

Final Environmental Impact Report

Moffett Gateway Project



State Clearinghouse # 2015062063



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**Final Environmental Impact Report
Moffett Gateway Project**

TABLE OF CONTENTS

SECTION 1.0	OVERVIEW AND PURPOSE OF THE FINAL EIR.....	2
1.1	FORMAT OF THE FINAL EIR.....	2
1.2	PURPOSE OF THE FINAL EIR.....	3
SECTION 2.0	LIST OF AGENCIES AND ORGANIZATIONS RECEIVING THE DRAFT EIR OR NOTICE OF AVAILABILITY	4
SECTION 3.0	LIST OF AGENCIES AND ORGANIZATIONS COMMENTING ON THE DRAFT EIR	5
SECTION 4.0	RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR.....	6
SECTION 5.0	REVISIONS TO THE TEXT OF THE DRAFT EIR.....	28
SECTION 6.0	COPIES OF COMMENT LETTERS RECEIVED	30

SECTION 1.0 OVERVIEW AND PURPOSE OF THE FINAL EIR

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the proposed *Moffett Gateway Project* in Mountain View, California. Under the California Environmental Quality Act (CEQA), the Lead Agency is required, after completion of a Draft EIR, to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project, and to provide the general public with an opportunity to comment on the Draft EIR. The City of Mountain View, as the Lead Agency, is then required to respond to significant environmental issues raised in the review and consultation process, as described in CEQA Section 15132.

The Draft EIR was circulated to affected public agencies and interested parties for a 45-day review period from May 2, 2016 through June 15, 2016. Comments on the Draft EIR were to be received in writing by no later than Wednesday, June 15, 2016 at 5:00 p.m.

1.1 FORMAT OF THE FINAL EIR

This document, which includes responses to comments and text revisions, has been prepared in accordance with Section 15088 of the CEQA Guidelines. In addition to Section 1.0, which provides an overview of the purpose and format of the Final EIR, the Final EIR includes the following sections:

***Section 2.0* List of Agencies and Individuals Receiving the Draft EIR**

The agencies, organizations, and individuals who received copies of the Draft EIR are listed in this section. The locations where the Draft EIR could be reviewed during the public circulation period are also included in this section.

***Section 3.0* List of Agencies and Individuals Commenting on the Draft EIR**

This section contains a list of all parties who submitted written comments on the Draft EIR.

***Section 4.0* Written Responses to Comments on the Draft EIR**

This section contains responses to the written comments received on the Draft EIR.

***Section 5.0* Revisions to the Text of the Draft EIR**

Section 5.0 contains text revisions to the Draft EIR. Text revisions can be made as a result of comments received during the Draft EIR public review process, corrections or clarifications to the text to reflect modifications that have been made to the project, or other information added by the Lead Agency.

***Section 6.0* Copies of Comment Letters**

Section 6.0 contains copies of the complete comment letters received on the Draft EIR during the circulation period.

1.2 PURPOSE OF THE FINAL EIR

In conformance with the CEQA Guidelines (Section 15151), EIRs should be prepared with a sufficient degree of analysis to provide decisions-makers with information which enables them to make a decision on the project that takes into account environmental consequences. The Final EIR also is required to examine mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts.

The Final EIR is used by the City and other Responsible Agencies in making decisions regarding the project. The CEQA Guidelines require that, while the information in the Final EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the Draft EIR by making written findings for each of those effects. According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
 - (1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effects on the environment.
 - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

In accordance with CEQA and the CEQA Guidelines, the Final EIR will be made available to the public and commenting agencies and organizations a minimum of ten days prior to the EIR certification hearing. All documents referenced in this Final EIR are available for public review in the City of Mountain View's Community Development Department, City Hall, 1st Floor, 500 Castro Street, Mountain View, during business hours, Monday through Friday, 8:00 a.m. to 4:00 p.m.

The Final EIR will also be available for review on the City's website for the project, <http://www.mountainview.gov/depts/comdev/planning/activeprojects/moffettgateway.asp>, and at the Mountain View Public Library, 585 Franklin Street, Mountain View, during business hours:

Monday through Thursday, 10:00 a.m. to 9:00 p.m.,
Friday and Saturday, 10:00 a.m. to 6:00 p.m., and
Sunday, 1:00 p.m. to 5:00 p.m.

SECTION 2.0 LIST OF AGENCIES AND ORGANIZATIONS RECEIVING THE DRAFT EIR OR NOTICE OF AVAILABILITY

Federal Agencies

National Aeronautics and Space Administration (NASA), Ames Research Center
Environmental Protection Agency (EPA), Region 9

California State Agencies

Caltrans Division of Aeronautics
California Highway Patrol
Department of Transportation, District 4 (CalTrans)
Department of Fish and Wildlife, Region 3
Department of Parks and Recreation
Department of Water Resources
Native American Heritage Commission
Office of Planning and Research, State Clearinghouse
Public Utilities Commission
Regional Water Quality Control Board, Region 2
Resources Agency

Regional and Local Agencies

Bay Area Air Quality Management District (BAAQMD)
City of Sunnyvale
Los Altos School District
Santa Clara County Parks
Santa Clara County Road and Airports
Santa Clara Valley Habitat Agency
Santa Clara Valley Water District (SCVWD)
Valley Transportation Authority

Businesses and Organizations

Adams Broadwell (Janet Laurain)
Adams Broadwell & Cardoza (Rita I. Chavez)
Building Industry Association of the Bay Area
Campaign for Jobs Local 104 (Mark Espinoza)
Carpenter's Local 405 Counties Conference Board (Drury Lozeau LLP)
Drury Lozeau LLP (Seiu, Stacey Osborne)
No. California Carpenters (Katie Boyd)
Pacific Gas and Electric Company (PG&E)
Wagon Wheel Neighborhood Association

Additional individuals and groups were notified of the availability of the Draft EIR by the City's MyMV email notification system and postal mail. The Draft EIR was posted on the City's website: <http://www.mountainview.gov/depts/comdev/planning/activeprojects/moffettgateway.asp> and paper copies of the Draft EIR and associated documents were available for public viewing at the Community Development Department of Mountain View City Hall and the Mountain View Public Library, during business hours.

SECTION 3.0 LIST OF AGENCIES AND ORGANIZATIONS COMMENTING ON THE DRAFT EIR

Shown below is a list of agencies and organizations who submitted comments on the Draft EIR. The table below also identifies the date of the letter received, and whether the comment submitted requires substantive responses in the Final EIR, in accordance with CEQA Guidelines Section 15132(d). Comments that raise questions regarding the adequacy of the Draft EIR or analyses in the Draft EIR require substantive responses. Comments that contain only opinions regarding the merits, or lack thereof, of the proposed project do not require substantive responses in the Final EIR. Complete copies of all the letters received are included in *Section 6.0* of this Final EIR.

Comment Received From	Date of Letter	Response Required	Response on Page
<i>State Agencies</i>			
A. California State Clearinghouse	June 16, 2016	No	6
B. California Department of Transportation	June 15, 2016	Yes	6
<i>Regional and Local Agencies</i>			
C. County of Santa Clara – Parks and Recreation	June 15, 2016	Yes	19
D. County of Santa Clara – Roads and Airports	June 15, 2016	Yes	20
E. Santa Clara Valley Transportation Authority	June 15, 2016	Yes	21
<i>Businesses and Organizations</i>			
F. Santa Clara Valley Audubon Society and Sierra Club Loma Prieta Chapter	June 15, 2016	Yes	23

SECTION 4.0 RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR

The comments are organized under headings containing the source and date of the letter. The specific comments have been excerpted from the letter and are shown as “Comment” with each response directly following (“Response”). The letters submitted to the City of Mountain View on the Draft EIR are contained in their entirety in *Section 6.0* of this document.

A. COMMENT LETTER FROM THE CALIFORNIA STATE CLEARINGHOUSE, DATED JUNE 16, 2016.

This letter documents compliance with the State Clearinghouse review requirements. No response is required.

B. COMMENT LETTER FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION, DATED JUNE 15, 2016.

Comment B-1: Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's State Transportation Network (STN), in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling both pedestrian and transit. Also, these targets support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our comments are based on the Draft Environmental Impact Report (DEIR). Please also refer to the previous comment letters on this project and incorporated herein.

The proposed project is located in the southeast quadrant of the U.S. Highway 101 (US 101) and State Route (SR) 85 interchange, immediately adjacent to State right-of-way (ROW). It would develop the approximately 9.7-acre undeveloped site with a new office, hotel, and restaurant uses and an above-grade parking garage. The total square footage of the proposed uses is approximately 380,000 square feet (sf), including approximately 210,000 sf of office and 157,330 sf of hotel uses. The propose office building and hotel would both be four stories tall with maximum heights of approximately 70 feet and 54 feet, respectively. The parking garage would contain five levels of parking and have a maximum height of approximately 58 feet. The proposed project includes a new bicycle and pedestrian bridge over Stevens Creek, connecting the Stevens Creek Trail to the proposed project.

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

Response B-1: The potential for the proposed project to impact the transportation facilities serving the project are evaluated and mitigation measures to reduce significant transportation impacts are identified in *Section 3.13, Transportation* and *Section 5.3.13, Cumulative Transportation Impacts* of the Draft EIR. If the project is approved, per Section 15097, Mitigation Monitoring or Reporting, the City of Mountain View will adopt a program (i.e., Mitigation Monitoring or Report Program or MMRP) for monitoring or reporting on the measures it has imposed to mitigate or avoid significant environmental effects. The MMRP will identify the scheduling, implementation, and monitoring responsibilities. Please refer to Response B-6, below, regarding the lack of a fair share funding mechanism for the planned improvements to US 101.

Comment B-2: *Traffic Impacts*

The project is of regional and area-wide significance, as it has the potential for causing significant traffic effects extending beyond the City; in particular, queuing, intersections, and ramps. Please provide mitigation measures for impacts, such as additional storage length at intersections and the on-ramps/local streets for the freeway on-ramp traffic.

Response B-2: The potential for the proposed project to impact the transportation facilities serving the project are evaluated and mitigation measures to reduce significant transportation impacts are identified in *Section 3.13, Transportation* and *Section 5.3.13, Cumulative Transportation Impacts* of the Draft EIR. The discussion in the Draft EIR is based on a Traffic Impact Analysis (TIA) that was completed for the proposed project by *Fehr & Peers Transportation Consultants*. The TIA addresses the project's impacts on the roadway system and the adjacent bicycle, pedestrian, and transit network. Project impacts were evaluated following the guidelines of the City of Mountain View and the Santa Clara Valley Transportation Authority (VTA), the congestion management agency for Santa Clara County. The TIA is included as Appendix I to the Draft EIR. As recommended in the VTA Transportation Impact Analysis Guidelines, the intersections evaluated for the proposed development project are those that the project is expected to add 10 or more peak hour vehicles per lane to any intersection movement. Vehicle queuing is an operational issue that is not considered a significant impact unless the queuing creates a safety hazard. The proposed project is not expected to result in queues that create a safety hazard. For this reason, a queuing analysis was not completed for the proposed project and included in the Draft EIR. Please refer to Responses B-3 and B-4, below, for more information regarding queuing at freeway on-ramps and off-ramps.

