



CITY OF SUNNYVALE

CEQA GHG EMISSIONS ANALYSIS

PRELIMINARY COMPLIANCE CHECKLIST

Climate Action Playbook Update/Game Plan 2028 Consistency Checklist for Future Development¹

Version: April 2025

On June 25, 2024, the City of Sunnyvale adopted the Sunnyvale Climate Action Playbook Update/Game Plan 2028 (Playbook) that establishes 2030 and 2045 greenhouse gas (GHG) emissions targets and provides plays and moves to establish a trajectory towards achieving those targets. The Playbook includes specific plays and moves to achieve the communitywide emissions reduction targets of 56 percent below 1990 levels by 2030 and carbon neutrality by 2045. This is consistent with California's goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 (pursuant to Senate Bill 32) and provides substantial progress towards achieving the State GHG reduction goal of carbon neutrality by 2045 (pursuant to Assembly Bill 1279). The Sunnyvale City Council, City staff, and community will continue to develop an approach to meet the State 2045 goal of carbon neutrality.

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183.5, a lead agency may determine that a project's or plan's incremental contribution to a GHG emissions cumulative effect is not cumulatively considerable if the project or plan complies with the requirements in a previously adopted plan or mitigation program for the purpose of reducing GHG emissions under specified circumstances. For the Playbook to be considered a qualified GHG reduction strategy and provide for CEQA streamlining of GHG emissions analysis for future development, the Playbook must identify those plays and moves that are applicable to future development projects. Specifically, the Sunnyvale Playbook includes plays and moves that are applicable to existing developments and municipal government operations, as well as mandatory plays and moves to be applied to future development for public and private projects. Mandatory GHG reduction programs that are applicable to future development are summarized in the following CEQA GHG Emissions Compliance Checklist (referred to herein as the CEQA GHG Checklist). This CEQA GHG Checklist identifies applicable regulations, requirements, and monitoring and reporting required by those regulations. The purpose of the CEQA GHG Checklist is to assist with determining project or plan consistency with the Playbook and provide a

¹ Future development refers to any project or plan that is subject to discretionary review and triggers environmental review pursuant to CEQA. Projects with NOPs submitted application packages, and/or other official documentation that predate the adoption of the Playbook and CEQA GHG Emissions Thresholds are not required to utilize this checklist and/or the CEQA GHG Emissions Thresholds, at the discretion of the City as the CEQA Lead Agency.

streamlined review process for proposed future projects and plans that are subject to discretionary review and trigger environmental review pursuant to the CEQA.

This CEQA GHG Checklist contains plays and moves that are required to be implemented on a project-by-project basis to confirm that the specified GHG emissions targets identified in the Playbook are achieved. Implementation of these plays and moves would demonstrate that future development is consistent with Playbook assumptions and assist Sunnyvale in achieving its identified GHG reduction targets. Projects or plans that are consistent with the Playbook (as determined through the use of this CEQA GHG Checklist) may rely on the programmatic Playbook Initial Study-Negative Declaration for the respective project- and cumulative-level GHG emissions impacts analysis. Inconsistency with any of the applicable by-land-use-type² plays and moves in this CEQA GHG Checklist would make a Plan/Project inconsistent with the overall CEQA GHG Checklist. **Projects that are identified as not consistent with the Playbook with this CEQA GHG Checklist must prepare a project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions compared to Sunnyvale CEQA GHG Emissions Thresholds adopted June 25, 2024, and incorporate the Playbook plays and moves in this CEQA GHG Checklist to the extent feasible.**³

