



August 12, 2021

Diana Pancholi, Project Planner
Community Development
City of Mountain View
Via email to: diana.pancholi@mountainview.gov

RE: Comments on the DEIR for 555 W. Middlefield

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

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

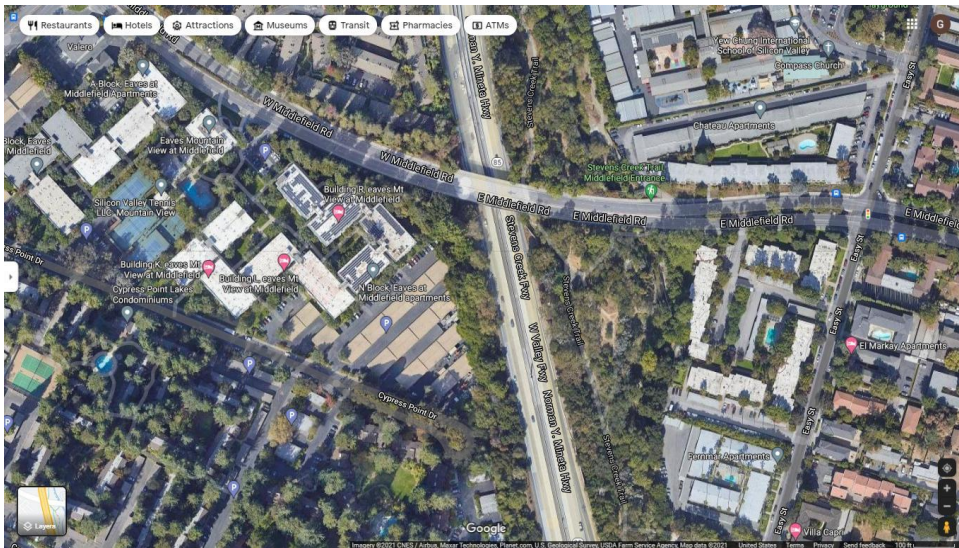
Block “C,” however, is very problematic as it has serious impacts. The proposed development here involves removal of every single tree in the existing wide tree buffer that currently exists along Hwy 85 and in close proximity to Stevens Creek Trail. This canopy is part of the unique Stevens Creek habitat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

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

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

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

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



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



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



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

Stevens Creek Corridor Park

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

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

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

The Stevens Creek corridor connects several rich habitat areas, home to a variety of both aquatic and land-based wildlife¹. Some species found in the parks include:

- **Mammals:** Coyote, Gray Fox, Raccoon, Brush Rabbit, Merriam's Chipmunk, Fox Squirrel, Opossum, black-tailed deer, and Big brown bat.
- **Birds:** the parks and trail are great for bird watching, with over 150 different species;

¹ SF Bay Wildlife https://www.sfbaywildlife.info/places/stevens_creek_county_park.htm

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

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

Summary

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

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

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

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

Respectfully submitted,



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



Shani Kleinhaus
Environmental Advocate
Santa Clara Valley Audubon Society

CC

Mountain View City Council
Gladwyn D'Souza, Conservation Chair, Sierra Club Loma Prieta Chapter (SCLP)
James Eggers, Executive Director, Sierra Club Loma Prieta Chapter (SCLP)
Rajiv Mathur, Friends of Stevens Creek <rajiv_mathur@stevenscreektrail.org>

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

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

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

Scientific evidence shows that urban trees remove fine particulate air pollution². The removal of the trees along Hwy 85 eliminates an important green infrastructure service that can help reduce PM2.5 concentrations not only during construction, but also for the operations lifetime of the project. The Project should be modified in a way that retains all the existing trees along the freeway (eliminating Block "C," for example).

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

Hwy 85 is not considered a scenic highway at the state level, but thousands of drivers spend several hours each week on this roadway on their way to and from work at Silicon Valley companies³. The value of the tree-lined highway in this section is not negligible - seeing trees

2

United States Environmental Protection Agency (EPA). 2017. Our nation's air: Status and trends through 2016. Accessed October 2020.