Comment B-3: 1. Caltrans recommends traffic queuing on US Highway (US) 101/Moffett Boulevard be analyzed for impacts to the US 101 mainline operations.

Response B-3: The Draft EIR uses VTA CMP thresholds of significance for freeway impact analyses. The VTA’s TIA guidelines do not specify a threshold of significance for ramp metering operations at the freeway. Furthermore, vehicle queueing is an operational issue that is not considered a significant impact unless the queuing creates a safety hazard. The proposed project is not expected to result in queues that create a safety hazard. For these reasons, a queuing analysis was not completed for the proposed project and included as part of the Draft EIR. However, as requested in the comment, the City has provided traffic queuing information for US 101/Moffett Boulevard. The queuing information is summarized below and shown in Table 1.

Field observations were conducted to identify the existing extents of the queues during the AM and PM peak hours. The results were compared to the estimated queues for Existing Conditions. Then, the changes in queue lengths were calculated for Background and Background plus Project Conditions to determine the change in queue caused by the project. The estimated queues with the addition of project traffic are estimated to increase by approximately 50 feet or less and are much shorter than the available storage area on the ramps. Therefore, the queues would not impact US 101 mainline operations.

TABLE 1: US 101/MOFFETT BOULEVARD OFF-RAMP QUEUES

Off-Ramp	Storage Length (ft)	Peak Hour	Existing		Background		Background + Project		
			Ramp Volume	Queue ² (ft)	Ramp Volume ³	Queue ² (ft)	Ramp Volume ³	Queue ² (ft)	Change ¹
Southbound Loop	1,050	AM	275	109	315	137	377	182	+45
		PM	173	119	187	131	200	142	+11
Northbound Diagonal	870	AM	218	71	234	81	322	132	+51
		PM	330	212	346	225	365	241	+16

1. Change represents difference in queue lengths between Background Plus Project and Background No Project Scenarios.

2. Queue lengths calculated using Synchro 95th percentile queue.

Source: Fehr & Peers, July 2016.

Comment B-4: 2. The proposed plan is likely to have impacts on the operations of the following metered freeway on-ramps:

- Southbound (SB) US 101/Moffett Boulevard diagonal on-ramp (metered 3:00 pm to 7:00 pm).
- Northbound (NB) US 101/Moffett Boulevard loop on-ramp (planned to be metered 2017)
- SB State Route (SR) 85/Moffett Blvd loop on-ramp (metered 2:30 pm to 8:00 pm)

During the ramp metering hours, the on-ramp queues will likely be lengthened with the additional traffic demand by this project, and they may impede onto the local streets affecting their operations.

Response B-4:

The Draft EIR uses VTA CMP thresholds of significance for freeway impact analyses. The VTA's TIA guidelines do not specify a threshold of significance for freeway ramp metering operations. Furthermore, vehicle queuing is an operational issue that is not considered a significant impact unless the queuing creates a safety hazard. The proposed project is not expected to result in queues that create a safety hazard. For this reason, a queuing analysis was not completed for the proposed project and included as part of the Draft EIR. However, as requested in the comment, the City has provided a traffic queuing analysis for the ramps, which is summarized below.

Field observations were conducted to identify the existing extents of the queues during the AM and PM peak hours and existing metering rates. The Demand to Capacity method was used to estimate queue lengths for Existing, Background, and Background plus Project Conditions. This method uses the on-ramp capacity based on the maximum metering rates provided by Caltrans, on-ramp demand based on each scenario's volumes from the Moffett Gateway TIA, as well as the arrival distribution pattern for each on-ramp location based on existing 15-minute counts. This information is then used to estimate queue accumulation/dissipation and queue length. Changes in queue caused by the project and whether the queues would extend onto the local streets were evaluated. The results are shown in Table 2, below. For ramps with high-occupancy vehicle (HOV) by-pass lanes, the queue in the single-occupant vehicle (SOV) lane is longer and is reported. To distribute on-ramp volumes between SOV and HOV lanes, HOV percentages from 2014 VTA CMP freeway data were reviewed, and lower percentages were used to be conservative. As an example, the 2014 VTA CMP freeway data shows 15 percent HOVs for Northbound US 101 between Moffett Boulevard and SR 85 during the PM peak hour, therefore, 10 percent HOVs was assumed for the Northbound US 101/Moffett Boulevard on-ramp. The results of this analysis are shown in Table 2, below.

As shown in Table 2, the estimated queues for the US 101 on-ramps would be contained within the ramp storage area with the addition of project traffic. Therefore, the queues would not extend onto Moffett Boulevard. For the Southbound SR 85 on-ramp, the maximum queue under Background Conditions matches the available storage area indicating that the existing metering rate can accommodate the projected volume but that any added traffic would result in the queue exceeding the storage area, as projected to occur under the Background Plus Project scenario. By slightly increasing the ramp metering rate from 550 vehicles per hour per lane (vphpl) to 590 vphpl, the maximum queue length can be accommodated within the available storage capacity.

TABLE 1: US 101/MOFFETT BLVD AND SR 85/MOFFETT BLVD METERED ON-RAMP QUEUES

On-Ramp	Storage Length (ft)	Peak Hour	Existing		Background		Background + Project		
			Ramp Volume	Queue ¹ (ft.)	Ramp Volume	Queue ¹ (ft)	Ramp Volume	Queue ¹ (ft)	Change ²
US 101 / Moffett Boulevard									
Southbound Diagonal	450	AM	258	N/A	267	N/A	292	N/A	N/A
		PM	314	30	334	30	397	90	+60
Northbound Loop	210	AM	192	N/A	204	30	221	30	0
		PM	271	N/A	313	30	358	30	0
SR 85 / Moffett Boulevard									
Southbound Loop	725	AM	314	N/A	339	N/A	352	N/A	N/A
		PM	475	30	553	720	587	1,320	+600
SR 85 / Moffett Boulevard – Adjusted Ramp Metering³									
Southbound Loop	725	AM	314	N/A	339	N/A	352	N/A	N/A
		PM	475	30	553	420	587	720	+300

1. On-Ramp queues calculated using Demand to Capacity method. Queuing calculations included in Attachment A.
 2. Change represents difference in queue lengths between Background Plus Project and Background No Project Scenarios.
 3. Maximum ramp metering rate increased from 550 vehicles per hour per lane (vphpl) to 590 vphpl.
 4. N/A = not applicable, ramp is not metered during that time period.
 5. Bold text indicates conditions where the queue exceeds the available storage capacity.
- Source: Fehr & Peers, July 2016.

Comment B-5: 3. Please include the US 101/Ellis Street ramp intersections in the intersection analysis which is currently not part of the Traffic Impact Analysis (TIA). The TIA indicates the project will have a significant impact to NB US 101 mainline between SR 237 and Moffett Boulevard during AM peak hour. The congestion within this segment may result in people exiting US 101 at Ellis Street and using local road network to access the project site.

Response B-5: The potential diversion route of using the Ellis Street interchange to avoid the northbound US 101 mainline segment would not offer a travel time savings for Project traffic as it is approximately 0.25 miles longer and contains three additional signalized intersections, including the two at the Ellis Street/US 101 ramps that have light rail crossings, which would add further delay for vehicles. Therefore, little, if any, project traffic would use the diversion route. Because little project traffic would use the US 101/Ellis Street ramp intersections, the project would not cause a significant impact on their operations and they were not added to the analysis.

Comment B-6: Please commit in the DEIR to paying fair share fees to the US 101 Express Lanes project from the San Mateo County Line to Cochrane Road in Morgan Hill (RTP 240466). The TIA identified fair share contributions to mitigate the project's significant impacts to the abovementioned segment; however, the DEIR does not commit the City to paying the fees. There are no other projects in the Regional Transportation Plan (RTP) or Valley Transportation Plan that can be used as a mitigation improvement.

Response B-6: As discussed in Section 3.13.3.4, Freeway Segment Level of Service, the following freeway improvement is identified in the Valley Transportation Plan (VTP) 2040, which has the potential to improve freeway operations on the affected segment:

- US 101 Express Lanes: San Mateo County Line to Cochrane Road in Morgan Hill

A fair share contribution toward this freeway improvement project would be an acceptable mitigation measure for the project freeway impact. There is not, however, a fair share funding mechanism in place (e.g., regional impact fee) to impose/collect the fee. Furthermore, the significant impact would not be reduced or eliminated until the improvement project is constructed. To provide adequate funding for the improvement project, funding sources in addition to the project fair share contribution would be needed, which may include State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee. For these reasons, feasible measures are not available to reduce the project freeway impact to a less than significant level, and the addition of project traffic results in a significant and unavoidable freeway segment impact.

Comment B-7: *Vehicle Trip Reduction*

Caltrans encourages the City to locate future housing, jobs, and employee-related services near major mass transit centers connecting streets configured to facilitate walking and biking. This would promote mass transit use thereby reducing regional VMT.

Response B-7: The project site is located in central Mountain View near existing housing. As discussed in *Section 3.13.2, Existing Setting*, the project site is well served by transit, pedestrian, and bicycle facilities. For example, the project is approximately one mile from the Mountain View Caltrain Station and is connected to the station by a VTA bus route, the MVgo free shuttle, and continuous Class II and Class III bicycle facilities.

Comment B-8: Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. Suggested TDM strategies include working with the Santa Clara Valley Transportation Authority (VTA) to decrease headway times and improve way-finding on bus lines to provide a better connection between the project, the Mountain View Station, and regional destinations and providing:

- Membership in a transportation management association.
- Transit subsidies and/or transit passes to all employees
- 10 percent vehicle parking reduction.
- Transit and trip planning resources.
- Carpool and vanpool ride-matching support.
- Carpool and clean-fuel parking spaces.

- Secured bicycle storage facilities.
- Fix-it bicycle repair station (s).
- Bicycles for employee uses to access local resources.
- Amenities, access and connections, incorporate wide sidewalks.
- Showers, changing rooms and clothing lockers.
- Transportation and commute information kiosk.
- Outdoor patios, outdoor areas, furniture, pedestrian pathways, picnic and recreational areas.
- Nearby walkable amenities.
- Kick-off commuter event at full occupancy.
- Employee transportation coordinator.
- Emergency Ride Home Program.
- Bicycle route mapping resources and incentivize bicycle parking.

