

CITY OF SUNNYVALE

Climate Action Playbook Project LUTE Final EIR Addendum



Sunnyvale

Climate Action Playbook Project
Final EIR Addendum

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City of Sunnyvale

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August 2019

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LIST OF ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AFY	acre-feet per year
BAAQMD	Bay Area Air Quality Management District
BAU	Business-as-usual
BMP	best management practices
CAP 1.0	City of Sunnyvale Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCA	Community Choice Aggregation
CEQA	California Environmental Quality Act
CLUP	Comprehensive Land Use Plan
EIR	Environmental Impact Report
EV	electric vehicle
GHG	greenhouse gas
LID	low impact design
LOS	levels of service
LUTE	Land Use and Transportation Element
MPO	metropolitan planning organizations
MRP	Municipal Regional Stormwater Permit
MTCO _{2e}	metric tons of carbon dioxide equivalent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas and Electric
Playbook	Climate Action Playbook
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaics
SB	Senate Bill
SCS	sustainable community strategies
SVCE	Silicon Valley Clean Energy
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminants
TDM	Transportation Demand Management
VMT	vehicle miles traveled
WSA	Water Supply Assessment
ZNE	Zero Net Energy

Addendum to the Land Use and Transportation Element Final Environmental Impact Report

State Clearinghouse No. 2012032003

BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

This document serves as an addendum to the Final Environmental Impact Report (Final EIR) for the City of Sunnyvale's Land Use and Transportation Element (LUTE). As discussed in Section 3.13, "Greenhouse Gases and Climate Change," of the Final EIR, the LUTE could result in comparable greenhouse gas (GHG) emissions efficiencies anticipated by the Climate Action Plan (CAP) 1.0 for 2035 and meet GHG reduction percentages specified in the CAP 1.0. However, the GHG modeling used in the EIR included different assumptions and inputs than the activity-based modeling used in CAP 1.0, and results of the analysis cannot be equivalently compared to demonstrate compliance with 2035 GHG reduction targets outlined in CAP 1.0. To demonstrate compliance with 2020 and 2035 GHG reduction targets, the LUTE EIR resulted in the adoption of Mitigation Measure 3.13.1 which required the City to update the CAP 1.0 to include the new LUTE growth projections. To implement Mitigation Measure 3.13.1, the City of Sunnyvale prepared the Climate Action Playbook (Playbook) which identifies six key Strategies and eighteen Plays that specify a plan of action to reduce GHG emissions across all sectors. The Playbook outlines a pathway to achieve GHG emission reductions of 56 percent below 1990 levels by 2030 (exceeding the State's interim target) and 80 percent below 1990 levels by 2050. Consistent with the LUTE EIR Mitigation Measure 3.13.1, the Playbook's GHG emissions forecast uses Sunnyvale-specific growth projections from the LUTE. These Strategies and Plays complement the policy framework in the LUTE by promoting clean electricity, decarbonizing transportation and buildings, encouraging sustainable land use and resource management, enhancing community awareness, and enhancing community resilience to climate change.

As the lead agency under the California Environmental Quality Act (CEQA), the City of Sunnyvale has determined that, in accordance with Section 15164 of the State CEQA Guidelines, the adoption and implementation of the proposed Playbook warrants the preparation of an addendum.

PREVIOUS ENVIRONMENTAL ANALYSIS

The environmental process for the LUTE involved the preparation of the following documents that are relevant to the consideration of the proposed Playbook.

- ▶ Land Use and Transportation Element, April 2017
- ▶ Draft EIR for the Land Use and Transportation Element, August 2016
- ▶ Final EIR for the Land Use and Transportation Element, January 2017

For the purposes of this addendum the LUTE EIR consists of the Draft EIR and the Final EIR. The Final EIR incorporates the Draft EIR by reference and it also includes responses to comments on the Draft EIR and any corrections to the Draft EIR.

CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under CEQA. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three mechanisms to address these changes: a subsequent environmental impact report (SEIR), a Supplement to an EIR, and an Addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which a SEIR would be prepared. In summary, when an EIR has been certified for a project, no Subsequent EIR shall be prepared for that project unless

the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a Subsequent EIR if:

- (1) any of the conditions described above for Section 15162 would require the preparation of a SEIR; and
- (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

An addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, 15168, and 15183.

This addendum is intended to evaluate and confirm CEQA compliance for the proposed Playbook, which would be a change relative to what is described and evaluated in the LUTE EIR. This addendum is organized as an environmental checklist, and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the certified LUTE EIR, and determine whether such changes were or were not adequately covered in the certified LUTE EIR. This checklist is not the traditional CEQA Environmental Checklist, per Appendix G of the CEQA Guidelines. As explained below, the purpose of this checklist is to evaluate the checklist categories in terms of any "changed condition" (i.e., changed circumstances, project changes, issues that are peculiar to the project, or new information of substantial importance) that may result in a different or new environmental impact significance conclusion from the EIR. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, 15164, 15168, and 15183.

1 INTRODUCTION AND PROJECT HISTORY

The City of Sunnyvale Climate Action Plan (CAP 1.0), adopted by the City Council in May 2014, outlines the City's path toward mitigating the effects of climate change while fostering a sustainable, healthy, and livable community. CAP 1.0 identifies sources of greenhouse gas (GHG) emissions within the city's boundary and establishes strategies for reducing GHG emissions from each contributing sector including energy transportation, land use, water, and solid waste. The GHG reduction strategies were designed to achieve a reduction target of 15 percent below 2008 levels by the year 2020 (equivalent to 1990 levels), consistent with Assembly Bill (AB) 32, and initiate a path towards achieving a GHG emission reduction target of 80 percent below 1990 levels by 2050, consistent with Executive Order S-3-05. Implementation of the CAP 1.0 enabled the City to decrease GHG emissions by 12 percent below 1990 in 2016, surpassing the City's goal of reaching 1990 levels of emissions by 2020. Although implementation of CAP 1.0 helped the City exceed the state's 2020 GHG emissions reduction target, it was not designed to address state reduction targets for 2030 and 2050. In addition, the CAP 1.0 growth predictions were based on land use designations in the City's 1997 Land Use and Transportation Element (LUTE). As discussed in more detail below, the City updated the LUTE in 2017. This update increased the City's population growth projection by approximately 13,400 residents and its total employment by approximately 14,500 jobs as compared to projections in the previous LUTE (City of Sunnyvale 2016).

The Sunnyvale City Council adopted the updated LUTE of the General Plan in April 2017. The LUTE establishes the fundamental framework of how streets and buildings in the City of Sunnyvale will be laid out and how various land uses, developments, and transportation facilities will function together. The LUTE and accompanying policies were developed to help guide decision-making regarding land use and transportation for an approximate 20-year horizon—a time frame that is referred to as *Horizon 2035*. The LUTE land use policies provide guidance for the amount, location, and direction of future change. In addition, the LUTE's policy framework encourages the City to promote sustainable growth and maintain a CAP that supports the LUTE by establishing specific measures to put the City in a regional leadership role regarding its GHG emissions reductions.

The City prepared and certified an Environmental Impact Report (EIR) (State Clearinghouse No. 2012032003) for the LUTE that evaluated the environmental impacts associated with development of land uses and implementation of transportation planning efforts in Sunnyvale as regulated and guided by the LUTE. As discussed in Section 3.13, "Greenhouse Gases and Climate Change," of the EIR, the LUTE could result in comparable GHG emissions efficiencies anticipated by the CAP 1.0 for 2035 and meet GHG reduction percentages specified in the CAP 1.0. However, the LUTE has different growth projections than the CAP 1.0. The GHG modeling used in the EIR included different assumptions and inputs than the activity-based modeling used in CAP 1.0, and results of the analysis cannot be equivalently compared to demonstrate compliance with 2035 GHG reduction targets outlined in CAP 1.0. To demonstrate compliance with 2020 and 2035 GHG reduction targets, the LUTE EIR resulted in the adoption of Mitigation Measure 3.13.1 which required the City to update the CAP 1.0 to include the new LUTE growth projections. Therefore, the development of an updated climate action plan that incorporates the new LUTE growth projections is an implementation action of the LUTE.