Nowak, D.J., D.E. Crane, and J.C. Stevens. 2006. Air pollution removal by urban trees and shrubs in the United States. *Urban Forestry and Urban Greening* 4:115–123.

Smith, W. H. 1990. *Air pollution and forests*. New York: Springer-Verlag, 618 p.

Nowak, D.J., S. Hirabayashi, A. Bodine and R. Hoehn. 2013. Modeled PM2.5 removal by trees in ten U.S. cities and associated health effects. *Environmental Pollution* 178: 395–402.

Centers for Disease Control and Prevention (CDC). 2012. *Asthma in the U.S: Growing every year*. Accessed October 2020.

³ "Gloomy forecasts abound with traffic experts predicting severe congestion on all South Bay roads to return in a very short time despite the opening of Highway 85. Anywhere from 100,000 to 150,000 vehicles are expected to use the freeway each weekday."
<https://www.mercurynews.com/2014/10/17/from-the-archives-highway-85-debuts-with-a-surprise/> (2014)
and

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/census/aadt/tc-2016-aadt-volumes-a11y.pdf>

improves mental health, cognition, and productivity for these drivers⁴. Indeed, studies show that people who commute through natural environments daily report better mental health, and this association is even stronger among active commuters⁵. The project replacement trees will take decades to grow to provide the aesthetic and health benefits that the existing trees provide.

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

Views from Hwy 85,
looking towards the
project site:



4

Urban trees and human health (a scoping review):
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7345658/>

Effects of nature on cognitive functioning, emotional well-being, and other dimensions of mental health:
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6656547/>

Effects of trees on academic success: <https://aslathedirt.files.wordpress.com/2016/01/li-sullivan.pdf>

Nature conservancy benefits of urban trees:
https://www.nature.org/content/dam/tnc/nature/en/documents/Public_Health_Benefits_Urban_Trees_FIN_AL.pdf

Urban forests and climate change (discusses benefits of urban forests to physical and mental health):
<https://www.fs.usda.gov/ccrc/topics/urban-forests> and

Effects of vegetation on reducing frustration levels for drivers:
<https://journals.sagepub.com/doi/abs/10.1177/0013916503256267>

⁵ <https://www.sciencedaily.com/releases/2018/10/181018095349.htm>



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

Artificial Light at Night (ALAN) is an emerging global environmental concern, and light pollution is an under-recognized problem. In recent years, there has been a remarkable increase in scientific articles showing devastating effects of ALAN on species and ecosystems⁶, and on human health.

The most devastating ecological impacts have been on insects and insect populations, including aquatic insects⁷, and the ecosystems that depend on insects for pollination, or as a food source. Because the project site is so close to Stevens Creek, attracting aquatic insects to light can cause adverse impacts to the aquatic and riparian ecosystem of the Creek.

Outdoor lighting has also been implicated in adverse impacts to teen mental health⁸ and to human physical health, including thyroid cancer and sleeping disorders⁹.

The International Dark-sky Association provides sound recommendations for addressing light pollution¹⁰ including:

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

⁶ "Exposure to Artificial Light at Night and the Consequences for Flora, Fauna, and Ecosystems" - an in depth summary of how ALAN affects the natural world:

<https://www.frontiersin.org/articles/10.3389/fnins.2020.602796/full>.

⁷ <https://www.sciencemag.org/news/2021/05/can-scientists-help-insects-survive-their-fatal-attraction-light-night>

⁸ <https://www.nimh.nih.gov/news/science-news/2020/outdoor-light-linked-with-teens-sleep-and-mental-health>

⁹ <https://acsjournals.onlinelibrary.wiley.com/doi/abs/10.1002/cncr.33392> and <https://time.com/5033099/light-pollution-health/>.

¹⁰ <https://www.darksky.org>

- Prevent light spillage.¹¹

In addition, please limit the Correlated Color Temperature (CCT) of all lights to warmer light - no more than 2400 Kelvin within 300-ft of a riparian corridor, and no more than 2700 Kelvin throughout the Project. The reason is that LED lighting >2400 Kelvin is associated with pervasive negative impacts on humans, wildlife, and ecosystems¹².