These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan.

Response B-8: As stated in the project description of the Draft EIR (*Section 2.2.10, Transportation Demand Management Plan*), a project-specific TDM Plan has been prepared for the project and includes the measures requested in this comment. The TDM Plan is included as an appendix to the Traffic Impact Analysis (refer to Appendix I of the Draft EIR). As described in *Section 3.13, Transportation*, the TDM Plan would provide at least a 20 percent reduction in peak hour vehicle trips. An annual TDM effectiveness monitoring program is also part of the project and includes financial penalties for non-compliance.

Comment B-9: *Voluntary Contribution Program*

We encourage the City to participate in the VTA's voluntary contribution program and plan for the impact of future growth on the regional transportation system. Contributions by the City funding regional transportation programs would improve the transportation system by reducing congestion and improving mobility on major roadways throughout the San Francisco Bay Area.

Response B-9: While fees provided towards regional improvements would fund worthwhile transportation improvements, they would not be applicable as mitigation measures unless a fair share funding mechanism was in place (e.g., regional impact fee) to impose/collect the fee. To provide adequate funding for the improvement project, funding sources in addition to the project fair share contribution would be needed, which may include State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee. The City will continue to explore ways to participate in funding opportunities in order to further regional transportation improvements that can be implemented through a State Transportation Improvement Program funds, City impact fees, and/or a future regional impact fee.

Comment B-10: *Hydrology*

1. The DEIR should evaluate sheet flow impacts to Stevens Creek. Currently, the surface water from SB US 101 adjacent to the project site sheet flows off-site, which is the area of the former off-ramp from SB US 101 to westbound Moffett Boulevard. The proposed noise barrier will block the flow and convey the flow directly into the Stevens Creek.

Response B-10: Interaction between Stevens Creek and sheet flow outside the creek banks was analyzed in the EIR. Results show that water surface elevation of Stevens Creek just upstream of the US 101 bridge (downstream of project site) is not changed by the proposed project. Stormwater sheet flow from US 101 currently drains onto the project site and then ultimately to the 24-inch inlet at the northeast corner of the site or the 18-inch inlet at Stevens Creek. The sound wall that would be constructed along US 101 under the proposed project would not prevent US 101 sheet flow from entering the 24-inch and 18-inch inlets.

Comment B-11: 2. Based on Figure 9 of the Floodplain Study, prepared by Schaaf & Wheeler, it appears that SB US 101 near Stevens Creek will be inundated during the 100-year flood event due to the proposed project. Please analyze this inundation issue in the DEIR.

Response B-11: As stated in Section 3.9, Hydrology and Water Quality of the Draft EIR, a Floodplain Study was completed for the proposed project by Schaaf & Wheeler, Consulting Civil Engineers. The Floodplain Study analyzes flood flows upstream and downstream (i.e., US 101) of the project site during the 100-year event under existing and project conditions. The results of the Floodplain Study show that flooding of US 101 adjacent to the project site currently occurs under existing conditions to a depth of approximately one foot during the 100-year event. The proposed project would incrementally increase this flooding by approximately 0.1 foot (i.e., between one and two inches). The incremental increase in flood levels on US 101 is within the flood model's six-inch margin of error and would not constitute a substantial increase. Please refer to Floodplain Study (Appendix G of the Draft EIR) for more information.

Comment B-12: *Geology & Soils*

1. "No Impact" Determinations
 - A. Impact GEO-1 (p. 86): Expansive Soil
The GEO-1 impact should be designated as "Less than significant", not "No Impact", since the City's standard conditions of approval would be incorporated into the project to address effects of existing expansive soils.

Response B-12: As discussed on pages 21 and 22 of the Draft EIR, the California Supreme Court recently issued an opinion in "CBIA vs. BAAQMD" holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of

existing conditions on a project unless the project could exacerbate the existing environmental hazards or risks. Although expansive soils exist on-site, the proposed project would not exacerbate existing geology and soil conditions in the project area. Therefore, the project would not result in CEQA impacts related to expansive soils, and no revisions are necessary.

Comment B-13: B. Impact GEO-4 (pg. 87): Ground Shaking

The GEO-4 impact should be designated as “Less than significant”, not “No Impact”, since the City’s standard conditions of approval would be incorporated into the project to address effects of strong ground shaking.

Response B-13: As discussed on pages 21 and 22 of the Draft EIR, the California Supreme Court recently issued an opinion in “CBIA vs. BAAQMD” holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of existing conditions on a project unless the project could exacerbate the existing environmental hazards or risks. Although the project site would be subject to strong to very strong earthquake-induced ground shaking during the lifetime of the proposed project, the proposed project would not exacerbate existing geology and soil conditions in the project area. Therefore, the project would not result in CEQA impacts related to ground shaking, and no revisions are necessary.

Comment B-14: C. Impact GEO-5 (p. 87): Liquefaction

The GEO-5 impact should be designated as "Less than significant", not "No Impact", since Appendix E, "Liquefaction Potential" section states, "The site within a State - designated Liquefaction Hazard Zone and the potentially liquefiable materials will be removed and re-compacted as a mitigation method."

Response B-14: As discussed on pages 21 and 22 of the Draft EIR, the California Supreme Court recently issued an opinion in “CBIA vs. BAAQMD” holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of existing conditions on a project unless the project could exacerbate the existing environmental hazards or risks. Although the project site is located within a State-designated Liquefaction Hazard Zone, the proposed project would not exacerbate existing geology and soil conditions in the project area. Therefore, the project would not result in CEQA impacts related to liquefaction, and no revisions are necessary.

Comment B-15: D. Impact GEO-7 (p.88): Lateral Spreading

The GEO-7 impact should be designated as "Less than significant", not "No Impact", since the DEIR and Appendix E, "Lateral Spreading" sections state, "Lateral spreading could occur on the southern portion of the site adjacent to unlined creek channel" and "The section of Stevens Creek adjacent to the office building is not concrete-lined and our analysis at CPT -3 indicates the potential for lateral spreading to occur, provided this material will be removed and replaced as engineered fill (as mitigation method)," respectively.

Response B-15: As discussed on pages 21 and 22 of the Draft EIR, the California Supreme Court recently issued an opinion in “CBIA vs. BAAQMD” holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of existing conditions on a project unless the project could exacerbate the existing environmental hazards or risks. Although a portion of the project site has a potential for lateral spreading to occur, the proposed project would not exacerbate existing geology and soil conditions in the project area. Therefore, the project would not result in CEQA impacts related to lateral spreading.

Comment B-16: 1. Section 3.6.4 Planning Considerations (p, 88): Please note that the excavation and shoring plans in the northern part of the project adjacent to the US 101 should be submitted to Caltrans for review.

Response B-16: The comment does not raise an issue regarding the analysis in the Draft EIR. As recommended in the comment, the excavation and shoring plans in the northern part of the project site adjacent to the US 101 will be submitted to Caltrans for review.

Comment B-17: 2. Appendix E: The Geologic Map showing the geologic unit(s) covering the project locations and its constituents should be included.

Response B-17: Appendix E, Geotechnical Investigation, has been revised to include a Geologic Map showing the geologic unit(s) covering the project site and surrounding area. Please refer to Section 5.0, *Revisions to the Text of the Draft EIR* of this Final EIR.

Comment B-18: *Cultural Resources*

Caltrans requires that a project's environmental document include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within State ROW. Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resource study by a qualified, professional archaeologist, and evidence of Native American consultation to ensure compliance with CEQA, Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans' Standard Environmental Reference (www.dot.ca.gov/ser/vol2/vol2.htm).

These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in State ROW. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to State ROW.

Response B-18: As stated in Section 3.4, Cultural Resources of the Draft EIR, an Archaeological Survey Report (ASR) was completed by Holman &

Associates for the proposed project, including adjacent offsite areas of construction. On June 10, 2015, Holman & Associates completed a records search at the Northwest Information Center of the California Historical Resources Information System, Sonoma State University. The review included all cultural resources mapped within a quarter mile of the project site, all studies completed within an eighth of a mile of the site, and historic-era maps and literature on file, including state and federal inventories. Based on the results of the records search and literature review, there are no known cultural resources within the project site.

Native American consultation was completed as part of the project ASR. As stated in mitigation measure MM CR-2.2 -Tribal Consultation Requests, cultural sensitivity training will be provided to the construction crews and a Native American archaeological monitor will be present for all ground disturbing activities, including coring at the proposed bridge location.

Although no known cultural resources were identified on the project site and no cultural resources were found during the site survey completed by the archaeologist, the potential for Native American deposits to be encountered during project construction was determined to be moderate to high on Parcel 1, the Stevens Creek corridor, and the PG&E property. Accordingly and as requested in this comment, mitigation measures are identified on page 73 and 74 of the Draft EIR to reduce the potential of the proposed project to impact cultural resources to a less than significant level.

Lastly, the City acknowledges that all applicable mitigation must be implemented before a Caltrans encroachment permit could be issued for ground-disturbing activity within the Caltrans right-of-way.

Comment B-19: *Traffic Control Plan*

Since it is anticipated that vehicular, bicycle, and pedestrian traffic will be impacted during the construction of the proposed project requiring traffic restrictions and detours, a Caltrans-approved Traffic Control Plan (TCP) is required to avoid project-related impacts to the STN. The TCP must also comply with the requirements of corresponding jurisdictions. In addition, pedestrian access through the construction zone must be in accordance with the Americans with Disabilities Act (ADA) regulations (see Caltrans' *Temporary Pedestrian Facilities Handbook* for maintaining pedestrian access and meeting ADA requirements during construction at: www.dot.ca.gov/hq/construc/safety/Temporary_Pedestrian_Facilities_Handbook.pdf) (see also Caltrans' Traffic Operations Policy Directive 11-01 "Accommodating Bicyclists in Temporary Traffic Control Zones" at: www.dot.ca.gov/hq/traffops/policy/11-01.pdf). All curb ramps and pedestrian facilities located within the limits of the project are required to be brought up to current ADA standards as part of this project.

For further TCP assistance, please contact the Caltrans District 4 Office of Traffic Management Operations at (510) 286-4579. Further traffic management information is available at the following website: www.dot.ca.gov/hq/traffops/trafmgmt/tmp_lcs/index.htm.

