C and surrounding lands.

Response T.25

This comment is similar to comment N.26. See response to comment N.26.

Comment T.26

2.5.2 General Plan Amendment

The new High-Low Density Residential designation would only apply to the Project Site. This is not a City-wide new zoning designation and is a special gift to a private real estate investment trust company? That's what it sounds like to me.

The High-Low designation would allow a height limit of up to 5 stories. What is to stop AvalonBay or the new landowner to get approval to continuing adding stories to their buildings? The Project Plan has a 4-story building in Block C.

Response T.26

This comment is similar to comment N.19. See response to comment N.19.

Comment T.27

2.5.3 Site Access, Circulation, and Parking

The number of total parking spaces in Blocks B & C is 624 parking spaces (584 underground and 40 surface spaces). This parking facilities will be accessed from Cypress Point Drive, a substandard, narrow, dead-end, cul-de-sac. There is currently parking on both sides of the street making it a very narrow roadway for cars, trucks, and bikers. The use of this small neighborhood street for traffic and parking will have competition from a townhouse complex, a condominium, and an adult school. There are no bike lanes and there is no space for bike lanes. This is a formula for disaster in terms of car and bike safety, traffic jams at the intersection of Moffett Blvd and Cypress Point Drive, and wayward vehicles entering the driveway and parking lot at Cypress Point Woods Townhouse because they are unaware that street dead-ends at the entrance to the townhouse parking lot.

There are a total of 363 parking spaces in Block A (341 underground and 22 surface spaces). This will generate much less traffic entering and exiting Middlefield Road which is a standard primary road for through traffic. Why are there not more vehicles entering and exiting Middlefield Road as compared to Cypress Point Drive. Middlefield Road has much more capacity to handle the number of vehicles and traffic safely and efficiently compared to Cypress Point Drive. Clearly, Cypress Point Drive cannot handle this vehicle load safely and efficiently.

Response T.27

This comment is similar to comment N.28. See response to comment N.28.

Comment T.28

The DEIR states an emergency access along SR 85's building frontage (see figure 2-3) will be provided. This area for an emergency vehicle access road is located between Cypress Point Woods parking garages and surface parking lot in Block C. It is very close to the property lines separating the two properties. It is also very close to the driveway entrance to Cypress Point Woods. There is a steep vegetated hill with trees with a path to the top of the hill. The path ends at the end of the Cypress Point Woods perimeter wall on top of the hill. This is a low security wall along the freeway that was not constructed by Caltrans as a sound wall. The trees along the perimeter wall and the sound wall provide protection from the noise, dust, and pollution from the freeway. According to statements by AvalonBay, this hill will be leveled to ground surface and the soil and debris will be trucked away. The DEIR does not address the property lines, the hill, the leveling of the hill, and impacts to Cypress Point Woods property, if any.

Response T.28

This comment is similar to comment N.29. See response to comment N.29.

Comment T.29

Diagrams are needed to be expanded to display the relationship and distance of other multi-family housing developments to this project site. These residential developments are cut-off from the diagrams. For example, Figure 2-3, Project Site Plan, and Figure 2-9, Proposed Landscape Plan do not display or identify major housing developments in proximity to the project site. The diagrams need to display the footprint of Cypress Point Woods Townhouse, Cypress Point Lakes, and the Adult School buildings and driveway entrances in relationship to the opposing project site.

Response T.29

This comment is similar to comment N.30. See response to comment N.30.

Comment T.30

Have highly visible property perimeter stakes been placed between Cypress Point Woods property and 555 West Middlefield property so it is clear where the properties lie? Very visible perimeter stakes driven into the ground should also be used to outline the perimeter or footprint of the apartment building, underground garage, and the emergency access road in Block C.

Response T.30

This comment is similar to comment N.31. See response to comment N.31.

Comment T.31

It was my intention to review, evaluate, and comment on all the sections of the DEIR. But I did not have sufficient time to give this report all my attention and time. I suffered a severe angina attack on July 30 and admitted to the ER. I received two stents in two of three of previous triple bypass arteries that flowed blood to the heart. It was a very close call. I may have additional comments in a second submission before the deadline, which is today, August 12, 2021. But I wanted to submit the comments I have ready to share to guarantee the comments are received by the official deadline. Please call me at 650-269-7551 if you have any questions pertaining to my comments or suggestions.

Thank you for the opportunity to review, evaluate, and comment on the DEIR. I hope my comments will improve upon the work already accomplished by the consultant, ICF. I hope my comments will educate the consultant on best practices to use to communicate to the audience. In this case, the audience is primary the public. These are residents, homeowners, tenants, shopkeepers, and other people living or working near the project site. Although I understand there are certain rules and requirements that must be followed under CEQA in the drafting of the DEIR and Final EIR, there is no reason why the DEIR had to be over 400 pages. This was too overwhelming even for me and I have been in the environmental protection business for nearly 40 years. This document could be reduced, condensed, and distilled down to the most important project details, problems, and solutions. This report could be more concise and transparent. As it is, I am not sure it will have the practical utility it was intended for and that was communicate to the community (1) accurate details about project, (2) the environmental impacts of this project both short-term and long-term and, (3) feasible alternatives and solutions that would mitigate these impacts. Also importantly, the DEIR was supposed to thoroughly address the pre-DEIR comments submitted by the public. I believe this was not accomplished. I believe this DEIR could have been more focused on the interests and needs of the neighborhood and the environment by scheduling pre-DEIR meetings with representatives from the developer, the city, the community, and the environmental advocacy groups.

Response T.31

The comment expresses concern about the incorporation of community feedback in the Project design and the Draft EIR. As discussed in Chapter 1, *Introduction*, of the Draft EIR, a Notice of Preparation (NOP) was published on alerting agencies and the public that the City would be preparing this EIR, and the Project's scoping period was from July 10 to August 9, 2019. On July 24, 2019, a public meeting was held, providing an opportunity for attendees to comment on environmental issues of concern. Comments submitted during the scoping period or received at the public scoping meeting were considered and incorporated during development of the EIR, as feasible. In addition, public input has been requested during numerous public meetings, including study sessions with the Environmental Planning Commission on March 15, 2017, and February 3, 2021; study sessions with City Council on April 18, 2017, and February 23, 2021; and the Development Review Committee on October 6, 2021. More information about the Project, including all of the environmental review documents, is provided on the City's website at: <https://www.mountainview.gov/depts/comdev/planning/activeprojects/555middlefield.asp>.

The comment also expresses concern about the length of the Draft EIR. The EIR was prepared according to the City and State CEQA requirements, and the document was drafted to be readable. The CEQA Guidelines encourage lead agencies to strive to keep EIR documents to a manageable length, which was the intent on this Project as well. However, given the complexity of the site and the Project, the City understands and acknowledges that EIR document was lengthy and detailed, and the City appreciates the comments and questions raised. There will be additional opportunity for public comment and input at the City's hearings to consider certification of the EIR and then whether the Project should be approved. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

U. Bruce England

Comment U.1

GreenSpacesMV appreciates the opportunity to respond to the 555 W. Middlefield project environmental impact report (EIR). To learn more about our organization, see "About GreenSpacesMV" at the end of this letter.

The primary goals of our organization are to protect and enhance green spaces in Mountain View and, by extension, to protect wildlife that depends on our actions on their behalf. This letter reflects those concerns. That said, many of our members also have an interest in our city meeting housing needs and would like to see the project succeed due to its contribution on this front. To the extent the developers can do it, we would like to see housing optimized through the project while being mindful about environmental impacts during and after the development process.

Note that, while some of our comments here might fall outside of the purposes of the EIR documentation, we would like to bring all of them to your attention due to their relevance to the project, and to the environmental health and stability of our city at large.

Response U.1

The comment presents the commenter's affiliation and goals. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment U.2

Tree removal is a major concern of ours. Our understanding is that all the existing trees providing a wide buffer along highway 85 are to be cut down in order to make space for a new Block C building (Landscape Drawing L.003) and, in addition, a significant number of additional trees will be removed in the area of Block C, and that this is needed specifically (we have been told) to enable access for construction vehicles during the construction process. In hopes of preserving trees, especially large mature trees that take decades to grow, we strongly urge you to find other solutions for this. Those trees are providing numerous benefits and will to current and future residents as well. Large trees should not be permanently removed for the sake of short term convenience. The trees along Highway 85 have an aesthetic value to drivers, and they provide a sound barrier between the highway and the entire neighborhood in addition to a myriad of environmental benefits including sequestering carbon and reducing air pollution.

Response U.2

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The Project does not propose the removal of any landscape trees within the Caltrans right-of-way.

Comment U.3

In both cases where trees and landscaping are to be replaced or added (see 2.5.5 Landscaping and Heritage Trees in the EIR), we urge you to choose from native, drought tolerant, climate resilient, pollinator-friendly landscaping choices. In addition to great choices identified in the North Bayshore Precise Plan (<https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=31203>), we would like you to select from the following options, as identified by GreenSpacesMV members with the appropriate expertise:

The species list for the gardens may be drought tolerant (unfortunately even in swales where it makes sense to allow some flexibility and use a little more water), but almost all the species are not native and have no habitat value beyond providing some structure. As a requirement for mulch, at least 3" is required on all soil surfaces. This is very common in plans but it's harsh unless compost-like mulch is used. Kids often no longer know what soil looks like, or feels. And mulch is often wood chips, sometimes dyed, which is worse. The entire surface is paved or mulched. And mulch needs to be applied only to tree cups, not on all soil surfaces. Incidentally, the development could use a community garden!

In addition, the plans note: "Minor planting revisions may occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability." All the plants should be selected from the North Bayshore list with no substitution.

Rethinking your planting palette to include significantly more natives will not affect the buildings but will enhance the environment for their residents (making it more desirable) and for the community as a whole. Currently, with many people choosing to work from home, thriving landscaping and biodiversity are more attractive and important than ever.

Trees

There are no native trees in the plan. The one oak, holy oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western redbud. Some of the species on the list should not be planted here—magnolias are thirsty, camphor trees break easily, and London plane trees hybridize with local sycamores.

The plan should be revised to use trees from the North Bayshore list, even where the chosen non-native is consistent with existing trees onsite. Less consistency visually, but much higher biodiversity value.

We are particularly concerned about seeing any native oak trees removed. As Staff has noted, the developer should work very hard on protecting as many oaks as possible. A mature native oak is irreplaceable. Certainly, why plant European oaks when there are so many native oaks that are clearly thriving while many other trees in town (including camphors and magnolias) are suffering? Removing oaks simply goes against the biodiversity goal of the City, and important habitat is lost

Shrubs

The plan is predominantly (99%) non-native. Very disappointing given that California is blessed with a huge diversity of native shrubs that are drought tolerant, lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options. The plan should be revised to replace most of the shrubs.

Is ok to keep:

- The only native on the list, *Juncus patens*, which people plant in swales everywhere.
- New gold lantana provides nectar for butterflies and hummingbirds
- Lion tail provides nectar for butterflies and hummingbirds

Some additional plants provide nectar for hummingbirds, but there are better choices on the North Bayshore Precise Plan list.

In short, we urge you to take a development approach that thoughtfully incorporates trees and high quality green spaces.

Response U.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment also suggests using native species in the proposed planting palette. As shown in Table 3.3-3 on page 3.3-18 in Section 3.3, *Biological Resources*, of the Draft EIR, the majority of the tree removals under the Project would be non-native species. As required by the City, most of the new trees that would be planted under the Project would be in the "low water use" category, in accordance with the Water Use Classifications of Landscape Species.

Comment U.4

Regarding transportation impacts

We also care about making our transportation network as robust as possible, with high accessibility, safety, and comfort provided to pedestrians and bicyclists, with special attention to children, seniors, and those with disabilities. These needs go beyond the boundaries of the project site. As you know, three access points to the Stevens Creek Trail are nearby (at the end of Central Avenue, to the north off of Moffett Boulevard, and to the east off of Middlefield Road). We urge you to do all that you can to make these connection points as accessible, safe, and comfortable as possible, even if this means tying this project to others undertaken separately and also to work with neighboring communities to secure access through their jurisdictions.

Response U.4

The comment expresses concerns about access to Stevens Creek Trail. The City's 2020–2021 CIP includes a project that will evaluate the need for a sidewalk on the south side of Middlefield Road, across SR 85. A sidewalk on the north side of Middlefield Road already connects to the trail. The transportation analysis recommends prohibiting on-street parking along the sidewalk, which would allow a segment of the adjacent bike lane to be used as a full-time bike lane and improve accessibility to the trail from the bike lane.

There currently are no bike lanes on Moffett Boulevard between the site and the trail access points. However, the City's 2020–2021 CIP includes a project that would evaluate the need for a Class IV bikeway on Moffett Boulevard between Middlefield Road and Clark Road, within NASA Ames. In addition, the City's Bicycle Transportation Plan Update (2015) includes a project that would evaluate the need for a Class IV bikeway on Moffett Boulevard. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment U.5

Regarding lighting throughout the site

We ask that you do the following:

- Limit the Correlated Color Temperature of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife and ecosystems.
- Use timers to dim during use hours and turn off lighting outside of activity hours.
- Have all bollard lights on motion sensors to dim when not in use and turn off after 6pm.
- Shield all lights and direct it to only light the intended area
- Do not impact pollinators, native plants, or school gardens through additional lighting or destruction of their plantings.

If you would like more information on light pollution and its impacts, you can see details here: <https://www.darksky.org/light-pollution/>.

Response U.5

The comment identifies recommendations for addressing light pollution. As stated on page 3.1-13 in Section 3.1, *Aesthetics*, of the Draft EIR, the Project would most likely include accent and security lighting at the entrances to buildings and in the open spaces/courtyards. Pedestrian-scale lights could be mounted on poles and/or installed as bollard lights. Overall, because of the height and mass of the proposed buildings, the Project would increase the amount of ambient light radiating into the night sky. The Project would, however, be subject to the City's development approval process prior to submittal of construction drawings. This review and approval process includes a DRC public hearing to receive recommendations on the design as well as public hearings before the Environmental Planning Commission and City Council. These reviews would ensure that the proposed lighting would be consistent with the City's community standards for residential development and would not significantly adversely affect the visual quality of the area or create a substantial new source of light or glare.

Per Standard Condition of Approval PL-121 (Lighting Plan), a lighting plan would be required with the application for a building permit. Specifically, Standard Condition of Approval PL-121 requires the applicant to submit a lighting plan with the application for building permit that includes photometric contours, manufacturer's specifications on the fixtures, and mounting heights. At the time of final design review, the DRC would review the lighting plan to ensure that lighting would be directed downward and would not spill over on adjacent properties or be highly visible, as required under applicable standards and guidelines. Therefore, impacts related to new sources of substantial light during Project operation are expected to be less than significant.

Comment U.6

Regarding stormwater management

We once again urge you to retain as many trees as possible, as they provide needed water filtration and that you incorporate as many green infrastructure features as possible that prevent unnecessary water runoff to storm drains.

We hope you incorporate our recommendations into the project specifications and design prior to approval of the project. Thank you again for the opportunity to comment.

Response U.6

Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Impacts related to stormwater runoff were determined to be less than significant under CEQA. Please refer to Draft EIR Section 3.9, *Hydrology and Water Quality*, for a discussion of the proposed Project's impacts related to stormwater as well as descriptions of the applicable standards and regulatory controls that would be followed during construction and operation of the proposed Project.

V. Shani Kleinhaus (dated August 12, 2021)

Comment V.1

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the "No Block C" alternative provides a reasonable balance of housing and environmental impact.

Response V.1

The comment expresses opposition to the Project and support for the No Block C Alternative. These opinions will be considered by the City Council during their review of the Project. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an

identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being “impractical or undesirable from a policy standpoint.” (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project’s impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project’s units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

Comment V.2

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the “No Block C” alternative provides a reasonable balance of housing and environmental impact.

Response V.2

The comment expresses opposition to the Project and support for the No Block C Alternative.

These opinions will be considered by the City Council during their review of the Project. Refer to response to comment V.1, above.

Comment V.3

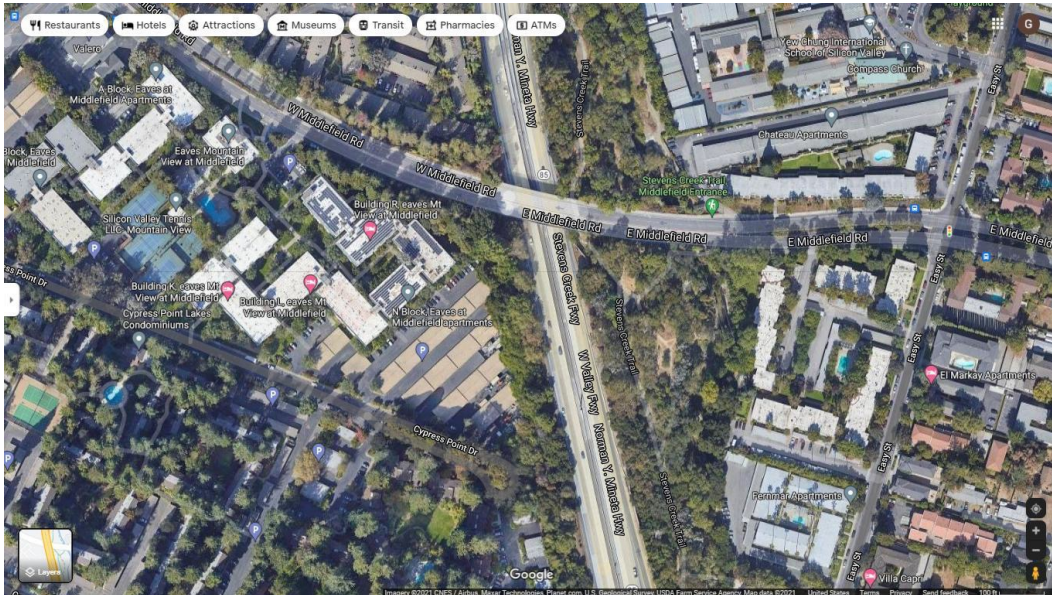
555 Middlefield is proposing to add housing in 3 different locations, using existing surface parking lots to insert additional housing with multi-level underground parking.

Block “C,” however, is very problematic as it has serious impacts. The proposed development here involves removal of every single tree in the existing wide tree buffer that currently exists along Hwy 85 and in close proximity to Stevens Creek Trail. This canopy is part of the unique Stevens Creek habitat corridor that extends from the Bay to the hills.

The 80’-100’ wide existing urban canopy will be lost to make place for a four-story building near Hwy 85 along with a strip of new landscaping including a few relocated olive trees.

We are strongly opposed to degradation of the urban canopy along the habitat corridor and the removal of so many trees. We support the alternative of “No Block C” because we oppose removal of the urban canopy along Hwy 85.

The existing landscaping provides an effective aesthetic barrier to Hwy 85 visually and as a barrier for freeway noise. It also helps to trap airborne toxics, such as particulates from auto exhaust and tire dust, and brake linings dust from the highway. This is important because there is clear evidence of increased incidence and severity of health problems associated with air pollution exposures related to proximity to roadway traffic. In addition, the tree canopy is part of an important unique habitat corridor, along Stevens Creek, from the Bay to the hills. Many resident and migratory bird species, as well as mammals, including bats, amphibian life and insect pollinators, use this corridor to travel between rich habitat patches.



View showing Stevens Creek Habitat Corridor at the site along Hwy 85.



Typical view of existing tree canopy along Hwy 85, seen from the site, part of a critical habitat corridor extending from the Bay to the hills. The project proposes clear cutting of all the trees along Hwy 85 to make room for a new building close to Hwy 85.



Excerpt from Drawing L.003 ‘Tree Removal Plan’: Green hatched area shows ***ALL*** the trees along Hwy 85, on the property, are to be clear cut to make place for new buildings. Blue numbers are heritage trees, black numbers are non-heritage, and shrubs to be removed are not documented

Response V.3

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project’s replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. All existing trees that would be removed under the Project were properly disclosed and analyzed in the EIR.

In addition, the comment expresses support for the No Block C Alternative. Refer to response to comment V.1, above.

Comment V.4

Stevens Creek Corridor Park

Stevens Creek is a 20-mile-long waterway that starts on the slopes of Black Mountain in the Santa Cruz Mountains and flows to the Bay.

The 4.8-mile Stevens Creek Trail, which intermittently follows along the banks of Stevens Creek, is one of the best-developed and most ambitious trails in the Bay Area. The existing trail cost around \$30 million to build, with funding from a wide range of public and private sources. Building the trail

required the construction of several bridges and underpasses, the planting of thousands of trees and shrubs, and the installation of numerous amenities, such as benches, signs, and drinking fountains. Since then, many other funding sources have been utilized to fund improving the ecology of the trail and the creek, and to protect biodiversity.

Because of the extensive landscaping and amenities, the trail acts as a natural linear park and is one of the peninsula's unique habitat corridors connecting the Bay to the hills.

The Stevens Creek corridor connects several rich habitat areas, home to a variety of both aquatic and land-based wildlife. Some species found in the parks include:

- **Mammals:** Coyote, Gray Fox, Raccoon, Brush Rabbit, Merriam's Chipmunk, Fox Squirrel, Opossum, black-tailed deer, and Big brown bat.
- **Birds:** the parks and trail are great for bird watching, with over 150 different species;
- **Butterflies:** California Sister, Lorquin's Admiral, Variable Checkerspot, Northern Checkerspot, Mylitta Crescent, Unsilvered Fritillary, Sara Orangetip, Gray-veined White, Painted Lady, Mournful Duskywing, Echo Blue, Spring Azure, Umber Skipper, Tailed Copper;
- **Dragonflies/Damselflies:** Flame Skimmer, Red Rock Skimmer, Common Green Darner,
- **Variegated Meadowhawk**, Vivid Dancer, Familiar Bluet;
- Other **invertebrates** worth mentioning are California Forest Scorpion and Banana Slug.

The Stevens Creek habitat corridor connects park habitats along different areas of Stevens Creek, enabling bird, mammal, and insect migration, (re)colonization and breeding opportunities for flora and fauna, and promoting increased genetic diversity. It provides food and shelter for a variety of wildlife and helps with juvenile dispersal and seasonal migrations. We believe that as proposed, the project is likely to interfere substantially with the movement of wildlife species in this corridor.

Response V.4

The comment expresses concern about the proposed tree removal under the Project. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment V.5

Summary

We support the alternative of "No Block C" as we oppose removal of the urban canopy along Hwy 85 for all the reasons given above.

In addition, increased density should come with some positive benefits for the community.

Response V.5

The comment expresses support for the No Block C Alternative. Refer to response to comment V.1, above.

The comment also expresses opposition to the removal of the urban canopy along SR 85. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment supports positive benefits for the community as a result of the increased density on the Project site proposed under the Project. Implementation of the Project would result in benefits to the community, including the dedication of 1.3 acres of park space, the construction of affordable housing units, and improved bicycle and pedestrian connectivity, both for the Project site and surrounding neighborhood. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment V.6

We would propose actually improving the tree buffer and urban canopy along Hwy 85 by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's urban greening efforts.

This will improve the livability of the project for residents, including better health effects due to an improved buffer for auto exhaust, toxic dust and noise from the freeway, and a better aesthetic experience.

Importantly, it will advance Mountain View's strategic goal for improved biodiversity. In addition, added trees contribute to urban cooling, ameliorating climate change and urban heat island effects, and provide more carbon sequestration and better management of stormwater.

Response V.6

The comment supports improving the tree canopy along SR 85 by planting more trees. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment V.7

COMMENTS ON IMPACTS AND MITIGATION MEASURES: DEIR 555 WEST MIDDLEFIELD ROAD, MOUNTAIN VIEW

The Project would result in the significant and unavoidable impacts with respect to Project and cumulative PM2.5 concentrations at existing on-site sensitive receptors.

CEQA requires mitigation for impacts, even when mitigation does not reduce the impacts to below significance level. The mitigations offered for Impact AQ-2b are limited to construction activities, and do not address the impact associated with the loss of tree canopy buffer along Hwy 85.

Scientific evidence shows that urban trees remove fine particulate air pollution. The removal of the trees along Hwy 85 eliminates an important green infrastructure service that can help reduce PM2.5 concentrations not only during construction, but also for the operations lifetime of the project. The Project should be modified in a way that retains all the existing trees along the freeway (eliminating Block "C," for example).

Response V.7

The comment expresses support for retaining all existing trees along SR 85. Impacts related to localized concentrations of PM2.5 were found to be significant and unavoidable during the construction phase after implementation of applicable mitigation measures upon existing on-site receptors. This construction-related impact would not be avoided or substantially reduced with preservation of all trees at the eastern end of the site along SR 85. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

Comment V.8

The Project finds no significant impact to Aesthetic Resources. We disagree.

Hwy 85 is not considered a scenic highway at the state level, but thousands of drivers spend several hours each week on this roadway on their way to and from work at Silicon Valley companies. The value of the tree-lined highway in this section is not negligible - seeing trees improves mental health, cognition, and productivity for these drivers. Indeed, studies show that people who commute through natural environments daily report better mental health, and this association is even stronger among active commuters. The project replacement trees will take decades to grow to provide the aesthetic and health benefits that the existing trees provide.

Trees (and the urban forest) are also important to community health. The loss of the trees along Hwy 85 should be recognized as a significant, unavoidable impact to the environment and the health of residents and drivers alike. This impact can be avoided if the "No Block C" alternative is adopted, or another configuration is offered that retains the existing trees along the freeway.

Views from Hwy 85, looking towards the project site:



Response V.8

The comment states that the loss of the trees along SR 85 should be considered a significant and unavoidable aesthetics impact and a significant impact on the health of residents and motorists. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

The comment also expresses support for the No Block C Alternative. The City, as Lead Agency, will determine whether or not to approve the Project as proposed or an identified Project alternative. Rejection of alternatives may be based on the alternative not meeting project objectives or being “impractical or undesirable from a policy standpoint.” (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 955, 1001; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948-949.)

The No Block C Alternative assumes the existing parking lot on Block C would not be demolished; the alternative would result in the construction of a total of 111 new residential units on Block B, 17,964 square feet of leasing/amenity area on Blocks A and B, 6,364 square feet of private open space on Block B, 534 vehicle parking spaces on Blocks A and B, and a 1.3-acre park on the Park Parcel. As discussed on page 5-4, Chapter 5, *Alternatives*, of the Draft EIR, although the No Block C Alternative would reduce many of the Project’s impacts, it would not meet some of the key Project objectives, including developing at least 320 new multi-family residential units while retaining all existing 402 units, reserving at least 48 of the Project’s units as affordable, and developing higher-density residential units with significant amenities near existing transit and planned transit enhancements as well as major employment centers and downtown commercial retail uses and services.

The comment expresses opposition to the removal of the urban canopy along SR 85. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment V.9

Biological impacts must address and mitigate the impacts of nighttime lighting on human health and on the Stevens Creek riparian ecosystem.

Artificial Light at Night (ALAN) is an emerging global environmental concern, and light pollution is an under-recognized problem. In recent years, there has been a remarkable increase in scientific articles showing devastating effects of ALAN on species and ecosystems, and on human health.

The most devastating ecological impacts have been on insects and insect populations, including aquatic insects, and the ecosystems that depend on insects for pollination, or as a food source. Because the project site is so close to Stevens Creek, attracting aquatic insects to light can cause adverse impacts to the aquatic and riparian ecosystem of the Creek.

Response V.9

This comment states that artificial light affects insects and insect populations, including aquatic insects. The Project site is located approximately 0.25 mile west of Stevens Creek and is west of SR 85. It is not anticipated that light generated by the Project within the Project site would be transmitted to the Stevens Creek corridor due to the distance between the Project site and Stevens Creek as well as intervening objects (e.g., SR 85 roadway and sound walls, trees along Stevens Creek). No substantial light spillover from the site would extend beyond SR 85.

Comment V.10

Outdoor lighting has also been implicated in adverse impacts to teen mental health and to human physical health, including thyroid cancer and sleeping disorders.

Response V.10

The comment expresses concern about the health impacts of outdoor lighting. See response to comment V.11 for a discussion of the Project's less-than-significant impacts related to lighting. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment V.11

The International Dark-sky Association provides sound recommendations for addressing light pollution including:

- Shield lights and direct light downward;
- Use only as much light as needed;
- Use light only when necessary;
- Install control systems such as dimmers, motion sensors, and timers;
- Light close to ground;
- Prevent light spillage.

In addition, please limit the Correlated Color Temperature (CCT) of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout the Project. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife, and ecosystems.

Response V.11

The comment identifies recommendations for addressing light pollution. As stated on page 3.1-13 in Section 3.1, *Aesthetics*, of the Draft EIR, the Project would most likely include accent and security lighting at the entrances to buildings and in the open spaces/courtyards. Pedestrian-scale lights could be mounted on poles and/or installed as bollard lights. Overall, because of the height and mass of the proposed buildings, the Project would increase the amount of ambient light radiating into the night sky. However, the Project proposes infill residential development on an urban site currently developed with residential apartments. The Project would add more walkway and security lighting, similar to the existing lighting on the site, and would not create substantial light spillover to nearby areas.

The Project would be subject to the City's development approval process prior to submittal of construction drawings. This review and approval process includes a DRC public hearing to receive recommendations on the design as well as public hearings before the Environmental Planning Commission and City Council. These reviews would ensure that the proposed lighting would be consistent with the City's community standards for residential development and would not significantly adversely affect the visual quality of the area or create a substantial new source of light or glare. Per Standard Condition of Approval PL-121 (Lighting Plan), a lighting plan would be required with the application for a building permit. Specifically, Standard Condition of Approval PL-121 requires the applicant to submit a lighting plan with the application for building permit that includes photometric contours, manufacturer's specifications on the fixtures, and mounting heights. At the time of final design review, the DRC would review the lighting plan to ensure that lighting would be directed downward and would

not spill over on adjacent properties or be highly visible, as required under applicable standards and guidelines. Therefore, impacts related to new sources of substantial light during Project operation are expected to be less than significant.

Comment V.12

Plant and tree palette

The City of Mountain View has adopted a strategic plan that prioritizes biodiversity in the City. To support biodiversity, mature trees (especially oaks) should be retained, especially in areas where they function as a wildlife movement corridor (along Hwy 85). In addition, a native plant palette would support native fauna and flora, especially local birds, and pollinators.