4. Plant and tree palette

The City of Mountain View has adopted a strategic plan that prioritizes biodiversity in the City¹³. To support biodiversity, mature trees (especially oaks) should be retained, especially in areas where they function as a wildlife movement corridor (along Hwy 85). In addition, a native plant palette would support native fauna and flora, especially local birds, and pollinators.

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

Trees

There are no California native trees in the plan! The only oak, holly oak, is a species that provides no habitat value. Even the redbud is the eastern, rather than western, redbud. Some of the species on the list should not be planted here. For example, in California, London plane trees tend to hybridize with local sycamores in riparian corridors, threatening the genetic integrity of the local population.¹⁴

The plan should be revised to use trees from the North Bayshore plant palette¹⁵, even where the chosen non-native is consistent with existing trees onsite. This will result in less consistency visually, but much higher biodiversity value, which is a key priority of the City.

Shrubs

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

¹¹ <https://www.iau.org/static/publications/dgskies-book-29-12-20.pdf>

¹² 2021 A Values-Centered Approach to Nighttime Conservation <https://www.darksky.org/values-centered-lighting-resolution/>

¹³ https://www.mountainview.gov/council/strategic_planning_and_visioning.asp

Strategic plan FY 2021-23 pg. 2 Protect and enhance local ecosystems and biodiversity through rewilding and other measures.; and pg. 3 Define biodiversity requirements for landscaping in Mountain View.

¹⁴ [https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore Alluvial Woodland Planting Guide 08 30 2018 med res.pdf](https://www.valleywater.org/sites/default/files/D2%20-%20Sycamore%20Alluvial%20Woodland%20Planting%20Guide%2008%2030%202018%20med%20res.pdf)

O'Rourke, S.M. and M.R. Miller. 2017. RAD sequencing identifies trees that are a product of hybridization between California sycamore (*Platanus racemosa*) and London planetree (*Platanus x acerifolia*). Department of Animal Science, University of California, Davis.

¹⁵ https://www.mountainview.gov/depts/comdev/planning/activeprojects/northbayshore_/default.asp

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

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

4. Biological Resources: nesting birds

Large trees near waterways are often used by nesting birds, including raptors such as the Red-shouldered hawk, Great-horned owl, and Red-tailed hawk¹⁶. The nesting season for large birds is longer, and thus a nesting raptor survey is needed for the trees along Hwy 85 in the months of January through September.

5. Energy

Net Zero Energy

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

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

EV Charging Stations

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

We believe more EV charging stations are needed than the 10% currently proposed. The project should provide closer to 25% charging stations or include documented capacity for easily expanding the number of charging stations to 25% within the next decade¹⁷.

6. Transportation

Parking and Car Share

¹⁶ Breeding Bird Atlas of Santa Clara County (Bill Bousman, Santa Clara Valley Audubon Society, 2007)

¹⁷ A study by the [National Renewable Energy Laboratory](#) estimates that 3.4 DCFC, and 40 Level 2 charging ports are needed per 1,000 EVs. Assuming [35 million EVs by 2030](#), the U.S. will need to build about 50,000 DCFCs and 1.2 million Level 2 ports. This means that 380 EV charging ports will need to be installed each day over the next nine years. In comparison, the U.S. has installed on average about [30 ports a day](#) between 2010 and 2020.

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

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

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

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

7. Noise

Green space has the ability to mitigate noise in urban areas. Planting "noise buffers" composed of trees and shrubs can reduce noise by five to ten decibels for every 30m width of woodland, especially sharp tones, and this reduces noise to the human ear by approximately 50%¹⁸.

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

8. Alternatives

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

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

Thank you for the opportunity to comment on the DEIR.

¹⁸<https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-regeneration-and-greenspace-partnership/greenspace-in-practice/benefits-of-greenspace/noise-abatement/>