Response B-19: A Traffic Control Plan (TCP) would be prepared for the project as a City of Mountain View Standard Condition of Approval. If, at the time the TCP is prepared, it is determined that the State Transportation Network (STN) could be affected during project construction activities, the TCP would be submitted to Caltrans for review and approval. The TCP must be approved prior to issuance of a demolition permit. Text has been added to page 187 of the Draft EIR indicating that the project is required to prepare a TCP. Please refer to *Section 4, Revisions to the Text of the Draft EIR*.

Comment B-20: *Bridges, Trestles, Culverts and Other Structures in Riparian Environments*

Some project level activities may affect riparian flow patterns upstream of bridges, trestles, culverts or other structures for which Caltrans holds responsibility. Please ensure your project-level environmental documents include hydrological studies to determine whether such impacts will occur, and to identify appropriate mitigation measures.

Response B-20: The hydrology impacts of the proposed project are addressed in the Draft EIR starting on page 115. As stated at the top of page 115, the hydrology impact analysis in the Draft EIR is based on a Floodplain Study that was prepared Schaaf & Wheeler and included as Appendix G to the Draft EIR. As stated on page 125 of the Draft EIR, the hydraulic modeling performed by Schaaf & Wheeler shows that the proposed project would have little effect on water surface elevations. The maximum increase in water surface elevation off-site is less than 0.25 feet (Schaaf & Wheeler, 2016). The incremental increase would not significantly impact flow patterns upstream of bridges, trestles, culverts or other structures for which Caltrans holds responsibility. The project will not increase water surface elevations in Stevens Creek (refer to Response B-10). For these reasons, the incremental increase in water surface elevation that could occur off-site as a result of the proposed project is less than significant and no mitigation measures are necessary.

Comment B-21: *Habitat Restoration and Management*

Project-level activities related to habitat restoration and management should be done in coordination with local and regional Habitat Conservation Plans, and with Caltrans where our programs share stewardship responsibilities for habitats, species and/or migration routes.

Response B-21: As stated on page 66 in the EIR, the project site and the location of the proposed off-site improvements are not within the area of an applicable habitat conservation plan or natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Additionally, the project does not include habitat restoration and management on or off the project site.

Comment B-22: *Sea Level Rise*

The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies to plan for potential impacts by considering a range of sea level rise scenarios for the years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans.

Response B-22: As stated on pages 119 and 120 of the Draft EIR, the City of Mountain View completed the *Shoreline Regional Park Community Sea Level Rise Study: Feasibility Report and Capital Improvement Program* (Sea Level Rise Study) in December 2012. Shoreline Regional Park is located approximately 1.5 miles north of the project where Stevens Creek empties into the San Francisco Bay. Therefore, the findings of the Sea Level Rise Study are applicable to the project site. The two sea level rise scenarios studied were eight inches of sea level rise between 2000 and 2067 and 31 inches of sea level rise between 2000 and 2067. Based on the results of the Sea Level Rise Study, the project site would not be affected by sea-level rise under either scenario.

Furthermore, as discussed on pages 21 and 22 of the Draft EIR, the California Supreme Court recently issued an opinion in “CBIA vs. BAAQMD” holding that CEQA is primarily concerned with the impacts of a project on the environment and generally does not require agencies to analyze the impact of existing conditions on a project unless the project could exacerbate the existing environmental hazards or risks. The project would not exacerbate sea level rise and, therefore, would not result in a sea level rise impact.

Comment B-23: *Encroachment Permit*

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623--0660. Traffic related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information:
www.dot.ca.gov/hq/traffops/developserv/permits.

Response B-23: The comment does not raise an issue regarding the analysis in the Draft EIR. The City will obtain an encroachment permit from Caltrans for any work or traffic control that encroaches onto the State ROW.

C. COMMENT LETTER FROM THE COUNTY OF SANTA CLARA – PARKS AND RECREATION DEPARTMENT, DATED JUNE 15, 2016.

The County of Santa Clara, Parks and Recreation Department ("County Parks Department"), has reviewed the Draft Environmental Impact Report (EIR) for the Moffett Gateway Project. The proposed Project is to build a 255-room hotel, 200,000 square-foot office building and above-grade parking structure on two parcels in the northern portion of the City of Mountain View.

Comment C-1: The County Parks Department is 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. Although responsibility for the actual construction and long-term management of each individual trail varies, the County Parks Department provides general oversight and protection of the overall trail system. The Countywide Trails Plan indicates the following regional trail routes adjacent to the project site:

- ***Stevens Creek Sub-regional Trail (S2)*** – This partially existing trail follows Stevens Creek from Stevens Creek County Park to the San Francisco Bay. The City of Mountain View's portion of the trail is almost complete, including in the area directly across the creek from the project site, and it is designated for hiking and off-street cycling.

The Final EIR should address the proposed Project's consistency with the Countywide Trails Plan, which was not addressed in the existing DEIR. The County Parks Department recommends that the EIR also address the following items as they relate to County wide Trail Routes in the vicinity of the Project site:

Response C-1: The Santa Clara County Countywide Trails Master Plan Update, which is part of the Santa Clara County General Plan, is a governing document only in unincorporated Santa Clara County. Both the project site and the nearby Stevens Creek Trail are located within the city limits of Mountain View. Therefore, the County Trails Plan is not "an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project ... adopted for the purpose of avoiding or mitigating an environmental effect" (see Thresholds of Significance, Draft EIR p. 134) and the EIR for the project is not required to analyze the project with the Countywide Trails Plan.

Comment C-2: *Aesthetics*

In regard to the potential for visual and aesthetic impacts, the EIR should more fully evaluate degradation of views and the potential for lighting and glare impacts on users of the regional trail. To the extent feasible, the project should seek to minimize impacts through designs that take into account the close proximity of the Stevens Creek Trail, and its naturalistic setting along the creek corridor. Although the portion of the creek adjacent to the Project site has some existing light pollution due to car lights traveling on State Route 85, the Project's new lighting and glare impacts need to be assessed given that the height of the buildings may further degrade the trail user experience. The lighting and glare assessment should evaluate potential glare from automobiles parked inside the parking structure.

Response C-2: As stated on page 33 of the Draft EIR, the proposed project would be highly visible to the users of the Stevens Creek Trail; however, large sections of the trail currently traverse adjacent developed areas. For example, the trail travels adjacent to many residential neighborhoods and under US 101 immediately adjacent to the project site. Additionally, substantial native landscaping and trees plantings are proposed between the office building and parking garage and Stevens Creek and would provide some screening of the structures from the Creek Trail. The view of the Project site from the Stevens Creek Trail (see Draft EIR p. 26, Photo 2) does not indicate that the project would likely degrade the trail user experience.

The proposed above grade parking garage would be approximately 52 feet in height and provide 808 parking spaces that would mainly be utilized during the daylight hours. As shown on Figure 2.2-4 in the Draft EIR, the exterior walls on each tier of the parking garage would substantially limit the amount of automobile light emanating from the structure and would be further shielded by trees planted between the parking garage and the creek. Additionally, buildings proposed by the project would be oriented and designed in accordance with the City of Mountain View's design standards to minimize reflective materials and glare. New lighting sources would be installed on the site in conformance with the City's design guidelines for commercial and office uses.

Comment C-3: *Biological Resources*

The EIR should analyze the abovementioned concern about lighting and glare impacts on habitat within the Stevens Creek corridor. Although the Draft EIR assessed the potential lighting and glare impacts of the building design and materials on steelhead habitat, the analysis should also assess the potential glare from automobiles parked inside the parking structure, and evening lighting on the entire riparian corridor.

Response C-3: Please refer to Response C-2 and Response F-2.

D. COMMENT LETTER FROM THE COUNTY OF SANTA CLARA – ROADS AND AIRPORTS DEPARTMENT, DATED JUNE 15, 2016.

The County of Santa Clara Roads and Airports Department is submitting the following comments regarding the draft environmental impact report (DEIR) for the project cited above.

Comment D-1: As noted in the Notice of Preparation comment letter dated July 14, 2015, transportation impact analysis (TIA) should be conducted using the Congestion Management Program (CMP) guidelines, and most recent counts and County signal timing for County study intersections. The existing conditions analysis presented in the DEIR and TIA for intersections along Central Expressway at Moffett-Castro Street and North Mary Avenue do not reflect approved CMP counts and County signal timing settings. Please contact Ananth Prasad at (408) 494-1342 or Ananth.Prasad@rda.sccgov.org for the correct signal timing.

Analysis should be revised to reflect the correct information and submitted to County for review. Should the revised analysis result in a significant impact, appropriate mitigation measures should be identified to address the impact. The preliminary Comprehensive County Expressway Planning Study - Expressway Plan 2040 project list should be consulted for a list of mitigation measures for significant impacts to the expressways. Should the preliminary Expressway Plan 2040 project list not include an improvement that would mitigate a significant impact, the TIA should identify mitigation measures that would address the significant impact. Mitigation measures listed in the TIA should be incorporated into the EIR document.

Response D-1: The volumes used in the project TIA are from counts conducted in May 2015 and were used for all the intersections analyzed in the Draft EIR. As requested in the comment, the County was contacted to obtain approved counts and signal timings. The County provided signal timings for the AM peak hour and signal timings and counts for the PM peak hour. The PM peak hour counts provided by the County were conducted in September 2014; therefore, the counts used in the project TIA are more recent than the counts provided by the County. In order to ensure that the project impact analysis uses a consistent set of data with the most up to date information, the City elects to use the May 2015 project TIA counts for the County intersections, which show that there is not a significant impact at the Central Expressway/Moffett-Castro Street or Central Expressway/North Mary Avenue.

E. COMMENT LETTER FROM THE SANTA CLARA VALLEY TRANSPORTATION AUTHORITY, DATED JUNE 15, 2016.

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for 200,000 square feet of office development and a 255-room hotel on 9.7 acres on a site bounded by Moffett Boulevard, U.S. 101, and Stevens Creek. We have the following comments.

Comment E-1: *Transportation Demand Management/ Trip Reduction*

VTA commends the City and applicant for including a commitment to a Transportation Demand Management (TDM) Program with a trip reduction targets of 20%, required membership in the Mountain View Transportation Management Association (MVTMA), monitoring of trip generation via annual driveway counts and employee surveys, and penalties if the TDM goals are not met. VTA is also pleased that the TDM Measures included in the TDM Plan include measures to encourage transit ridership, such as working with the MVTMA to extend the existing MVGo shuttle service to the site or providing a separate shuttle service if the MVTMA chooses not to implement this extension (TDM Plan, pgs. 18-19).

Response E-1: The comment commends the project's TDM commitment. No response is required.