Almost all the species in the plant palette for the Project are not native to California and to our region and the vast majority has no habitat value beyond providing some structure.

Trees

There are no California native trees in the plan! The only oak, holly oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western, redbud. Some of the species on the list should not be planted here. For example, in California, London plane trees tend to hybridize with local sycamores in riparian corridors, threatening the genetic integrity of the local population.

The plan should be revised to use trees from the North Bayshore plant palette, even where the chosen non-native is consistent with existing trees onsite. This will result in less consistency visually, but much higher biodiversity value, which is a key priority of the City.

Shrubs

The plan is predominantly non-native despite the fact that California is blessed with an extensive diversity of native shrubs that are drought tolerant, aesthetically lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options.

The plan should be revised to replace most of the shrubs with natives in accordance with the City priority for improving biodiversity.

The landscaping plan allows “minor planting revisions [to] occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability.” All the plants should be selected from the North Bayshore plant palette with no substitution.

Response V.12

The comment states that native trees and shrubs that support native fauna and flora should be planted in lieu of non-native trees and shrubs. As shown in Table 3.3-3 on page 3.3-18 in Section 3.3, *Biological Resources*, of the Draft EIR, the majority of the tree removals under the Project would be non-native species. As required by the City, most of the new trees that would be planted under the Project would be in the “low water use” category, in accordance with the Water Use Classifications of Landscape Species.

Comment V.13

Biological Resources: nesting birds

Large trees near waterways are often used by nesting birds, including raptors such as the Redshouldered hawk, Great-horned owl, and Red-tailed hawk. The nesting season for large birds is longer, and thus a nesting raptor survey is needed for the trees along Hwy 85 in the months of January through September.

Response V.13

The comment states that raptors could be nesting in trees along waterways from January through September. The discussion of construction activities during the nesting season in Section 3.3.4.4 in Section 3.3, *Biological Resources*, of the Draft EIR was revised to include a nesting bird survey if any construction were to begin in January rather than February. This text change to the Draft EIR is documented in Chapter 5, *Draft EIR Text Revisions*, of this Final EIR.

Comment V.14

Energy

Net Zero Energy

Mountain View's Climate Action Plan (CAP) requires the City to move towards electrification to reduce GHG emissions. We note that some of the existing buildings have solar panels on their roofs. However, the proposed development does not include rooftop solar and the roof design may possibly preclude rooftop solar.

In order to achieve the City's Climate Action goals, proposed new development should be encouraged to be Net Zero energy for new construction and include rooftop solar.

Response V.14

The comment states that the Project should be encouraged to include rooftop solar in order to achieve the City's Climate Action Goals and Net Zero energy consumption. As described on pages 3.7-26 to 3.7-29 of Section 3.7, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would be consistent with all applicable measures in the City's Greenhouse Gas Reduction Plan. Eleven of the CAP measures, including rooftop solar, are not applicable to the Project; therefore, consistency with these measures is not required for the Project. However, per the MV Green Building Code, the Project would be required to include 50 percent solar roof cover and this will be a City Condition of Approval. Furthermore, as described on page 3.6-12 of Section 3.6, *Energy*, the Project would include a variety of sustainable design features, energy efficient measures, and transportation demand management features to reduce energy consumption consistent with the City's Greenhouse Gas Reduction Plan.

Comment V.15

EV Charging Stations

This project will be operational for the next 50 years and climate change is driving the movement from gas powered vehicles to electric powered vehicles. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor's Executive Order established a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045.

We believe more EV charging stations are needed than the 10% currently proposed. The project should provide closer to 25% charging stations or include documented capacity for easily expanding the number of charging stations to 25% within the next decade.

Response V.15

The comment states that the 25 percent of parking provided under the Project should be EV charging stations instead of the 10 percent that is currently proposed. The provision of 10 percent of the proposed parking spaces, or 99 parking spaces, with power outlets for EV charging is consistent with the City's EV parking requirements. The proposed spaces with power outlets for EV charging as part of the Project would help the City achieve its primary climate objective of reducing greenhouse gas emissions by 80 percent by 2050 by expanding EV charging opportunities in multi-family residential developments.

Comment V.16

Transportation

Parking and Car Share

The parking ratio is difficult to determine as it is not clear from the documents whether the parking count includes the parking spaces that will be replaced by the new construction.

The DEIR documents indicate 997 parking spaces (there may be a math error in the DEIR which lists 987 spaces) including garage spaces and surface parking. This yields a parking ratio of 1.37 spaces per unit. These numbers need to be clarified to explain whether existing spaces are included in this count or excluded.

A parking ratio of 1 space per unit should be the maximum for a transit-oriented housing development in order to encourage transit use. Please clarify the parking count of existing versus new parking spaces.

Car Share, in addition, is a critical element in making it convenient to have access to a car when transit is not available. The number of Car Share spaces is not listed anywhere. Since this is a critical element in the parking design, the proposed number of car share spaces needs to be part of the development proposal. Please include the minimum number of Car Share units that will be included even though the TDM plan is not part of the DEIR.

Response V.16

The comment requests an explanation of the parking ratio identified in the Draft EIR and supports a parking ratio of 1 space per unit. The City supports and uses a "model parking standard" of one space per studio/one-bedroom unit and two spaces per unit for units with

more than one bedroom. The Project would provide a total of 970 parking spaces for the 402 existing units and the 323 new units, a total of 725 units, which would meet the model parking standard. The Project does not propose excessive parking which might deter transit use. As indicated in the TDM plan, the development would provide at least two parking spaces for carshare operators.

Comment V.17

Noise

Green space has the ability to mitigate noise in urban areas. Planting "noise buffers" composed of trees and shrubs can reduce noise by five to ten decibels for every 30m width of woodland, especially sharp tones, and this reduces noise to the human ear by approximately 50%.

For this reason, with the intensification of development on this site, the tree buffer along Hwy 85 is an important element that needs to be preserved and augmented. We recommend improving the tree buffer and urban canopy along Hwy 85, by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's Urban Greening efforts.

Response V.17

The comment states that the tree buffer along SR 85 should be preserved and augmented with more trees using California native species. Please refer to the Master Response for a discussion of why removal of trees is necessary to meet the basic Project objectives for the proposed infill development, information concerning the Project's replanting of trees on-site, and a description of the potential physical environmental impacts resulting from the proposed removal of heritage trees, including impacts associated with noise pollution.

In addition, the comment states that greenspace has the ability to mitigate noise in urban areas. The commenter cites an article that states that noise can supposedly be reduced by 5 to 10 dB for every 30-meter width of woodland. As mentioned in the Master Response, according to information from the Federal Highway Administration, trees and foliage generally do not result in perceptible reductions in noise levels unless the foliage is dense enough to block views along the propagation path completely (Federal Highway Administration 2019). If the foliage is approximately 20 meters thick and the complete line of sight between the source and the receiver is blocked, attenuation of approximately 1 decibel (dB) would be expected to occur. (Note: A three (3) dB change in noise is generally considered to be "barely perceptible" by the human ear [Federal Highway Administration 2019].)

The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required. Although noise can be somewhat reduced by forested areas, the complete line of sight between a source of noise and a receiver would need to be blocked (as discussed above) to result in perceptible noise attenuation.

Comment V.18

Alternatives

The EIR suggests that the “No Block C” alternative would have “similar but slightly lesser” environmental impacts for most resource topics (particularly air quality, greenhouse gas emissions, noise, and traffic) because of the reduced scale of the alternative compared with the Project, although there would be no change in the impact conclusion for any of the foregoing resource areas.

Based on the evidence provided above, we believe we have a fair argument showing that the “No Block C” alternative reduces aesthetic and air pollution impacts and improves noise impacts enough to provide additional housing while balancing environmental considerations and the need for housing.

Thank you for the opportunity to comment on the DEIR.

Response V.18

The comment expresses support for the No Block C Alternative. Refer to response to comment V.1, above. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Chapter 5

Draft EIR Text Revisions

This section contains revisions to the text of the 555 West Middlefield Road Project (Project) Draft Environmental Impact Report (draft EIR) dated June 2021. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

In addition, revised versions of some of the figures in Chapter 2 of the draft EIR are included at the end of this section.

Page ES-1: **REVISE** the sixth sentence in the *Executive Summary* under “Project Overview,” as follows:

The Project proposes a General Plan Amendment to allow the retention of the 402 existing residential units (which would ensure no tenant displacement), while involving the demolition of most of the existing surface parking areas, tennis and basketball facilities, as well as the existing leasing office and amenity building, pool, and space, and the development of up to ~~324~~ 323¹ new multi-family residential units (apartments) in three buildings as well as two below-grade parking garages.

Page ES-1: **REVISE** the last sentence on page ES-1 of the *Executive Summary* under “Project Overview,” as follows:

The total amount of development at the site would consist of approximately ~~713,161~~ 722,750 square feet (sf), including approximately 310,263 sf of existing uses to remain and approximately ~~402,898~~ 412,487 sf of new uses to be constructed under the Project.

Page ES-1: **REVISE** the first footnote on page ES-1 of the *Executive Summary*, as follows:

As discussed in greater detail in Chapter 2, *Project Description*, and Chapter 3, *Setting, Impacts, and Mitigation Measures*, during the preparation of this Draft EIR but after specified technical reports and quantitative analysis was performed, the applicant decreased the number of residential units being proposed from 329 to ~~324~~ 323 (a reduction of ~~5~~ 6 units), based on input received during City Council study sessions. This Executive Summary and Chapters 1 and 2 reflect the current proposal of ~~324~~ 323 units. Chapter 3, however, refers to and evaluates 329 net new residential units in the impacts analysis consistent with the quantitative analysis and technical reports that were already prepared. In addition, the total square footage identified for the new residential units throughout this Draft EIR is still based on 329 units, and will decrease incrementally when the site plans are finalized for the Project to reflect a maximum of ~~324~~ 323 new units. The decrease of ~~5~~ 6 residential units would not result in any changes to the environmental analysis, as discussed in detail in Chapter 3.

Page ES-2: **REVISE** footnote number 2 on page ES-2 of the *Executive Summary*, as follows:

This square footage is expected to decrease incrementally due to the reduction in units from 329 to ~~324~~ 323 (refer to Footnote 1), as explained in greater detail in Chapter 2.

Page 1-1: **REVISE** the third sentence in the first paragraph of Chapter 1, *Introduction*, as follows:

The Project proposes an amendment to the Mountain View 2030 General Plan (General Plan) to allow retention of the 402 residential units, ensuring no tenant displacement, but demolition of surface parking areas, tennis and basketball facilities, a leasing office and amenity building, pool, and spa, followed by development of up to ~~324~~ 323¹ new multi-family residential units (apartments) in three buildings as well as two below-grade parking garages.

Page 1-1: **REVISE** the second-to-last sentence in the first paragraph on page 1-1 of Chapter 1, *Introduction*, as follows:

Upon Project completion, the total amount of development at the site would have an area of approximately ~~713,161~~ 722,750 square feet, including the approximately 310,263 square feet of existing uses to remain at the Project site and the approximately ~~402,898~~ 412,487 square feet of new uses to be constructed under the Project.

Page 1-1: **REVISE** footnote number 1 in Chapter 1, *Introduction*, as follows:

The original development application for the Project reflected a maximum of 334 new residential units; subsequently, the Project's design was further refined, which resulted in a nominal reduction in the number of units (from 334 to 329). As discussed in Chapter 2, *Project Description*, and Chapter 3, *Setting, Impacts, and Mitigation Measures*, during preparation of this Draft EIR, but after completion of specified quantitative analysis and technical reports, the applicant reduced the proposed number of new residential units from 329 to ~~324~~ 323 units based on input received during City Council study sessions. Chapter 2, *Project Description*, reflects the current proposal of up to ~~324~~ 323 net new residential units, while Chapter 3 analyzes impacts associated with 329 net new residential units consistent with the quantitative analysis and technical reports that were already prepared, and thus, reflects a more conservative analysis of impacts than what is proposed. In addition, the total square footage identified for the new residential units throughout this Draft EIR is still based on 329 net new units, and will decrease very slightly when site plans are finalized for the Project to reflect the ~~324~~ 323 net new units. The decrease of ~~5~~ 6 residential units, and associated reduction in square footage, does not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Page 1-1: **REVISE** footnote number 2 in Chapter 1, *Introduction*, as follows:

This square footage will be slightly less based on the reduction from 329 units to ~~324~~ 323 units. See Footnote 1.

Page 2-1: **REVISE** the second paragraph of Chapter 2, *Project Description*, under Section 2.1, Project Overview, as follows:

The Project proposes construction of up to ~~324~~ 323 new residential units (apartments) in three buildings as well as two below-grade parking garages. Of these units, up to 49 units would be affordable. The original development application for the Project reflected a maximum of 334 new residential units, and this was reduced to 329 units. Based on input received during City Council study sessions, the applicant reduced the number of units from 329 to ~~324~~ 323. This change occurred after completion of specified quantitative analysis and technical reports that were based on 329 units. As a result, Chapter 3 analyzes impacts associated with 329 net new residential units consistent with the quantitative analysis and technical reports that were already prepared. and thus reflects a more conservative analysis of impacts than what is proposed. In addition, the total square footage identified for the new residential units throughout this Draft EIR is still based on 329 units, and will decrease incrementally when site plans are finalized for the Project to reflect up to ~~324~~ 323 units. The decrease of ~~5~~ 6 residential units, and associated reduction in square footage, does not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Page 2-1: **REVISE** the second sentence in the third paragraph of Chapter 2, *Project Description*, under Section 2.1, Project Overview, as follows:

The General Plan amendment would allow the Project to retain the existing 402 residential units, ensuring no tenant displacement, but allow for the demolition of surface parking areas, tennis and basketball facilities, a leasing office and amenity building, pool, and spa, and then development of up to ~~324~~ 323 new multi-family residential units (apartments) in three buildings as well as two below-grade parking garages.

Page 2-1: **REVISE** the first sentence in the fourth paragraph of Chapter 2, *Project Description*, under Section 2.1, Project Overview, as follows:

Upon Project completion, the total amount of development at the site would have an area of approximately ~~713,161~~ 722,750 square feet, including the approximately 310,263 square feet of existing uses to remain at the Project site and the approximately ~~402,898~~ 412,487 square feet of new uses to be constructed under the Project.

Page 2-7: **REVISE** the first two sentences in the first paragraph of Chapter 2, *Project Description*, under Section 2.5, Proposed Project, as follows:

The Project proposes to retain the 402 existing residential units to ensure no displacement of existing tenants; demolish most of the surface parking areas, tennis and basketball facilities, a leasing office and amenity building, pool, and spa; and construct up to ~~324~~ 323 new multi-family residential units within two new buildings on the 14.5-acre Project site. Including the existing residential units that would be retained and the proposed residential units that would be constructed, there would be a total of up to ~~726~~ 725 residential units at the Project site.

Page 2-7: **REVISE** the last sentence in the first paragraph of Chapter 2, *Project Description*, under Section 2.5, Proposed Project, as follows:

Upon Project completion, development at the site would total approximately ~~713,161~~ 722,750 square feet, including approximately 310,263 square feet within the existing uses that would remain at the Project site and approximately ~~402,898~~ 412,487 square feet of new uses to be constructed under the Project.

Page 2-7: **REVISE** the fifth footnote on page 2-7 of Chapter 2, *Project Description*, as follows:

The total square footage identified for the new residential units throughout this Draft EIR is still based on 329 units and will decrease incrementally when site plans are finalized for the Project to reflect up to ~~324~~ 323 units. The decrease of ~~5~~ 6 residential units, and associated reduction in square footage, does not result in any substantive changes to the environmental impact analysis or conclusions, as discussed in detail in Chapter 3.

Page 2-8: **REVISE** the fourth sentence in the first paragraph on p. 2-8 of Chapter 2, *Project Description*, as follows:

The ~~324~~ 323 new residential units are anticipated to consist of 9 studios, ~~153~~ 150 one-bedroom units, ~~136~~ 130 two-bedroom units, and ~~26~~ 34 three-bedroom units, based on currently available information, although the ultimate unit mix would be determined as part of the final design process.

Page 2-8: **REVISE** the sixth footnote on p.2-8 of Chapter 2, *Project Description*, as follows:

The City's Below Market Rate Housing Program requires that 15 percent of new residential units (~~324~~ 323) be reserved as affordable units, which equates to a total of ~~48.6~~ 48.5 units. The applicant would reserve and deed 49 of the ~~324~~ 323 units as "affordable" as required by the City's Below Market Rate Housing Program.

Page 2-10: **REVISE** Table 2-1, Project Features, of Chapter 2, *Project Description*, as follows:

Feature	Block B	Block A	Areas Containing Existing Units	Block C	Park Parcel	Total (approx.)
<i>Existing Uses to Remain</i>						
Residential Units	0	0	402	0	0	402
Residential Area (square feet)	0	0	310,263	0	0	310,263
Common Open Space (square feet)	0	0	56,914	0	0	56,914
Vehicle Parking Spaces	0	0	28	0	0	28
<i>Existing Uses to Be Demolished</i>						
Leasing/Amenity Area (square feet)	0	(7,493)	0	0	0	(7,493)
Common Open Space (square feet)	(8,926)	(44,145)	0	(22,958)	(44,160)	(120,189)
Vehicle Parking Spaces	(197)	(16)	0	(305)	(124)	(642)
	(2.2 acres)	(0.1 acre)		(3.5 acres)	(1.3 acres)	(7.1 acres)
<i>Proposed Uses</i>						
Residential Units	111	0	0	213,212	0	324,323
Residential Area (square feet)	145,091	0	0	236,452	0	381,543
	<u>153,805</u>			<u>237,327</u>		<u>391,132</u>
Leasing/Amenity Area (square feet)	8,714	9,250	0	3,391	0	21,355
Common Open Space (square feet)	17,675	24,278	0	46,607	0	88,560
Private Open Space (square feet)	6,364	0	0	12,499	0	18,863
				<u>12,154</u>		<u>18,518</u>
Dedication for a future public park (acres)	0	0	0	0	1.3	1.3
Vehicle Parking Spaces	171,167	363	0	425,412	0	959,942
<i>Total Uses (Including Existing Uses to Remain plus Proposed Uses)</i>						
Residential Units	111	0	402	213,212	0	726,725
Residential Area (square feet)	145,091	0	310,263	236,452	0	691,806
	<u>153,805</u>			<u>237,327</u>		<u>701,395</u>
Leasing/Amenity Area (square feet)	8,714	9,250	0	3,391	0	21,355
Common Open Space (square feet)	17,675	24,278	56,914	46,607	0	145,474
Private Open Space (square feet)	6,364	0	0	12,499	0	18,863
				<u>12,154</u>		<u>18,518</u>
Dedication for a future public park (acres)	0	0	0	0	1.3	1.3
Vehicle Parking Spaces	171,167	363	28	425,412	0	987,970
Total Residential Area + Leasing/Amenity Area Uses (square feet)						713,161
						<u>722,750</u>
Source: BDE Architecture, 2020 <u>2021</u> .						

Page 2-11: **REVISE** the third paragraph of Chapter 2, *Project Description*, under Section 2.5.1, Proposed Development and Site Plan, as follows:

The proposed development on Block B would include a total of 111 new residential units within a four-story, ~~52~~ 54-foot-tall building and one level of below-grade parking (Figure 2-4). The proposed development on Block A would include a new one-story, 22-foot-tall leasing office and related amenity building and three levels of below-grade parking (Figure 2-5). The 15 existing 40-foot-tall residential buildings would be retained, with the applicant performing minor enhancements to the exteriors of the buildings (e.g., repainting, applying wood-like tiles) as part of the Project (Figure 2-6). The proposed development on Block C would include a total of ~~218~~ 212 residential units within a four-story, ~~52~~ 54-foot-tall building and two levels of below-grade parking (Figure 2-7). Proposed site cross-sections, which show the Project components proposed for each level of the buildings on Blocks B, A, and C, are shown in Figures 2-8a, 2-8b, and 2-8c, respectively.

Page 2-19: **REVISE** the last paragraph of Chapter 2, *Project Description*, under Section 2.5.2, General Plan Amendment, as follows:

Furthermore, a Vesting Tentative Map for Condominium Purposes and Development Review Permit to allow construction of ~~324~~ 323 new residential units and related improvements would be pursued. Additional required approvals from the City and other agencies are identified in Table 2-2 in Section 2.7, *Required Permits and Approvals*.

Page 2-20: **REVISE** the first paragraph on page 2-20 of Chapter 2, *Project Description*, as follows:

The Project would include a total of approximately ~~987~~ 970 vehicle parking spaces, consisting of approximately 159 spaces in the below-grade garage and approximately ~~128~~ surface parking spaces on Block B, approximately 341 spaces in the below-grade garage and approximately 22 surface parking spaces on Block A, approximately ~~425~~ 412 spaces in the below-grade garage of Block C, and the approximately 28 existing spaces that would be retained. A total of approximately 43 spaces would be reserved for Americans with Disabilities Act- (ADA-) compliant accessible vehicles, in accordance with applicable statutory requirements. Within the below-grade parking garages of the new residential buildings, spaces would be reserved for personal storage areas in accordance with applicable Code requirements.

Page 2-20: **REVISE** the second sentence in the first paragraph of Chapter 2, *Project Description*, under Section 2.5.4, *Amenities*, as follows:

In terms of on-site open space, including the existing 56,914 square feet of common open space that would remain in the areas containing the existing residential units, there would be a total of approximately 145,474 square feet of common usable open space and a total of approximately ~~18,863~~ 18,518 square feet of private open space upon Project completion.

Page 2-22: **REVISE** the sixth sentence in the second paragraph of Chapter 2, *Project Description*, under Section 2.5.4, *Amenities*, as follows:

In addition, the Project would include transit-related amenities (e.g., bicycle repair stations, delivery storage spaces, real-time transit information, on-site carshare spaces), as described further below and detailed in the Project's proposed transportation demand management (TDM) program (Nygaard 2020~~1~~).¹

Page 2-22: **REVISE** the last sentence in the second paragraph of Chapter 2, *Project Description*, under Section 2.5.5, *Landscaping and Heritage Trees*, as follows:

There are 417 existing trees on the Project site. Of these, 255 meet the City's criteria for Heritage Trees. It is anticipated that a total of approximately 246 trees would remain in their current location (including 158 Heritage Trees); 36 trees would be transplanted on-site (including 35 Heritage Trees); and 135 trees would be removed (including 62 Heritage Trees). None of the trees and shrubs within the Caltrans right-of-way along SR 85 adjacent to the Project site would be removed and any trees on the SR 85 side of the Caltrans sound wall would remain.

Page 2-22: **REVISE** the third paragraph of Chapter 2, *Project Description*, under Section 2.5.5, *Landscaping and Heritage Trees*, as follows:

The Project would retain portions of the existing landscaping in the areas containing the existing residential units and include new landscaping along the remaining perimeter of the Project site, between each of the buildings and within each courtyard. In addition to the approximately 282 trees that would remain on site, the Project would plant approximately 197 trees at the Project site. The City will require, as a Condition of Approval, that 75 percent of all new trees and plantings on the site will be native species. As required by the City, most new trees that would be planted on-site would be in the Low Water Use category, in accordance with the Water Use Classifications of Landscape Species (WUCOLS). Many of these new trees would be evergreen, allowing for year-round shade and screening of the Project site. All planted areas (both new and retained) would be watered with an approved automatic irrigation system to make efficient use of water through conservation techniques and comply with applicable provisions of the City's and state's Water Conservation in Landscaping Regulations, adopted in July 2010, and the Green Building Code, adopted in March 2011.

Page 3-2: **REVISE** the first paragraph on page 3-2 in Chapter 3, *Setting, Impacts, and Mitigation Measures*, as follows:

As described in Chapter 2, *Project Description*, the original development application for the Project reflected a maximum of 334 new residential units; subsequently, the Project's design was further refined, which resulted in a nominal reduction in the number of units (from 334 to 329). During the preparation of this Draft EIR, and after specified quantitative analysis and technical reports were prepared, the applicant reduced the Project's residential net new units by ~~5-6~~ units, from 329 to ~~324~~ 323 based on input received during Environmental Planning Commission and City Council study

¹ Please note that the *555 West Middlefield Road Transportation Demand Management Plan* prepared by Nelson Nygaard was updated after the release of the Draft EIR. The amended July 2021 transportation demand management plan is attached to this Final EIR as Appendix FEIR-1.

sessions. Thus, the proposed Project is up to ~~324~~ 323 net new units, with up to 49 of those units as affordable units, as reflected in Chapter 2, *Project Description*. In addition, the total square footage identified for the new residential units throughout this Draft EIR is still based on 329 net new units and will decrease incrementally when site plans are finalized for the Project to reflect up to ~~324~~ 323 net new units. Chapter 3 analyzes impacts associated with 329 net new residential units consistent with the quantitative analysis and technical reports that were already prepared, and thus, reflects a more conservative analysis of impacts than what is proposed. The decrease of ~~5~~ 6 residential units, and associated reduction in square footage, does not result in any material changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall proposed duration of construction, construction schedule, construction intensity, and building footprint all remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth (e.g., Population and Housing, Public Services, and Utilities) present a conservative approach because they analyze ~~5~~ 6 more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantively alter the environmental impact analysis or conclusions set forth herein.

Page 3.1-9: **REVISE** the first four sentences in the third paragraph under “Operation” in Section 3.1, *Aesthetics*, as follows:

The development on proposed Block B would include a four-story, ~~52~~ 54-foot-tall building and one level of below-grade parking. The development on proposed Block A would include a new one-story, 22-foot-tall leasing office and related amenity building with three levels of below-grade parking as well as the 15 existing 40-foot-tall residential buildings. The new building on proposed Block C would be four stories tall (~~52~~ 54 feet) and have two levels of below-grade parking. The maximum height of the proposed buildings would be ~~52~~ 54 feet, which would be greater than the height of the existing buildings, and the new buildings would add density to the area.

Page 3.1-9: **REVISE** the fourth sentence in the last paragraph on p.3.1-9 in Section 3.1, *Aesthetics*, as follows:

The Project includes a landscape plan to compensate for the removal of existing trees and vegetation and enhance the overall aesthetic appearance of the proposed development. There are 417 trees on the Project site, 255 of which meet the City’s criteria for Heritage Trees. It is anticipated that approximately 246 trees would remain at their current locations, including 158 Heritage Trees; 36 trees would be transplanted on-site, including 35 Heritage Trees; and 135 trees would be removed, including 62 Heritage Trees. None of the trees and shrubs within the Caltrans right-of-way along SR 85 adjacent to the Project site would be removed and any trees on the SR 85 side of the Caltrans sound wall would remain. The Project would retain portions of the existing landscaping in areas containing the existing residential units and include new landscaping along the remaining perimeter of the Project site, between each of the buildings and within each courtyard.

Page 3.7-23: **REVISE** the second sentence in the first paragraph under conclusion in Section 3.7, *Greenhouse Gas Emissions*, as follows:

The Project would gain approximately 62 net trees on-site and therefore would be consistent with the scoping plan's overall goal of avoiding losses in carbon sequestration. Given the regional nature of GHG emissions and dispersal, along with the physical location of land uses near the Project site as well as the presence of trees within the vicinity of the Project site, the removal and temporary loss of trees on the Project site and along the SR 85 site frontage as a result of the Project is not anticipated to result in a quantifiable and material change in GHG emissions in the overall site area. Similarly, the Project's sustainability measures represent a robust suite of strategies that would be consistent with applicable policies from the 2017 Climate Change Scoping Plan and other regulatory programs for the area, energy, water, waste, and land use sectors. With respect to mobile sources, the Project would achieve the City's VMT reduction target, which would ensure that the Project would be consistent with relevant regulatory programs, such as SB 743, that expressly aim to reduce VMT, consistent with the state's climate change goals. Therefore, GHG impacts would be less than significant.

Page 3.3-18: **REVISE** the third sentence in the first paragraph under Discussion in Section 3.3, *Biological Resources*, as follows:

There are approximately 417 trees on the Project site, including approximately 255 on-site Heritage Trees regulated by the City of Mountain View (HortScience 2016, 2018, 2019). It is anticipated that a total of approximately 246 trees would remain in their current location (including 158 Heritage Trees); 36 trees would be transplanted on-site (including 35 Heritage Trees); and 135 trees would be removed (including 62 Heritage Trees). None of the trees and shrubs within the Caltrans right-of-way along SR 85 adjacent to the Project site would be removed and any trees on the SR 85 side of the Caltrans sound wall would remain. The trees that would be removed as part of the Project and an indication of whether each tree species is considered native or non-native, are presented in Table 3.3-3.

Page 3.8-17: **REVISE** the second-to-last sentence in the first paragraph under Impact HAZ-5 in Section 3.8, *Hazards and Hazardous materials*, as follows:

The maximum height of the proposed buildings would be ~~52~~ 54 feet, which would be greater than the height of the existing buildings, but still well below the 182-foot height restriction for the Project site.

Page 3.10-4: **REVISE** the sentence in the first paragraph under Impact LUP-1 in Section 3.10, *Land Use and Planning*, as follows:

The proposed buildings would be ~~52~~ 54-feet-tall.

Page 3.11-28: **REVISE** the fourth sentence in the first paragraph on p. 3.11-28 in Section 3.11, *Noise*, as follows:

As indicated in the Project landscape plan, (Figure 2-9), only certain trees currently located between the Project site and SR 85 would be removed, with other trees remaining in this area and new trees being planted on the Project site. None of the

trees and shrubs within the Caltrans right-of-way along SR 85 adjacent to the Project site would be removed and any trees on the SR 85 side of the Caltrans sound wall would remain. In addition, new structures constructed by the Project would provide additional shielding and noise reduction at residences located both on the Project site and to the south of the Project site. Given these circumstances, the removal of certain existing trees is not expected to perceptibly increase noise at these locations from SR 85.

Page 3.12-5: **REVISE** the second footnote on page 3.12-5 in Section 3.12, *Population and Housing*, as follows:

As described in Chapter 3, *Setting, Impacts, and Mitigation Measures*, subsequent to the preparation of this Draft EIR, based on input received during City Council study sessions, the number of new residential units associated with Project would decrease by ~~5-6~~, from 329 to ~~324~~ 323 units. This chapter analyzes 329 net new residential units despite Chapter 2 reflecting the current proposal of ~~324~~ 323 net new residential units. The decrease of ~~5-6~~ residential units would not result in any changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall duration of construction, construction schedule, construction intensity, and building footprint all would remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth present a conservative approach because they analyze ~~5-6~~ more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantively alter the environmental impact analysis or conclusions set forth herein.