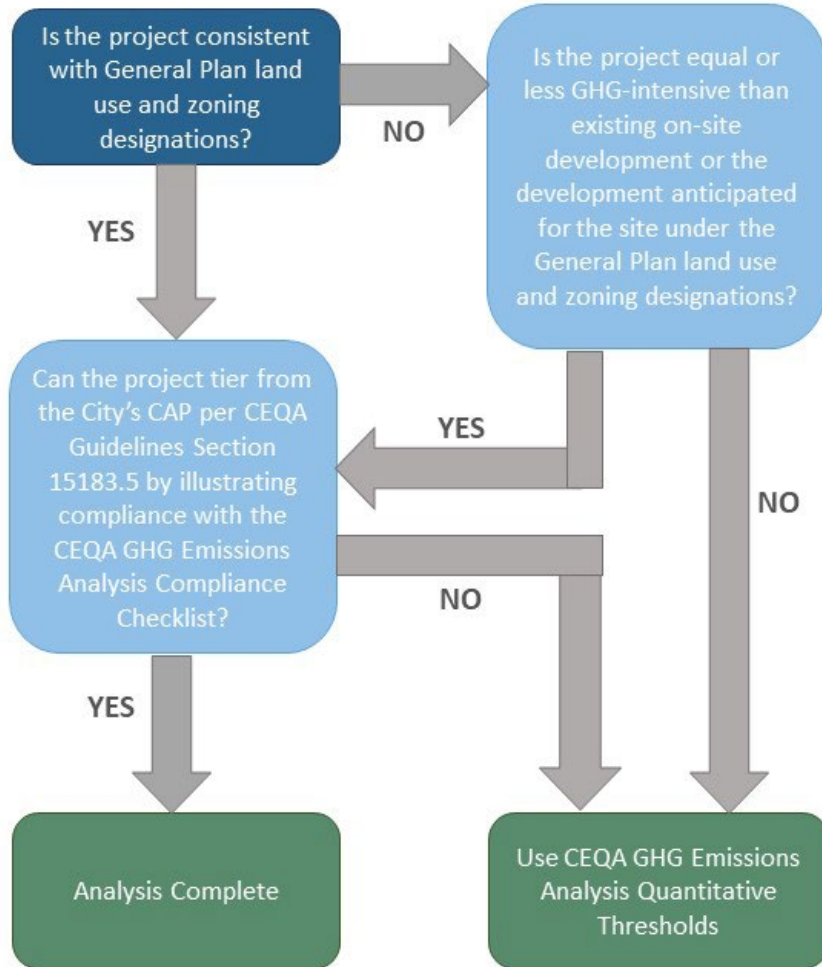
Cumulative GHG emissions associated with construction from a land use development project are generally orders of magnitude lower than the operational GHG emissions from a project, because construction emissions are generally short in duration compared to the project's overall lifetime and, as such, can be assessed qualitatively as part of related CEQA GHG emissions analysis. However, some projects may have long construction periods or entail large quantities of cut and fill that could result in construction-related GHG emissions that may be considered significant. Thus, the City retains the discretion on a project-by-project basis to consider whether a project's construction-related GHG emissions could be cumulatively considerable and require more detailed quantitative CEQA GHG emissions analysis and respective mitigation. The process for determining whether a project or plan may utilize this CEQA GHG Checklist for streamlining or whether a quantitative GHG analysis is required is illustrated in Figure 1, below.

² Land-use types that may streamline CEQA GHG emissions analysis using this CEQA GHG Checklist include residential, commercial (e.g. retail, office, mixed-use developments, restaurants, hotels, warehouses, shopping centers, entertainment venues, schools, hospitals, research centers, etc.), and municipal uses. Industrial projects and emissions generated by those sources are regulated by the California Air Resources Board (CARB) and are not under the City's direct operational control. Therefore, this checklist does not apply to industrial projects.

³ The Sunnyvale CEQA GHG Emissions Thresholds and guidance on preparation of quantitative GHG emissions analyses are available at <https://www.sunnyvale.ca.gov/home/showpublisheddocument/5260/638554468924530000>



Figure 1 Determining Consistency with the Sunnyvale Climate Action Playbook Update/Game Plan 2028



APPLICATION SUBMITTAL REQUIREMENTS

This CEQA GHG Compliance Checklist is required to accompany the Application Materials submitted to the City for all projects and plans subject to CEQA review that are not deemed statutorily or categorically exempt, whether supported by private or public (i.e., local, State, and/or federal government) funding. The CEQA GHG Checklist is designed to assist the applicant or the City's environmental consultant in identifying the minimum Playbook and other applicable sustainability-focused requirements specific to a proposed project or plan. However, it may be necessary to supplement the completed CEQA GHG Checklist with supporting information, materials, calculations, or certifications to demonstrate compliance with Playbook and other applicable sustainability-focused requirements. If the minimum Playbook and other applicable sustainability-focused requirements are not already clearly committed to as part of the CEQA project description, the completed CEQA GHG Checklist shall be included in the respective project or plan description and referenced in the respective conditions of approval.

PRELIMINARY COMPLIANCE CHECKLIST TABLE

Section 1: LAND USE CONSISTENCY			
Regulation	Requirements	Project/Plan Compliance	Required Explanation⁴
Sunnyvale General Plan ⁵	1a. Does the Project/Plan include a General Plan Amendment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	The Project is consistent with Section 21080.66(a)(4) because the Project is consistent with the City’s General Plan and Zoning Code, except to the extent permitted to deviate by use of the SDBL.
Sunnyvale Zoning Code ⁶	1b. Does the Project/Plan include a Zoning Map Amendment/Rezoning, and/or Zoning Text Amendment? <i>If “No” for questions 1a. and 1b., proceed to Section 2 – Playbook Plays Consistency. If “Yes” to either question 1a or 1.b, the applicant shall provide funding for the City’s environmental consultant to prepare a Project/Plan-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions compared to Sunnyvale GHG emissions thresholds and incorporation of the Playbook moves in this CEQA GHG Checklist to the extent feasible.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	The Project is consistent with Section 21080.66(a)(4) because the Project is consistent with the City’s General Plan and Zoning Code, except to the extent permitted to deviate by use of the SDBL.