Comment E-2: *Pedestrian and Bicycle Accommodations*

VTA commends the project applicant for proposing a publicly accessible bicycle and pedestrian path parallel to the roadway and a new bicycle and pedestrian bridge over Stevens Creek to connect the development to the Stevens Creek Trail (DEIR, pg. 10).

VTA recommends that the City work with the applicant and Caltrans to improve sidewalks and pedestrian connectivity along Moffett Boulevard in the vicinity of the project, particularly to locations north of US 101 and west of SR 85.

Response E-2: The proposed project would improve sidewalks and pedestrian connectivity on and adjacent to the project. As discussed in Section 3.13.3.6 Pedestrian, Bicycle, and Transit Facility Impacts, a crosswalk will be added to the east leg of the Moffett Boulevard/Leong Drive intersection to improve pedestrian access between the project site and the crosswalk on the east side of Moffett Boulevard to the south. The City is also studying Right-of-Way improvements to Moffett Boulevard between West Middlefield Road and NASA, which will continue to improve upon pedestrian and bicycle circulation in the area.

Comment E-3: *Freeway Impacts and Mitigation Measures*

The DEIR/TIA identifies a significant impact on US 101 northbound between SR 237 and Moffett Boulevard. The TIA notes that "As the areas bordering this freeway are predominantly built out, there is little opportunity to widen it within the available right of way. Therefore any widening would require property acquisition. Due to the number of affected properties and financial implications, freeway segment impacts are considered significant and unavoidable." (TIA, pg. i)

VTA notes that certain cities in Santa Clara County have identified contributions to regional transportation improvements as mitigation measures for significant freeway impacts. VTA recommends that the City include voluntary contributions to projects in VTP 2040 that provide congestion relief and additional transportation options along the impacted corridors, such as SR 237 Express Lanes: Mathilda Avenue to SR 85 (VTP ID: H3). Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations.

Please see the March 6, 2014 Report to the VTA Board of Directors (Agenda Item 6.18), available online at <http://www.vta.org/sfc/servlet.shepherd/document/download/069A0000001LwZYIA0>, for further information about Voluntary Contributions to Transportation Improvements.

Response E-3: The project would impact US 101 northbound between SR 237 and Moffett Boulevard. Voluntary contributions are not an acceptable mitigation measure for the project freeway segment impact, because there is not a fair share funding mechanism in place, the significant impact would not be reduced or eliminated until the US 101 Express Lane project is constructed, and the funding is uncertain. Please refer to Response B-6 for further details.

Comment E-4: *Coordination with Caltrans and VTA Regarding Highway Facilities*

- We recommend coordination with Caltrans regarding the purchase of Parcel 2 to determine if right-of-way will be needed for potential future interchange improvements.

Response E-4: The project applicant has an option agreement with Caltrans for the purchase of Parcel 2. If the proposed project is approved and the applicant exercises its option and Caltrans later proposes to acquire part of Parcel 2 for interchange improvements, then Caltrans will need to analyze the impacts of its proposed interchange on the project.

Comment E-5:

- We also recommend coordination with Caltrans regarding Recovery Zone requirements for the hotel and parking garage. The purchase of Parcel 2 may affect the ability to meet these requirements. Please specify the distance from the edge of travel way on southbound US 101 to the property line.

Response E-5: An area clear of fixed objects adjacent to the traveled way is desirable to provide a clear recovery zone (CRZ) for vehicles that leave the travel way, as identified in the Caltrans Traffic Manual (Chapter 7, Traffic Safety Systems). The Caltrans Traffic Manual states that a minimum 30-foot CRZ should be provided where possible for freeways and high speed expressways. The northern property line of Parcel 2 is located along US 101. Consistent with Caltrans recommendations, the northern property line of Parcel 2 is located at least 30 feet from the edge of travel way on southbound US 101, thus providing the recommended 30-foot CRZ.

Comment E-6:

- The project developer should be aware that VTA has submitted a proposed US 101/ Moffett Boulevard interchange improvement to MTC as part of VTP 2045. This project may include widening of Moffett Boulevard in the vicinity of the interchange in the future.

Response E-6: The US 101/Moffett Boulevard interchange improvement is not identified in the current approved Valley Transportation Plan (VTP 2040). As noted in Response E-4, if the proposed project is approved and a later project is proposed that would widen Moffett Boulevard, the proponent of the widening project will need to analyze its impacts on the proposed project.

F. COMMENT LETTER FROM THE SANTA CLARA VALLEY AUDUBON SOCIETY AND SIERRA CLUB LOMA PRIETA CHAPTER, DATED JUNE 15, 2016.

Comment F-1: Santa Clara Valley Audubon Society (SCVAS) and the Loma Prieta Chapter of the Sierra Club are local environmental organizations dedicated to the protection and enjoyment of our natural resources and wildlife. We thank you for the opportunity to provide comment on the Draft EIR for Moffett Gateway Project. Since almost all our native wildlife species use riparian corridors during their life cycle, we are always concerned when development is proposed near streams.

Here are our comments:

1. Most native bird species in our region use stream corridors at least for part of their life cycle, and the location of the Project within 100-ft of the creek corridor and next to the riparian forest puts birds at risk of collision, injury and death. In Mountain View neighborhoods, riparian bird species have been observed more than 750-ft from the creek corridor (Ms. Marti White, birder and Mountain View resident, Personal Communication).

We thank you for requiring a bird strike management plan and a bird strike monitoring plan post construction.

- Please provide criteria for these plans? At a minimum,
 - Highly reflective glass should be avoided within 300-ft of the creek and its riparian forest.
 - Any reflective or highly transparent glass should provide visual cues to birds
 - Avoid transparent glass skyways, walkways, or entryways, free-standing glass walls and transparent building corners
 - Avoid funneling open space towards a building façade
 - No foliage should be visible through glass
 - A monitoring plan should be comprehensive and calibrated, and include placing small carcasses to evaluate removal rates by predators and scavengers.
 - Remediation (retrofitting for bird safety) should be provided if bird collisions are reported post construction.

Response F-1: The exterior windows of the proposed office building and hotel would be fritted glass as suggested in the comment (see page 62 of the Draft EIR). Additionally, a bird strike monitoring plan would be required to be submitted as part of the building permit submittal and would include the suggested provisions for monitoring bird strikes and remediation procedures post construction.

The Bird Strike Management Plan described on page 62 of the Draft EIR has been updated to include specific bird-safe design features that are consistent with the recommendations in this comment. Please refer to *Section 4, Revisions to the Text of the Draft EIR*.

Comment F-2: Light attracts migratory birds (since most migratory birds fly at night) and thus it is important to minimize lighting near the creek, and to develop a lighting plan that minimizes impacts to wildlife, including birds and fish.

Response F-2: As discussed on page 33 of the Draft EIR, the project would be subject to the City's Development Review approval process prior to submittal of construction drawings for a building permit. This review would ensure that the proposed design and construction materials would not create a substantial new source of light and glare off-site. Per the City of Mountain View Standard Conditions of Approval, the applicant shall submit a lighting plan with the application for building permit, and the lighting plan must be approved by the Zoning Administrator prior to building permit issuance. The lighting plan will demonstrate that the design and location of outdoor lighting

fixtures proposed by the project will not result in glare and light spillover to surrounding properties, including Stevens Creek.

There are numerous existing sources of light and glare in the project area including headlights from cars travelling on US 101 and SR 85, streetlights, and lights associated with the surrounding residential and commercial uses. Given the existing sources of light and glare in the project area, the proposed project, including the proposed building setbacks and adherence to the City's Development Review process and Standard Conditions of Approval, would not create a new source of substantial light or glare that would adversely affect wildlife in the project area.

Furthermore, as noted in Response F-1, the Bird Strike Management Plan described on page 62 of the Draft EIR has been updated to include specific bird-safe design features that are consistent with the lighting recommendations in this comment. Please refer to *Section 4, Revisions to the Text of the Draft EIR*.

Comment F-3: 2. The proposed development would generate thousands of new vehicle trips that will emit pollutants, including nitrogen components of vehicle exhaust. We disagree with the finding that the project would not have a cumulatively significant impact – if this was true, no project in the region would have a significant impact, and endangered species of serpentine soil would thrive.

We maintain that cumulative impacts of nitrogen emission on serpentine and other endangered species habitats in Santa Clara County (not only in the Habitat Plan study area but also in areas closer to Mountain View, such as the Palo Alto/Stanford foothills) are significant and require mitigation. Unless mitigation is implemented for this project and similar projects in the future, Mountain View should embark on a Habitat Conservation Plan process to mitigate for impacts that cumulatively increase nitrogen emissions, degrade endangered species habitat, and could result in “take” of the endangered species.

Response F-3: The comments on the general effects of nitrogen deposition on serpentine habitats and related species are acknowledged; however, the implication that the proposed project would result in significant cumulative effects from nitrogen deposition on covered species is not supported by any substantial evidence. Nitrogen deposition is an acknowledged significant cumulative impact in certain locations; therefore, the relevant question under CEQA is whether the nitrogen deposition that would result from the proposed project is “cumulatively considerable.” Neither CEQA, the CEQA Guidelines, case law, the USFWS, CDFW, nor the SCV Habitat Agency define what level of nitrogen deposition constitutes an amount that is cumulatively considerable; therefore, it is within the discretion of the City of Mountain View, as the lead agency, to make that determination. CEQA establishes that the threshold is not just one molecule, and the fact that numerous projects within the SCV Habitat Plan boundary were exempted from paying fees as “pipeline” projects indicates that substantial amounts of nitrogen deposition can be emitted

without being considered cumulatively considerable. Pipeline projects were not required to provide any mitigation due to the conclusion that the SCV Habitat Plan would address the cumulative impact. As discussed in Section 3.3, Biological Resources, of the Draft EIR, nitrogen deposition on the effected serpentine habitats from areas of Santa Clara County not covered by the SCV Habitat Plan is about 17 percent. The proposed project would cause an extremely small portion of these emissions, which would not be cumulatively considerable.

Comment F-4: 3. Stevens Creek is designated as critical habitat for the Central California Coast steelhead. The buildings and associated infrastructure could shed light into to an already impacted section of the creek, and could increase existing impediments thereby significantly steelhead migration and reproduction. We believe that consultation with NOAA must be required for this project.

Response F-4: The potential for the project to impact steelhead is evaluated on pages 63 through 65 of the Draft EIR. The discussion in the Draft EIR is based on the findings of the Biological Reconnaissance that was completed for the proposed project. The proposed project, with implementation of the mitigation measures MM BIO-7.1 and 7.2 would not impact steelhead trout in Stevens Creek. As discussed above in Response F-2, the project would be subject to the City's Development Review approval process and would be required to prepare and submit a lighting plan for City review and approval. This review would ensure that the proposed design and construction materials would not create a substantial new source of light and glare. Because no impact would occur, consultation with National Oceanic and Atmospheric Administration (NOAA) is not required.