Page 3.13-10: **REVISE** the third footnote on page 3.13-10 in Section 3.13, *Public Services and Recreation*, as follows:

As described in Chapter 3, *Setting, Impacts, and Mitigation Measures*, subsequent to the preparation of this Draft EIR, based on input received during City Council study sessions, the number of new residential units associated with Project would decrease by ~~5-6~~, from 329 to ~~324~~ 323 units. This chapter analyzes 329 net new residential units despite Chapter 2 reflecting the current proposal of ~~324~~ 323 net new residential units. The decrease of ~~5-6~~ residential units would not result in any changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall duration of construction, construction schedule, construction intensity, and building footprint all would remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth (e.g., increase in service calls, student generation, increase in park and library usage) present a conservative approach because they analyze ~~5-6~~ more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantively alter the environmental impact analysis or conclusions set forth herein.

Page 3.13-17: **REVISE** the fourth footnote on page 3.13-17 in Section 3.13, *Public Services and Recreation*, as follows:

As described in Chapter 3, *Setting, Impacts, and Mitigation Measures*, subsequent to the preparation of this Draft EIR, based on input received during City Council study sessions, the number of new residential units associated with the Project would decrease by ~~56~~, from 329 to ~~324~~ 323 units. This chapter analyzes 315 net new residential units despite Chapter 2 reflecting the current proposal of 315 net new residential units. The decrease of ~~56~~ residential units would not result in any changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall duration of construction, construction schedule, construction intensity, and building footprint would all remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth (e.g., service ratios or response times) present a conservative approach because they analyze ~~56~~ more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantially alter the environmental impact analysis or conclusions set forth herein.

Page 3.14-13: **REVISE** the second footnote on page 3.14-13 in Section 3.14, *Transportation and Circulation*, as follows:

As described in Chapter 3, *Setting, Impacts, and Mitigation Measures*, subsequent to the preparation of this Draft EIR, based on input received during City Council study sessions, the number of new residential units associated with Project would decrease by ~~56~~, from 329 to ~~324~~ 323 units. This chapter analyzes 329 net new residential units despite Chapter 2 reflecting the current proposal of ~~324~~ 323 net new residential units. The decrease of ~~56~~ residential units would not result in any changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall duration of construction, construction schedule, construction intensity, and building footprint all would remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth (e.g., trip generation) present a conservative approach because they analyze ~~56~~ more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantively alter the environmental impact analysis or conclusions set forth herein.

Page 3.16-7: **REVISE** the first footnote on page 3.16-7 in Section 3.16, *Utilities and Service Systems*, as follows:

As described in Chapter 3, *Setting, Impacts, and Mitigation Measures*, subsequent to the preparation of this Draft EIR, based on input received during City Council study sessions, the number of new residential units associated with Project would decrease by ~~56~~, from 329 to ~~324~~ 323 units. This chapter analyzes 329 net new residential units despite Chapter 2 reflecting the current proposal of ~~324~~ 323 net new residential units. The decrease of ~~56~~ residential units would not result in any changes to the environmental analysis, including impact conclusions and mitigation measures, primarily because the overall duration of construction, construction schedule,

construction intensity, and building footprint all would remain the same. In addition, assumptions used in the analysis of operational-related topics for impacts resulting from population growth (e.g., water usage, wastewater generation, and solid waste generation) present a conservative approach because they analyze ~~5~~ 6 more units than what is currently proposed under the Project. Thus, the minor reduction in the number of units and residents that would be generated by the Project does not substantively alter the environmental impact analysis or conclusions set forth herein.

Page 3.3-17: **REVISE** the second paragraph under Section 3.3.4.4 in Chapter 3, *Setting, Impacts, and Mitigation Measures*, as follows:

Migratory bird and raptor species, ~~such as American crow~~, could use the trees in and adjacent to the Project site for nesting. Active migratory bird nests are regulated by the MBTA and Sections 3503 and 3503.5 of the California Fish and Game Code. If construction were to begin during the nesting season (~~January 1 February 1~~ to August 31), construction activities could disturb active nests of migratory birds at and/or adjacent to the Project site, which would be a significant impact. The Project would also be required to adhere Standard Condition of Approval PL-206 (Preconstruction Nesting Bird Survey) (effective December 15, 2020) (see full condition of approval below), which requires, to the extent practicable, that vegetation removal and construction activities be performed from September 1 through ~~January~~ December 31 to avoid the general nesting period for birds. Otherwise, preconstruction surveys are required to be performed. Adherence to Standard Condition of Approval PL-206 would ensure that the Project would not disturb any active nests during construction. Therefore, this impact would be less than significant. No mitigation is required.

Page 3.3-17 **REVISE** the third and fourth paragraphs under Section 3.3.4.4 in Chapter 3, *Setting, Impacts, and Mitigation Measures*, as follows:

Standard Conditions of Approval

- PL-206: Preconstruction Nesting Bird Survey. To the extent practicable, vegetation removal and construction activities shall be performed from September 1 through ~~January~~ December 31 to avoid the general nesting period for birds. If construction or vegetation removal cannot be performed during this period, preconstruction surveys will be performed no more than two days prior to construction activities to locate any active nests as follows:

The applicant shall be responsible for the retention of a qualified biologist to conduct a survey of the project site and surrounding 500' for active nests—with particular emphasis on nests of migratory birds and raptors—if construction (including site preparation) will begin during the bird nesting season, from ~~January 1 February 1~~ through August 31.

Page 3.3-18: **REVISE** the paragraph under Table 3.3-3 in Section 3.3.4.4 in Chapter 3, *Setting, Impacts, and Mitigation Measures*, as follows:

As discussed above, the Project would be required to adhere to the Standard Conditions of Approval (effective December 15, 2021). The following standard conditions apply to trees: PL-133 (Trees and Landscaping), PL-134 (Landscaping), PL-136 (Certification), PL-137 (Street Tree), PL-138 (Arborist Report), PL-139 (Arborist Inspections), PL-140 (Monthly Arborist Inspections), PL-143 (Implementation), PL-144 (Replacement), PL-147 (Tree Protection Measures), PL-148 (Tree Mitigation and Preservation Plan), PL-149 (Security Bond), PL-150 (Security Deposit), PL-151 (Irrevocable Damage to Heritage Trees), PL-152 (Relocation), PL-153 (Off-Site Mitigation), and PL-154 (Replacement Fee) (see full conditions of approval below). In addition, the City will require, as a Condition of Approval, that 75 percent of all new trees and plantings on the site will be native species.

Page 3.7-19: **REVISE** the second paragraph on page 3.7-19 under Section 3.7.4.3 in Chapter 3, *Impacts and Mitigation Measures*, as follows:

Because BAAQMD's screening criteria do not apply, GHG emissions from motor vehicles were evaluated using CalEEMod and trip generation rates from the Project's trip generation analysis. Default trip lengths from CalEEMod were also used, as were area, energy, water, and waste emissions for the existing land uses. For the Project land uses, Project-specific energy, water, and waste data were used to calculate emissions for these sectors. Area sources include gasoline- and diesel-fired landscaping equipment. Energy sources include natural gas use and off-site electricity generation. For this Project analysis, it was conservatively assumed that no onsite photovoltaic solar panels would be installed to offset off-site electricity demand. Water consumption results in indirect GHG emissions from the conveyance and treatment of water. Waste generation results in fugitive CH₄ and N₂O emissions from the decomposition of organic matter.

Page 3.7-29: **REVISE** the first paragraph on page 3.7-29 under Section 3.7.4.3 in Chapter 3, *Impacts and Mitigation Measures*, as follows:

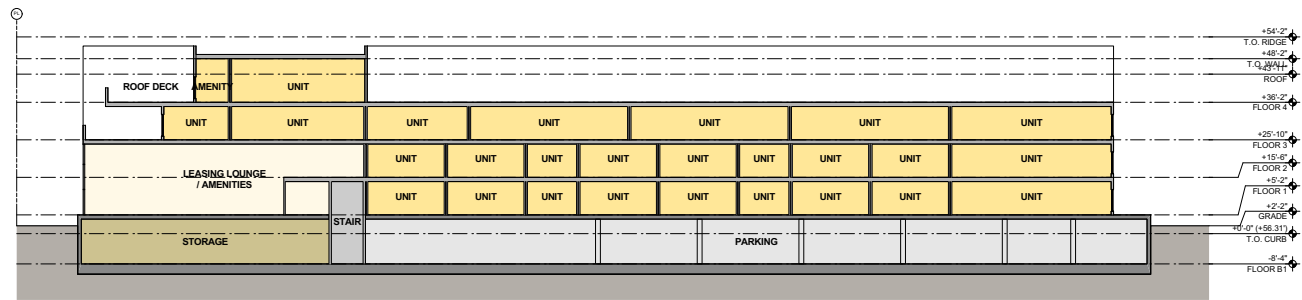
As shown in Table 3.7-9, the Project would be consistent with all applicable measures in the City's GGRP. Eleven of the measures are not applicable to the Project; therefore, consistency with these measures does not apply. Because the Project is consistent with all applicable CAP measures, it would not conflict with the City's GGRP. However, per the Mountain View Green Building Code, the Project would be required to install photovoltaic solar panels on 50 percent of Project roof area and this will be a City Condition of Approval.

Page 3.7-31: **REVISE** the first paragraph on page 3.7-31 under Section 3.7.4.3 in Chapter 3, *Impacts and Mitigation Measures*, as follows:

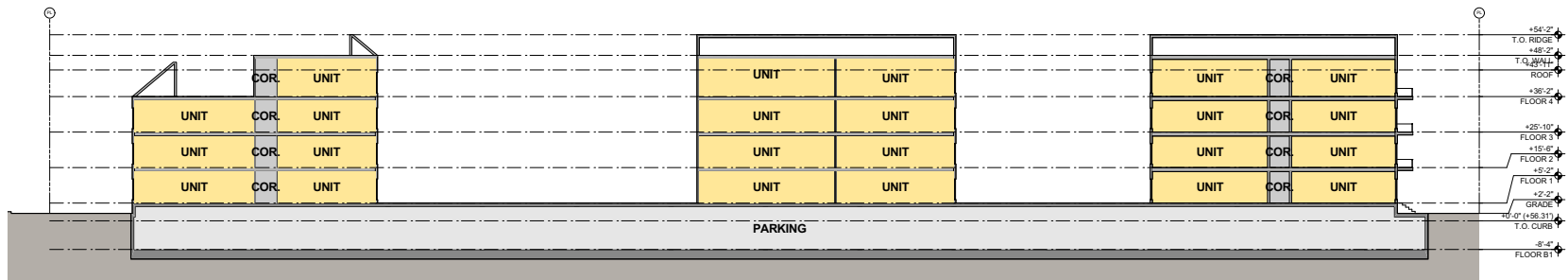
Standard Conditions of Approval

- PL-127: Green Building – Residential New Construction. The project is required to meet the mandatory measures of the California Green Building Standards Code and meet the intent of GreenPoint Rated points. All mandatory prerequisite points and minimum point totals per category to attain GreenPoint Rated status must be achieved, unless specific point substitutions

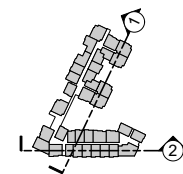
or exceptions are approved by the Community Development Department. Formal project registration and certification through Build It Green is not required for compliance with the Mountain View Green Building Code (MVGBC). The project is also required to comply with Title 24, Part 6. In addition, the Project would be required to install photovoltaic solar panels on 50 percent of Project roof area.



SECTION 2



SECTION 1

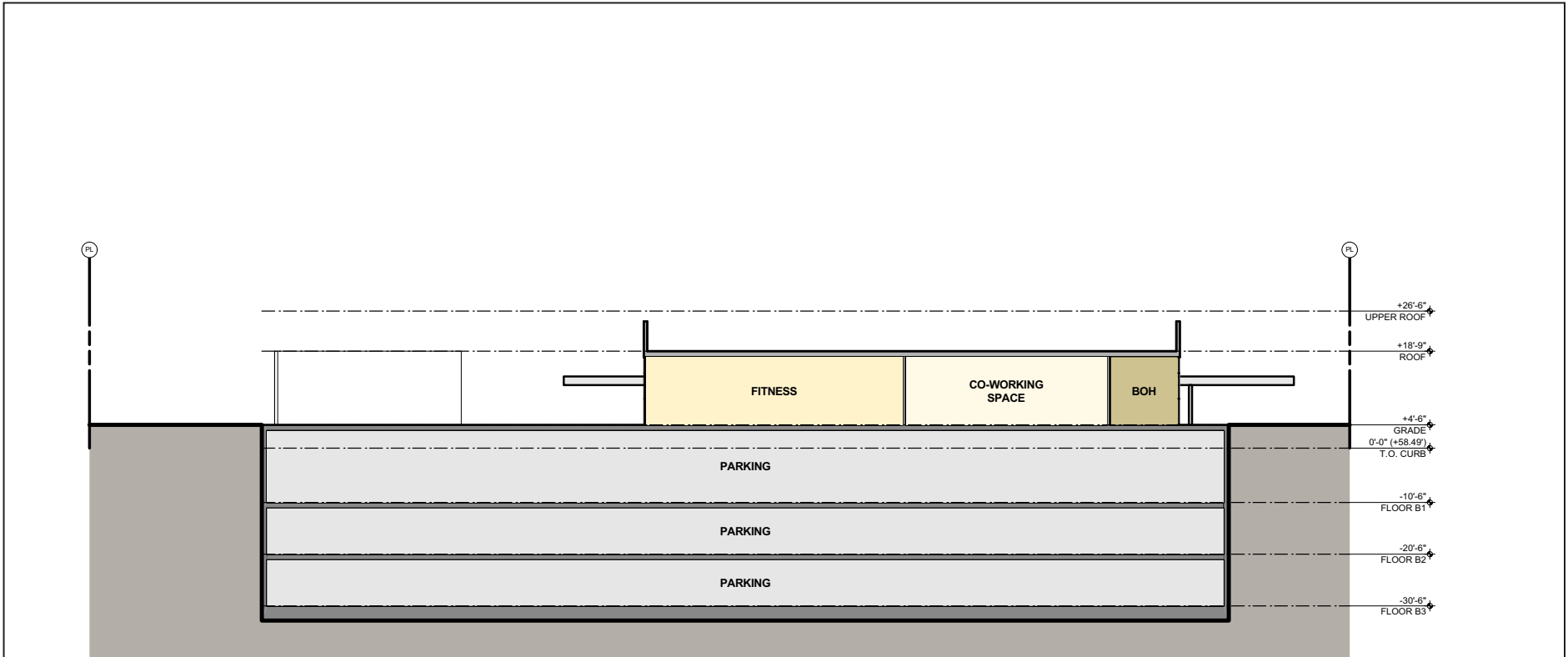


ICF Graphics...00214.20 (8/31/21).AB

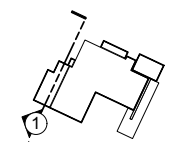
BDE Architecture, 2021.



Figure 2-8a
 Revised Proposed Site Cross-Section (Proposed Block B)
 555 West Middlefield Road



SECTION 1

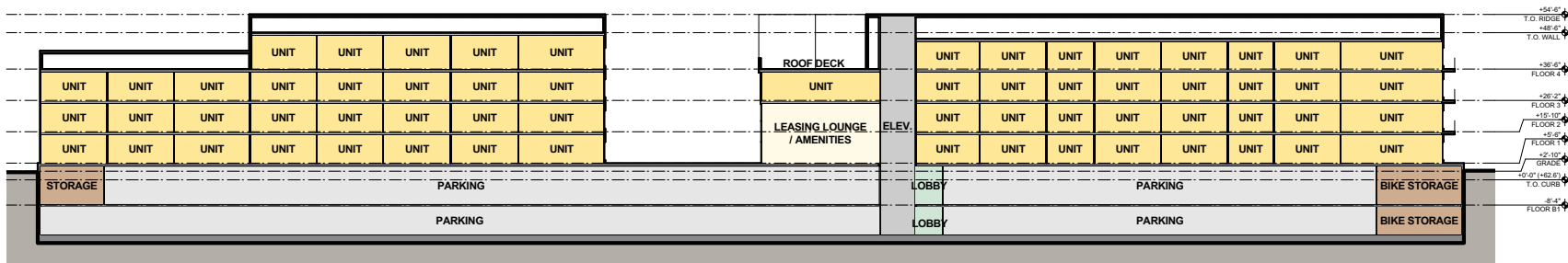


ICF Graphics...00214.20 (8/31/21) A8

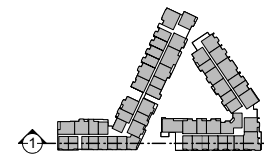
BDE Architecture, 2021.



Figure 2-8b
Revised Proposed Site Cross-Section (Proposed Block A)
 555 West Middlefield Road



SECTION 1



ICF Graphics...00214_20 (8/31/21).AB

BDE Architecture, 2021.



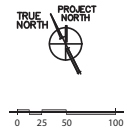
Figure 2-8c
Revised Proposed Site Cross-Section (Proposed Block C)
 555 West Middlefield Road



--- PROJECT SITE
 N.A.P. Not a part of the project

EXISTING LANDSCAPE TO BE PROTECTED IN PLACE
 NEW PROPOSED LANDSCAPE

EXISTING TREES TO BE PROTECTED IN PLACE
 RELOCATED TREES
 NEW PROPOSED TREES



Cypress Point Dr

ICF Graphics...00214.2018/24/21) AB

BDE Architecture, 2021.



Figure 2-9
Revised Proposed Landscape Plan
 555 West Middlefield Road

Copies of the Comment Letters Received on the Draft EIR

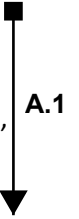
The original comment letters received regarding the Draft Environmental Impact Report are provided on the following pages:

Letter A

From: Ayon, Llisel@DOT <Llisel.Ayon@dot.ca.gov>
Sent: Wednesday, August 11, 2021 9:36 AM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: 555 West Middlefield - Caltrans Comments

Hello Diana,

Thank you for including Caltrans in the review process for the 555 West Middlefield Project. Please see the attached letter for our comments on the DEIR. If you need any additional information or clarification on any of these comments, please feel free to email me at this address or call me at the phone number listed below.



Thank you,

Llisel Ayon
Associate Transportation Planner
Local Development - Intergovernmental Review
California Department of Transportation – District 4
Cell: (510) 506-6184



California Department of Transportation



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

August 12, 2021

SCH #: 2019070252
GTS #: 04-SCL-2019-00920
GTS ID: 16357
Co/Rt/Pm: SCL/85/23.244

Diana Pancholi, Senior Planner
City of Mountain View
500 Castro Street
Mountain View, CA 94039

Re: 555 West Middlefield Road Project Draft Environmental Impact Report (DEIR)

Dear Diana Pancholi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 555 West Middlefield Road Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the June 2021 DEIR.

A.1
Con't

Project Understanding

The proposed project would demolish existing parking and facilities on site to construct an additional 324 multi-family residential units with two below-grade parking garages. This approximately 14.5-acre project site is located west of State Route (SR)-85 at the intersection of West Middlefield Road and Moffett Boulevard in the City of Mountain View.

Travel Demand Analysis

Caltrans commends the City's effort to implement Transportation Demand Management (TDM) measures to reduce resident-based Vehicle Miles Traveled (VMT). The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR and TRA-2, this project is found to have Less than Significant impacts, therefore working towards meeting the State's VMT reduction goals. Caltrans acknowledges the mitigation and TDM strategies incorporated into the DEIR and supports the implementation and monitoring of these strategies.

A.2

Aesthetics

As requested in Caltrans previous letter dated August 9, 2019, please evaluate the visual impacts of project tree removal and replacement with regards to highway travelers along SR-85. Any trees within state right of way damaged due to construction activities would require replacement per Caltrans Replacement Highway Planting Policy. See the Caltrans Project Development Procedures Manual, Chapter 29 ([link](#)).

A.3

Lead Agency

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

A.4

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

A.5

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the State Right of Way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating the State ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

A.6

To download the permit application and to obtain more information on all required documentation, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Diana Pancholi, Senior Planner
August 12, 2021
Page 3

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon at Llisel.Ayon@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please email LDIGR-D4@dot.ca.gov.

▲
A.6
Con't
■

Sincerely,



MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter B
County of Santa Clara
Parks and Recreation Department



298 Garden Hill Drive
Los Gatos, California 95032-7669
(408) 355-2200 FAX (408) 355-2290
Reservations (408) 355-2201

www.parkhere.org

July 26, 2021

City of Mountain View
Community Development Department
Attn: Diana Pancholi
PO Box 7540
Mountain View, CA 94041

SUBJECT: Notice of Availability of the Draft EIR for the 555 West Middlefield Road Project

Dear Diana Pancholi,

The Santa Clara County Parks and Recreation Department (County Parks Department) has received the Notice of Availability of the Draft EIR for the 555 West Middlefield Road Project (Project).

The County Parks Department functions to provide a sustainable system of diverse regional parks, trails, and open spaces that connects people with the natural environment and supports healthy lifestyles while balancing recreation opportunities with natural, cultural, historic, and scenic resource protection. The County Parks Department is also charged with the planning and implementation of the Santa Clara County Countywide Trails Master Plan Update (Countywide Trails Plan), an element of the Parks and Recreation Section of the County General Plan (adopted by the Board of Supervisors on November 14, 1995). The Countywide Trails Plan indicates the following regional trail route located in the Project vicinity:

Stevens Creek Sub-Regional Trail (S2): a hiking and off-road bicycle route along Stevens Creek, from Stevens Creek County Park to the San Francisco Bay.

The City of Mountain View's segment of the trail in the Project vicinity is complete and located approximately 270 feet east of the Project site, across Highway 85. The County Parks Department recommends that the Final EIR evaluate and address any potential impacts related to the Stevens Creek Trail, including the following:

Air Quality

The Draft EIR states that the Stevens Creek Trail is one of the Air Quality Sensitive Receptors, and that air quality impacts during construction will be significant. The proposed construction duration (May 2023-August 2028) implies that approximately 64 months of significant pollutants, including the primary criteria pollutants reactive organic gas and nitrogen oxides, could circulate in the air and reach the Stevens Creek Trail. This is noted as a significant impact to the natural corridor along Stevens Creek and trail users on the Stevens Creek Trail. Signage and contact information should be provided for trail users during construction, to inform the City of Mountain View or other agencies such as the Bay Area Air Quality Management District of any concerns related to poor air quality along the Stevens Creek Trail.

Board of Supervisors: Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian

County Executive: Jeffrey V. Smith



B.1

B.2

Noise

Noise is considered an environmental pollutant that can interfere with human activities. Any intense noise related to the Project construction may have a significant impact on the natural corridor along Stevens Creek and Stevens Creek Trail users as well. Signage and contact information should be provided for trail users to inform the City of Mountain View or other agencies such as the California Department of Transportation of any concerns related to noise issues along the Stevens Creek Trail.

B.3

The County Parks Department also recommends the City of Mountain View consider any opportunities to improve pedestrian and cycling connections between the Project site and Stevens Creek Trail, to improve public access to regional trails featured in the Countywide Trails Plan.

B.4

Thank you for the opportunity for County Parks Department to provide comments on the Draft EIR for the 555 West Middlefield Road Project. If you have any questions, please email me at kelly.gibson@prk.sccgov.org

B.5

Sincerely,

Kelly Gibson

Kelly Gibson

Assistant Planner



Board of Supervisors: Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian

County Executive: Jeffrey V. Smith

Letter C

From: Swierk, Robert <Robert.Swierk@vta.org>
Sent: Wednesday, August 11, 2021 10:06 AM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Cc: plan.review <plan.review@vta.org>
Subject: 555 West Middlefield Road Project

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

Hello, Diana –

Just writing to let you know that VTA has no comments on the DEIR for the 555 West Middlefield Road Project.

Regards,
Rob

Robert Swierk, AICP
Principal Transportation Planner
Santa Clara Valley Transportation Authority
3331 North First Street, Building B
San Jose, CA 95134-1927
Phone: 408-321-5949

C.1

Letter D

To: Ms. Pancholi

Re: 555 Middlefield Project - EIR Comments

Signatures of Board of Cypress Point Drive Against Block C of Avalon's 555 Middlefield Proposal

I agree that I could NOT vote for Avalon's proposal to take down 129 trees of which 61 are mature heritage trees.

I know the Loma Prieta Chapter of the Sierra Club's Sustainable Land Use Committee also votes NO on Block C.

Trees are a deterrent of the noise pollution from Highway 85 as well as a deterrent of air pollution.

I vote NO ON BLOCK C!

Dorothy Wilson

Karla B. Fortner

Lucy King

Shady Blum

Wendy Wyss

Karen Fontana

Terrie Rayl

Shaily Bhargava

D.1

Letter E

Hi Diana,

It looks like there was an intersection LOS and delay assessment that was done and included in Appendix 3.14-1. I couldn't quite tell if there's a separate appendix related to VMT, but it would be great to get that as well.

Thanks!

From: Kevin Forestieri <kforestieri@mv-voice.com>

Sent: Wednesday, July 28, 2021 4:27 PM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>

Subject: MV Voice - seeking appendices for 555 W. Middlefield Road project

Hi Diana,

This is Kevin Forestieri from the Mountain View Voice. We're interested in writing a story about 555 W. Middlefield Road and the recently released DEIR for the project, and the document references numerous tables and information in the appendices. Could you provide us with a copy or a link to these documents?

Thanks!

--

Kevin Forestieri

kforestieri@mv-voice.com

650-223-6535 (office)

408-857-5042 (cell)

E.1

E.2

Letter F

From: rbankus <rbankus@comcast.net>

Sent: Sunday, August 15, 2021 3:18 PM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>; Kamei, Ellen <Ellen.Kamei@mountainview.gov>; Ramirez, Lucas <Lucas.Ramirez@mountainview.gov>; Abe-Koga, Margaret <Margaret.abe-koga@mountainview.gov>; Hicks, Alison <Alison.Hicks@mountainview.gov>; Lieber, Sally <Sally.Lieber@mountainview.gov>; Matichak, Lisa <Lisa.Matichak@mountainview.gov>; Showalter, Pat <Pat.Showalter@mountainview.gov>; City Council <City.Council@mountainview.gov>; , City Manager <city.mgr@mountainview.gov>; CitymgrPIO@mountainview.gov <CitymgrPIO@mountainview.gov>

Subject: [Sierra Club & Audubon Society comments on DEIR for 555 W. Middlefield Rd.](#)

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

Dear Mountain View City Officials,

Regarding the proposed development project at 555 W. Middlefield Rd, I strongly urge you to oppose the removal of the tree canopy located along Hwy 85 and in close proximity to the Stevens Creek Trail. This canopy provides an important aesthetic and noise reduction barrier between our neighborhood and Hwy 85, and provides habitat for numerous wildlife species that live along Stevens Creek (see attached DEIR document). The removal of these trees will significantly degrade our neighborhood environment.

F.1

Your help with this issue would be greatly appreciated!

Ron Bankus
505 Cypress Point Dr. #277
Mountain View, CA



August 12, 2021

Diana Pancholi, Project Planner
Community Development
City of Mountain View
Via email to: diana.pancholi@mountainview.gov

RE: Comments on the DEIR for 555 W. Middlefield

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the “No Block C” alternative provides a reasonable balance of housing and environmental impact.

F.2

555 Middlefield is proposing to add housing in 3 different locations, using existing surface parking lots to insert additional housing with multi-level underground parking.

Block “C,” however, is very problematic as it has serious impacts. The proposed development here involves removal of every single tree in the existing wide tree buffer that currently exists along Hwy 85 and in close proximity to Stevens Creek Trail. This canopy is part of the unique Stevens Creek habitat corridor that extends from the Bay to the hills.

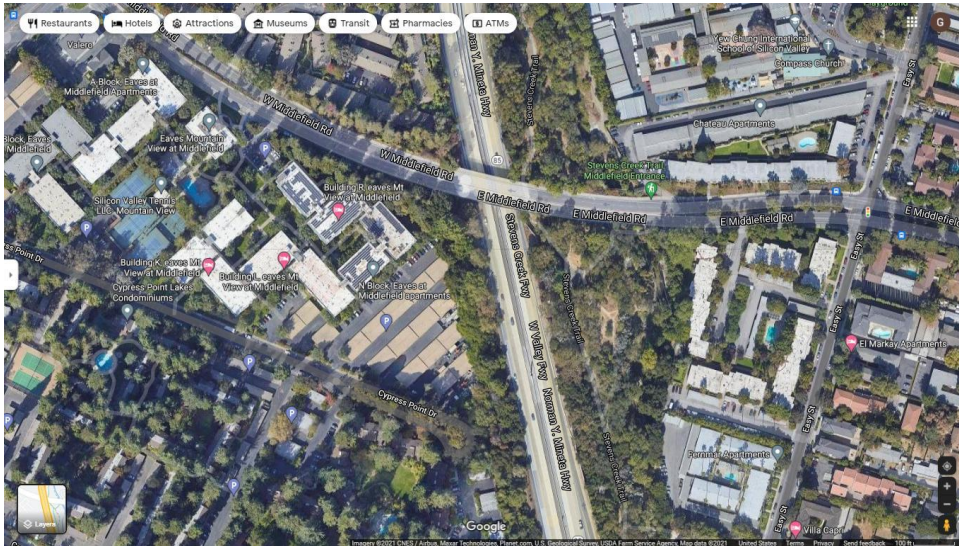
The 80’-100’ wide existing urban canopy will be lost to make place for a four-story building near Hwy 85 along with a strip of new landscaping including a few relocated olive trees.

We are strongly opposed to degradation of the urban canopy along the habitat corridor and the removal of so many trees. We support the alternative of “No Block C” because we oppose removal of the urban canopy along Hwy 85.

F.3

The existing landscaping provides an effective aesthetic barrier to Hwy 85 visually and as a barrier for freeway noise. It also helps to trap airborne toxics, such as particulates from auto exhaust and tire dust, and brake linings dust from the highway. This is important because there is clear evidence of increased incidence and severity of health problems associated with air pollution exposures related to proximity to roadway traffic.