⁴ Every question included in this checklist is required to be answered with explanation of either: 1) how it will be achieved, 2) why it will not be achieved, or 3) why it is not applicable. References to the plan set page number or other project description detail should be provided to demonstrate compliance.

⁵ <https://www.sunnyvale.ca.gov/your-government/codes-and-policies/general-plan>

⁶ <https://www.sunnyvale.ca.gov/business-and-development/planning-and-building/zoning>

Section 2: PLAYBOOK PLAYS CONSISTENCY ⁷			
Play No.	Requirements	Project/Plan Compliance	Required Explanation
Land Use			
Smart Growth			
Play 3.1	2. All Project Types - Smart Growth. Will the Project/Plan include infill, ⁸ transit-oriented, ⁹ and/or mixed-use development ¹⁰ ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project site is currently developed with a 26,625 square foot single-story commercial/research and development building, which qualifies as an infill development.
Green Building Standards			
Play 2.3	3. All Project Types - Green Building Policy. Will the Project/Plan include construction and operational commitment to comply with the latest version of CALGreen Code ¹¹ and any applicable Sunnyvale Reach Codes ¹² for building decarbonization and water and energy efficiency?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will be designed to comply with the 2025 CALGreen code.

⁷ “No” responses to checklist items, except for those that include “as an option” in the language, indicate that a quantitative GHG emissions analysis shall be required for the Plan/Project. Checklist items that include “as an option” in the language are voluntary in nature.

⁸ Per the Governor’s Office of Planning and Research, “infill development” refers to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas.

⁹ Per the Federal Highway Administration, Transit-Oriented Development is compact, mixed-use development near transit facilities providing high quality walking environments. It usually includes new residential development, office space, and other service amenities that are within a half mile of public transportation and easily commutable by other means such as walking and biking as defined in the California Public Resources Code 21064.3.

¹⁰ Per SMC 19.12.140, “Mixed use” means a development that includes nonresidential and residential uses on the same development site, except that in the El Camino Real Specific Plan District, “Mixed use office” means a development comprised of office and commercial uses and no residential uses.

¹¹ <https://www.dgs.ca.gov/BSC/CALGreen>

¹² Non-residential/multifamily - <https://www.sunnyvale.ca.gov/home/showpublisheddocument/5016>, Single-family/townhomes- <https://www.sunnyvale.ca.gov/home/showpublisheddocument/5014>

Energy			
<i>Energy Efficiency</i>			
Plays 2.1 and 2.2	4. All Remodels - Energy Efficiency Upgrades. Will the Project/Plan include energy efficiency upgrades via installation of energy-efficient window upgrades, appliances, Light Emitting Diode (LED) lighting, etc.?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project proposes energy-efficient window upgrades and appliances.
<i>Building Decarbonization</i>			
Plays 2.2 and 2.3	5. All Project Types – Building Decarbonization. Will the Project/Plan include decarbonized new construction and applicable remodels (based on the Sunnyvale Reach Codes ¹³), including for lighting, heating, cooking, and water heating?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	The Project complies with 2025 CALGreen Code and is not required to comply with Sunnyvale Reach Codes.
<i>Renewable Energy</i>			
Play 1.1	6. All Project Types - Participation in Community Choice Aggregation. Will the Project/Plan retain Silicon Valley Energy Company (SVCE) as the energy provider and encourage occupants to not opt out from the 100% renewable energy option?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	PG&E will be the energy provider for the Project.