Comment F-5: 4. We strongly disagree with the DEIR conclusion that the site the project site does not function as a movement corridor. The EIR bases this conclusion on an opinion that "the site is not located along movement pathways between high-quality habitats due to the presence of extensive urban and suburban land uses surrounding the site." We maintain that the site, being undeveloped at this time, provides refuge and a migratory stop over for animals such as grey fox as they move from wintering to breeding grounds in fall and in spring. The impact to animal movement should be considered significant. This impact can be rendered less-than-significant by re-designing the project with a wider riparian setback (at least 100-ft setback, including a 50-ft riparian forest).

Response F-5: The function of the project site and the segment of Stevens Creek adjacent to the project site as a wildlife corridor is evaluated in the Draft EIR starting on page 57. The discussion in the Draft EIR is based on the findings of the Biological Reconnaissance that was completed for the proposed project and included as Appendix C to the Draft EIR. It is the professional opinion of the biologist that prepared the Biological Reconnaissance that, except for steelhead, the project site and adjacent segment of Stevens Creek does not function as a wildlife corridor. The opinion is largely based on the fact that the project site, which is located adjacent to US 101 and SR 85, is surrounded by extensive and developed urban and suburban land uses, which do not

connect one or more area of core habitat. The project site is an undeveloped island surrounded by miles of developed land, and the body of conservation biology literature discussing wildlife corridors views such areas as unsuitable as wildlife corridors.

SECTION 5.0 REVISIONS TO THE TEXT OF THE DRAFT EIR

The following section contains text revisions to the *Draft Environmental Impact Report, Moffett Gateway Project*, dated April 2016.

Underline depicts text added.

~~Strikeout~~ depicts text deleted.

Page 62: REVISE the text as shown below:

~~**BIRD STRIKE MANAGEMENT PLAN:** A bird strike management plan, which provides project design features to reduce bird strikes, and a bird strike monitoring plan post construction shall be submitted as part of the building permit submittal with recommended provisions included in the building permit plans.~~

BIRD-SAFE DESIGN: The following project design features/documentation shall be provided to reduce bird strikes and included on the building permit plans:

- a. A minimum of 90 percent of the glazing on the office building (including the pavilion) shall be treated with a bird-friendly glazing treatment, such as a frit pattern.
- b. Occupancy sensors or other switch control devices shall be installed on nonemergency lights. The lights shall be programmed to shut off during non-work hours and between 10:00 p.m. and sunrise.
- c. The glass railings on the terraces of the office building and glass corners of the building shall be treated with a bird-friendly design treatment to make them visible to birds.
- d. A bird-strike monitoring plan for the monitoring and evaluation of bird strikes post-construction.

Page 187: **ADD** the following text:

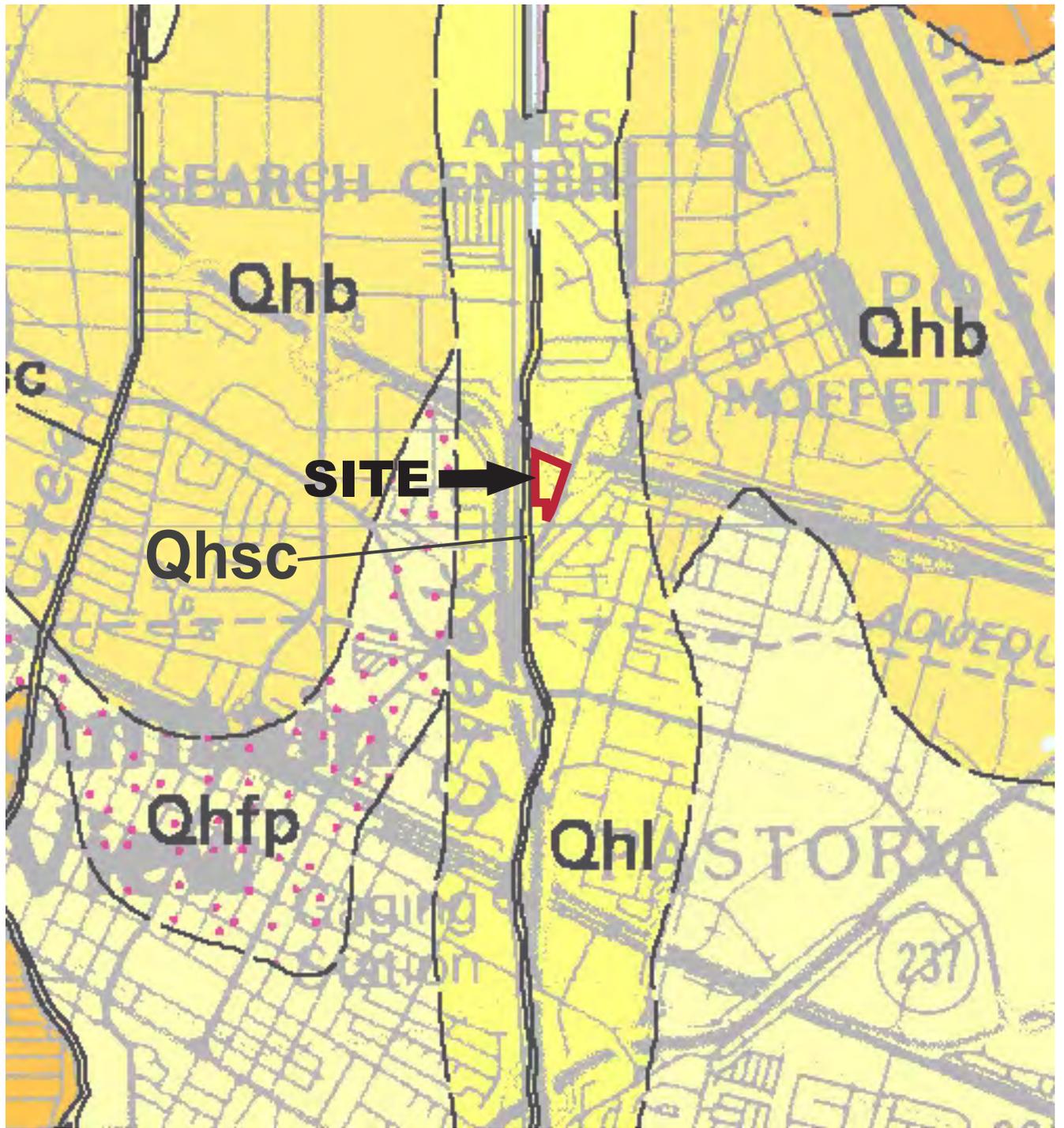
3.13.3.7 Construction Traffic

It is anticipated that vehicular, bicycle, and/or pedestrian traffic would be affected during construction of the proposed project, which may require traffic restrictions and/or detours. The following City of Mountain View Standard Conditions of Approval would be incorporated into the project:

TRAFFIC CONTROL PLAN: Submit a Traffic Control plan for any off-site and on-site improvements or any work that requires temporary lane closure for review and approval. Sidewalk closures are not allowed unless reconstruction of sidewalk necessitates temporary sidewalk closure. In these instances, sidewalk detour should be shown on the Traffic Control plan.

Impact TRANS-8: Project construction activities, with implementation of the City Standard Conditions of Approval, would not result in a significant impact. **[Less Than Significant Impact]**

Appendix E: **REPLACE** *Figure 1, Vicinity Map* with the figure shown on the following page.



Geologic Units

- Qhb** Basin deposits (Holocene)
- Qhfp** Flood-plain deposits (Holocene)
- Qhl** Natural levee deposits (Holocene)
- Qhsc** Stream channel deposits (Holocene)

Explanation

— Contact- dashed where approximate, dotted where concealed



APPROXIMATE SCALE (FEET)

Base: USGS, Geologic Map and Map Database of the Palo Alto 30'x60' Quadrangle, California, by Brabb, Graymer, and Jones, 2000



Vicinity Geologic Map

Moffett Gateway Mixed-Use Development
750 Moffett Boulevard
Mountain View, CA

Project Number
486-2-3

Figure Number
Figure 1

Date
June 2016

Drawn By
RRN

SECTION 6.0 COPIES OF COMMENT LETTERS RECEIVED

The original comment letters on the *Draft Environmental Impact Report, Moffett Gateway Project* are provided on the following pages.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

June 16, 2016

RECEIVED

JUN 20 2016

Stephanie Williams
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Community Development

Subject: Moffett Gateway Project
SCH#: 2015062063

Dear Stephanie Williams:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 15, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2015062063
Project Title Moffett Gateway Project
Lead Agency Mountain View, City of

Type EIR Draft EIR

Description The Moffett Gateway Project proposes to develop the approximately 9.7-acre undeveloped site with new office, hotel, and restaurant uses and an above-grade parking garage. The total square footage of the proposed uses is approximately 380,000 sf, including approximately 200,000 sf of office and 180,000 sf of hotel uses. The proposed office building and hotel would both be five stories tall with maximum heights of approximately 72 feet and 60 feet, respectively. The parking garage would contain six levels of parking and have a maximum height of approximately 52 feet. The project also includes a new bicycle and pedestrian bridge over Stevens Creek, connecting the Stevens Creek Trail to the project and off-site storm drainage improvements. Other proposed features include a landscaped open space area along the site's Moffett Boulevard frontage.

Lead Agency Contact

Name Stephanie Williams
Agency City of Mountain View
Phone 650-903-6446 **Fax**
email
Address 500 Castro Street
City Mountain View **State** CA **Zip** 94041

Project Location

County Santa Clara
City Mountain View
Region
Lat / Long 37° 24' 21.61" N / 122° 4' 5.62" W
Cross Streets Leong Drive and Moffett Boulevard
Parcel No. 153-19-007
Township 6S **Range** 2W **Section** 15 **Base** MDB&M

Proximity to:

Highways SR 237, 85, US 101
Airports Moffett Federal Airfield
Railways VTA Light Rail, Caltrain
Waterways Stevens Creek
Schools Stevenson ES
Land Use GPD: Mixed-Use Corridor
Z: Agriculture
PLU: Undeveloped

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; Public Utilities Commission

Date Received 05/02/2016 **Start of Review** 05/02/2016 **End of Review** 06/15/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

P.O. BOX 23660

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

FAX (510) 286-5559

TTY 711

www.dot.ca.gov

*Serious Driver
Help save lives*

June 15, 2016

SCLVAR064
SCL/VAR/PM VAR
SCH# 2015062063

Ms. Stephanie Williams
Community Development Department
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Dear Ms. Williams:

Moffett Gateway Project – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's State Transportation Network (STN), in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling both pedestrian and transit. Also, these targets support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our comments are based on the Draft Environmental Impact Report (DEIR). Please also refer to the previous comment letters on this project and incorporated herein.