In addition, the tree canopy is part of an important unique habitat corridor, along Stevens Creek, from the Bay to the hills. Many resident and migratory bird species, as well as mammals, including bats, amphibian life and insect pollinators, use this corridor to travel between rich habitat patches.



View showing Stevens Creek Habitat Corridor at the site along Hwy 85.



Typical view of existing tree canopy along Hwy 85, seen from the site, part of a critical habitat corridor extending from the Bay to the hills. The project proposes clear cutting of all the trees along Hwy 85 to make room for a new building close to Hwy 85.

F.3
Con't



Excerpt from Drawing L.003 'Tree Removal Plan': Green hatched area shows ALL the trees along Hwy 85, on the property, are to be clear cut to make place for new buildings. Blue numbers are heritage trees, black numbers are non-heritage, and shrubs to be removed are not documented

Stevens Creek Corridor Park

Stevens Creek is a 20-mile-long waterway that starts on the slopes of Black Mountain in the Santa Cruz Mountains and flows to the Bay.

The 4.8-mile Stevens Creek Trail, which intermittently follows along the banks of Stevens Creek, is one of the best-developed and most ambitious trails in the Bay Area. The existing trail cost around \$30 million to build, with funding from a wide range of public and private sources. Building the trail required the construction of several bridges and underpasses, the planting of thousands of trees and shrubs, and the installation of numerous amenities, such as benches, signs, and drinking fountains. Since then, many other funding sources have been utilized to fund improving the ecology of the trail and the creek, and to protect biodiversity.

Because of the extensive landscaping and amenities, the trail acts as a natural linear park and is one of the peninsula's unique habitat corridors connecting the Bay to the hills.

The Stevens Creek corridor connects several rich habitat areas, home to a variety of both aquatic and land-based wildlife¹. Some species found in the parks include:

- **Mammals:** Coyote, Gray Fox, Raccoon, Brush Rabbit, Merriam's Chipmunk, Fox Squirrel, Opossum, black-tailed deer, and Big brown bat.
- **Birds:** the parks and trail are great for bird watching, with over 150 different species;

¹ SF Bay Wildlife https://www.sfbaywildlife.info/places/stevens_creek_county_park.htm

F.3
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F.4

- **Butterflies:** California Sister, Lorquin's Admiral, Variable Checkerspot, Northern Checkerspot, Mylitta Crescent, Unsilvered Fritillary, Sara Orangetip, Gray-veined White, Painted Lady, Mournful Duskywing, Echo Blue, Spring Azure, Umber Skipper, Tailed Copper;
- **Dragonflies/Damselflies:** Flame Skimmer, Red Rock Skimmer, Common Green Darner, Variegated Meadowhawk, Vivid Dancer, Familiar Bluet;
- Other **invertebrates** worth mentioning are California Forest Scorpion and Banana Slug.

F.4
Con't

The Stevens Creek habitat corridor connects park habitats along different areas of Stevens Creek, enabling bird, mammal, and insect migration, (re)colonization and breeding opportunities for flora and fauna, and promoting increased genetic diversity. It provides food and shelter for a variety of wildlife and helps with juvenile dispersal and seasonal migrations. We believe that as proposed, the project is likely to interfere substantially with the movement of wildlife species in this corridor.

Summary

We support the alternative of "No Block C" as we oppose removal of the urban canopy along Hwy 85 for all the reasons given above.

F.5


In addition, increased density should come with some positive benefits for the community. We would propose actually improving the tree buffer and urban canopy along Hwy 85 by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's urban greening efforts.

This will improve the livability of the project for residents, including better health effects due to an improved buffer for auto exhaust, toxic dust and noise from the freeway, and a better aesthetic experience.

Importantly, it will advance Mountain View's strategic goal for improved biodiversity. In addition, added trees contribute to urban cooling, ameliorating climate change and urban heat island effects, and provide more carbon sequestration and better management of stormwater.

F.6

Respectfully submitted,



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



Shani Kleinhaus
Environmental Advocate
Santa Clara Valley Audubon Society

CC

Mountain View City Council
Gladwyn D'Souza, Conservation Chair, Sierra Club Loma Prieta Chapter (SCLP)
James Eggers, Executive Director, Sierra Club Loma Prieta Chapter (SCLP)
Rajiv Mathur, Friends of Stevens Creek <rajiv_mathur@stevenscreektrail.org>

COMMENTS ON IMPACTS AND MITIGATION MEASURES: DEIR 555 WEST MIDDLEFIELD ROAD, MOUNTAIN VIEW

1. The Project would result in the significant and unavoidable impacts with respect to Project and cumulative PM2.5 concentrations at existing on-site sensitive receptors.

CEQA requires mitigation for impacts, even when mitigation does not reduce the impacts to below significance level. The mitigations offered for Impact AQ-2b are limited to construction activities, and do not address the impact associated with the loss of tree canopy buffer along Hwy 85.

Scientific evidence shows that urban trees remove fine particulate air pollution². The removal of the trees along Hwy 85 eliminates an important green infrastructure service that can help reduce PM2.5 concentrations not only during construction, but also for the operations lifetime of the project. The Project should be modified in a way that retains all the existing trees along the freeway (eliminating Block "C," for example).

2. The Project finds no significant impact to Aesthetic Resources. We disagree.

Hwy 85 is not considered a scenic highway at the state level, but thousands of drivers spend several hours each week on this roadway on their way to and from work at Silicon Valley companies³. The value of the tree-lined highway in this section is not negligible - seeing trees

²

United States Environmental Protection Agency (EPA). 2017. Our nation's air: Status and trends through 2016. Accessed October 2020.

Nowak, D.J., D.E. Crane, and J.C. Stevens. 2006. Air pollution removal by urban trees and shrubs in the United States. *Urban Forestry and Urban Greening* 4:115–123.

Smith, W. H. 1990. *Air pollution and forests*. New York: Springer-Verlag, 618 p.

Nowak, D.J., S. Hirabayashi, A. Bodine and R. Hoehn. 2013. Modeled PM2.5 removal by trees in ten U.S. cities and associated health effects. *Environmental Pollution* 178: 395–402.

Centers for Disease Control and Prevention (CDC). 2012. *Asthma in the U.S: Growing every year*. Accessed October 2020.

³ "Gloomy forecasts abound with traffic experts predicting severe congestion on all South Bay roads to return in a very short time despite the opening of Highway 85. Anywhere from 100,000 to 150,000 vehicles are expected to use the freeway each weekday."
<https://www.mercurynews.com/2014/10/17/from-the-archives-highway-85-debuts-with-a-surprise/> (2014) and

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/census/aadt/tc-2016-aadt-volumes-a11y.pdf>

F.7

F.8

improves mental health, cognition, and productivity for these drivers⁴. Indeed, studies show that people who commute through natural environments daily report better mental health, and this association is even stronger among active commuters⁵. The project replacement trees will take decades to grow to provide the aesthetic and health benefits that the existing trees provide.

Trees (and the urban forest) are also important to community health. The loss of the trees along Hwy 85 should be recognized as a significant, unavoidable impact to the environment and the health of residents and drivers alike. This impact can be avoided if the “No Block C” alternative is adopted, or another configuration is offered that retains the existing trees along the freeway.

Views from Hwy 85,
looking towards the
project site:



F.8
Con't

4

Urban trees and human health (a scoping review):

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7345658/>

Effects of nature on cognitive functioning, emotional well-being, and other dimensions of mental health:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6656547/>

Effects of trees on academic success: <https://aslathedirt.files.wordpress.com/2016/01/li-sullivan.pdf>

Nature conservancy benefits of urban trees:

https://www.nature.org/content/dam/tnc/nature/en/documents/Public_Health_Benefits_Urban_Trees_FIN_AL.pdf

Urban forests and climate change (discusses benefits of urban forests to physical and mental health):

<https://www.fs.usda.gov/ccrc/topics/urban-forests> and

Effects of vegetation on reducing frustration levels for drivers:

<https://journals.sagepub.com/doi/abs/10.1177/0013916503256267>

⁵ <https://www.sciencedaily.com/releases/2018/10/181018095349.htm>

F.8
Con't

3. Biological impacts must address and mitigate the impacts of nighttime lighting on human health and on the Stevens Creek riparian ecosystem.

Artificial Light at Night (ALAN) is an emerging global environmental concern, and light pollution is an under-recognized problem. In recent years, there has been a remarkable increase in scientific articles showing devastating effects of ALAN on species and ecosystems⁶, and on human health.

F.9

The most devastating ecological impacts have been on insects and insect populations, including aquatic insects⁷, and the ecosystems that depend on insects for pollination, or as a food source. Because the project site is so close to Stevens Creek, attracting aquatic insects to light can cause adverse impacts to the aquatic and riparian ecosystem of the Creek.

Outdoor lighting has also been implicated in adverse impacts to teen mental health⁸ and to human physical health, including thyroid cancer and sleeping disorders⁹.

F.10

The International Dark-sky Association provides sound recommendations for addressing light pollution¹⁰ including:

- Shield lights and direct light downward;
- Use only as much light as needed;
- Use light only when necessary;
- Install control systems such as dimmers, motion sensors, and timers;
- Light close to ground;

F.11

⁶ "Exposure to Artificial Light at Night and the Consequences for Flora, Fauna, and Ecosystems" - an in depth summary of how ALAN affects the natural world:

<https://www.frontiersin.org/articles/10.3389/fnins.2020.602796/full>.

⁷ <https://www.sciencemag.org/news/2021/05/can-scientists-help-insects-survive-their-fatal-attraction-light-night>

⁸ <https://www.nimh.nih.gov/news/science-news/2020/outdoor-light-linked-with-teens-sleep-and-mental-health>

⁹ <https://acsjournals.onlinelibrary.wiley.com/doi/abs/10.1002/cncr.33392> and <https://time.com/5033099/light-pollution-health/>.

¹⁰ <https://www.darksky.org>

- Prevent light spillage.¹¹

In addition, please limit the Correlated Color Temperature (CCT) of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout the Project. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife, and ecosystems¹².

4. Plant and tree palette

The City of Mountain View has adopted a strategic plan that prioritizes biodiversity in the City¹³. To support biodiversity, mature trees (especially oaks) should be retained, especially in areas where they function as a wildlife movement corridor (along Hwy 85). In addition, a native plant palette would support native fauna and flora, especially local birds, and pollinators.

Almost all the species in the plant palette for the Project are not native to California and to our region and the vast majority has no habitat value beyond providing some structure.

Trees

There are no California native trees in the plan! The only oak, holly oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western, redbud. Some of the species on the list should not be planted here. For example, in California, London plane trees tend to hybridize with local sycamores in riparian corridors, threatening the genetic integrity of the local population.¹⁴

The plan should be revised to use trees from the North Bayshore plant palette¹⁵, even where the chosen non-native is consistent with existing trees onsite. This will result in less consistency visually, but much higher biodiversity value, which is a key priority of the City.

Shrubs

The plan is predominantly non-native despite the fact that California is blessed with an extensive diversity of native shrubs that are drought tolerant, aesthetically lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options.

¹¹ <https://www.iau.org/static/publications/dgskies-book-29-12-20.pdf>

¹² 2021 A Values-Centered Approach to Nighttime Conservation <https://www.darksky.org/values-centered-lighting-resolution/>

¹³ https://www.mountainview.gov/council/strategic_planning_and_visioning.asp

Strategic plan FY 2021-23 pg. 2 Protect and enhance local ecosystems and biodiversity through rewilding and other measures.; and pg. 3 Define biodiversity requirements for landscaping in Mountain View.

¹⁴ [https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore Alluvial Woodland Planting Guide 08 30 2018 med res.pdf](https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore%20Alluvial%20Woodland%20Planting%20Guide%2008%2030%202018%20med%20res.pdf)

O'Rourke, S.M. and M.R. Miller. 2017. RAD sequencing identifies trees that are a product of hybridization between California sycamore (*Platanus racemosa*) and London planetree (*Platanus x acerifolia*). Department of Animal Science, University of California, Davis.

¹⁵ https://www.mountainview.gov/depts/comdev/planning/activeprojects/northbayshore_/default.asp

F.11
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F.12

The plan should be revised to replace most of the shrubs with natives in accordance with the City priority for improving biodiversity.

The landscaping plan allows “minor planting revisions [to] occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability.” All the plants should be selected from the North Bayshore plant palette with no substitution.

4. Biological Resources: nesting birds

Large trees near waterways are often used by nesting birds, including raptors such as the Red-shouldered hawk, Great-horned owl, and Red-tailed hawk¹⁶. The nesting season for large birds is longer, and thus a nesting raptor survey is needed for the trees along Hwy 85 in the months of January through September.

5. Energy

Net Zero Energy

Mountain View’s Climate Action Plan (CAP) requires the City to move towards electrification to reduce GHG emissions. We note that some of the existing buildings have solar panels on their roofs. However, the proposed development does not include rooftop solar and the roof design may possibly preclude rooftop solar.

In order to achieve the City’s Climate Action goals, proposed new development should be encouraged to be Net Zero energy for new construction and include rooftop solar.

EV Charging Stations

This project will be operational for the next 50 years and climate change is driving the movement from gas powered vehicles to electric powered vehicles. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor’s Executive Order established a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045.

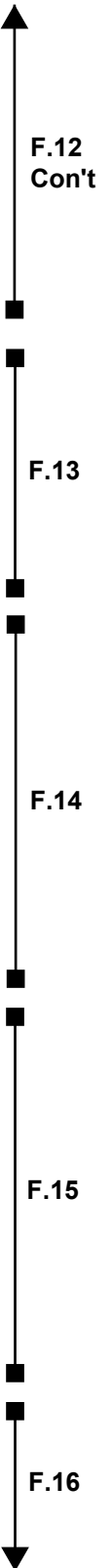
We believe more EV charging stations are needed than the 10% currently proposed. The project should provide closer to 25% charging stations or include documented capacity for easily expanding the number of charging stations to 25% within the next decade¹⁷.

6. Transportation

Parking and Car Share

¹⁶ Breeding Bird Atlas of Santa Clara County (Bill Bousman, Santa Clara Valley Audubon Society, 2007)

¹⁷ A study by the [National Renewable Energy Laboratory](#) estimates that 3.4 DCFC, and 40 Level 2 charging ports are needed per 1,000 EVs. Assuming [35 million EVs by 2030](#), the U.S. will need to build about 50,000 DCFCs and 1.2 million Level 2 ports. This means that 380 EV charging ports will need to be installed each day over the next nine years. In comparison, the U.S. has installed on average about [30 ports a day](#) between 2010 and 2020.



The parking ratio is difficult to determine as it is not clear from the documents whether the parking count includes the parking spaces that will be replaced by the new construction.

The DEIR documents indicate 997 parking spaces (there may be a math error in the DEIR which lists 987 spaces) including garage spaces and surface parking. This yields a parking ratio of 1.37 spaces per unit. These numbers need to be clarified to explain whether existing spaces are included in this count or excluded.

A parking ratio of 1 space per unit should be the maximum for a transit-oriented housing development in order to encourage transit use. Please clarify the parking count of existing versus new parking spaces.

F.16
Con't

Car Share, in addition, is a critical element in making it convenient to have access to a car when transit is not available. The number of Car Share spaces is not listed anywhere. Since this is a critical element in the parking design, the proposed number of car share spaces needs to be part of the development proposal. Please include the minimum number of Car Share units that will be included even though the TDM plan is not part of the DEIR.

7. Noise

Green space has the ability to mitigate noise in urban areas. Planting "noise buffers" composed of trees and shrubs can reduce noise by five to ten decibels for every 30m width of woodland, especially sharp tones, and this reduces noise to the human ear by approximately 50%¹⁸.

For this reason, with the intensification of development on this site, the tree buffer along Hwy 85 is an important element that needs to be preserved and augmented. We recommend improving the tree buffer and urban canopy along Hwy 85, by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's Urban Greening efforts.

F.17

8. Alternatives

The EIR suggests that the "No Block C" alternative would have "similar but slightly lesser" environmental impacts for most resource topics (particularly air quality, greenhouse gas emissions, noise, and traffic) because of the reduced scale of the alternative compared with the Project, although there would be no change in the impact conclusion for any of the foregoing resource areas.

Based on the evidence provided above, we believe we have a fair argument showing that the "No Block C" alternative reduces aesthetic and air pollution impacts and improves noise impacts enough to provide additional housing while balancing environmental considerations and the need for housing.

Thank you for the opportunity to comment on the DEIR.

F.18

¹⁸<https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-regeneration-and-greenspace-partnership/greenspace-in-practice/benefits-of-greenspace/noise-abatement/>

Letter G

From: Lada Adamic <ladamic@hotmail.com>

Sent: Tuesday, August 3, 2021 7:34 AM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>; Whyte, Brandon <Brandon.Whyte@mountainview.gov>

Subject: Re: feedback on environmental impact of 555 W. Middlefield project

Dear Ms. Pancholi,

Apologies for the second email. It just occurs to me that current utilization of bikes at the site may be indicative of the potential for biking. Since there are already hundreds of apartment units at 555 W. Middlefield, one could observe people biking there. However, in my weekly visits for tennis lessons I have not observed anyone exiting or entering the complex by bike (except for my son and me), and the bike racks inside the gate by the parking garage (they are probably not the only ones, but still...) have no bikes locked there except for a while there was a stripped bike frame locked to one of them.

For this to improve, one would need one or probably actually both of these

1. a legit way to access Stevens Creek trail
2. bike lanes on Moffet

Thanks and sorry about the multiple emails!

G.1

From: Lada Adamic <ladamic@hotmail.com>

Sent: Tuesday, August 3, 2021 7:23 AM

To: diana.pancholi@mountainview.gov <diana.pancholi@mountainview.gov>; Whyte, Brandon <Brandon.Whyte@mountainview.gov>

Subject: feedback on environmental impact of 555 W. Middlefield project

Dear Ms. Pancholi,

I would like to suggest this project be reviewed by the Mountain View B/PAC if it is claiming to have significant environmental benefits for providing bike facilities.

Though the improvements are laudable, e.g. providing 300+ bike parking spots + a cut-through path connecting Cypress Point and Middlefield (this is great! as long blocks are the enemy of good pedestrian circulation), they gloss over the reality that this development is on an island unreachable by bikes, since Moffet does not have bike lanes (and this project makes no accommodation for e.g. a bike lane along Moffet, as the facade/landscaping goes right up to the sidewalk), no access to the Stevens Creek Trail except by cutting through private property in order to get to Central (unless one again would like to brave Moffet with no bike lanes). Getting back from Stevens Creek trail (if one were to not cut through the condo complex), one ends up on the sidewalk on Middlefield. Moffet is a 40mph road and without bike lanes it is not suitable for most people.

So even though the report advertises that residents could take their bikes to the lightrail or Caltrain station, this is not the case. Without being able to bring their bikes on public transit, the range of endpoints accessible to the residents without cars is more limited. Either the city, or the project planners, need to figure out how bikes would actually be able to access this complex where hundreds of people would be living with 300+ bikes.

Separately (and less of an environmental concern, more for parks & rec future planning), the loss of the tennis courts (where Silicon Valley Tennis holds classes and lessons -- one of the few outfits in the city besides Mountain View Tennis) is a casualty, as park tennis courts are frequently fully booked, especially on evenings and weekends.

Thanks for considering this feedback!

■
|
G.2
■
■
|
G.3
■

Letter H

From: Patricia Albers <palbers2@earthlink.net>
Sent: Friday, August 6, 2021 9:55 PM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Subject: 555 Middlefield Road Project

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

Dear Ms. Pancholi:

I live on Central Avenue near the corner of Orchard Avenue, and I'm deeply concerned about the 555 Middlefield Road Project currently under consideration by the city.

I understand that the proposed development would involve taking down one hundred-and-some trees, over half of them heritage trees, including those at the end of Cypress Point Drive. Those trees protect all of us in this neighborhood from the intense noise and pollution from highway 85. They're also a refuge for birds and other wildlife along Stevens—Creek, badly needed storehouses for carbon, and a small oasis in our overbuilt city. I understand that emissions from transportation are a major problem for Mountain View and that, in theory, people who will live in this project will take advantage of public transportation or at least be closer to their offices. But to develop the end of Cypress Point Drive is to throw the baby out with the bath water. Actually, the developer should be required to plant more trees there to compensate for those they will remove for the rest of the project.

Thanks for reading this.

All best,

Patricia Albers

H.1

H.2

Letter I

From: Hala Alshahwany <alshahwany@gmail.com>
Sent: Wednesday, August 11, 2021 10:11 PM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Cc: , City Manager <city.mgr@mountainview.gov>
Subject: Comments for 555 Middlefield Draft EIR

Hello Ms. Pancholi,

The following are my comments and concerns regarding 555 Middlefield project's DEIR.

Pp. 5-6 & 5-7 section 5.3.5, **Environmentally Superior Alternative** states that *"The CEQA Guidelines require that an environmentally superior alternative be identified... Because the No Block C Alternative would result in 34 percent of the residential units proposed under the Project, the impacts would be similar to but less than those of the Project. Therefore, the No Block C Alternative is considered the environmentally superior alternative."*

I.1

I completely agree with the EIR's statement above. Exposing neighboring residents to harmful air particulates during construction period, estimated to last 5+ years, is a great and unreasonable burden to inflict on the community. The report highlights this in p. ES-3 under **Significant and Unavoidable Impacts** (Impact AQ-3a) stating that despite mitigations measures, *"cumulative PM2.5 concentrations would remain above BAAQMD's PM2.5 concentration significance threshold at all receptor locations; therefore, the cumulative impact would be significant and unavoidable."*

The EIR report, however, missed a very critical long term cumulative impact, namely the proposed removal of 62 mature heritage trees. Most of these trees are currently positioned between the project site and HWY 85 (where Block C units to be built) functioning as the best natural and highly effective buffer to air pollution from cars' exhaust and airborne toxic dust formed by tires and brakes particulates. There's well documented and tracked scientific evidence that negative health impacts along our freeways are significant and affects human health adversely (respiratory problems, asthma, etc.). The EIR fails to state that. Moreover, this natural tree buffer being in close proximity to Steven's Creek Trail (275 feet from site per EIR p. 3-2-9 Table 3.2-3) acts as an extension to the trail's natural habitat corridor from the hills all the way to the bay shorelines. In addition to protecting human health and sustaining natural habitats, the trees are also highly effective as a sound barrier to noise pollution. The removal of these trees may require sound walls to achieve acceptable decibel levels from freeway. The EIR does not adequately address this and all other long term impacts caused by elimination of the heritage trees. Replanting 197 trees to compensate for the removal of 135 trees, 62 of which are heritage (p. 2-22, section 2.5.5 **Landscaping and Heritage Trees**), is not a realistic nor is it an equivalent solution, considering current climate change and GHGe we're facing today. The IPCC (Intergovernmental Panel on Climate Change) released their 6th assessment report on August 9th, 2021, stating that human activities are the primary source for our planet degradation of natural habitats, and it's leading to dangerous warming of oceans and climate extremes. It is in our power to act now to save our natural resources-habitats and plan a sustainable growth so we can have a future.

I.2

I.3

Additionally, the EIR p. 2-1, section 2.1, **Project Overview** states that project *"seeks approval of an amendment to the Mountain View 2030 General Plan (General Plan) from the existing designation of Medium-Density Residential to a new land use designation referred to as the High-Low Density Residential; the Project would retain the existing Planned Community ("P") zoning"*. This amendment should not be made without clear vision by the city and the community as to what Moffett Blvd area should look like in the future. In other words, a precise plan is essential for that area (considering

I.4

all the old buildings with potential developments surrounding this project site). Providing housing near transit is very desirable, however not at the expense of degrading livability and the infrastructure for the existing community.

Finally, great consideration should be given to surrounding streets such as Cypress Point Dr (a substandard less than 40' wide, dead-end street) where most of the generated traffic by this project will take place. Parking and traffic issues especially when the Adult Education Center was operating at full capacity (located at corner of Moffett & Cypress), do not seemed to be addressed adequately in the EIR (p. 3.14.4.2 section **Traffic Analysis Scenarios**). As a daily driver on that street for the last 4 years, and prior to Covid restrictions, I have experienced many near accidents at the intersection mentioned above, as well as great difficulty parking on the street. The report assessment of traffic and parking impacts do not reflect the reality I experienced.

In summary, I believe that "No Block C" alternative will allow this project to provide 111 units (with 15% affordable), save our most valuable natural resources, the heritage trees for human and habitat health, minimizes the construction duration which will lessen the impacts of air contaminants, retain traffic and parking issues at a reasonable level, and continue the medium density zoning until the precise plan for Moffett area is completed.

Thank you for supporting the community and myself in how we imagine our city progresses into the future.

Best Regards,
Hala Alshahwany



Letter J

From: Leona Chu <leonachu41@gmail.com>
Sent: Thursday, August 12, 2021 1:00 PM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Subject: Comments on DEIR for 555 Middlefield Road

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

As a resident of Mountain View living on Cypress Point Drive, I have read the Draft Environmental Impact Report (DEIR) and I am concerned about some of the developer's plans for building more apartment units at 555 Middlefield Road.

Discrepancy re Units to be Constructed

The DEIR of June 2021 and the Architect's schematic drawings of July 2021 list different numbers of units to be built. The DEIR states 324 apartments will be constructed. The Architect's schematic drawings show that 345 units will be built. There is a discrepancy of 21 apartment units to be built. Which number is correct?

“

Trees in Block C

There are serious issues regarding the trees located in Block C on the developer's property and what the developer plans to do with them.

Current trees vs replacement trees

Currently there are many heritage trees located in Block C. They are mature and native to California. The developer intends to replace them with non-native and immature olive trees. The replacement olive trees are not equal to the quality of heritage trees which will be destroyed. These olive trees are a poor substitute.

J.1

J.2

The landscape replacement plan in the DEIR will also remove a green buffer of heritage trees which absorb carbon dioxide and release oxygen. Olive trees don't provide those healthy benefits. The tree replacement plan in the DEIR would also remove a wildlife habitat corridor. And it would destroy trees that currently provide shade for urban cooling.

J.2
Cont

Preserve Heritage Trees

We need to preserve the mature native heritage trees and shrubs located in Block C, especially those on the wide swath located at the border of Block C and Highway 85. We need this green buffer to:

** Preserve healthy air quality and reduce noise levels,

** Provide a wildlife habitat corridor for birds and animals

And

** Protect residents of Avalon Bay Communities and Cypress Point Drive

from airborne toxic dust which comes from the tire and brake dust generated

by the cars and trucks driven on HWY 85 located on the other side of the Block

C property. It has been proven these toxic dusts cause asthma and other

respiratory illnesses.

J.3

In fact, the developer intends to plant fewer trees to replace those removed. One aerial overview also shows the size of new trees **15 years after construction**.

Conclusion Preserve Heritage Trees in Block C

We need to preserve, even increase, the heritage trees in Block C. We need to preserve the healthy environmental benefits these trees provide. These mature trees remove unhealthy carbon dioxide and release oxygen! They serve as a wildlife habitat corridor, and they provide shade for urban cooling, especially so in a time of higher temperatures and increasing wildfires in California.

J.4

Choose No Block C Alternative

This is the environmentally healthy alternative. It allows both the construction of additional rental units **and** the preservation of trees and shrubs in Block C, vital to maintaining a healthy quality of life.

J.4
Con't

Consider Other Alternative

Another alternative is to build more units on Block A and move the park (public or private) to Block C. This alternative will allow more apartment units to be built, reduce the amount of time needed for construction, and preserve the trees and shrubs growing in Block C.

I hope this alternative will receive serious consideration. It has many benefits meeting housing and environmental needs.

J.5

Thank you for your consideration of these concerns,

Leona Chu

Sent from my iPad

Letter K

From: joeldean@sonic.net <joeldean@sonic.net>

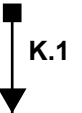
Sent: Sunday, August 8, 2021 9:31 PM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>

Cc: Abe-Koga, Margaret <Margaret.abe-koga@mountainview.gov>; Kamei, Ellen <Ellen.Kamei@mountainview.gov>; Hicks, Alison <Alison.Hicks@mountainview.gov>; Lieber, Sally <Sally.Lieber@mountainview.gov>; Ramirez, Lucas <Lucas.Ramirez@mountainview.gov>; Matichak, Lisa <Lisa.Matichak@mountainview.gov>; Showalter, Pat <Pat.Showalter@mountainview.gov>

Subject: 555 West Middlefield DEIR Transportation Impact Analysis

Attached are my comments on the subject TIA.



555 West Middlefield DEIR, Transportation Impact Analysis

Public comments by Joel Dean

This TIA, aided and abetted by the Mountain View Voice, has sown confusion among the public over how expansion of the Eaves complex could result in minimal traffic impacts on Cypress Point Drive. Stripping away irrelevant topics and hairsplitting statistics reduces the traffic forecasting process to a few pages of text, a pair of tables, one chart and one photo. Decision makers and the public can review these in a fraction of the time it takes to wade through the TIA, leaving them more time to evaluate what they are reading.

Irrelevant topic 1: Vehicle Miles of Travel (VMT)

VMT analysis is not required because the Eaves is within half a mile of the Caltrain station, the importance of which is greatly exaggerated. Why do it at all? VMT would not have changed the assessments of traffic impacts if it had been applied.

Irrelevant topic 2: Level of Service (LOS)

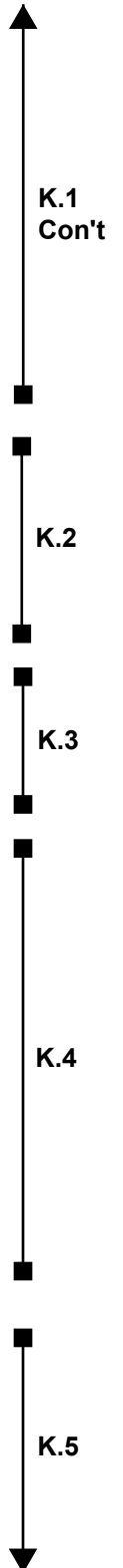
The importance of LOS in the real world is equal to the number of times you hear the term "Level of Service" used in a mass media traffic report.