¹³ Applicable projects include (1) new construction and newly constructed additions and improvements in existing buildings where more than 50 percent of the exterior walls are removed or 50 percent of the wall plate height is raised: https://localenergycodes.com/download/1365/local_government_adoption_ordinance/fieldList/2022%20Sunnyvale%20-%20Ordinance%203202-22.pdf

Plays 1.2 and 1.3	7. All Project Types - Solar Requirement. Will the Project/Plan include installation of a solar photovoltaic (PV) system in accordance with the Sunnyvale Reach Codes ¹⁴ at time of new construction?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	The Project complies with 2025 CALGreen Code and is not required to comply with Sunnyvale Reach Codes.
Plays 1.2 and 1.3	8. All Project Types – Battery Storage. As an option, will the Project/Plan include battery storage to maximize utilization of solar energy supply from on-site solar PV systems?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will include a Battery Energy Storage System (BESS).
Transportation			
<i>Alternative and Shared Transportation</i>			
Plays 3.1 and 3.2	8. All Project Types - Transportation Demand Management (TDM). Will the Project/Plan implement TDM measures ¹⁵ such as parking preferences or incentives for residents and employees who carpool or use low- or zero-emission vehicles, and/or parking demand management related to vehicle pricing, time limits, and supply restrictions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	See Draft TDM Plan provided for applicable measures proposed.
Play 3.2	9. Commercial Projects - TDM Plan. Will the Project/Plan (if involving 1,000 or more employees) develop and implement a TDM Plan to encourage use of alternative and shared modes of transportation?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	The Project is a housing development project.

¹⁴ https://localenergycodes.com/download/1365/local_government_adoption_ordinance/fieldList/2022%20Sunnyvale%20-%20Ordinance%203202-22.pdf

¹⁵ TDM measures to consider may be found at the following links:

- Sunnyvale TDM Toolkit for Multi-Family Residential Development (see page 40 of this document for commercial project TDM measures): <https://www.sunnyvale.ca.gov/home/showpublisheddocument/1468/637820846935330000>
- Valley Transportation Authority TDM Home Page: <https://www.vta.org/cdt/transportation-demand-management-home-page#accordion-transportation-demand-management>

Active Transportation

Play 3.2	10. All Project Types - Walkable/Bikeable Streetscape. Will the Project/Plan design the project site or plan area to make walking and biking more desirable, including provision or funding of features such as bike lanes, bike repair stations, traffic calming features, wayfinding signage, pedestrian crosswalks, and beautification consistent with the Active Transportation Plan, ¹⁶ Vision Zero Plan, ¹⁷ and Roadway Safety Plan ¹⁸ , as applicable?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project proposes a 6' Raised Bike Lane along Bordeaux Dr compliant with modified roadway configurations based on the Moffett Park Specific Plan (MPSP).
Play 3.2	11. All Project Types - Bicycle Parking. Will the Project/Plan comply with the latest version of the Sunnyvale Municipal Code or CALGreen Code, whichever has the greater requirement, for provision of bicycle parking?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project provides bicycle parking in compliance with the Moffett Park Specific Plan, as outlined in Sunnyvale Municipal Code Ch 19.29.

Vehicle and Off-road Equipment Decarbonization

Play 3.3	12. All Project Types - EV Charger Reach Code. Will the Project/Plan comply with the most recent Sunnyvale EV Charging Reach Code (Sunnyvale Municipal Code Section 16.43.050 through 16.43.060 ¹⁹) requirements for provision of parking spaces and infrastructure designed to accommodate electric vehicles?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	The Project complies with 2025 CALGreen Code and is not required to comply with Sunnyvale Reach Codes.
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¹⁶ <https://www.sunnyvale.ca.gov/home/showpublisheddocument/2844/637822670426570000>

¹⁷ <https://www.sunnyvale.ca.gov/home/showpublisheddocument/2858/637822670451930000>

¹⁸ <https://www.sunnyvale.ca.gov/home/showpublisheddocument/2854/637822670443300000>

¹⁹ <https://ecode360.com/42720908#42720944>

Play 3.4	<p>13. All Project Types - Off-Road Equipment Decarbonization. Will the Project/Plan include the use of electrified off-road construction and landscaping equipment (e.g., mowers, chippers, tractors)? **NOTE: This play is only in effect after the City of Sunnyvale adopts an implementation ordinance. As of 2025, this ordinance has not yet been adopted. Mark “N/A” in the interim.**</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input checked="" type="checkbox"/></p>	N/A
Plays 3.3 and 3.4	<p>14. Municipal (City-Owned) Projects - Fleet and Equipment Electrification. Will the Project/Plan include installation of electric vehicle charging equipment and incorporate electric or other zero-emission vehicles and electrified off-road landscaping equipment (e.g., mowers, chippers, tractors) as new and replacement vehicles and off-road equipment?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input checked="" type="checkbox"/></p>	N/A
Waste			
Materials Recycling & Composting			
Play 4.1	<p>15. All Project Types - Landfill Diversion. Will the Project/Plan meet current legislation (e.g., California SB 1383, AB 1276, etc.) and Sunnyvale Municipal Code Chapter 8.16²⁰ requirements for solid waste sorting and disposal to support the Playbook and Statewide goals to sort, recycle, and collect recyclables and organic waste and reduce landfilled garbage to 1 pound per person per day?</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	The Project will meet current legislation and SMC Ch 8.16. Adequate compost and recycling diversion will be provided.
Play 4.1	<p>16. All Project Types - Organics Recycling Requirement. Will the Project/Plan meet SB 1383²¹ legislation by requiring that residences and businesses provide organic waste disposal containers²² and post educational signage to encourage Project/Plan occupants to sort, compost, and collect organic waste to support the goal of achieving a 75 percent diversion from landfill rate for organic waste?</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	The Project will meet current legislation.