Project Understanding

The proposed project is located in the southeast quadrant of the U.S. Highway 101 (US 101) and State Route (SR) 85 interchange, immediately adjacent to State right-of-way (ROW). It would develop the approximately 9.7-acre undeveloped site with a new office, hotel, and restaurant uses and an above-grade parking garage. The total square footage of the proposed uses is approximately 380,000 square feet (sf), including approximately 210,000 sf of office and 157,330 sf of hotel uses. The proposed office building and hotel would both be four stories tall with maximum heights of approximately 70 feet and 54 feet, respectively. The parking garage would contain five levels of parking and have a maximum height of approximately 58 feet. The proposed project includes a new bicycle and pedestrian bridge over Stevens Creek, connecting the Stevens Creek Trail to the proposed project.

Ms. Stephanie Williams/City of Mountain View
June 15, 2016
Page 2

Lead Agency

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

Traffic Impacts

The project is of regional and area-wide significance, as it has the potential for causing significant traffic effects extending beyond the City; in particular, queuing, intersections, and ramps. Please provide mitigation measures for impacts, such as additional storage length at intersections and the on-ramps/local streets for the freeway on-ramp traffic.

1. Caltrans recommends traffic queuing on US Highway (US) 101/Moffett Boulevard be analyzed for impacts to the US 101 mainline operations.
2. The proposed plan is likely to have impacts on the operations of the following metered freeway on-ramps:
 - Southbound (SB) US 101/Moffett Boulevard diagonal on-ramp (metered 3:00 pm to 7:00 pm).
 - Northbound (NB) US 101/Moffett Boulevard loop on-ramp (planned to be metered 2017).
 - SB State Route (SR) 85/Moffett Blvd loop on-ramp (metered 2:30 pm to 8:00 pm).

During the ramp metering hours, the on-ramp queues will likely be lengthened with the additional traffic demand by this project, and they may impede onto the local streets affecting their operations.

3. Please include the US 101/Ellis Street ramp intersections in the intersection analysis which is currently not part of the Traffic Impact Analysis (TIA). The TIA indicates the project will have a significant impact to NB US 101 mainline between SR 237 and Moffett Boulevard during AM peak hour. The congestion within this segment may result in people exiting US 101 at Ellis Street and using local road network to access the project site.

Please commit in the DEIR to paying fair share fees to the US 101 Express Lanes project from the San Mateo County Line to Cochrane Road in Morgan Hill (RTP 240466). The TIA identified fair share contributions to mitigate the project's significant impacts to the above-mentioned segment; however, the DEIR does not commit the City to paying the fees. There are no other projects in the Regional Transportation Plan (RTP) or Valley Transportation Plan that can be used as a mitigation improvement.

Vehicle Trip Reduction

Caltrans encourages the City to locate future housing, jobs, and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. This would promote mass transit use thereby reducing regional VMT and traffic impacts.

Ms. Stephanie Williams/City of Mountain View
June 15, 2016
Page 3

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. Suggested TDM strategies include working with the Santa Clara Valley Transportation Authority (VTA) to decrease headway times and improve way-finding on bus lines to provide a better connection between the project, the Mountain View Station, and regional destinations and providing:

- Membership in a transportation management association.
- Transit subsidies and/or transit passes to all employees.
- 10 percent vehicle parking reduction.
- Transit and trip planning resources.
- Carpool and vanpool ride-matching support.
- Carpool and clean-fuel parking spaces.
- Secured bicycle storage facilities.
- Fix-it bicycle repair station(s).
- Bicycles for employee uses to access local resources.
- Amenities, access and connections, incorporate wide sidewalks.
- Showers, changing rooms and clothing lockers.
- Transportation and commute information kiosk.
- Outdoor patios, outdoor areas, furniture, pedestrian pathways, picnic and recreational areas.
- Nearby walkable amenities.
- Kick-off commuter event at full occupancy.
- Employee transportation coordinator.
- Emergency Ride Home program.
- Bicycle route mapping resources and incentivize bicycle parking.

These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan.

Voluntary Contribution Program

We encourage the City to participate in the VTA's voluntary contribution program and plan for the impact of future growth on the regional transportation system. Contributions by the City funding regional transportation programs would improve the transportation system by reducing congestion and improving mobility on major roadways throughout the San Francisco Bay Area.

Hydrology

1. The DEIR should evaluate sheet flow impacts to Stevens Creek. Currently, the surface water from SB US 101 adjacent to the project site sheet flows off-site, which is the area of the former off-ramp from SB US 101 to westbound Moffett Boulevard. The proposed noise barrier will block the flow and convey the flow directly into the Stevens Creek.
2. Based on Figure 9 of the Floodplain Study, prepared by Schaaf & Wheeler, it appears that SB US 101 near Stevens Creek will be inundated during the 100-year flood event due to the proposed project. Please analyze this inundation issue in the DEIR.

Ms. Stephanie Williams/City of Mountain View

June 15, 2016

Page 4

Geology & Soils

1. "No Impact" Determinations

A. Impact GEO-1 (p. 86): Expansive Soil

The GEO-1 impact should be designated as "Less than significant", not "No Impact", since the City's standard conditions of approval would be incorporated into the project to address effects of existing expansive soils.

B. Impact GEO-4 (p. 87): Ground Shaking

The GEO-4 impact should be designated as "Less than significant", not "No Impact", since the City's standard conditions of approval would be incorporated into the project to address effects of strong ground shaking.

C. Impact GEO-5 (p. 87): Liquefaction

The GEO-5 impact should be designated as "Less than significant", not "No Impact", since Appendix E, "Liquefaction Potential" section states, "The site within a State - designated Liquefaction Hazard Zone and the potentially liquefiable materials will be removed and re-compacted as a mitigation method."

D. Impact GEO-7 (p. 88): Lateral Spreading

The GEO-7 impact should be designated as "Less than significant", not "No Impact", since the DEIR and Appendix E, "Lateral Spreading" sections state, "Lateral spreading could occur on the southern portion of the site adjacent to unlined creek channel" and "The section of Stevens Creek adjacent to the office building is not concrete-lined and our analysis at CPT-3 indicates the potential for lateral spreading to occur, provided this material will be removed and replaced as engineered fill (as mitigation method)," respectively.

2. Section 3.6.4 Planning Considerations (p. 88): Please note that the excavation and shoring plans in the northern part of the project adjacent to the US 101 should be submitted to Caltrans for review.

3. Appendix E: The Geologic Map showing the geologic unit(s) covering the project locations and its constituents should be included.

Cultural Resources

Caltrans requires that a project's environmental document include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within State ROW. Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resource study by a qualified, professional archaeologist, and evidence of Native American consultation to ensure compliance with CEQA, Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans' Standard Environmental Reference (www.dot.ca.gov/ser/vol2/vol2.htm).

Ms. Stephanie Williams/City of Mountain View
June 15, 2016
Page 5

These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in State ROW. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to State ROW.

Traffic Control Plan

Since it is anticipated that vehicular, bicycle, and pedestrian traffic will be impacted during the construction of the proposed project requiring traffic restrictions and detours, a Caltrans-approved Traffic Control Plan (TCP) is required to avoid project-related impacts to the STN. The TCP must also comply with the requirements of corresponding jurisdictions. In addition, pedestrian access through the construction zone must be in accordance with the Americans with Disabilities Act (ADA) regulations (see Caltrans' *Temporary Pedestrian Facilities Handbook* for maintaining pedestrian access and meeting ADA requirements during construction at: www.dot.ca.gov/hq/construc/safety/Temporary_Pedestrian_Facilities_Handbook.pdf) (see also Caltrans' Traffic Operations Policy Directive 11-01 "Accommodating Bicyclists in Temporary Traffic Control Zones" at: www.dot.ca.gov/hq/traffops/policy/11-01.pdf). All curb ramps and pedestrian facilities located within the limits of the project are required to be brought up to current ADA standards as part of this project.

For further TCP assistance, please contact the Caltrans District 4 Office of Traffic Management Operations at (510) 286-4579. Further traffic management information is available at the following website:
www.dot.ca.gov/hq/traffops/trafmgmt/tmp_lcs/index.htm.

Bridges, Trestles, Culverts and Other Structures in Riparian Environments

Some project level activities may affect riparian flow patterns upstream of bridges, trestles, culverts or other structures for which Caltrans holds responsibility. Please ensure your project-level environmental documents include hydrological studies to determine whether such impacts will occur, and to identify appropriate mitigation measures.

Habitat Restoration and Management

Project-level activities related to habitat restoration and management should be done in coordination with local and regional Habitat Conservation Plans, and with Caltrans where our programs share stewardship responsibilities for habitats, species and/or migration routes.

Sea Level Rise

The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies to plan for potential impacts by considering a range of sea level rise scenarios for the years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans.

Ms. Stephanie Williams/City of Mountain View
June 15, 2016
Page 6

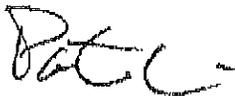
Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information:
www.dot.ca.gov/hq/traffops/developserv/permits.

The developer has until November 24, 2016, to exercise the extended option to purchase "Parcel 2" (Caltrans Parcel # DD-011831-04-01) from Caltrans.

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

- c: Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
- Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy

County of Santa Clara

Parks and Recreation Department

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



June 15, 2016

Stephanie Williams, Senior Planner
City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94041

SUBJECT: Draft Environmental Impact Report for the Moffett Gateway Project

Dear Ms. Williams:

The County of Santa Clara, Parks and Recreation Department (“County Parks Department”), has reviewed the Draft Environmental Impact Report (EIR) for the Moffett Gateway Project. The proposed Project is to build a 255-room hotel, 200,000 square-foot office building and above-grade parking structure on two parcels in the northern portion of the City of Mountain View.

The County Parks Department is 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. Although responsibility for the actual construction and long-term management of each individual trail varies, the County Parks Department provides general oversight and protection of the overall trail system. The *Countywide Trails Plan* indicates the following regional trail routes adjacent to the project site:

- ***Stevens Creek Sub-regional Trail (S2)*** – This partially existing trail follows Stevens Creek from Stevens Creek County Park to the San Francisco Bay. The City of Mountain View’s portion of the trail is almost complete, including in the area directly across the creek from the project site, and it is designated for hiking and off-street cycling.