Irrelevant topic 3: Forecasts of traffic on Moffett Boulevard which use 2019 as the base condition

2019 traffic counts do not show the impact on Moffett of the planned closing of Castro Street at Central Expressway. The number of crossings of the expressway in 2019 exceeded the total volume of traffic which would be generated by a 731-unit Eaves. Most of the crossings which won't be made at Moffett will be diverted to Shoreline Boulevard. Moffett will see considerable relief, its intersections will operate more efficiently, and the effects of Eaves traffic will be less pronounced than they are today. Using 2019 traffic to generate the existing-plus-project estimates is unavoidable. Using it for longer-range forecasts would cause them to overestimate traffic on Moffett.

Relevant topics

Traffic forecasting is not rocket science. It's barely even considered engineering. Digging up a few facts, making a few assumptions, doing some elementary arithmetic, and documenting all the digging, assuming, and pencil-pushing are its essentials. The process consists of three steps: trip generation, trip distribution, and traffic assignment.



Trip generation

A DIY version of the trip generation step is shown in Attachment 1 on page 6. The results were computed on a 50-year-old hand-held calculator. The grunt and groan method's bottom line is virtually identical to the TIA's.

Inputs to trip generation include:

- (1) Base-year traffic counts. While the base traffic counts were taken on one day only, they are quite consistent with counts taken in 2017 -- 3% lower in the AM peak hour, 4% higher in the PM peak hour. There is no reason to believe they are inaccurate and there are no better sources of this information.
- (2) The number of trips generated per dwelling unit. The per-unit trip rates are national averages taken from an Institute of Transportation Engineers manual. They produce plausible estimates of total peak traffic at CP Drive when compared to the actual counts. They differ in the proportion of trips which are incoming to the project site (26% estimated vs. 31% counted in the AM, 61% estimated vs. 73% counted in the PM), with a corresponding overestimate of outgoing trips. If, instead of the ITE percentages, the count percentages had been applied to all forecasts, there would be shifts of trips from outgoing to incoming as follows: At CP Drive, 1 or 2 trips in the AM, 3 in the PM; at Middlefield, 3 or 4 trips in the AM, 12-13 in the PM. These numbers are too small to require Hexagon to modify the TIA. Counts were not taken at all Eaves driveways to determine trip rates specific to the project. Lacking those, the ITE rates are the most acceptable substitute.
- (3) The numbers of dwelling units existing and to be added by the project. So far, no one has denied that Eaves currently has 402 units. The number of units to be added is a subject of debate. 329 was the number the consultant on the TIA used, and is used here. Anyone who wants to dispute that can easily patch a different number into the table and recalculate trips generated.
- (4) The percent reduction in per-unit trips due to Transportation Demand Management measures. The benefits of TDM are purely notional, and our governmental authorities tend to overestimate the effectiveness of the local mass transportation system. If brownie points for TDM have to be injected into the trip forecasts, then TIA's should publish projections both with and without the TDM bonus. Attachment 1 does this. It shows the effects of the 6% reduction in trips attributed to TDM are minimal.
- (5) The percentages of trips allocated to Cypress Point Drive and to Middlefield Road. Lacking base-year trip counts at the Eaves driveways, Hexagon somewhat arbitrarily assumed 90% used CP Drive and 10% used Middlefield. If they had used the proportions of spaces in the parking lots, which is currently 626 (93.4%) Cypress Point and 44 (6.6%) Middlefield, they would have assigned 4 more trips to CP Drive in the AM and 6 more in the PM. The difference is too trivial to worry about. Post-expansion, the parking space split will be 602 (60.6%) CP Drive and 391

K.5
Con't

K.6

K.7

(39.4%) Middlefield. Hexagon used splits of 61/39 inbound and 60/40 outbound. 60.6% is used for all trips in Attachment 1. These splits seem reasonable, but there is one element of uncertainty, which will be discussed later.

Trip distribution and traffic assignment

Once trips generated by a project are estimated, they are distributed into a matrix by assigning destinations to outgoing trips and origins to incoming ones.

Documentation of how this was done for Eaves expansion consists of a short paragraph on page 25 of the TIA stating that distribution was "based on existing travel patterns and complementary land uses." That sounds reasonable enough, but is too vague to permit critiquing Hexagon's methods.

After the origin/destination matrix is created, each cell is assigned to the road network.

Documentation of this step is as sketchy as that for the previous one: a short paragraph on page 25 saying it is based on "directions of approach and departure, roadway connections, and locations of project driveways." That also sounds reasonable, and probably means trips are assigned to whatever route from origin to destination a computer algorithm decides is quickest.

Attachment 2 on page 7 shows an origin/destination matrix for project-generated trips in the immediate vicinity of The Eaves. Thanks to the paucity of information about the trip distribution method, this matrix had to be derived by working backwards from the traffic assignments shown in TIA Figure 9 and the inset to Figure 8, with 2019 trips subtracted from the latter for the sake of consistency. Most notable is that U-turns are minimized in some ways. First, outgoing Block A trips which would have been assigned to southbound Moffett had they originated at Cypress Point are assigned to southbound Easy Street instead. The opposite movement is assigned to eastbound Middlefield or northbound Moffett because left turns from eastbound Central Expressway to Easy Street are prohibited. Second, eastbound trips from Block A are assigned to Middlefield rather than U-turning at Easy Street and taking the freeway. The opposite movement mostly avoids a U-turn at Moffett by being assigned to the freeway, exiting at Moffett and making a left from a supposedly overloaded pocket onto Middlefield.

Attachment 3 on page 8 is derived from TIA Figure 9. It is composed of diagrams of expansion-generated trips assigned to the Moffett/CP Drive, Moffett/Middlefield, and Middlefield/Easy intersections, with the addition of the Middlefield/Eaves inset from TIA Figure 8. These have been arranged according to their actual physical relation to each other, instead of the Picasso-like jumble of Figure 9. There were a few small bloopers in Figure 9. Two were corrected, one was not, as noted in Attachment 2.

The 2019 traffic data in the TIA looks reasonable, the modeling process is boilerplate, and the arithmetic errors are minimal. Anyone who accepts those statements is apt to agree that the TIA

K.7
Con't

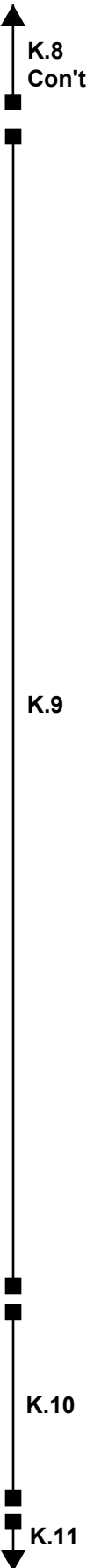
K.8

makes a reasonable case for claiming that Eaves expansion will have less than significant impact on the operation of the Moffett/Cypress Point intersection.

Issues the TIA does not address

(1) Block A driveway at Middlefield. This is the location with the heaviest impact from Eaves expansion. The expected increase in vehicle trips is concentrated there. Middlefield already carries considerably more traffic than Moffett and will not get any relief from Castro Street closing. In common with TIA's for other large residential projects (777 West Middlefield, 1001 North Shoreline) this one does not have much to say about operations at driveways. The Eaves driveways on Middlefield are not huge problems currently, thanks to their low hourly trip counts -- 15 in the AM, 18 in the PM. That could change with the construction of a 363-space garage in Block A, with sevenfold increases in trip counts during peak hours. One car every minute in the AM and one every minute and a half in the PM are forecast to be trying to exit the Block A garage onto eastbound Middlefield. Queues at the downstream intersection at Easy street are not likely to extend far enough (+/- 1000') to obstruct the Eaves driveway. But there may be long waits for breaks in the traffic, especially in the evening, which could lead to queuing in the driveway and impatient motorists blocking the bike lane. Attachment 4 on page 9 shows the defects of the existing eastern driveway, including a car parked in the bike lane and vegetation obstructing the vision of drivers exiting Eaves. Removal of that vegetation should be added to Hexagon's suggestion to paint the curb red. Hexagon also suggests transitioning the slopes of the garage ramps to prevent bottoming out. Reducing the threat of bottoming out might encourage more drivers going up a ramp with a 16-degree incline to accelerate, which some will do anyway, thus endangering passing bicyclists. Assuming that the lives of cyclists are at least as important as preventing scraped undercarriages, adding a speed hump before cars exiting the Block A garage reach the bike lane would be advisable. That goes double if a sidewalk is added to the south side of the SR85 overpass, adding pedestrians to the list of potential victims. Based on the bicycle counts on Middlefield at Moffett and Easy, it would be difficult to justify an expensive upgrade of the SR85 overpass. If there are no bicycle improvements, there will be no pedestrian improvements. Though pedestrians outnumber cyclists, they are stepchildren who subsist on table scraps from shared bike/ped projects. They even have to compete for the scraps with unscrupulous cyclists. The effort and expense of improving the SR85 overpass would be better spent on a pedestrian crossing on the west side of the Shoreline/Central Expressway interchange, with barriers to keep cyclists from encroaching. Ditto the planned bike/ped bridge over US101 on Shoreline.

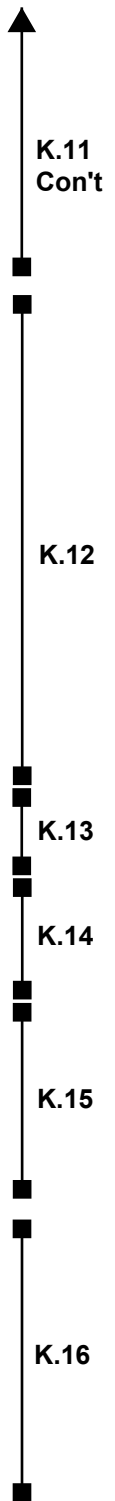
(2) Cypress Point Drive. The "element of uncertainty" mentioned above concerns how the trip split between CP Drive and Middlefield is affected by unassigned parking spaces, of which there will be 181 in Blocks B & C. People may find being assigned spaces in the Block A garage onerous and occupy unassigned spaces in B and C instead, or park on the street. So may multi-car households. At its unlikely worst, this could add 60 vehicle trips (one per minute) to Cypress Point Drive in the AM peak hour and 70 (one every 51 seconds) in the PM peak hour. Another



issue on CP Drive is congestion due to Adult School traffic. The driveway there and the Eaves driveway across the street, are close enough to the Moffett intersection that a very short queue could obstruct both driveways and possibly all traffic on CP Drive. The TIA should include documentation of whether this occurs and how serious it is. The information should be obtained at times when the Adult School traffic is greatest, which would not necessarily be during peak hours.

(3) Shoreline at Middlefield. The TIA notes on page 23 that lengthy queues occur in the northbound left turn pocket in the AM and in the southbound pocket in the PM. Since these pockets are in flush medians and defined only by pavement markings, the backups do not interfere with through traffic. Hexagon also observed lengthy queues in the westbound turn pocket in the PM, and these did interfere with through traffic thanks to the pocket being carved out of the raised median. Conspicuously absent was any mention of excessive queueing in the eastbound pocket, for the simple reason that it does not occur. On page 30, when discussing background conditions, the TIA mentions that the Shoreline median between Middlefield and Terra Bella is to be converted to a reversible exclusive bus lane, which will require a preemptive signal phase to allow southbound buses to exit that lane in the PM, and thus increase delays for everyone else. It neglects to say that the bus lane will inflict the same problem on the southbound pocket that already affects the westbound pocket. Also on page 30, the TIA notes that second lanes are to be added to both eastbound and westbound turn pockets. It doesn't admit that the eastbound second lane is not needed and its justification is based on fabricated data. The TIA also fails to discuss the effects of the closing of Castro Street at Central Expressway, which, as stated above, will divert considerable traffic from Moffett to Shoreline. Shoreline will have to bear another burden whenever Rengstorff is closed by grade separation construction. Finally, the TIA does not discuss the plan to convert Shoreline at Middlefield to a so-called 'Dutch' intersection, which is likely to backfire, with severe negative consequences for traffic operations and for pedestrian and bicycle safety. The only thing that could save Shoreline at Middlefield from this serial abuse would be Google's adopting a hybrid remote work schedule permanently.

(4) Shoreline at Terra Bella. This receives only a tiny mention in the TIA, having been excluded from the scope of study. The TIA notes that there will be a protected left-turn signal phase to cross Shoreline there in the future, which will increase delays for everyone else. At least we are spared hearing any repetition of "During the A.M. peak hour, this intersection generally operates well without significant operational issues." Thank heaven for little favors. They are all Shoreline Boulevard ever gets.



Attachment 1

Eaves expansion trip generation							
AM peak hour			PM peak hour				
Total	In	Out	Total	In	Out		
=====							
BASE (2019) VEHICLE TRIP COUNT							
1. 2019 traffic count at CP Drive	207	65	142	215	157	58	Source: All Traffic Data Services Inc.
2. 2019 Eaves-generated trips	145	38	107	177	108	69	402 DU X 0.36 AM, 0.44 PM; TIA Table 6
3. Eaves traffic using CP Drive	130	34	96	159	97	62	90% of line 2; assumed by Hexagon, p.54
4. Non-Eaves traffic at CP Drive	77	31	46	56	60	-4	Line 1 minus line 3; ignore absurdity
5. Eaves traffic at Middlefield	15	4	11	18	11	7	Line 2 minus line 3
=====							
POST-EXPANSION without 6% TDM reduction							
6. Project-generated trips	118	31	87	145	88	57	329 DU X 0.36 AM, 0.44 PM; TIA Table 6
7. Total Eaves-generated trips	263	69	194	322	196	126	Line 2 + line 6
8. Eaves traffic using CP Drive	159	42	117	195	119	76	60.6% of Line 7; same % as proportion (602/993) of total parking spaces in blocks B & C. Conforms to TIA Figure 8.
9. Total traffic at CP Drive	236	73	163	251	179	72	Line 4 + line 8
10. Net change due to project	+29	+8	+21	+36	+22	+14	Line 9 minus line 1
11. Net change according to Hexagon	+19	+5	+14	+25	+15	+10	Figure 9; includes 6% TDM reduction
12. Eaves traffic at Middlefield	104	27	77	127	77	50	Line 7 minus line 8
13. Net change due to project	+89	+23	+66	+109	+66	+43	Line 12 minus line 5
14. Net change according to Hexagon	+83	+22	+61	+102	+62	+40	Derived from Figure 9 flows at Moffett/CP Drive, Moffett/Middlefield, and Middlefield/Easy; includes 6% TDM reduction
=====							
POST-EXPANSION with 6% TDM reduction							
15. Total Eaves-generated trips	247	65	182	303	184	119	731 DU X 0.3384 AM, 0.4136 PM; Table 6
16. Eaves traffic using CP Drive	149	39	110	184	112	72	60.6% of line 15; see note to line 8.
17. Total traffic at CP Drive	226	70	156	240	172	68	Line 4 + line 16
18. Net change due to project	+19	+5	+14	+25	+15	+10	Line 17 minus line 1
19. Net change according to Hexagon	+19	+5	+14	+25	+15	+10	Same as line 11
20. Eaves traffic at Middlefield	98	26	72	119	72	47	Line 15 minus line 16; Conforms to figure 8
21. Net change due to project	+83	+22	+61	+101	+61	+40	Line 20 minus line 5
22. Net change according to Hexagon	+83	+22	+61	+102	+62	+40	Same as line 14

Attachment 2

Origin/Destination data for Eaves expansion generated traffic

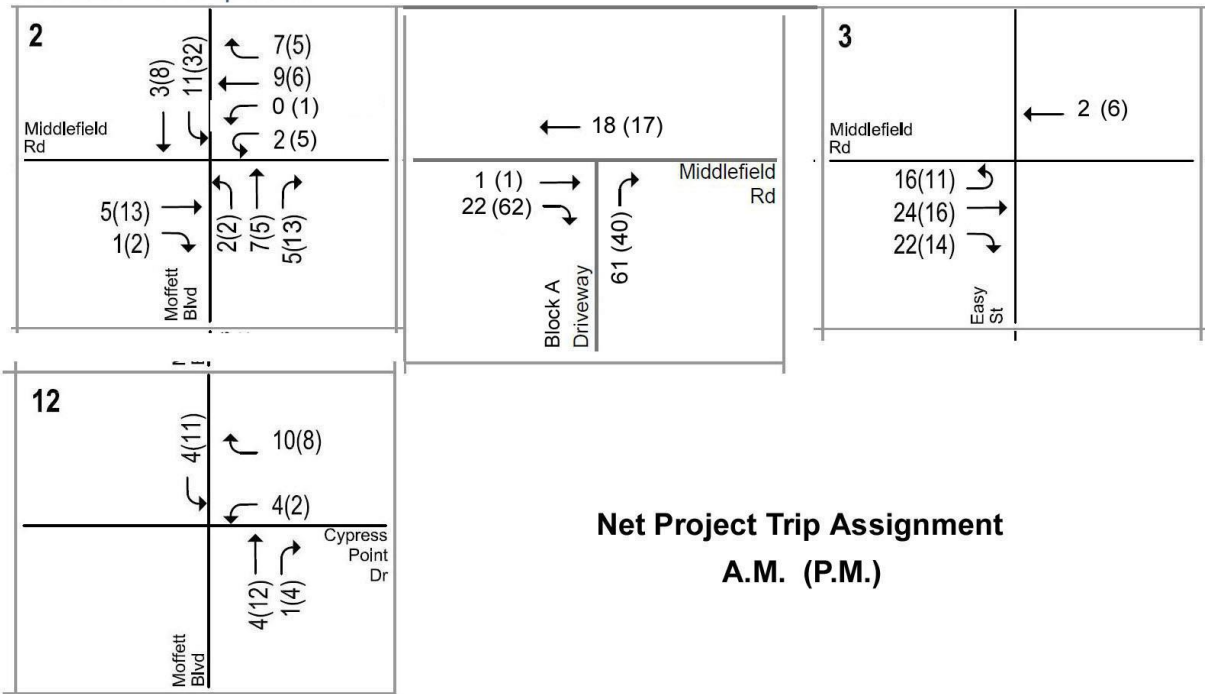
Origin	Destination							TOTALS South
	Eaves CP Drive	Eaves Drive	Moffett Middlefield	Moffett North	Middlefield South	Middlefield East	Easy West	
Eaves CP Drive	-	0	7	4	1 *	2	0	14
Eaves Middlefield	0	-	7	0	23	9	22	61
Moffett North	3	11	-	0	0	0	0	14
Moffett South	1	4	0	-	0	0	0	5
Middlefield East	0	2	0	0	-	-	0	2
Middlefield West	1	5	0	0	0	0	0	6
AM PEAK TOTALS	5	22	14	4	24	11	22	102
Eaves CP Drive	-	0	5	2	1 *	2	0	10
Eaves Middlefield	0	-	5	0	15	6	14	40
Moffett North	8	32	-	0	0	0	0	40
Moffett South	4	12	0	-	0	0	0	16
Middlefield East	1 *	5 &	0	0	-	0	0	6
Middlefield West	2	13	0	0	0	-	0	15
PM PEAK TOTALS	15	62 #	10	2	16	8	14	127 #

Trip generation rate 0.36/apartment AM peak, 0.44/apt. PM peak, each reduced 6% due to TDM measures.

Data in each cell was derived from movements shown in Figure 9 of the TIA., with the following adjustments to resolve discrepancies in the diagrams; One trip was added to cells marked with an asterisk, and one was subtracted from the cell marked with an ampersand.

AM peak totals (75 outgoing, 27 incoming, 102 total net Eaves-generated trips) match TIA Table 6. PM peak trips should be 76 incoming, 50 outgoing, 126 total according to Table 6. The one-trip difference in incoming trips at Block A marked with a pound sign may be due to rounding errors.

Attachment 3



Net Project Trip Assignment A.M. (P.M.)

Attachment 4



Eaves Driveway, Middlefield Road 7/19/21 looking east toward SR 85 overpass

Letter L

From: Gita Dev <gd@devarchitects.com>
Sent: Thursday, July 29, 2021 10:31 AM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Subject: Re: 555 W Middlefield Road_DEIR All Appendices

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

Thank you Diana. Much appreciated.

What is the reason behind for removing these critical landscape drawings -showing the existing and proposed trees on the site - from view of the public?

Best,

Gita Dev
Sierra Club Loma Prieta
415.722.3355
www.devarchitects.com

On 7/29/2021 9:40 AM, Diana Pancholi via Proofpoint wrote:



15 FILE(S)
SHARED

105.2 MB
TOTAL

30 DAYS UNTIL
EXPIRATION

Diana Pancholi has invited you to a new Secure Share

Message from Diana Pancholi:

Please see attached all the Appendices for the 555 W Middlefield Road Project DEIR. Also, attached is the Landscape sheets for your reference as requested. Please confirm receipt of this information and let me know if you need anything else.

Diana

Shared Files:

555 W Middlefield Road _Landscape
Plan.pdf

App 1_NOPComments.pdf

L.1

App 3.10-1_NoiseSupportingMaterials.pdf	App 3.14-1_TransportationAnalysis_2021-03-25.pdf
App 3.14-1_TransportationAnalysisAppendices_2021-3-25.pdf	App 3.16-1_UtilityImpactStudy_4-9-2021.pdf
App 3.2-1_AirQuality-GHGSsupportingMaterials.pdf	App 3.3-1_USFWSList.pdf
App 3.3-2_CDFW-CNDDList.pdf	App 3.3-3_CNPSList.pdf
App 3.4-1_DPRForm_091419.pdf	App 3.8-1_2020EDRRradiusMapReport.pdf
App 3.9-1_Hydrology&WQReport_092520.pdf	Redacted_App 3.4-2_SB18-AB52Materials.pdf
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Letter M

From: Diane Gazzano <dpgazz@yahoo.com>
Sent: Wednesday, August 11, 2021 9:42 PM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Cc: , City Manager <city_mgr@mountainview.gov>
Subject: DEIR 555 Middlefield Road Project

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Diana Pancholi, Senior Planner
City of Mountain View

Having lived on Cypress Point Drive CPD) for 45 years, I found the 555 Middlefield (555) DEIR, lacking in data to support certain claims, nuanced, and short on critical thinking and analysis as it pertains to the 555 Middlefield Project and the City of Mountain View. My analysis comes from a long term “boots on the ground” observation; not from boilerplate material, nor from sitting in a board room making observations. There are many items of concern in the DEIR. I will highlight only some of them.

Note-Incorrect number of new units cited in DEIR

The footnote on page ES-I of the DEIR explains how the project is being reduced from 329 to 324 units, and how these numbers are being used in the analysis of the project. Unfortunately, these number are incorrect. The actual number of units shown on the July 2021 project plans posted on the City’s Web site is 345. (Verified by multiple people). When the initial incorrect unit count was discovered in the July 2020 project plan on the City Web Site, the Planning Department was notified and the response was that it would be corrected in the next update. There is still an error in the counting of units in the Developer’s plan. All numbers and analysis in my response are based on the actual number of units as shown in the Developer’s plans posted on the City’s web site.

TREES

On page 3.1.12. the DEIR boldly states 555 is in compliance with PL-14” (Removal of the tree(s) will not adversely affect the shade, noise attenuation, protection from wind damage and air pollution, historic value, or scenic beauty of the area, nor shall the removal adversely affect the general health, safety, prosperity, and general welfare of the City as a whole).” This is inaccurate for the following reasons:

- The Google Map shows there is a dense forest of trees running along the side of the 85 freeway and the Stevens Creek and Trail all the way from 555 to the Bay. This buffer serves to protect the City of Mountain View from pollution, offers carbon sequestration, and provides urban cooling. The trees also provide a habitat for many species, and help in the fight against global warming. Studies have shown that there is strong evidence that tire, brake dust, and road dust resuspension, which these trees and shrubs protect against, have an adverse effect on health. [Brake & Tire Wear Emissions | California Air Resources Board](#). The City of Mountain View should not allow the clear cutting of this buffer, but should be adding to the buffer along Highway 85 and the Stevens Creek and Trail.

- The DEIR states that as a solution for the 62 Heritage trees they are destroying, “*The Project would provide approximately 62 additional trees; many of the trees would be evergreens, providing year-round shade for the Project site.*” pg. 3.7-27 and pg. 3.1-10. The DEIR is in conflict with the Developers plans as no evergreen trees are shown as tree replacement in the Developer’s July 2021 Plan Set 3 pg. L.043, posted on the City’s Web site. Many of the heritage trees are being replaced by olive trees. How many olives trees does it take to replace one heritage tree? Olive trees are not native to California, will never reach the height or foliage of heritage trees, and all new trees planted will take

M.1

M.2

M.3

15 to 20 years to reach maturity, thus creating a very barren effect for many years. Along the sound wall will be ornamental trees and shrubs creating an environmental disaster both for the residents living as close as 38' from the wall, the community, and City of Mountain View.

M.3
Con't

- Tree Relocation. The DEIR states that approximately 35 trees shall be relocated on the property. Some of these are heritage trees. The DEIR admits that some of these trees may be damaged in relocation. The success rate of relocating trees is low. The developer would then have the option to pay a small fee and the trees could be placed at another site. This would further reduce the number of trees at 555. Nowhere does the DEIR factored this into the calculations of number of trees on site. The Developer's plans show the heritage trees being kept in place at the future park area, but the DEIR also states that this site could be used for a staging area. These two things are incongruent and, in all probability, this staging area would lead to the further loss of additional heritage trees.

M.4

- Cypress Point Wood Drive has long been known and written about for its street tree canopy giving the street a park like feeling. I strongly take exception to the following statement made by the DEIR. *"The proposed buildings would have limited street buffers and would be highly visible from surrounding areas, such as roadways and residences. However, this change would not be considered a significant impact because the Project site is not currently a visual asset to the area.* Pg. 3.1-9. For 40 years I drove down the street and marveled at the wonderful landscaping of 555. Since Avalon has taken over the property the landscaping has gone downhill fast. No benefit comes to the community or the City of Mountain View by degrading the street canopy or failing to maintain an acceptable level of landscaping. (Avalon is not known for the maintenance of their property.) The City of Mountain View should demand that Avalon bring CPD back to its position where it is a visual asset to the community.

M.5

5 Year 4 Month Construction Plan

The following are statements taken from the DEIR.

*"The Project would result in a significant and unavoidable impact related to construction air quality (cumulative PM2.5 concentrations)"*pg. ES-4

*"Construction materials and equipment would be staged on the Park Parcel, if permitted by the City, or, otherwise, on-site in areas that are not under construction, or potentially within Project frontage rights-of-way. Construction and associated visual degradation would be short term and temporary."*pg 3.1-8

M.6

As a resident of CPD, short-term is not 5.3 years. The park area in which the construction materials and equipment would be stored, would have to be fenced in for 5.3 years. This would be a degradation to the visual asset of the community. The construction time according to the DEIR would be 7:00 am until 6:00 pm. Since this is a long-established community, there are many elder citizens in the surrounding community some of which are house bound. The noise, dust, and pollution created for 5.3 years would be a hardship and a health risk for them and the community as a whole. If the developer were truly dedicated to the project, he should be able to complete the building in a much shorter period of time. Other builders do not take 5.3 years to constructing 345 apartments.

Pg 3.12-8 states: *"The Project would not result in the loss of any housing units. Therefore, there would be no impact related to the displacement of people or housing units."* The probability of this happen is most likely zero. During the construction of Phase I and II , two parking lots will be removed (247 parking spaces). Only Block C with 217 parking spaces will remain for 402 existing units. Many residents, guests, and deliveries trucks would be without parking spaces. Cypress Points Drive is usually lined with parked cars, especially when the Adult School is in session. Delivery trucks often block one side of the narrow street. There will be no spaces for cars to park.

M.7

As the DEIR states residents will be exposed to excessive loud construction noise from 7:00 am to 6:00 pm, along with the exposure to dust and pollutants created during construction. The residents of 555 will be without amenities such as the club house, pool, and tennis courts for much of the construction. Now, especially with the work from home environment, which is expected to continue in some form after the pandemic, tenants will move. No community accommodations have been by the Developer to offset these major disruptions. If the Developer really believes there will be no displacement of tenants during construction, the Developer should offer to pay moving costs for all residents who have to move for physical or mental health reasons.

Bicycle Path

The DEIR claims that 555 will :*"Improve bicycle and pedestrian connectivity for the Project and surrounding neighborhood by constructing a new pedestrian and bicycle path to connect Cypress Point Drive with West Middlefield Road;* pg. ES-2 This is a spurious claim. The whole time I have lived on Cypress Point Drive, I have seen about 2 bicycles on the street. This is because it is a dangerous street to bike on. It is a narrow dead-end street with cars parked on both sides of the street. There are no bicycle paths. The proposed bicycle path near the front of the property would lead to nowhere. Since CPD is a narrow dead-end street, one would need to peddle out to Moffett Blvd or traverse through private property. Contrary to what the DEIR says, from experience, I can say Moffett Blvd is also a dangerous street to bike on. With cars parked along the street and no bike lanes I have followed many a bike down the first lane of

M.8

traffic on Moffett. Moffett can be a very busy street. Only recently has a bike lane been placed in one small section. It is also dangerous to bicycle over the 85 overpass on Middlefield to the Steven Creek Trail. The bike path lane through 555, as it now shown, is dangerous especially to children as it flows out into a busy street with no bike lanes, and is not a benefit to the community.

Parking /Walkability

The DEIR projects states that walking will be a major mode of transportation due to the drastic lack of parking spaces. However the DEIR on pg 3.1-10 states: *“Under existing conditions, a large portion of the development on the Project site is blocked by dense landscaping and setbacks. However, the Project would include buildings with limited setbacks from the streets and would remove vegetation.”*

Unfortunately, this creates a less desirable environment for walking. With the removal of heritage redwoods trees on Moffett Blvd, very narrow setbacks of buildings on Moffett and CPD, limited planned street tree canopy, and narrow sidewalks on both Moffett Blvd. and CPD, an inviting walking environment is not being created. The 555 developer needs to revise their design to accommodate a friendly, inviting walking environment.

Most of the time parking is limited on CPD. When the Adult School is in session parking is nonexistent, with some of the students parking on Cypress Point Lakes property. There will be an addition of 835 new residents on CPD and only approximately 1.3 parking spaces per the total 747 units at 555. The residents, guests, and delivery trucks of the 555 project will have to share the 1.3 spaces. The Developer must work with the City and the citizens of the Willow Gate community to mitigate the parking crisis that is coming without careful planning. The school plays an important role in serving the Mountain View community and they must be protected from 555 residents parking in their lot or taking up all the street parking.