²⁰ <https://ecode360.com/42712724>

²¹ <https://calrecycle.ca.gov/organics/slcp/>

²² <https://ecode360.com/42712724>

Play 4.1	17. All Project Types - Construction and Demolition Debris Recycling. Will the Project/Plan achieve a 65 percent diversion from landfill rate for construction waste in accordance with Sunnyvale Municipal Code Chapter 16.74 ²³ requirements?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will comply with SMC Ch 16.74 requirements.
Water			
Water Use Efficiency			
Play 4.2	18. All Project Types - Water Conservation. Will the Project/Plan meet the water-efficiency standards established by the Sunnyvale Municipal Code Chapter 12.34, which includes requirements for potable water use on landscape, in decorative water features, and installation of cooling processes in new construction ²⁴ and CALGreen code?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will follow and comply with ordinance.
Play 4.2	19. All Project Types - Water Efficient Landscaping. Will the Project/Plan implement the Sunnyvale Landscape Ordinance ²⁵ by including water efficient landscaping and landscaping irrigation systems?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will follow and comply with ordinance.
Water Recycling			
Play 4.2	20. All Project Types - Graywater Ready. Will the Project/Plan include development that is built “graywater ready” ²⁶ for landscape watering and toilets?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	The Project will include graywater ready development.

²³ <https://ecode360.com/42721832#42721817>

²⁴ <https://ecode360.com/42718057>

²⁵ <https://ecode360.com/42730616>

²⁶ “Graywater-ready” means that drains from graywater sources (clothes washers, showers, lavatory faucets, etc) must be plumbed separately than those from blackwater sources (i.e. toilets, kitchen faucets, and dishwashers)

Play 4.2	21. All Project Types - Recycled Water Connections. Will the Project/Plan include development that connects to the City's recycled water infrastructure if such service is existing or planned in the project or plan area?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will connect to City's recycled water infrastructure for landscape irrigation.
Overall Sustainability			
Urban Forest			
Play 4.3	22. All Project Types - Tree Planting. Will the Project/Plan include new and replacement climate-adaptive/drought tolerant trees ²⁷ (as applicable) in order to increase the Citywide urban forest?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will incorporate new climate-adaptive and drought tolerant tree species.
Play 4.3	23. All Project Types - Tree Replacement. Will the Plan/Project comply with the tree replacement requirements of Sunnyvale Municipal Code Chapter 19.94 ²⁸ and Sunnyvale Tree Replacement Standards ²⁹ as applicable?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	The Project will comply with the tree replacement requirements of SMC and replacement standards.
Stormwater Management			
Play 4.3	24. All Project Types – Green Stormwater Infrastructure. Will the Plan/Project include green stormwater management infrastructure, such as bioswales and permeable pavement, consistent with the City's Green Stormwater Infrastructure Plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	See Stormwater Management Data Form.
Sustainable Purchasing			
Play 4.4	25. Municipal Projects – Preferred Purchasing Criteria. As an option, will the Plan/Project implement a preferred purchasing policy that includes sustainable goods and services, such as products with post-consumer recycled content?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	N/A

²⁷ Refer to the University of California UC Master Gardeners, Santa Clara County Waterwise Plants List for examples: <https://mgsantaclara.ucanr.edu/garden-help/water-wise-plants/>

²⁸ <https://ecode360.com/42733058#42733058>

²⁹ <https://www.sunnyvale.ca.gov/home/showpublisheddocument/1420/637884696381670000>

Section 3: Summary and Signature

Final Consistency Determination	Does the Project/Plan incorporate all applicable and non-optional checklist items? If no, Project/Plan requires quantitative GHG emissions assessment.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Signature(s)	Signatures for the checklist preparer and/or Project/Plan applicant/proponent should be added below to indicate that this checklist has been filled out accurately and the Project/Plan has committed to including the Checklist Items above marked with "Yes" in the Project/Plan design.	

Tom Holt

Checklist Prepared by: _____

Checklist Prepared by: _____

Signed by: (Name)

F5A7CD0B44F5418...
 (Signature)

Checklist Prepared on: 11/7/2025

 (Date)