The Final EIR should address the proposed Project’s consistency with the *Countywide Trails Plan*, which was not addressed in the existing DEIR. The County Parks Department recommends that the EIR also address the following items as they relate to Countywide Trail Routes in the vicinity of the Project site:

Aesthetics

In regard to the potential for visual and aesthetic impacts, the EIR should more fully evaluate degradation of views and the potential for lighting and glare impacts on users of the regional

Board of Supervisors: Mike Wasserman, Cindy Chavez, Dave Cortese, Ken Yeager, S. Joseph Simitian

County Executive: Jeffrey V. Smith



trail. To the extent feasible, the project should seek to minimize impacts through designs that take into account the close proximity of the Stevens Creek Trail, and its naturalistic setting along the creek corridor. Although the portion of the creek adjacent to the Project site has some existing light pollution due to car lights traveling on State Route 85, the Project's new lighting and glare impacts need to be assessed given that the height of the buildings may further degrade the trail user experience. The lighting and glare assessment should evaluate potential glare from automobiles parked inside the parking structure.

Biological Resources

The EIR should analyze the abovementioned concern about lighting and glare impacts on habitat within the Stevens Creek corridor. Although the Draft EIR assessed the potential lighting and glare impacts of the building design and materials on steelhead habitat, the analysis should also assess the potential glare from automobiles parked inside the parking structure, and evening lighting on the entire riparian corridor.

The County Parks Department appreciates the opportunity to provide comments on the Draft Environmental Impact Report for the Moffett Gateway Project. If you have any questions regarding this letter, please contact me at (408) 355-2228 or by email at:

Hannah.Cha@prk.sccgov.org.

Sincerely,



Hannah Cha
Provisional Associate Planner

cc: Annie Thomson, Principal Planner



Board of Supervisors: Mike Wasserman, Cindy Chavez, Dave Cortese, Ken Yeager, S. Joseph Simitian

County Executive: Jeffrey V. Smith

County of Santa Clara

Roads and Airports Department

101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400



June 15, 2016

Stephanie Williams
Senior Planner
Community Development Department
City of Mountain View
500 Castro Street
Mountain View, CA 94041

**SUBJECT: Notice of Availability of a Draft Environmental Impact Report
Moffett Gateway Project**

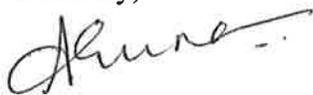
Dear Ms. Williams:

The County of Santa Clara Roads and Airports Department is submitting the following comments regarding the draft environmental impact report (DEIR) for the project cited above.

- As noted in the Notice of Preparation comment letter dated July 14, 2015, transportation impact analysis (TIA) should be conducted using the Congestion Management Program (CMP) guidelines, and most recent counts and County signal timing for County study intersections. The existing conditions analysis presented in the DEIR and TIA for intersections along Central Expressway at Moffett-Castro Street and North Mary Avenue do not reflect approved CMP counts and County signal timing settings. Please contact Ananth Prasad at (408) 494-1342 or Ananth.Prasad@rda.sccgov.org for the correct signal timing.
- Analysis should be revised to reflect the correct information and submitted to County for review. Should the revised analysis result in a significant impact, appropriate mitigation measures should be identified to address the impact. The preliminary *Comprehensive County Expressway Planning Study – Expressway Plan 2040* project list should be consulted for a list of mitigation measures for significant impacts to the expressways. Should the preliminary *Expressway Plan 2040* project list not include an improvement that would mitigate a significant impact, the TIA should identify mitigation measures that would address the significant impact. Mitigation measures listed in the TIA should be incorporated into the EIR document.

Thank you for the opportunity to comment on the DEIR. If you have any questions about these comments, please contact me at 408-573-2462 or at aruna.bodduna@rda.sccgov.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Aruna", with a horizontal line extending to the right.

Aruna Bodduna
Associate Transportation Planner
cc: DSC, MA, AP



June 15, 2016

City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94039

Attention: Stephanie Williams

Subject: Moffett Gateway

Dear Ms. Williams:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for 200,000 square feet of office development and a 255-room hotel on 9.7 acres on a site bounded by Moffett Boulevard, U.S. 101, and Stevens Creek. We have the following comments.

Transportation Demand Management / Trip Reduction

VTA commends the City and applicant for including a commitment to a Transportation Demand Management (TDM) Program with a trip reduction targets of 20%, required membership in the Mountain View Transportation Management Association (MVTMA), monitoring of trip generation via annual driveway counts and employee surveys, and penalties if the TDM goals are not met. VTA is also pleased that the TDM Measures included in the TDM Plan include measures to encourage transit ridership, such as working with the MVTMA to extend the existing MVGo shuttle service to the site or providing a separate shuttle service if the MVTMA chooses not to implement this extension (TDM Plan, pgs. 18-19).

Pedestrian and Bicycle Accommodations

VTA commends the project applicant for proposing a publicly accessible bicycle and pedestrian path parallel to the roadway and a new bicycle and pedestrian bridge over Stevens Creek to connect the development to the Stevens Creek Trail (DEIR, pg. 10).

VTA recommends that the City work with the applicant and Caltrans to improve sidewalks and pedestrian connectivity along Moffett Boulevard in the vicinity of the project, particularly to locations north of US 101 and west of SR 85.

Freeway Impacts and Mitigation Measures

The DEIR/TIA identifies a significant impact on US 101 northbound between SR 237 and Moffett Boulevard. The TIA notes that "As the areas bordering this freeway are predominantly built out, there is little opportunity to widen it within the available right of way. Therefore any widening would require property acquisition. Due to the number of affected properties and

City of Mountain View
June 15, 2016
Page 2

financial implications, freeway segment impacts are considered significant and unavoidable.”
(TIA, pg. i)

VTA notes that certain cities in Santa Clara County have identified contributions to regional transportation improvements as mitigation measures for significant freeway impacts. VTA recommends that the City include voluntary contributions to projects in VTP 2040 that provide congestion relief and additional transportation options along the impacted corridors, such as SR 237 Express Lanes: Mathilda Avenue to SR 85 (VTP ID: H3). Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations.

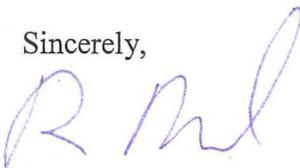
Please see the March 6, 2014 Report to the VTA Board of Directors (Agenda Item 6.18), available online at <http://www.vta.org/sfc/servlet.shepherd/document/download/069A0000001LwZYIA0>, for further information about Voluntary Contributions to Transportation Improvements.

Coordination with Caltrans and VTA Regarding Highway Facilities

- We recommend coordination with Caltrans regarding the purchase of Parcel 2 to determine if right-of-way will be needed for potential future interchange improvements.
- We also recommend coordination with Caltrans regarding Recovery Zone requirements for the hotel and parking garage. The purchase of Parcel 2 may affect the ability to meet these requirements. Please specify the distance from the edge of travel way on southbound US 101 to the property line.
- The project developer should be aware that VTA has submitted a proposed US 101/Moffett Boulevard interchange improvement to MTC as part of VTP 2045. This project may include widening of Moffett Boulevard in the vicinity of the interchange in the future.

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans



June 15, 2016

via email

Stephanie Williams
Project Planner
City of Mountain View

Dear Ms. Williams,

Santa Clara Valley Audubon Society (SCVAS) and the Loma Prieta Chapter of the Sierra Club are local environmental organizations dedicated to the protection and enjoyment of our natural resources and wildlife. We thank you for the opportunity to provide comment on the Draft EIR for Moffett Gateway Project. Since almost all our native wildlife species use riparian corridors during their life cycle, we are always concerned when development is proposed near streams.

Here are our comments:

1. Most native bird species in our region use stream corridors at least for part of their life cycle, and the location of the Project within 100-ft of the creek corridor and next to the riparian forest puts birds at risk of collision, injury and death. In Mountain View neighborhoods, riparian bird species have been observed more than 750-ft from the creek corridor (Ms. Marti White, birder and Mountain View resident, Personal Communication).

We thank you for requiring a bird strike management plan and a bird strike monitoring plan postconstruction.

- Please provide criteria for these plans? At a minimum,
 - Highly reflective glass should be avoided within 300-ft of the creek and its riparian forest.
 - Any reflective or highly transparent glass should provide visual cues to birds
 - Avoid transparent glass skyways, walkways, or entryways, free-standing glass walls and transparent building corners
 - Avoid funneling open space towards a building façade
 - No foliage should be visible through glass
 - A monitoring plan should be comprehensive and calibrated, and include placing small carcasses to evaluate removal rates by predators and scavengers.
 - Remediation (retrofitting for bird safety) should be provided if bird collisions are reported postconstruction.

Light attracts migratory birds (since most migratory birds fly at night) and thus it is important to minimize lighting near the creek, and to develop a lighting plan that minimizes impacts to wildlife, including birds and fish.

2. The proposed development would generate thousands of new vehicle trips that will emit pollutants, including nitrogen components of vehicle exhaust. We disagree with the finding that

the project would not have a cumulatively significant impact – if this was true, no project in the region would have a significant impact, and endangered species of serpentine soil would thrive.

We maintain that cumulative impacts of nitrogen emission on serpentine and other endangered species habitats in Santa Clara County (not only in the Habitat Plan study area but also in areas closer to Mountain View, such as the Palo Alto/stanford foothills) are significant and require mitigation.

Unless mitigation is implemented for this project and similar projects in the future, Mountain View should embark on a Habitat Conservation Plan process to mitigate for impacts that cumulatively increase nitrogen emissions, degrade endangered species habitat, and could result in “take” of the endangered species.

3. Stevens Creek is designated as critical habitat for the Central California Coast steelhead. The buildings and associated infrastructure could shed light into to an already impacted section of the creek, and could increase existing impediments thereby significantly steelhead migration and reproduction. We believe that consultation with NOAA must be required for this project.

4. We strongly disagree with the DEIR conclusion that the site the project site does not function as a movement corridor. The EIR bases this conclusion on an opinion that “the site is not located along movement pathways between high-quality habitats due to the presence of extensive urban and suburban land uses surrounding the site.” We maintain that the site, being undeveloped at this time, provides refuge and a migratory stop over for animals such as grey fox as they move from wintering to breeding grounds in fall and in spring. The impact to animal movement should be considered significant. This impact can be rendered less-than-significant by re-designing the project with a wider riparian setback (at least 100-ft setback, including a 50-ft riparian forest).

We thank you for the opportunity to comment on the Moffett Gateway project DEIR. Please contact us if you have questions,

Sincerely,



Shani Kleinhaus,
Environmental Advocate
Santa Clara Valley Audubon Society



Michael Ferreira,
Executive Committee Chair
Sierra Club Loma Prieta Chapter