Traffic

Pre-covid there was a dangerous traffic problem on CPD when classes ended and students were driving out of the parking lot of the Adult School. This parking lot is very close to the intersection of CPD and Moffett. Traffic, on the narrow CPD street, is going in three directions. Cars are coming onto and leaving CPD, as the students try to exit the parking lot by making a left had turn into these two lanes of traffic. All this is taking place a few feet from the stop light on Moffett. Adding 345 new units (825 residents) on CPD will make this traffic scramble exponentially worse. The DEIR does not address this issue.

Also, pre-covid there were problems exiting CPD during commute ties. Traffic was so bad on Moffett that the City installed pavement bumps at the corner of Moffett and Central to prevent cars from forming an illegal third land so they could make a right hand turn off Moffett toward Siterlin Court to get out of the Moffett traffic.

The City’s Web site shows an extraordinary amount of recently completed, active and future large projects being constructed in the Moffett/Whisman corridor. Whether it is the Hotel/Office/Garage complex at 101 and Moffett, the 777 Middlefield construction of 716 new apartments, the Linklin garages, the future Goggle Whisman complex, a possible future school, or a host of other projects, all these projects will come with their transportation needs and traffic burdens on the Moffett-Middlefield corridor.

No Block C/Precise Plan

The DEIR is correct in stating the most of the environmental and livability problems would be overcome by no new construction on Block C. The project will still be able to build 119 new units.

The DEIR is not correct in its statement on pg. 5-3 *“Potential alternatives sites were evaluated that would (1) reduce or avoid some or all of the environmental impacts of the 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. A review of properties in Mountain View did not find any suitable properties that are available and meet these criteria.”* By choosing the No Block C option there are properties that could accommodate the building of the 226 units that would be built at Block C. The shopping center one-half block from the 555 project, on the other side of the adult school, is for sale. This property has two street accesses, Central and Moffett Blvd. It would not cause the environmental destruction of 192 trees and place residents right on top of the 85 freeway endangering their health. Also, the shopping center across Moffett from the 555 project, has recently been sold and will be up for redevelopment.

M.8
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M.9

M.10

M.11

M.12

M.13

M.14

I hope the City of Mountain View will not accept below market rate apartments as close as 38'-40' from the freeway where the health of the residents is endangered. For too long in our Country, the less fortunate have been forced to live in environmentally degraded housing. Mountain View should not continue this tradition, especially when there are alternatives. It would be ironic if after the City Council voted to protecting apartment dwellers from cigarette smoke, the City would endanger the health of apartment residents and the surrounding communities by allowing the destruction of hundreds of trees along the Middlefield and 85 corridors.

M.15

Section 3.12 of the DEIR discusses the future population and housing needs of Mountain View. It relies on data from the California Department of Finance 2020, and Association of Bay Area Governments 2019. This data is outdated. Nowhere does it analyze what the housing needs may be after the covid pandemic. Bloomberg and other news organization reported recently that Google is granting applications from employees to work out of the area, and to work from home. [Google OKs thousands of staff requests to transfer or work remotely - CNET](#). In order for any analysis on population to be valid, the post pandemic work environment needs to be taken into consideration. There may be former office and industrial buildings which can be converted to housing.

M.16

The Willow Gate neighborhood is the Gateway to downtown Castro. It should not be developed in a hodge-podge fashion. There are many other properties along Moffett Blvd and the surrounding neighborhood that will be redeveloped in the near future. There must be a vision for the community and a Precise Plan that can be used as a guideline. With proper planning all areas of Mountain View can be environmentally friendly and have good neighborhoods in which to live and work.

M.17

Diane Gazzano

Resident of Mountain View

Letter N

From: Daniel Shane <shanedan18@outlook.com>

Sent: Thursday, August 12, 2021 8:37 PM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>

Cc: City Council <City.Council@mountainview.gov>; , City Manager <city.mgr@mountainview.gov>; Kimberly Thomas <citymgrpio@mountainview.gov>

Subject: Correction - Comments on the DEIR for the Proposed 555 West Middlefield Road High-Density Housing Development (Version 2)

Dear Diana Pancholi,

As I notified you in my last email, I was unable to review and edit the first draft of my comments prior to the deadline. Please do me a favor and delete the first email and use this email which contains version 2, or the edited version, of the original I submitted earlier today.

Thank You,

Daniel Shane
213 Cypress Point Drive
Mountain View, CA
Homeowner
Representative for the Cypress Point Community Preservation Group
Environmental Scientist, U.S. EPA (retired), 1982-2017
(650) 269-7551
Shanedan18@outlook.com

N.1

August 12, 2021

COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

By

DANIEL M. SHANE

HOMEOWNER, 213 CYPRESS POINT DRIVE, MOUNTAIN VIEW 04043

(Version 2)

Project Title: 555 West Middlefield Road Project (SCH #2019070252)

City/County: City of Mountain View, Santa Clara County, California

Public Review Period: June 28, to August 12, 2021

Comments to be submitted to Diana Pancholi, Senior Planner, City of Mountain View, Community Development Department, P.O. Box 7540, Mountain View, CA 94041 or emailed to diana.pancholi@mountainview.gov

Dear Diana Pancholi,

The purpose of the letter is to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed 555 West Middlefield Road Project in my neighborhood. My comments begin by a broad overview of my evaluation of the report. Additionally, I have provided comments for key sections of the DEIR. I hope my comments will be incorporated into the Final EIR.

N.2

The DEIR seems to be mostly focused on the short-term environmental impacts during the 5-year construction phase. However, there are long-term impacts from this project to the future livability, quality-of-life, and neighborhood character from this high-density housing development. I know this because we have already reached maximum levels and capacities for this multi-family housing neighborhood. We have mostly townhouses, condominiums, and apartments in our neighborhood. I have listed some of the existing problems currently plaguing our neighborhood. The project, as proposed, will simply exacerbate these problems.

The Cypress Point Community Preservation Group (CPCPG) is supporting the No Block C Alternative listed in the DEIR. The No Block C Alternative will mitigate most of our concerns about environmental impacts including increased noise levels, dust, pollution, exposure to toxic emissions from the cars and trucks using the nearby freeway and preserve the aesthetics and visual comfort we benefit from the tree canopies. The No Block C will reduce the density and intensity of this development in our neighborhood which is medium-density multi-family townhouses, condominiums, and apartment buildings. Our neighborhood has already reached its maximum limit on several livability parameters such noise sources, availability of street parking, traffic safety, and the numbers of people (bikers, dog walkers, and joggers) who cross our property to access the Stevens Creek Trailhead. The full project without the No Block C Alternative will have significant impact on the livability, quality of life, and the character of our neighborhood. As part of the Block C development many of the mature trees including majestic Heritage trees will need to be removed to make space for the construction of a large 4-story apartment building, a 2-level underground garage, and an emergency vehicle access road next to the driveway entrance to Cypress Point Woods Townhouse parking lot and townhouse units. The No Block C

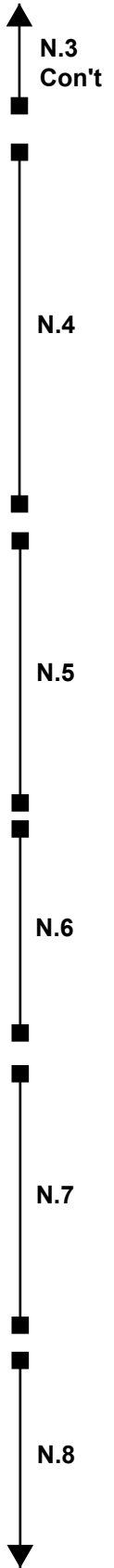
N.3

Alternative will likely shorten the duration of the construction activities from 5-years and 4-months to about 2-years. A demolition and construction project that lasts 64-months cannot be tolerated by the residents of our neighborhood.

The loss of the tree buffer zone in Block C and along Highway 85 will have significant impacts to the health of our families, especially our infants and children. It is a well-known, scientific fact that mature tree canopies along the freeways absorb high levels of noise, dust, and pollution and protect the health of our residents from toxic air emissions by cars and trucks. The replacement trees will not be a mature canopy for decades and will not have the capacity to provide the benefits of the existing tree buffer/barrier zone. This area in Block C has many trees including Heritage trees which are visually comforting and has aesthetic scenic qualities that are enjoyed by all the residents. It is a woodland area that supports a wildlife habitat and tall trees for nesting birds. There is a nexus between this woodland area and the Stevens Creek Trail corridor, and it provides more species and diversity to this world class urban forested trail that stretches from the coastal mountains to the Baylands.

The DEIR does not adequately address these problems.

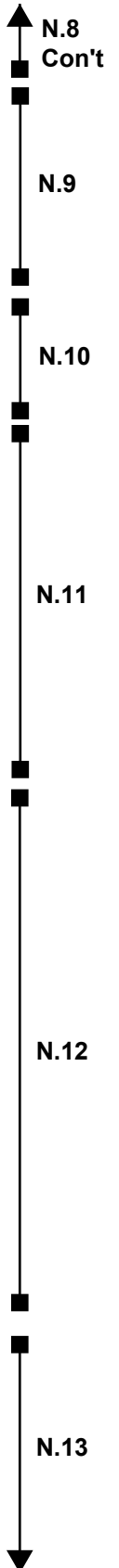
- There are already many sources of noises causing a nuisance in our neighborhood such as Highway 85 freeway noise, leaf blowers, Caltrain, freight trains, and Shoreline Park Amphitheater. The loss of many trees and Heritage trees during construction activities will eliminate the tree buffer zone that protects our homes and the health of our families from noise, dust, and pollution, especially with the construction of the large apartment building, underground garage, and emergency vehicle access roadway in Block C.
- There are already too many projects in our neighborhood that are removing trees and Heritage trees, filling in open space, and having a negative impact on aesthetics, including urban forest areas, trees, and wildlife habitat. The replacement trees and vegetation will not have the benefits that a mature woodland area provides the community. The Stevens Creek Trail green corridor is a world class urban green open space and trail. The woodland area in Block C is part of the Stevens Creek Trail corridor even though it is located across the freeway from the trail. The ecosystems are interconnected.
- There is already a traffic safety problem for both drivers, bikers, and pedestrians. Many near misses have been reported by residents. The substandard neighborhood street has street parking on both sides which narrows the street even more and cars cannot easily maneuver and avoid collisions. Cars come out of the driveways blindly and nearly collide with oncoming traffic. If street parking is moved away from the intersection of the driveway and the street to improve visibility, the street parking spaces will be reduced even further than it is now. Cypress Point Drive is a dead-end cul-de-sac and there are no barriers to prevent wayward vehicles from entering the driveway of Cypress Point Woods townhouse parking lot and endangering children at play.
- There is already competition for street parking spaces on Cypress Point Drive. Due to the addition of more 2 and 3-bedroom, as opposed to studios that now exist, the numbers of people could double in size. This means more vehicles, less garage parking, and added pressure on street parking. According to AvalonBay, there will be more vehicles flowing to Middlefield Road compared to Cypress Point Drive. How can this be if there are a total of 602 underground garage parking spaces on Cypress Point Drive and only 363 underground garage parking spaces on West Middlefield



Road. There will be 171 parking spaces in Block B and 431 parking spaces in two underground garages located on Cypress Point Drive.

- There is already a lack of access to the Stevens Creek Trailhead for dog walkers, joggers, and bike commuters who cut through our properties to get onto Central Avenue and the trailhead. The development will more than double the existing numbers of people who will cut through our properties to get to the Stevens Creek Trailhead. Security of our homes and garages have been a constant area of concern. Allowing more access to the properties will certainly increase the break-ins and thefts.
- There is already a cumulative impact from multiple housing and commercial developments in a relatively small area north of Central Expressway. These developments are proposed, under review, under-construction, and recently completed. The cumulative impacts are not known because they have not been studied. Equally important is the lack of a Precise Plan to guide the growth and development of this significant area that will eventually be an extension of Downtown Castro Street.
- We already have the developers designing and guiding our growth through their many housing developments being allowed no matter the cost to the residents and the livability of their neighborhood. This property has never been envisioned as high-density housing and will require the city to give a large private real estate investment trust exemptions to the General Plan and the local zoning density requirements. This is called the Gate-Keeper Program which has been disbanded for good reasons. A Precise Plan is needed to guide the growth and development of our community and ensure the people reap the benefits of a green, livable, healthy, and prosperous life for all, not just more profit for the developers and their shareholders.
- The Draft DEIR already has a comprehensive list of alternatives to the proposed project. Many in our community support the No Block C Alternative. The No Block C Alternative will sufficiently scale-back the project to mitigate most of our concerns about the project. According to the City's consultant, ICF, the No Block C Alternative is the most environmentally superior alternative, except for the No Project Alternative. The No Block C Alternative appears to be a win-win for all the stakeholders including the developer, the homeowners and their families, retired seniors, the neighborhood, and the environment. The No Block C alternative will allow the construction of Block A and Block B. Block B construction site is distant from most of the existing multi-family housing developments compared to the construction activities in Block C. Block B will allow the development of an apartment building with 119 units and an underground garage, a leasing building as well as an amenities and recreation building. We estimate the duration of short-term environmental impacts will be reduced from 5 years to 2 years which is typical for a housing development in our area. Most of our concerns about the long-term health and environmental consequences of this project should be mitigated by the No Block C Alternative. Additionally, this will allow time to study and evaluate future growth and a vision for our community.

It was difficult to review and evaluate the DEIR against the Project Plan. The Project Plan was repeatedly revised by AvalonBay during the review period. The DEIR used the June 2021 project plan and was released to the public on June 28, 2021. The plan was modified by the developer and the July 2021 project plan was posted on the city website. This resulted in a lot of confusion because the July 2021 project plan became a moving target and did not always equate or agree with the June 2021 DEIR. Once a DEIR has been released to the public, there should be no modifications made by the developer



to the project plan. This was not the case and created a lot of confusion. Here is an example. The number of dwelling units constantly changed during the review period.

- The original project plan had 329 units including 1-, 2-, and 3-bedroom units.
- For unknown reasons, 5 units were removed from Block B, making it a total of 324 units.
- My project metrics analysis of the June 2021 project plan revealed 32 more units than reported by AvalonBay. This made the new total 356 units. This was verified in an email message from Diana Pancholi.
- The DEIR was made available on June 28, 2021, and was based on the June 2021 project plan.
- The June 2021 project plan was again revised in July 2021. Now there were 11 less units making a new total of 345 units. But the DEIR was still based on the June 2021 project plan.
- The June 2021 project plan had 111 units in Block B and 218 units in Block C.
- In July 2021 this was changed. Block B had 119 units and Block C had 226 units. The new total was 345 units.
- Are the total number of dwelling units existing and proposed 747 units (402 units + 345 units)?

N.13
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Executive Summary

- I recommend the consultant provide a one or two-page summary table, in bullet format, the key basic project metrics. The purpose of this summary is to preclude any future confusion. This page can be revised in the future if necessary to highlight any changes made to the project plan and can be posted on the city's website. Some of the metrics should be the size of the project site, the number of units per acre (density), the allowable density for this project, the number of existing and future studios, 1, 2 and 3-bedroom units, the number of affordable units, the estimated rent to comply with "affordability" in this area, the estimated number of existing tenants, the estimated maximum number of tenants after the addition of 345 new units, the number of dwelling units and parking spaces in Blocks A, B, and C, the number of stories and the heights for each existing and new buildings, the number of underground parking garage levels for each Building Block, the number of parking spaces in each underground garage and corresponding primary street for entering and existing traffic, the number of total trees and Heritage trees that will be lost in each Building Block, and other metrics that are deemed an important metric to keep track of during the planning process.

N.14

ES-3 Significant and Unavoidable Impacts

- Impact AQ-3a: This impact description addresses construction emissions involving diesel particulate matter and PM2.5 concentrations. These are emissions from trucks and heavy equipment. Why does this impact element not address dust emissions from the construction site? Significant and unhealthy dust emissions are typically generated by construction activities including demolition, excavation, vehicle, and heavy equipment driving over on-site dirt roads, moving and stockpiling soils, loading and transporting soils and demolition debris off-site in trucks. Additionally, due to the age of the existing apartment complex and its buildings there is a potential for asbestos in building materials and insulations, and lead in painted surfaces. I do not see this addressed as a potential impact nor any sampling and test results for these highly toxic substances.

N.15

N.16

Is there an asbestos and/or lead problem at this old apartment complex and does public health need to be protected?

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ES-4 Project Alternatives

- The report downplays the significance of the No Block C Alternative. It diminishes the benefits of the No Block C Alternative by not addressing the preservation of the urban woodland, the trees including Heritage Trees, the tree buffer zone that protects the health and welfare of the homeowners and their families by absorbing the noise, dust, and pollution from Highway 85. This is a well-known scientific fact. Other benefits include bird and wildlife habitat and it being integrated with the Stevens Creek Trail corridor. It is our desire that this area in Block C be even better integrated into the Stevens Creek Trail Corridor with the addition of trees and native water-resistant plants, landscape maintenance, watering, and habitat restoration. The Stevens Creek Trail corridor is a jewel, and we are very fortunate to have this in our community. We desire this area be deeded to the City in exchange for project approval in Blocks A and B. This would be a greater benefit to neighborhood, the city, and the environment compared to a small manicured public park surrounded by apartment units. We are constantly losing the aesthetics and other benefits provided by the natural environment which is as important as the air we breathe.

N.17

2.1 Project Overview

- The total number of units is incorrect when compared to the June 2021 and July 2021 Project Plan.
- The reference to the new “High-Low Density” designation needs more explanation. It is implied in the DEIR the new designation is necessary to allow the developer to move forward with the development and meet the regulatory requirements. The new designation will apply only to this project site or developer and to no other project site or developer. Has there been a legal opinion for this type of special treatment or “gift” to a private corporation?
- I can find no description or reference for “High-Low Density”. This density classification needs to be described in more detail.
- Is the demolition and non-replacement of the tennis and basketball courts, the pool and spa consider a benefit of the project? The tennis courts are used by the Silicon Valley Tennis Academy as is a significant benefit to the young tennis players.
- Is the city considering the building of a 1.3-acre public park a benefit to the public or to the tenants of the apartment complex? I believe, the developer will get most of the benefit from the park because it will increase the value of his property. The park will be constructed, maintained and watered at the taxpayers’ expense. The other multi-family townhouses and condominiums have their own green open space, picnic and barbeque areas. How can the public park be seen as a benefit when there will be a loss of a woodland area, trees including Heritage Trees? I consider the small public park a much lesser benefit to the neighborhood compared to the wooded wildlife area in Block C that will be lost to the development.
- There is no access to the Project Site from Moffett Blvd as far as I know (page 2-2).

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N.21

2.2 Project Objectives

- I do not agree that AvalonBay has taken adequate measures to preserve Heritage Trees to the greatest extent feasible. I believe the No Block C Alternative would preserve Heritage Trees to the greatest extent feasible and allow the developer to build 119 units in Block B.

2.3 Project Location

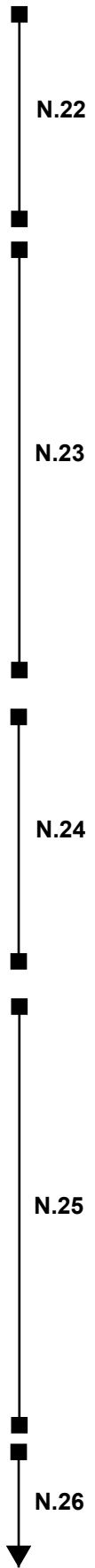
- Although the Project Site has an address of 555 West Middlefield Road, most of the demolition, construction of apartment buildings and underground garages, and the public park will occur on Cypress Point Drive. Since 2015, the public was unaware of the potential impacts of this project to their Cypress Point Drive neighborhood because the project site was referred to as “555 West Middlefield Road”. This was misleading because the residents believed the project was located on West Middlefield Road when, in fact, the project was going to extend to Cypress Point Drive and most of the construction activity and traffic would occur on our street and in our neighborhood. If there had been more outreach, our neighborhood would have likely opposed this high-density housing project from being voted into the Gate-Keeper Program at that time and prevented a massive high-density construction project in proximity to their homes.

2.4.3 Surrounding Land Uses

- This sentence is incorrect “South of Cypress Point Drive are professional offices”. On the southside of Cypress Point Drive are several multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums. There is also an Adult School and parking lot on the southside of Cypress Point Drive. The area between Cypress Point Drive and Central Expressway are more multi-family housing developments and single-family homes.

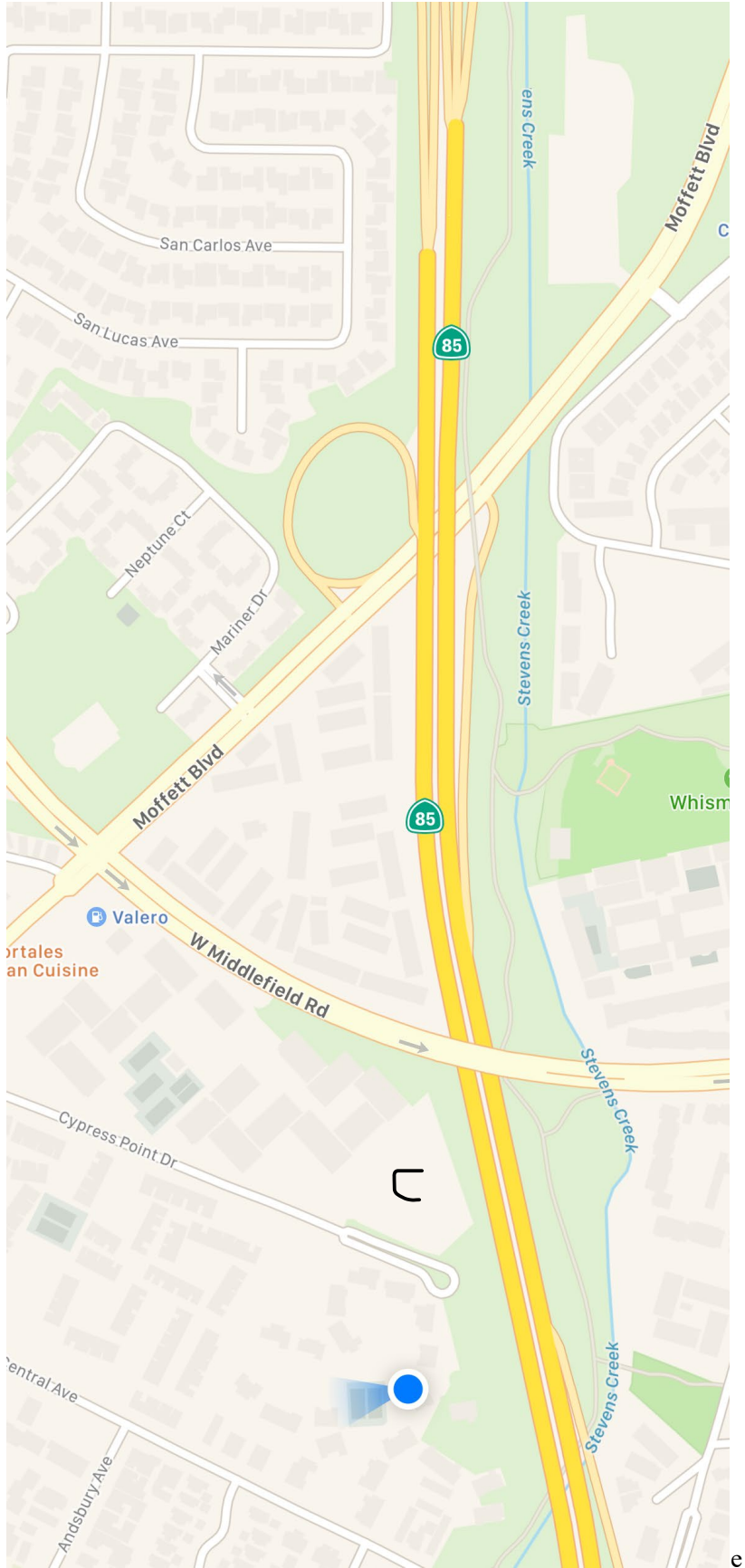
Figure 2-3: Proposed Site Plan

- The diagram labeled figure 2.3 should illustrate the locations of the multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums on the southside of Cypress Point Drive, and Willow Park Apartments on the northside of West Middlefield Road. These are the nearest targets for environmental impacts and should be displayed on all project site diagrams in the DEIR.
- The diagram should also show the proximity of the Stevens Creek Trail Corridor to Block C. I will attach a Google Map on page 8 that displays the proximity of this very important feature of Mountain View. The map displays the Stevens Creek Trail Corridor in green. The surface parking lot in Block C is marked with a “C” and is located at the end of Cypress Point Drive. The woodland area in Block C is visible as a green area to the north and east of Block C.
- A new diagram is needed. It is very important to illustrate the footprint of the new apartment building and underground garage in Block C. This footprint would be overlaid by the existing location of the trees including Heritage trees that AvalonBay plans to cut



down and remove to construct the apartment building, underground garage, and the emergency vehicle access road. Without this diagrammatic overlay it is not possible to fully assess the environmental impacts in Block C and surrounding lands.





2.5.2 General Plan Amendment

- The new High-Low Density Residential designation would only apply to this Project Site. This is not a City-wide new zoning designation, and it appears to be a special gift to a private real estate investment trust company?
- The High-Low designation would allow a height limit of up to 5 stories. What is to stop AvalonBay or the new landowner to get approval to continuing adding stories to their buildings in the future? The Project Plan currently has a 4-story building in Block C.

N.27

2.5.3 Site Access, Circulation, and Parking

- The number of total parking spaces in Blocks B & C is 624 parking spaces (584 underground and 40 surface spaces). This parking facilities will be accessed from Cypress Point Drive, a substandard, narrow, dead-end, cul-de-sac. There is currently parking on both sides of the street making it a very narrow roadway for cars, trucks, and bikers. The use of this small neighborhood street for traffic and parking will have competition from a townhouse complex, a condominium, and an adult school. There are no bike lanes and there is no space for bike lanes. This is a formula for disaster in terms of car and bike safety, traffic jams at the intersection of Moffett Blvd and Cypress Point Drive, and wayward vehicles entering the driveway and parking lot at Cypress Point Woods Townhouse because they are unaware that street dead-ends at the entrance to the townhouse parking lot.
- There are a total of 363 parking spaces in Block A (341 underground and 22 surface spaces). This will generate much less traffic entering and exiting Middlefield Ro which is a standard primary road for through traffic. Why are there not more vehicles entering and exiting Middlefield Road as compared to Cypress Point Drive. Middlefield Road has much more capacity to handle the number of vehicles and traffic safely and efficiently compared to Cypress Point Drive. Clearly, Cypress Point Drive cannot handle this vehicle load safely and efficiently.
- The DEIR states an emergency access along SR 85's building frontage (see figure 2-3) will be provided. What does "SR 85's building frontage" referred to? According to the figure, this area is for an emergency vehicle access road. The area is located between Cypress Point Woods parking garages and surface parking lot in Block C. It is very close to the property lines separating the two properties. It is also very close to the driveway entrance to Cypress Point Woods. There is a steep vegetated hill with trees with a path to the top of the hill. The path ends at the end of the Cypress Point Woods perimeter wall on top of the hill. This is a low security wall along the freeway that was not constructed by Caltrans as a sound wall. The wall was constructed in 1977 by the developer of Cypress Point Woods (CPW). The CPW HOA has been trying for years to have Caltrans build a proper sound wall. But for the present, the tall trees and canopy along the low perimeter wall, as well as the taller sound wall behind Block C, provide protection from the noise, dust, and pollution from the freeway. According to statements by AvalonBay, this hill will be leveled to ground surface and the soil and debris will be trucked away. The DEIR does not address the property lines, the hill, the leveling of the hill, and impacts to the environment and to Cypress Point Woods property, if any.
- Diagrams are needed to be expanded to display the relationship and distance of other multi-family housing developments to this project site. These existing residential developments are cut-off in the diagrams. For example, Figure 2-3, Project Site Plan, and Figure 2-9, Proposed Landscape

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Plan do not display or identify major housing developments in proximity to the project site. The diagrams need to display the footprint of Cypress Point Woods Townhouse, Cypress Point Lakes, and the Adult School buildings and driveway entrances in relationship to the opposing project site across Cypress Point Drive.

- Have highly visible property perimeter stakes been placed between Cypress Point Woods property and 555 West Middlefield property so it is clear where the properties lie? Very visible perimeter stakes driven into the ground should also be used to outline the perimeter or footprint of the apartment building, underground garage, and the emergency access road in Block C.

We support the No Block C Alternative. We believe the No Block C Alternative to be a win-win for all the key stakeholders including the residents, the neighborhood, the city, the developer, and the environment in the following ways:

- The resident’s health & safety will be protected and there will be less disturbances and impacts to the quality of life. The aesthetic value of the trees, the urban forest canopy, and wildlife will continue to be enjoyed at the pleasure of the residents.
- The neighborhood as a functioning community will be less impacted by the project if there is no Block C.
- The city will gain 119 or possibly more dwelling units to help meet the housing demand and help abate the housing shortage problems in Mountain View.
- The developer will be permitted to improve and expand the old apartment building complex by adding Blocks A and B. This will include a new apartment and leasing building, two underground garages, and a new amenities building on their property.
- The environment will benefit because the urban forest woodland area, Heritage Trees and wildlife habitat will be preserved. These areas are endangered and are dwindling at a rapid pace in our cities. Trees should be added to these areas and the accumulated and competitive undergrowth be removed to improve the health of our prized urban forested areas right in our backyards. This area in Block C is a prime example.
- The No Block C Alternative is a good compromise. A good compromise is when no one party gets all they want but it still results in a win-win for all the parties.

Thank you for the opportunity to review, evaluate, and comment on the DEIR. I hope my comments will improve upon the work already accomplished by the consultant, ICF. I hope my comments will inform the consultant with best practices to use to communicate this project to the audience. In this case, the audience is primary the public. These are the residents, homeowners, tenants, shopkeepers, and other people living or working near the project site. Although I understand there are certain rules and requirements that must be followed under CEQA in the drafting of the DEIR and Final EIR, there is no reason why the DEIR had to be over 400 pages. This was too overwhelming even for me and I have been in the environmental protection business for nearly 40 years. This document could be reduced, condensed, and distilled down to the most important project details, problems, and solutions. This report could be more concise and transparent. As it is, I am not sure it will have the practical utility it was intended for and that was communicate to the community (1) accurate details about project, (2) the environmental impacts of this project both short-term and long-term and, (3) feasible alternatives and solutions that would mitigate these impacts. Also

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importantly, the DEIR was supposed to thoroughly address the pre-DEIR comments submitted by the public. I believe this was not accomplished. I believe this DEIR could have been more focused on the interests and needs of the neighborhood and the environment by scheduling pre-DEIR meetings with representatives from the developer, the city, the community, and the environmental advocacy groups.

Sincerely,

Daniel Shane
213 Cypress Point Drive
Mountain View, CA
Homeowner
Representative for the Cypress Point Community Preservation Group
Environmental Scientist, U.S. EPA (retired), 1982-2017
(650) 269-7551
Shanedan18@outlook.com

Copied:

ellen.Kamei@mountainview.gov (Mayor)
lucas.ramirez@mountainview.gov
margaret.abe-koga@mountainview.gov
Alison.hicks@mountainview.gov
sally.lieber@mountainview.gov
lisa.matichak@mountainview.gov
Pat.Showalter@mountainview.gov
City.council@mountainview.gov
City.mgr@mountainview.gov (Kimbra McCarthy)
CitymgrPIO@mountainview.gov (Kimberly Thomas)

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Letter O

From: Daniel Shane <shanedan18@outlook.com>

Sent: Tuesday, June 29, 2021 6:12 PM

To: Diane Gazzano <dpgazz@yahoo.com>

Cc: Robert Cox <robert.cox@intel.com>; Hala Alshahwany <alshahwany@gmail.com>; Denley Rafferty <denleyr@yahoo.com>; Terrie Rayl <trayl@staffingsource.com>; Nancie Fimbel <fimbeln@gmail.com>; Leona Chu <leonachu41@gmail.com>; Tim Dooley <timdooley7@hotmail.com>; Christopher Peri and Sayo Palomino <perivision@gmail.com>

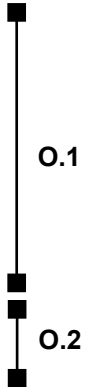
Subject: Where Is Asbestos Commonly Found In The Home, When and How Should It be Removed?

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

The apartment buildings at 555 W Middlefield were built in 1969. It's unfortunate but asbestos installation was commonly used in buildings prior to 1970. EPA did not begin to ban and phase out asbestos due to its carcinogenicity until 1970. Do we know if the Amenities building and clubhouse and other structures to be demolish contain asbestos? AvalonBay should be testing their building insulation for presence of asbestos and doing geotechnical borings to assess soil properties and the depth to groundwater for their 30' deep excavations. This data is needed to understand the environmental impacts. When the consultant determines "no impact" is this based on proper data and evidence? Or is it just wishful thinking or guessing? Additionally, lead-based paint was not phased out until 1978. Lead was commonly used in paint prior to 1978. Has AvalonBay tested the paint in their buildings to be demolished?

<http://www.ehso.com/asbestosfoundwhere.htm>

Sent from my iPhone



Letter P

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

On Jul 24, 2021, at 4:11 PM, Daniel Shane <shanedan18@outlook.com> wrote:

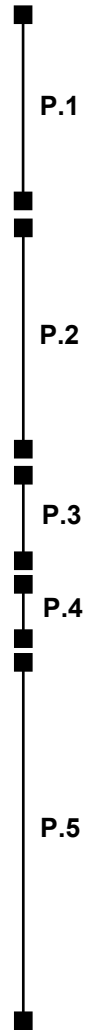
Hello Diana,

I do not see a list of appendices in the 435 page DEIR. Please send me the appendix that addresses the following:

- Describes the removal and replacement of trees.
- Diagrams and overlays that show the locations (footprints) of the apartment building and underground garage overlaying the trees that will be removed in Block C. We want to know if it is necessary to remove many or just a few trees for construction of the apartment building and underground garage. These trees are located along Highway 85 and provide a buffer between the freeway and the homes in our neighborhood. It is also a nice size woodland area that provides wildlife habitat in an urban setting. These are getting super rare.
- Most recent Google satellite photographs with apartment building and underground garage diagram overlays to evaluate the biological, climate, noise, and air quality impacts in Block C.
- The landscape plan for removal, transplanting, and replacement of trees and herbaceous plants in Block C.
- Please send me the list of appendices related to landscaping, building and underground garage footprints that support the need to remove so many trees.

Thank you for your immediate attention to this matter. As you know we have little time to evaluate and comment on the DEIR by August 12, 2021.

Daniel Shane
CPCPG Representative
650-269-7551



Letter Q

From: Daniel Shane <shanedan18@outlook.com>

Sent: Thursday, July 29, 2021 9:08 AM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>

Cc: louise katz <louisejkatz@sbcglobal.net>; Cox, Robert <robert.cox@intel.com>; Gita Dev <gd@devarchitects.com>; Diane Gazzano <dpgazz@yahoo.com>

Subject: Re: Appendices for the 555 W Middlefield Road Project Plan

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

Hi Diana. Gita Dev, Diane Gazzano, Louise Katz, and myself are in need of information from the developer and the City Planning Division on the information listed below. I don't know if you responded to the others but I have not received a confirmation of receipt of my request. Can you provide this information to me this week? Thank you, Daniel Shane.

Sent from my iPhone

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Letter R

From: Daniel Shane <shanedan18@outlook.com>
Sent: Friday, July 30, 2021 9:02 AM
To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>
Subject: Re: Appendices for the 555 W Middlefield Road Project Plan

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

Diana, thank you for the response. Question. Can you request AvalonBay to submit a diagram and an overlay displaying the extent of the apartment building and underground garage footprint over a diagram of the locations of the existing trees, canopy, and Heritage Trees on the perimeter of Block C, inside or outside Block C? Also can the diagram include a clear property line in this woodland area separating Caltrans property from AvalonBay property? Will AvalonBay need an easement to cut down trees on Caltrans property? I believe it is very difficult to do this impact assessment for the woodland area without the diagrams, overlays, clear property lines, and locations of Heritage trees and their relationship with construction in Block C. Thank you for your timely response to my inquiry. Daniel Shane.

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Sent from my iPhone

Letter S

From: Daniel Shane <shanedan18@outlook.com>

Sent: Sunday, August 8, 2021 8:35 PM

To: Pancholi, Diana <Diana.Pancholi@mountainview.gov>

Cc: Diane Gazzano <dpgazz@yahoo.com>

Subject: Re: Island of Eucalyptus Trees located at the end of Cypress Point Drive and across from the proposed Block C

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

Hello Diana,

I remember AvalonBay telling the residents during a community meeting that the stand of Eucalyptus trees must be removed to allow heavy equipment access, and a turn-around area for trucks, during demolition and construction activities. We do not see the loss of these trees addressed in the DEIR. These trees provide shade, cooling in the summer, bird perches and nests, and wildlife habitat. As long as the tree debris is removed by city workers they should not pose a significant fire hazard in this location. Several people have expressed their pleasure with preserving these trees and canopy. I guess they were put there for a reason.

Will the Eucalyptus trees and the island be removed as part of the construction project?

Thanks for clarifying this.

Daniel Shane
Homeowner

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Letter T

August 12, 2021

COMMENTS ON THE
OF A DRAFT ENVIRONMENTAL IMPACT REPORT

By

DANIEL M. SHANE

HOMEOWNER, 213 CYPRESS POINT DRIVE, MOUNTAIN VIEW 04043

Project Title: 555 West Middlefield Road Project (SCH #2019070252)

City/County: City of Mountain View, Santa Clara County, California

Public Review Period: June 28, to August 12, 2021

Comments to be submitted to Diana Pancholi, Senior Planner, City of Mountain View, Community Development Department, P.O. Box 7540, Mountain View, CA 94041 or emailed to diana.pancholi@mountainview.gov

Dear Diana Pancholi,

The purpose of the letter is to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed 555 West Middlefield Road Project in my neighborhood. My comments begin by a broad overview of my evaluation of the report. Additionally, I have provided comments for key sections of the DEIR. I hope my comments will be incorporated into the Final EIR.

The DEIR seems to be mostly focused on the short-term environmental impacts during the 5-year construction phase. However, there are long-term impacts from this project to the future livability, quality-of-life, and neighborhood character from this high-density housing development. I know this because we have already reached maximum levels and capacities for this multi-family housing neighborhood. We have mostly townhouses, condominiums, and apartments in our neighborhood. I have listed some of the existing problems currently plaguing our neighborhood. The project, as proposed, will simply exacerbate these problems.

The Cypress Point Community Preservation Group (CPCPG) is supporting the No Block C Alternative listed in the DEIR. The No Block C Alternative will mitigate most of our concerns about environmental impacts including increased noise levels, dust, pollution, exposure to toxic emissions from the cars and trucks using the nearby freeway and preserve the aesthetics and visual comfort we benefit from the tree canopies. The No Block C will reduce the density and intensity of this development in our neighborhood which is medium-density multi-family townhouses, condominiums, and apartment buildings. Our neighborhood has already reached its maximum limit on several livability parameters such noise sources, availability of street parking, traffic safety, and the numbers of people (bikers, dog walkers, and joggers) who cross our property to access the Stevens Creek Trailhead. The full project without the No Block C Alternative will have significant impact on the livability, quality of life, and the character of our neighborhood. As part of the Block C development many of the mature trees including majestic Heritage trees will need to be removed to make space for the construction of a large 4-story apartment building, a 2-level underground garage, and an emergency vehicle access road next to the driveway entrance to Cypress Point Woods Townhouse parking lot and townhouse units. The No Block C

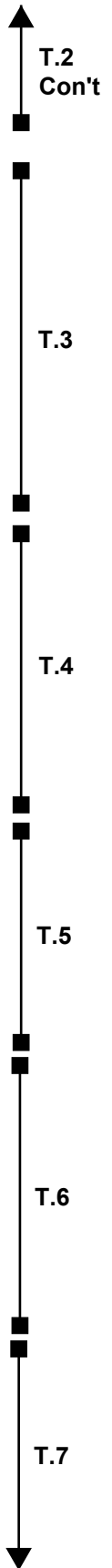


Alternative will likely shorten the duration of the construction activities from 5-years and 4-months to about 2-years. A demolition and construction project that lasts 64-months cannot be tolerated by the residents of our neighborhood.

The loss of the tree buffer zone in Block C and along Highway 85 will have significant impacts to the health of our families, especially our infants and children. It is a well-known, scientific fact that mature tree canopies along the freeways absorb high levels of noise, dust, and pollution and protect the health of our residents from toxic air emissions by cars and trucks. The replacement trees will not be a mature canopy for decades and will not have the capacity to provide the benefits of the existing tree buffer/barrier zone. This area in Block C has many trees including Heritage trees which are visually comforting and has aesthetic scenic qualities that are enjoyed by all the residents. It is a woodland area that supports a wildlife habitat and tall trees for nesting birds. There is a nexus between this woodland area and the Stevens Creek Trail corridor, and it provides more species and diversity to this world class urban forested trail that stretches from the coastal mountains to the Baylands.

The DEIR does not adequately address these problems.

- There are already many sources of noises causing a nuisance in our neighborhood such as Highway 85 freeway noise, leaf blowers, Caltrain, freight trains, and Shoreline Park Amphitheater. The loss of many trees and Heritage trees during construction activities will eliminate the tree buffer zone that protects our homes and the health of our families from noise, dust, and pollution, especially with the construction of the large apartment building, underground garage, and emergency vehicle access roadway in Block C.
- There are already too many projects in our neighborhood that are removing trees and Heritage trees, filling in open space, and having a negative impact on aesthetics, including urban forest areas, trees, and wildlife habitat. The replacement trees and vegetation will not have the benefits that a mature woodland area provides the community. The Stevens Creek Trail green corridor is a world class urban green open space and trail. The woodland area in Block C is part of the Stevens Creek Trail corridor even though it is located across the freeway from the trail. The ecosystems are interconnected.
- There is already a traffic safety problem for both drivers, bikers, and pedestrians. Many near misses have been reported by residents. The substandard neighborhood street has street parking on both sides which narrows the street even more and cars cannot easily maneuver and avoid collisions. Cars come out of the driveways blindly and nearly collide with oncoming traffic. If street parking is moved away from the intersection of the driveway and the street to improve visibility, the street parking spaces will be reduced even further than it is now. Cypress Point Drive is a dead-end cul-de-sac and there are no barriers to prevent wayward vehicles from entering the driveway of Cypress Point Woods townhouse parking lot and endangering children at play.
- There is already competition for street parking spaces on Cypress Point Drive. Due to the addition of more 2 and 3-bedroom, as opposed to studios that now exist, the numbers of people could double in size. This means more vehicles, less garage parking, and added pressure on street parking. According to AvalonBay, there will be more vehicles flowing to Middlefield Road compared to Cypress Point Drive. How can this be if there are a total of 602 underground garage parking spaces on Cypress Point Drive and only 363 underground garage parking spaces on West Middlefield

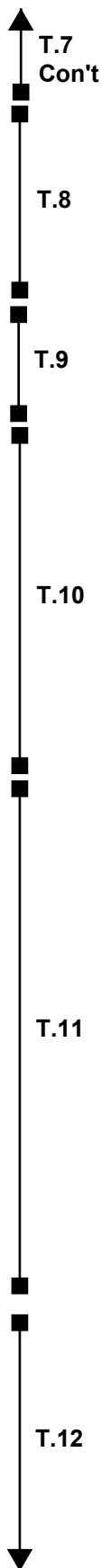


Road. There will be 171 parking spaces in Block B and 431 parking spaces in two underground garages located on Cypress Point Drive.

- There is already a lack of access to the Stevens Creek Trailhead for dog walkers, joggers, and bike commuters who cut through our properties to get onto Central Avenue and the trailhead. The development will more than double the existing numbers of people who will cut through our properties to get to the Stevens Creek Trailhead. Security of our homes and garages have been a constant area of concern. Allowing more access to the properties will certainly increase the break-ins and thefts.
- There is already a cumulative impact from multiple housing and commercial developments in a relatively small area north of Central Expressway. These developments are proposed, under review, under-construction, and recently completed. The cumulative impacts are not known because they have not been studied. Equally important is the lack of a Precise Plan to guide the growth and development of this significant area that will eventually be an extension of Downtown Castro Street.
- We already have the developers designing and guiding our growth through their many housing developments being allowed no matter the cost to the residents and the livability of their neighborhood. This property has never been envisioned as high-density housing and will require the city to give a large private real estate investment trust exemptions to the General Plan and the local zoning density requirements. This is called the Gate-Keeper Program which has been disbanded for good reasons. A Precise Plan is needed to guide the growth and development of our community and ensure the people reap the benefits of a green, livable, healthy, and prosperous life for all, not just more profit for the developers and their shareholders.
- The Draft DEIR already has a comprehensive list of alternatives to the proposed project. Many in our community support the No Block C Alternative. The No Block C Alternative will sufficiently scale-back the project to mitigate most of our concerns about the project. According to the City's consultant, ICF, the No Block C Alternative is the most environmentally superior alternative, except for the No Project Alternative. The No Block C Alternative appears to be a win-win for all the stakeholders including the developer, the homeowners and their families, retired seniors, the neighborhood, and the environment. The No Block C alternative will allow the construction of Block A and Block B. Block B construction site is distant from most of the existing multi-family housing developments compared to the construction activities in Block C. Block B will allow the development of an apartment building with 119 units and an underground garage, a leasing building as well as an amenities and recreation building. We estimate the duration of short-term environmental impacts will be reduced from 5 years to 2 years which is typical for a housing development in our area. Most of our concerns about the long-term health and environmental consequences of this project should be mitigated by the No Block C Alternative. Additionally, this will allow time to study and evaluate future growth and a vision for our community.

It was difficult to review and evaluate the DEIR against the Project Plan. The Project Plan was repeatedly revised by AvalonBay during the review period. Once a DEIR has been released to the public, there should be no modifications made by the developer to the project plan. This was not the case and created a lot of confusion. Here is an example. The number of dwelling units constantly changed during the review period.

- The original project plan had 329 units including 1-, 2-, and 3-bedroom units.



- For unknown reasons, 5 units were removed from Block B, making it a total of 324 units.
- My project metrics analysis of the June 2021 project plan revealed 32 more units than reported by AvalonBay. This made the new total 356 units. This was verified in an email message from Diana Pancholi.
- The DEIR was made available on June 28, 2021 and was based on the June 2021 project plan.
- The June 2021 project plan was again revised in July 2021. Now there were 11 less units making a new total of 345 units. But the DEIR was still based on the June 2021 project plan.
- The June 2021 project plan had 111 units in Block B and 218 units in Block C.
- In July 2021 this was changed. Block B had 119 units and Block C had 226 units. The new total was 345 units.
- Are the total number of dwelling units existing and proposed 747 units (402 units + 345 units)?

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Executive Summary

- I recommend the consultant provide a one or two-page summary table, in bullet format, the key basic project metrics. The purpose of this summary is to preclude any future confusion. This page can be revised in the future if necessary to highlight any changes made to the project plan and can be posted on the city's website. Some of the metrics should be the size of the project site, the number of units per acre (density), the allowable density for this project, the number of existing and future studios, 1, 2 and 3-bedroom units, the number of affordable units, the estimated rent to comply with "affordability" in this area, the estimated number of existing tenants, the estimated maximum number of tenants after the addition of 345 new units, the number of dwelling units and parking spaces in Blocks A, B, and C, the number of stories and the heights for each existing and new buildings, the number of underground parking garage levels for each Building Block, the number of parking spaces in each underground garage and corresponding primary street for entering and existing traffic, the number of total trees and Heritage trees that will be lost in each Building Block, and other metrics that are deemed an important metric to keep track of during the planning process.

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ES-3 Significant and Unavoidable Impacts

- Impact AQ-3a: This impact description addresses construction emissions involving diesel particulate matter and PM2.5 concentrations. These are emissions from trucks and heavy equipment. Why does this impact element not address dust emissions from the construction site? Significant and unhealthy dust emissions are typically generated by construction activities including demolition, excavation, vehicle, and heavy equipment driving over on-site dirt roads, moving and stockpiling soils, loading and transporting soils and demolition debris off-site in trucks. Additionally, due to the age of the existing apartment complex and its buildings there is a potential for asbestos in building materials and insulations, and lead in painted surfaces. I do not see this addressed as a potential impact nor any sampling and test results for these highly toxic substances. Is there an asbestos and/or lead problem at this old apartment complex and does public health need to be protected?

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ES-4 Project Alternatives

- The report downplays the significance of the No Block C Alternative. It diminishes the benefits of the No Block C Alternative by not addressing the preservation of the urban woodland, the trees including Heritage Trees, the tree buffer zone that protects the health and welfare of the homeowners and their families by absorbing the noise, dust, and pollution from Highway 85. This is a well-known scientific fact. Other benefits include bird and wildlife habitat and it being integrated with the Stevens Creek Trail corridor. It is our desire that this area in Block C be even better integrated into the Stevens Creek Trail Corridor with the addition of trees and native water-resistant plants, landscape maintenance, watering, and habitat restoration. The Stevens Creek Trail corridor is a jewel, and we are very fortunate to have this in our community. We desire this area be deeded to the City in exchange for project approval in Blocks A and B. This would be a greater benefit to neighborhood, the city, and the environment compared to a small manicured public park surrounded by apartment units. We are constantly losing the aesthetics and other benefits provided by the natural environment which is as important as the air we breathe.

2.1 Project Overview

- The total number of units is incorrect when compared to the June 2021 and July 2021 Project Plan.
- I can find no description or reference for “High-Low Density”. This density classification needs to be described in more detail.
- Is the demolition and non-replacement of the tennis and basketball courts, the pool and spa consider a benefit of the project? The tennis courts are used by the Silicon Valley Tennis Academy as is a significant benefit to the young tennis players.
- Is the building of a 1.3-acre public park considered a benefit to the public or to the tenants of the apartment complex? The multi-family townhouses and condominiums have their own green open space, picnic areas, and barbeques. How can the public park be seen as a benefit when there will be a loss of a woodland area, trees including Heritage Trees? I consider the small public park as a much less benefit to the neighborhood compared to the wooded area in Block C.
- There is no access to the Project Site from Moffett Blvd as far as I know (page 2-2).

2.2 Project Objectives

- I do not agree that AvalonBay has taken adequate measures to preserve Heritage Trees to the greatest extent feasible. I believe the No Block C Alternative would preserve Heritage Trees to the greatest extent feasible and allow the developer to build 119 units in Block B.

2.3 Project Location

- Although the Project Site has an address of 555 West Middlefield Road, most of the demolition, construction of apartment buildings and underground garages, and the public park will occur on Cypress Point Drive. Since 2015, the public was unaware of the potential impacts of this project to their Cypress Point Drive neighborhood because the

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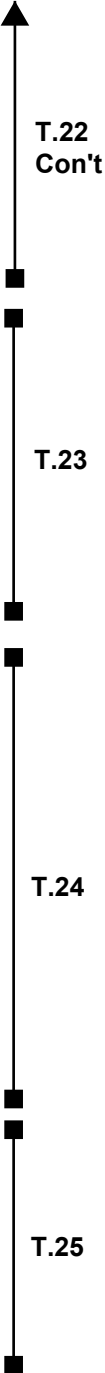
project site was referred to 555 West Middlefield Road. This was misleading and the residents believed the project was located on West Middlefield Road when, in fact, the project was going to extend to Cypress Point Drive and most of the construction activity and traffic would occur in our neighborhood. If there had been more outreach, our neighborhood would have likely opposed this high-density housing project from being voted into the Gate-Keeper Program at that time and prevented a massive construction project in proximity to their homes.

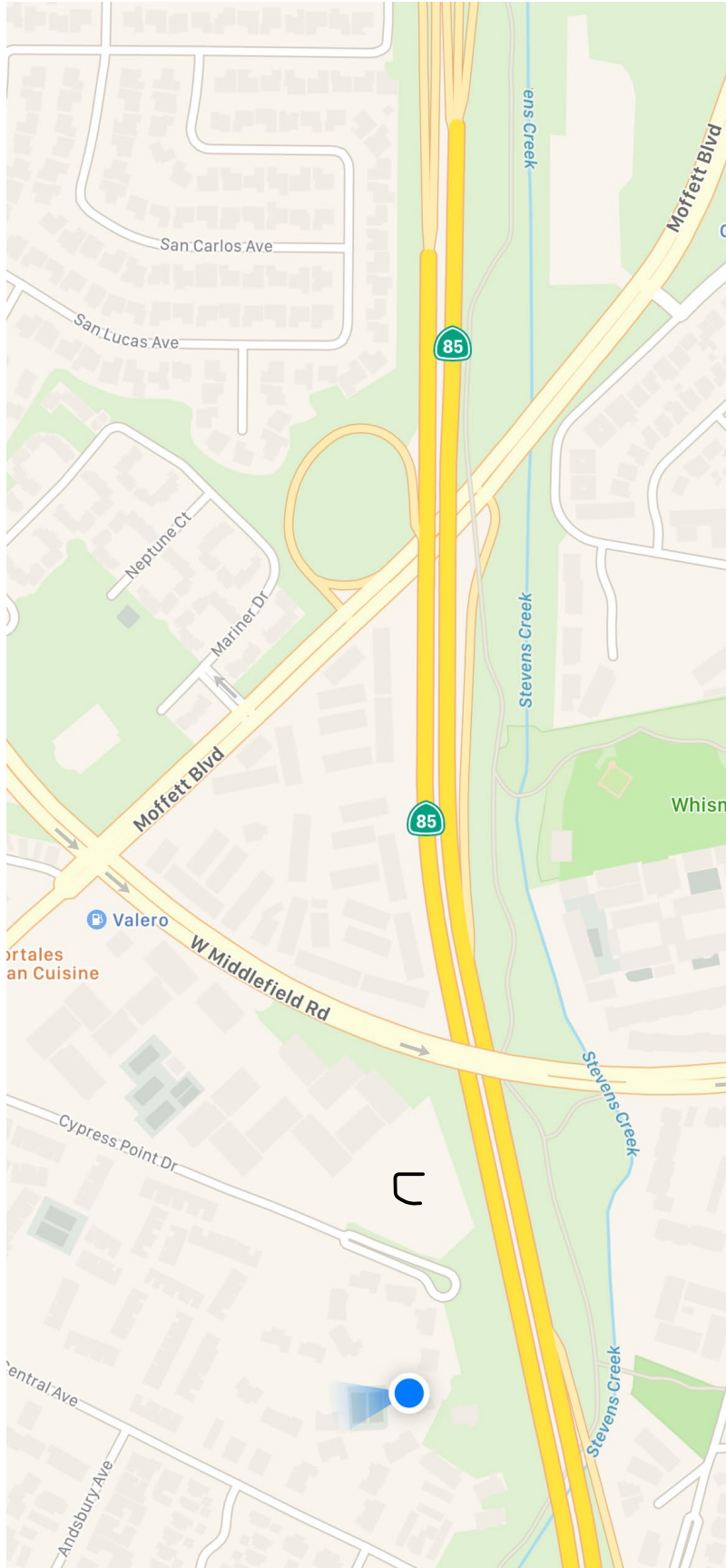
2.4.3 Surrounding Land Uses

- This sentence is incorrect “South of Cypress Point Drive are professional offices”. On the southside of Cypress Point Drive are several multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums. There is also an Adult School and parking lot on the southside of Cypress Point Drive. The area between Cypress Point Drive and Central Expressway are more multi-family housing developments and single-family homes.

Figure 2-3: Proposed Site Plan

- The diagram should illustrate the locations of the multi-family housing developments including Cypress Point Woods Townhouses and Cypress Point Lakes Condominiums on the southside of Cypress Point Drive, and Willow Park Apartments on the northside of West Middlefield Road.
- The diagram should also show the proximity of the Stevens Creek Trail Corridor to Block C. I will attach a Google Map on page 8 that displays the proximity of this very important feature of Mountain View. The map displays the Stevens Creek Trail Corridor in green. The surface parking lot in Block C is marked with a “C” and is located at the end of Cypress Point Drive. The woodland area in Block C is visible as a green area on the north and east side of Block C.
- Another diagram is needed and very important to illustrate the footprint of the new apartment building and underground garage in Block C. This footprint would be overlaid by the existing location of the trees including Heritage trees that AvalonBay plans to cut down and remove to construct the apartment building, underground garage, and the emergency vehicle access road. Without this diagrammatic overlay it is not possible to fully assess the environmental impacts in Block C and surrounding lands.





2.5.2 General Plan Amendment

- The new High-Low Density Residential designation would only apply to the Project Site. This is not a City-wide new zoning designation and is a special gift to a private real estate investment trust company? That's what it sounds like to me.
- The High-Low designation would allow a height limit of up to 5 stories. What is to stop AvalonBay or the new landowner to get approval to continuing adding stories to their buildings? The Project Plan has a 4-story building in Block C.

T.26

2.5.3 Site Access, Circulation, and Parking

- The number of total parking spaces in Blocks B & C is 624 parking spaces (584 underground and 40 surface spaces). This parking facilities will be accessed from Cypress Point Drive, a substandard, narrow, dead-end, cul-de-sac. There is currently parking on both sides of the street making it a very narrow roadway for cars, trucks, and bikers. The use of this small neighborhood street for traffic and parking will have competition from a townhouse complex, a condominium, and an adult school. There are no bike lanes and there is no space for bike lanes. This is a formula for disaster in terms of car and bike safety, traffic jams at the intersection of Moffett Blvd and Cypress Point Drive, and wayward vehicles entering the driveway and parking lot at Cypress Point Woods Townhouse because they are unaware that street dead-ends at the entrance to the townhouse parking lot.
- There are a total of 363 parking spaces in Block A (341 underground and 22 surface spaces). This will generate much less traffic entering and exiting Middlefield Ro which is a standard primary road for through traffic. Why are there not more vehicles entering and exiting Middlefield Road as compared to Cypress Point Drive. Middlefield Road has much more capacity to handle the number of vehicles and traffic safely and efficiently compared to Cypress Point Drive. Clearly, Cypress Point Drive cannot handle this vehicle load safely and efficiently.
- The DEIR states an emergency access along SR 85's building frontage (see figure 2-3) will be provided. This area for an emergency vehicle access road is located between Cypress Point Woods parking garages and surface parking lot in Block C. It is very close to the property lines separating the two properties. It is also very close to the driveway entrance to Cypress Point Woods. There is a steep vegetated hill with trees with a path to the top of the hill. The path ends at the end of the Cypress Point Woods perimeter wall on top of the hill. This is a low security wall along the freeway that was not constructed by Caltrans as a sound wall. The trees along the perimeter wall and the sound wall provide protection from the noise, dust, and pollution from the freeway. According to statements by AvalonBay, this hill will be leveled to ground surface and the soil and debris will be trucked away. The DEIR does not address the property lines, the hill, the leveling of the hill, and impacts to Cypress Point Woods property, if any.
- Diagrams are needed to be expanded to display the relationship and distance of other multi-family housing developments to this project site. These residential developments are cut-off from the diagrams. For example, Figure 2-3, Project Site Plan, and Figure 2-9, Proposed Landscape Plan do not display or identify major housing developments in proximity to the project site. The diagrams need to display the footprint of Cypress Point Woods Townhouse, Cypress Point Lakes, and the Adult School buildings and driveway entrances in relationship to the opposing project site.

T.27

T.28

T.29

- Have highly visible property perimeter stakes been placed between Cypress Point Woods property and 555 West Middlefield property so it is clear where the properties lie? Very visible perimeter stakes driven into the ground should also be used to outline the perimeter or footprint of the apartment building, underground garage, and the emergency access road in Block C.

T.30

It was my intention to review, evaluate, and comment on all the sections of the DEIR. But I did not have sufficient time to give this report all my attention and time. I suffered a severe angina attack on July 30 and admitted to the ER. I received two stents in two of three of previous triple bypass arteries that flowed blood to the heart. It was a very close call. I may have additional comments in a second submission before the deadline, which is today, August 12, 2021. But I wanted to submit the comments I have ready to share to guarantee the comments are received by the official deadline. Please call me at 650-269-7551 if you have any questions pertaining to my comments or suggestions.

Thank you for the opportunity to review, evaluate, and comment on the DEIR. I hope my comments will improve upon the work already accomplished by the consultant, ICF. I hope my comments will educate the consultant on best practices to use to communicate to the audience. In this case, the audience is primary the public. These are residents, homeowners, tenants, shopkeepers, and other people living or working near the project site. Although I understand there are certain rules and requirements that must be followed under CEQA in the drafting of the DEIR and Final EIR, there is no reason why the DEIR had to be over 400 pages. This was too overwhelming even for me and I have been in the environmental protection business for nearly 40 years. This document could be reduced, condensed, and distilled down to the most important project details, problems, and solutions. This report could be more concise and transparent. As it is, I am not sure it will have the practical utility it was intended for and that was communicate to the community (1) accurate details about project, (2) the environmental impacts of this project both short-term and long-term and, (3) feasible alternatives and solutions that would mitigate these impacts. Also importantly, the DEIR was supposed to thoroughly address the pre-DEIR comments submitted by the public. I believe this was not accomplished. I believe this DEIR could have been more focused on the interests and needs of the neighborhood and the environment by scheduling pre-DEIR meetings with representatives from the developer, the city, the community, and the environmental advocacy groups.

T.31

Sincerely,

Daniel Shane
213 Cypress Point Drive
Mountain View, CA
Homeowner
Representative for the Cypress Point Community Preservation Group
Environmental Scientist, U.S. EPA (retired), 1982-2017
(650) 269-7551
Shanedan18@outlook.com

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Pat.Showalter@mountainview.gov

City.council@mountainview.gov

City.mgr@mountainview.gov (Kimbra McCarthy)

CitymgrPIO@mountainview.gov (Kimberly Thomas)

Letter U



August 12, 2021

Diana Pancholi, Senior Planner
Community Development Department
City of Mountain View
PO Box 7540
Mountain View, CA 94041

Re: 555 W. Middlefield project EIR

Dear Ms. Pancholi:

GreenSpacesMV appreciates the opportunity to respond to the 555 W. Middlefield project environmental impact report (EIR). To learn more about our organization, see “About GreenSpacesMV” at the end of this letter.

The primary goals of our organization are to protect and enhance green spaces in Mountain View and, by extension, to protect wildlife that depends on our actions on their behalf. This letter reflects those concerns. That said, many of our members also have an interest in our city meeting housing needs and would like to see the project succeed due to its contribution on this front. To the extent the developers can do it, we would like to see housing optimized through the project while being mindful about environmental impacts during and after the development process.

Note that, while some of our comments here might fall outside of the purposes of the EIR documentation, we would like to bring all of them to your attention due to their relevance to the project, and to the environmental health and stability of our city at large.

U.1

Regarding landscaping

Tree removal is a major concern of ours. Our understanding is that all the existing trees providing a wide buffer along highway 85 are to be cut down in order to make space for a new Block C building (Landscape Drawing L.003) and, in addition, a significant number of additional trees will be removed in the area of Block C, and that this is needed specifically (we have been told) to enable access for construction vehicles during the construction process. In hopes of preserving trees, especially large mature trees that take decades to grow, we strongly urge you to find other solutions for this. Those trees are providing numerous benefits and will to current and future residents as well. Large trees should not be permanently removed for the sake of short term convenience. The trees along Highway 85 have an aesthetic value to drivers, and they provide a sound barrier between the highway and the entire neighborhood in addition to a myriad of environmental benefits including sequestering carbon and reducing air pollution.

U.2

In both cases where trees and landscaping are to be replaced or added (see 2.5.5 Landscaping and Heritage Trees in the EIR), we urge you to choose from native, drought tolerant, climate resilient, pollinator-friendly landscaping choices. In addition to great choices identified in the North Bayshore Precise Plan (<https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=31203>), we would like you to select from the following options, as identified by GreenSpacesMV members with the appropriate expertise:

The species list for the gardens may be drought tolerant (unfortunately even in swales where it makes sense to allow some flexibility and use a little more water), but almost all the species are not native and have no habitat value beyond providing some structure.

As a requirement for mulch, at least 3" is required on all soil surfaces. This is very common in plans but it's harsh unless compost-like mulch is used. Kids often no longer know what soil looks like, or feels. And mulch is often wood chips, sometimes dyed, which is worse.

The entire surface is paved or mulched. And mulch needs to be applied only to tree cups, not on all soil surfaces. Incidentally, the development could use a community garden!

U.3

In addition, the plans note: "Minor planting revisions may occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability." All the plants should be selected from the North Bayshore list with no substitution.

Rethinking your planting palette to include significantly more natives will not affect the buildings but will enhance the environment for their residents (making it more desirable) and for the community as a whole. Currently, with many people choosing to work from home, thriving landscaping and biodiversity are more attractive and important than ever.

Trees

There are no native trees in the plan. The one oak, holy oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western redbud. Some of the species on the list should not be planted here—magnolias are thirsty, camphor trees break easily, and London plane trees hybridize with local sycamores.

The plan should be revised to use trees from the North Bayshore list, even where the chosen non-native is consistent with existing trees onsite. Less consistency visually, but much higher biodiversity value.

We are particularly concerned about seeing any native oak trees removed. As Staff has noted, the developer should work very hard on protecting as many oaks as possible. A mature native oak is irreplaceable. Certainly, why plant European oaks when there are so many native oaks that are clearly thriving while many other trees in town (including camphors and magnolias) are suffering? Removing oaks simply goes against the biodiversity goal of the City, and important habitat is lost

Shrubs

The plan is predominantly (99%) non-native. Very disappointing given that California is blessed with a huge diversity of native shrubs that are drought tolerant, lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options.

The plan should be revised to replace most of the shrubs.

Is ok to keep:

- The only native on the list, *Juncus patens*, which people plant in swales everywhere.
- New gold lantana provides nectar for butterflies and hummingbirds
- Lion tail provides nectar for butterflies and hummingbirds

Some additional plants provide nectar for hummingbirds, but there are better choices on the North Bayshore Precise Plan list.

In short, we urge you to take a development approach that thoughtfully incorporates trees and high quality green spaces.

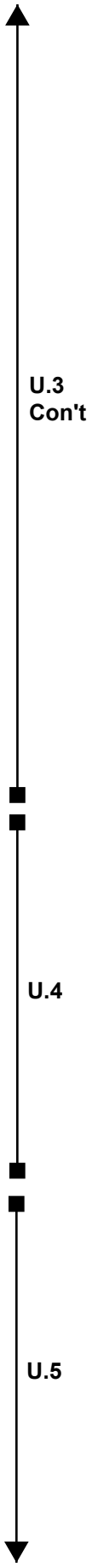
Regarding transportation impacts

We also care about making our transportation network as robust as possible, with high accessibility, safety, and comfort provided to pedestrians and bicyclists, with special attention to children, seniors, and those with disabilities. These needs go beyond the boundaries of the project site. As you know, three access points to the Stevens Creek Trail are nearby (at the end of Central Avenue, to the north off of Moffett Boulevard, and to the east off of Middlefield Road). We urge you to do all that you can to make these connection points as accessible, safe, and comfortable as possible, even if this means tying this project to others undertaken separately and also to work with neighboring communities to secure access through their jurisdictions.

Regarding lighting throughout the site

We ask that you do the following:

- Limit the Correlated Color Temperature of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife and ecosystems.
- Use timers to dim during use hours and turn off lighting outside of activity hours.
- Have all bollard lights on motion sensors to dim when not in use and turn off after 6pm.
- Shield all lights and direct it to only light the intended area



- Do not impact pollinators, native plants, or school gardens through additional lighting or destruction of their plantings.

If you would like more information on light pollution and its impacts, you can see details here:
<https://www.darksky.org/light-pollution/>.

Regarding stormwater management

We once again urge you to retain as many trees as possible, as they provide needed water filtration and that you incorporate as many green infrastructure features as possible that prevent unnecessary water runoff to storm drains.

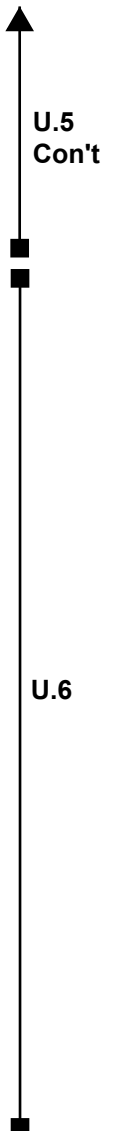
We hope you incorporate our recommendations into the project specifications and design prior to approval of the project. Thank you again for the opportunity to comment.

Sincerely,
Bruce England for GreenSpacesMV

Cc:
Joe Kirchofer, Avalon Bay
Cynthia James, Noble James, LLC
Ellen Kamei, Mountain View Mayor
Lucas Ramirez, Mountain View Vice Mayor
Margaret Abe-Koga, Mountain View City Council Member
Alison Hicks, Mountain View City Council Member
Sally Lieber, Mountain View City Council Member
Lisa Matachek, Mountain View City Council Member
Pat Showalter, Mountain View City Council Member

About GreenSpacesMV

Our focus is on biodiversity, native, drought-tolerant, and pollinator-friendly landscaping, complete green streets, parks and other open spaces, including Privately owned, publicly accessible (or POPA) park spaces, and so on. For more information, see <https://www.facebook.com/GreenSpacesMV>. To contact us, send email to GreenSpacesMV.info@gmail.com.



Letter V

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

August 12, 2021

Diana Pancholi, Project Planner
Community Development
City of Mountain View

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the “No Block C” alternative provides a reasonable balance of housing and environmental impact.

Please see our full comment letter attached.

Respectfully submitted,

Gita Dev, Co-Chair
Kleinhaus
Sustainable Land Use Committee
Environmental Advocate
Sierra Club Loma Prieta Chapter
Valley Audubon Society

Shani

Santa Clara

Cc: Mountain View City Council

Gladwyn D’Souza, Conservation Chair, Sierra Club Loma Prieta Chapter(SCLP)
James Eggers, Executive Director, Sierra Club Loma Prieta Chapter(SCLP)
Rajiv Mathur, Friends of Stevens Creek <rajiv_mathur@stevenscreektrail.org>

sent by:

Barbara Kelsey

she/her/hers

Chapter Coordinator

V.1

Sierra Club, Loma Prieta Chapter

3921 E. Bayshore Rd, Suite 204

Palo Alto, CA 94303

barbara.kelsey@sierraclub.org

We do not have a Chapter office

opening date yet, so email is the

best way to contact us. Thank you.



August 12, 2021

Diana Pancholi, Project Planner
Community Development
City of Mountain View
Via email to: diana.pancholi@mountainview.gov

RE: Comments on the DEIR for 555 W. Middlefield

The Sierra Club Loma Prieta Chapter Sustainable Land Use Committee and the Santa Clara Valley Audubon Society appreciate the opportunity to provide comments on this proposed development. We are generally supportive of increasing density using infill and we consider added housing, in proximity to transit, as desirable. However, this should not be at the expense of seriously degrading the environment. We believe that the “No Block C” alternative provides a reasonable balance of housing and environmental impact.

V.2

555 Middlefield is proposing to add housing in 3 different locations, using existing surface parking lots to insert additional housing with multi-level underground parking.

Block “C,” however, is very problematic as it has serious impacts. The proposed development here involves removal of every single tree in the existing wide tree buffer that currently exists along Hwy 85 and in close proximity to Stevens Creek Trail. This canopy is part of the unique Stevens Creek habitat corridor that extends from the Bay to the hills.

The 80’-100’ wide existing urban canopy will be lost to make place for a four-story building near Hwy 85 along with a strip of new landscaping including a few relocated olive trees.

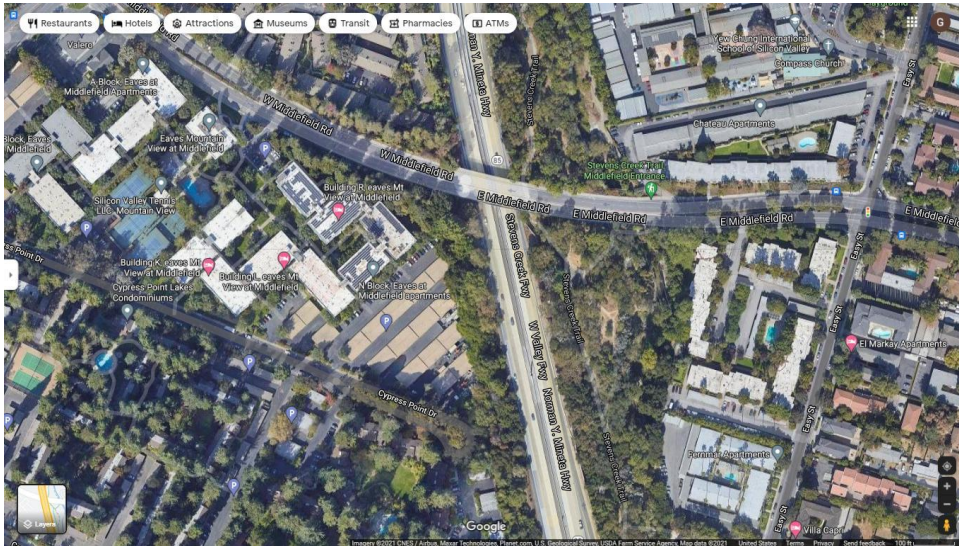
We are strongly opposed to degradation of the urban canopy along the habitat corridor and the removal of so many trees. We support the alternative of “No Block C” because we oppose removal of the urban canopy along Hwy 85.

V.3

The existing landscaping provides an effective aesthetic barrier to Hwy 85 visually and as a barrier for freeway noise. It also helps to trap airborne toxics, such as particulates from auto exhaust and tire dust, and brake linings dust from the highway. This is important because there is clear evidence of increased incidence and severity of health problems associated with air pollution exposures related to proximity to roadway traffic.

In addition, the tree canopy is part of an important unique habitat corridor, along Stevens Creek, from the Bay to the hills. Many resident and migratory bird species, as well as mammals, including bats, amphibian life and insect pollinators, use this corridor to travel between rich habitat patches.





View showing Stevens Creek Habitat Corridor at the site along Hwy 85.



Typical view of existing tree canopy along Hwy 85, seen from the site, part of a critical habitat corridor extending from the Bay to the hills. The project proposes clear cutting of all the trees along Hwy 85 to make room for a new building close to Hwy 85.

V.3
Con't



Excerpt from Drawing L.003 'Tree Removal Plan': Green hatched area shows ALL the trees along Hwy 85, on the property, are to be clear cut to make place for new buildings. Blue numbers are heritage trees, black numbers are non-heritage, and shrubs to be removed are not documented

Stevens Creek Corridor Park

Stevens Creek is a 20-mile-long waterway that starts on the slopes of Black Mountain in the Santa Cruz Mountains and flows to the Bay.

The 4.8-mile Stevens Creek Trail, which intermittently follows along the banks of Stevens Creek, is one of the best-developed and most ambitious trails in the Bay Area. The existing trail cost around \$30 million to build, with funding from a wide range of public and private sources. Building the trail required the construction of several bridges and underpasses, the planting of thousands of trees and shrubs, and the installation of numerous amenities, such as benches, signs, and drinking fountains. Since then, many other funding sources have been utilized to fund improving the ecology of the trail and the creek, and to protect biodiversity.

Because of the extensive landscaping and amenities, the trail acts as a natural linear park and is one of the peninsula's unique habitat corridors connecting the Bay to the hills.

The Stevens Creek corridor connects several rich habitat areas, home to a variety of both aquatic and land-based wildlife¹. Some species found in the parks include:

- **Mammals:** Coyote, Gray Fox, Raccoon, Brush Rabbit, Merriam's Chipmunk, Fox Squirrel, Opossum, black-tailed deer, and Big brown bat.
- **Birds:** the parks and trail are great for bird watching, with over 150 different species;

¹ SF Bay Wildlife https://www.sfbaywildlife.info/places/stevens_creek_county_park.htm

- **Butterflies:** California Sister, Lorquin's Admiral, Variable Checkerspot, Northern Checkerspot, Mylitta Crescent, Unsilvered Fritillary, Sara Orangetip, Gray-veined White, Painted Lady, Mournful Duskywing, Echo Blue, Spring Azure, Umber Skipper, Tailed Copper;
- **Dragonflies/Damselflies:** Flame Skimmer, Red Rock Skimmer, Common Green Darner, Variegated Meadowhawk, Vivid Dancer, Familiar Bluet;
- Other **invertebrates** worth mentioning are California Forest Scorpion and Banana Slug.

V.4
Con't

The Stevens Creek habitat corridor connects park habitats along different areas of Stevens Creek, enabling bird, mammal, and insect migration, (re)colonization and breeding opportunities for flora and fauna, and promoting increased genetic diversity. It provides food and shelter for a variety of wildlife and helps with juvenile dispersal and seasonal migrations. We believe that as proposed, the project is likely to interfere substantially with the movement of wildlife species in this corridor.

Summary

We support the alternative of "No Block C" as we oppose removal of the urban canopy along Hwy 85 for all the reasons given above.

V.5

In addition, increased density should come with some positive benefits for the community. We would propose actually improving the tree buffer and urban canopy along Hwy 85 by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's urban greening efforts.

This will improve the livability of the project for residents, including better health effects due to an improved buffer for auto exhaust, toxic dust and noise from the freeway, and a better aesthetic experience.

V.6

Importantly, it will advance Mountain View's strategic goal for improved biodiversity. In addition, added trees contribute to urban cooling, ameliorating climate change and urban heat island effects, and provide more carbon sequestration and better management of stormwater.

Respectfully submitted,



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

Shani Kleinhaus
Environmental Advocate
Santa Clara Valley Audubon Society

CC

Mountain View City Council
Gladwyn D'Souza, Conservation Chair, Sierra Club Loma Prieta Chapter (SCLP)
James Eggers, Executive Director, Sierra Club Loma Prieta Chapter (SCLP)
Rajiv Mathur, Friends of Stevens Creek <rajiv_mathur@stevenscreektrail.org>

COMMENTS ON IMPACTS AND MITIGATION MEASURES: DEIR 555 WEST MIDDLEFIELD ROAD, MOUNTAIN VIEW

1. The Project would result in the significant and unavoidable impacts with respect to Project and cumulative PM2.5 concentrations at existing on-site sensitive receptors.

CEQA requires mitigation for impacts, even when mitigation does not reduce the impacts to below significance level. The mitigations offered for Impact AQ-2b are limited to construction activities, and do not address the impact associated with the loss of tree canopy buffer along Hwy 85.

Scientific evidence shows that urban trees remove fine particulate air pollution². The removal of the trees along Hwy 85 eliminates an important green infrastructure service that can help reduce PM2.5 concentrations not only during construction, but also for the operations lifetime of the project. The Project should be modified in a way that retains all the existing trees along the freeway (eliminating Block "C," for example).

2. The Project finds no significant impact to Aesthetic Resources. We disagree.

Hwy 85 is not considered a scenic highway at the state level, but thousands of drivers spend several hours each week on this roadway on their way to and from work at Silicon Valley companies³. The value of the tree-lined highway in this section is not negligible - seeing trees

²

United States Environmental Protection Agency (EPA). 2017. Our nation's air: Status and trends through 2016. Accessed October 2020.

Nowak, D.J., D.E. Crane, and J.C. Stevens. 2006. Air pollution removal by urban trees and shrubs in the United States. *Urban Forestry and Urban Greening* 4:115–123.

Smith, W. H. 1990. *Air pollution and forests*. New York: Springer-Verlag, 618 p.

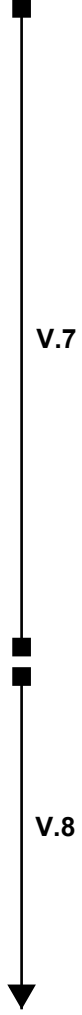
Nowak, D.J., S. Hirabayashi, A. Bodine and R. Hoehn. 2013. Modeled PM2.5 removal by trees in ten U.S. cities and associated health effects. *Environmental Pollution* 178: 395–402.

Centers for Disease Control and Prevention (CDC). 2012. *Asthma in the U.S: Growing every year*. Accessed October 2020.

³ "Gloomy forecasts abound with traffic experts predicting severe congestion on all South Bay roads to return in a very short time despite the opening of Highway 85. Anywhere from 100,000 to 150,000 vehicles are expected to use the freeway each weekday."

<https://www.mercurynews.com/2014/10/17/from-the-archives-highway-85-debuts-with-a-surprise/> (2014) and

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/census/aadt/tc-2016-aadt-volumes-a11y.pdf>



improves mental health, cognition, and productivity for these drivers⁴. Indeed, studies show that people who commute through natural environments daily report better mental health, and this association is even stronger among active commuters⁵. The project replacement trees will take decades to grow to provide the aesthetic and health benefits that the existing trees provide.

Trees (and the urban forest) are also important to community health. The loss of the trees along Hwy 85 should be recognized as a significant, unavoidable impact to the environment and the health of residents and drivers alike. This impact can be avoided if the “No Block C” alternative is adopted, or another configuration is offered that retains the existing trees along the freeway.

Views from Hwy 85,
looking towards the
project site:



V.8
Con't

4

Urban trees and human health (a scoping review):

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7345658/>

Effects of nature on cognitive functioning, emotional well-being, and other dimensions of mental health:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6656547/>

Effects of trees on academic success: <https://aslathedirt.files.wordpress.com/2016/01/li-sullivan.pdf>

Nature conservancy benefits of urban trees:

https://www.nature.org/content/dam/tnc/nature/en/documents/Public_Health_Benefits_Urban_Trees_FIN_AL.pdf

Urban forests and climate change (discusses benefits of urban forests to physical and mental health):

<https://www.fs.usda.gov/ccrc/topics/urban-forests> and

Effects of vegetation on reducing frustration levels for drivers:

<https://journals.sagepub.com/doi/abs/10.1177/0013916503256267>

⁵ <https://www.sciencedaily.com/releases/2018/10/181018095349.htm>

V.8
Con't

3. Biological impacts must address and mitigate the impacts of nighttime lighting on human health and on the Stevens Creek riparian ecosystem.

Artificial Light at Night (ALAN) is an emerging global environmental concern, and light pollution is an under-recognized problem. In recent years, there has been a remarkable increase in scientific articles showing devastating effects of ALAN on species and ecosystems⁶, and on human health.

V.9

The most devastating ecological impacts have been on insects and insect populations, including aquatic insects⁷, and the ecosystems that depend on insects for pollination, or as a food source. Because the project site is so close to Stevens Creek, attracting aquatic insects to light can cause adverse impacts to the aquatic and riparian ecosystem of the Creek.

Outdoor lighting has also been implicated in adverse impacts to teen mental health⁸ and to human physical health, including thyroid cancer and sleeping disorders⁹.

V.10

The International Dark-sky Association provides sound recommendations for addressing light pollution¹⁰ including:

- Shield lights and direct light downward;
- Use only as much light as needed;
- Use light only when necessary;
- Install control systems such as dimmers, motion sensors, and timers;
- Light close to ground;

V.11

⁶ "Exposure to Artificial Light at Night and the Consequences for Flora, Fauna, and Ecosystems" - an in depth summary of how ALAN affects the natural world:

<https://www.frontiersin.org/articles/10.3389/fnins.2020.602796/full>.

⁷ <https://www.sciencemag.org/news/2021/05/can-scientists-help-insects-survive-their-fatal-attraction-light-night>

⁸ <https://www.nimh.nih.gov/news/science-news/2020/outdoor-light-linked-with-teens-sleep-and-mental-health>

⁹ <https://acsjournals.onlinelibrary.wiley.com/doi/abs/10.1002/cncr.33392> and <https://time.com/5033099/light-pollution-health/>.

¹⁰ <https://www.darksky.org>

- Prevent light spillage.¹¹

In addition, please limit the Correlated Color Temperature (CCT) of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout the Project. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife, and ecosystems¹².

4. Plant and tree palette

The City of Mountain View has adopted a strategic plan that prioritizes biodiversity in the City¹³. To support biodiversity, mature trees (especially oaks) should be retained, especially in areas where they function as a wildlife movement corridor (along Hwy 85). In addition, a native plant palette would support native fauna and flora, especially local birds, and pollinators.

Almost all the species in the plant palette for the Project are not native to California and to our region and the vast majority has no habitat value beyond providing some structure.

Trees

There are no California native trees in the plan! The only oak, holly oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western, redbud. Some of the species on the list should not be planted here. For example, in California, London plane trees tend to hybridize with local sycamores in riparian corridors, threatening the genetic integrity of the local population.¹⁴

The plan should be revised to use trees from the North Bayshore plant palette¹⁵, even where the chosen non-native is consistent with existing trees onsite. This will result in less consistency visually, but much higher biodiversity value, which is a key priority of the City.

Shrubs

The plan is predominantly non-native despite the fact that California is blessed with an extensive diversity of native shrubs that are drought tolerant, aesthetically lovely, and provide habitat and biodiversity value. The North Bayshore plant palette provides many options.

¹¹ <https://www.iau.org/static/publications/dgskies-book-29-12-20.pdf>

¹² 2021 A Values-Centered Approach to Nighttime Conservation <https://www.darksky.org/values-centered-lighting-resolution/>

¹³ https://www.mountainview.gov/council/strategic_planning_and_visioning.asp

Strategic plan FY 2021-23 pg. 2 Protect and enhance local ecosystems and biodiversity through rewilding and other measures.; and pg. 3 Define biodiversity requirements for landscaping in Mountain View.

¹⁴ [https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore Alluvial Woodland Planting Guide 08 30 2018 med res.pdf](https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore%20Alluvial%20Woodland%20Planting%20Guide%2008%2030%202018%20med%20res.pdf)

O'Rourke, S.M. and M.R. Miller. 2017. RAD sequencing identifies trees that are a product of hybridization between California sycamore (*Platanus racemosa*) and London planetree (*Platanus x acerifolia*). Department of Animal Science, University of California, Davis.

¹⁵ https://www.mountainview.gov/depts/comdev/planning/activeprojects/northbayshore_/default.asp

V.11
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V.12

The plan should be revised to replace most of the shrubs with natives in accordance with the City priority for improving biodiversity.

The landscaping plan allows “minor planting revisions [to] occur during working drawings development, due to architecture and site plan refinements, irrigation design and/or plant material availability.” All the plants should be selected from the North Bayshore plant palette with no substitution.

4. Biological Resources: nesting birds

Large trees near waterways are often used by nesting birds, including raptors such as the Red-shouldered hawk, Great-horned owl, and Red-tailed hawk¹⁶. The nesting season for large birds is longer, and thus a nesting raptor survey is needed for the trees along Hwy 85 in the months of January through September.

5. Energy

Net Zero Energy

Mountain View’s Climate Action Plan (CAP) requires the City to move towards electrification to reduce GHG emissions. We note that some of the existing buildings have solar panels on their roofs. However, the proposed development does not include rooftop solar and the roof design may possibly preclude rooftop solar.

In order to achieve the City’s Climate Action goals, proposed new development should be encouraged to be Net Zero energy for new construction and include rooftop solar.

EV Charging Stations

This project will be operational for the next 50 years and climate change is driving the movement from gas powered vehicles to electric powered vehicles. By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor’s Executive Order established a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045.

We believe more EV charging stations are needed than the 10% currently proposed. The project should provide closer to 25% charging stations or include documented capacity for easily expanding the number of charging stations to 25% within the next decade¹⁷.

6. Transportation

Parking and Car Share

¹⁶ Breeding Bird Atlas of Santa Clara County (Bill Bousman, Santa Clara Valley Audubon Society, 2007)

¹⁷ A study by the [National Renewable Energy Laboratory](#) estimates that 3.4 DCFC, and 40 Level 2 charging ports are needed per 1,000 EVs. Assuming [35 million EVs by 2030](#), the U.S. will need to build about 50,000 DCFCs and 1.2 million Level 2 ports. This means that 380 EV charging ports will need to be installed each day over the next nine years. In comparison, the U.S. has installed on average about [30 ports a day](#) between 2010 and 2020.

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The parking ratio is difficult to determine as it is not clear from the documents whether the parking count includes the parking spaces that will be replaced by the new construction.

The DEIR documents indicate 997 parking spaces (there may be a math error in the DEIR which lists 987 spaces) including garage spaces and surface parking. This yields a parking ratio of 1.37 spaces per unit. These numbers need to be clarified to explain whether existing spaces are included in this count or excluded.

A parking ratio of 1 space per unit should be the maximum for a transit-oriented housing development in order to encourage transit use. Please clarify the parking count of existing versus new parking spaces.

V.16
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Car Share, in addition, is a critical element in making it convenient to have access to a car when transit is not available. The number of Car Share spaces is not listed anywhere. Since this is a critical element in the parking design, the proposed number of car share spaces needs to be part of the development proposal. Please include the minimum number of Car Share units that will be included even though the TDM plan is not part of the DEIR.

7. Noise

Green space has the ability to mitigate noise in urban areas. Planting "noise buffers" composed of trees and shrubs can reduce noise by five to ten decibels for every 30m width of woodland, especially sharp tones, and this reduces noise to the human ear by approximately 50%¹⁸.

V.17

For this reason, with the intensification of development on this site, the tree buffer along Hwy 85 is an important element that needs to be preserved and augmented. We recommend improving the tree buffer and urban canopy along Hwy 85, by augmenting with more trees, using California natives selected for resistance to highway impacts, to improve the habitat value and add to Mountain View's Urban Greening efforts.

8. Alternatives

The EIR suggests that the "No Block C" alternative would have "similar but slightly lesser" environmental impacts for most resource topics (particularly air quality, greenhouse gas emissions, noise, and traffic) because of the reduced scale of the alternative compared with the Project, although there would be no change in the impact conclusion for any of the foregoing resource areas.

V.18

Based on the evidence provided above, we believe we have a fair argument showing that the "No Block C" alternative reduces aesthetic and air pollution impacts and improves noise impacts enough to provide additional housing while balancing environmental considerations and the need for housing.

Thank you for the opportunity to comment on the DEIR.

¹⁸<https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-regeneration-and-greenspace-partnership/greenspace-in-practice/benefits-of-greenspace/noise-abatement/>

APPENDICES ARE AVAILABLE UPON REQUEST

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