The City of Sunnyvale's updated climate action plan, called the Climate Action Playbook (Playbook), was released for public review in March 2019. Subsequently, the Playbook was revised based on community feedback and the Proposed Final Playbook was presented to the CAP 2.0 Advisory Committee and City Commissions in July. Based on their recommendations, final edits were incorporated into the Revised Proposed Final Playbook.

The Playbook outlines a pathway to achieve GHG emission reductions of 56 percent below 1990 levels by 2030 (exceeding the State's interim target) and 80 percent below 1990 levels by 2050. Consistent with the LUTE EIR Mitigation Measure 3.13.1, the Playbook's GHG emissions forecast uses Sunnyvale-specific growth projections from the LUTE. The Playbook identifies six key Strategies and eighteen Plays that specify a plan of action to reduce GHG emissions across all sectors. These Strategies and Plays complement the policy framework in the LUTE by promoting clean electricity, decarbonizing transportation and buildings, encouraging sustainable land use and resource management, enhancing community awareness, and enhancing community resilience to climate change.

The LUTE EIR (consisting of the Draft EIR and Final EIR) was a program EIR that considered the environmental effects from the 2035 buildout scenario of the LUTE. Consistent with Public Resources Code (PRC) Section 21083.3(b) and State CEQA Guidelines (CEQA Guidelines) Section 15168 and 15183 the LUTE EIR can be used as the CEQA document for subsequent projects (public and private) consistent with the LUTE. As projects are proposed, such as the Playbook, they are evaluated to determine whether the actions proposed fall within the scope of the LUTE, whether project impacts are addressed in the certified LUTE EIR, and whether the project incorporates all applicable performance standards and mitigation measures identified therein. Should subsequent projects not be consistent with the approved LUTE, or if there are specific significant effects that are peculiar to the project and cannot be addressed by uniformly applied policies or standards, additional environmental review through the subsequent review provisions of CEQA for changes to previously-reviewed and approved projects may be warranted.

Consistent with the process described, the City is evaluating the project application to determine if additional environmental review would be required. This environmental checklist has been prepared to determine whether the environmental impacts of the Playbook meet any of the following four conditions:

- (1) Are peculiar to the project or the area in which the project would be located,
- (2) Were not analyzed as significant effects in the LUTE EIR,
- (3) Are potentially significant off-site impacts and cumulative impacts which were not addressed in the LUTE EIR, or
- (4) Are previously identified significant effects which, are determined to have a more severe adverse impact than discussed in the LUTE EIR based on substantial new information that was not known at the time the LUTE EIR was certified.

If an impact is not peculiar to the project, has been addressed as a significant effect in the LUTE EIR, or can be substantially mitigated by the imposition of uniformly applied policies or standards, then an additional EIR need not be prepared for the project solely on the basis of that impact.

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The City of Sunnyvale, as the lead agency, proposes to adopt a comprehensive GHG reduction plan, called the Climate Action Playbook, including key Strategies, Plays, and Moves that would apply to all property located within the City. The Playbook does not include any development proposals and would not directly result in physical environmental effects due to the construction and operation of facilities.

2.2 PROJECT LOCATION

As shown in Figure 2-1, the City of Sunnyvale is located within northwest Santa Clara County, in the greater San Francisco Bay Area. The City of Sunnyvale is almost surrounded by the cities of Santa Clara, Cupertino, Los Altos, and Mountain View, and the San Francisco Bay.

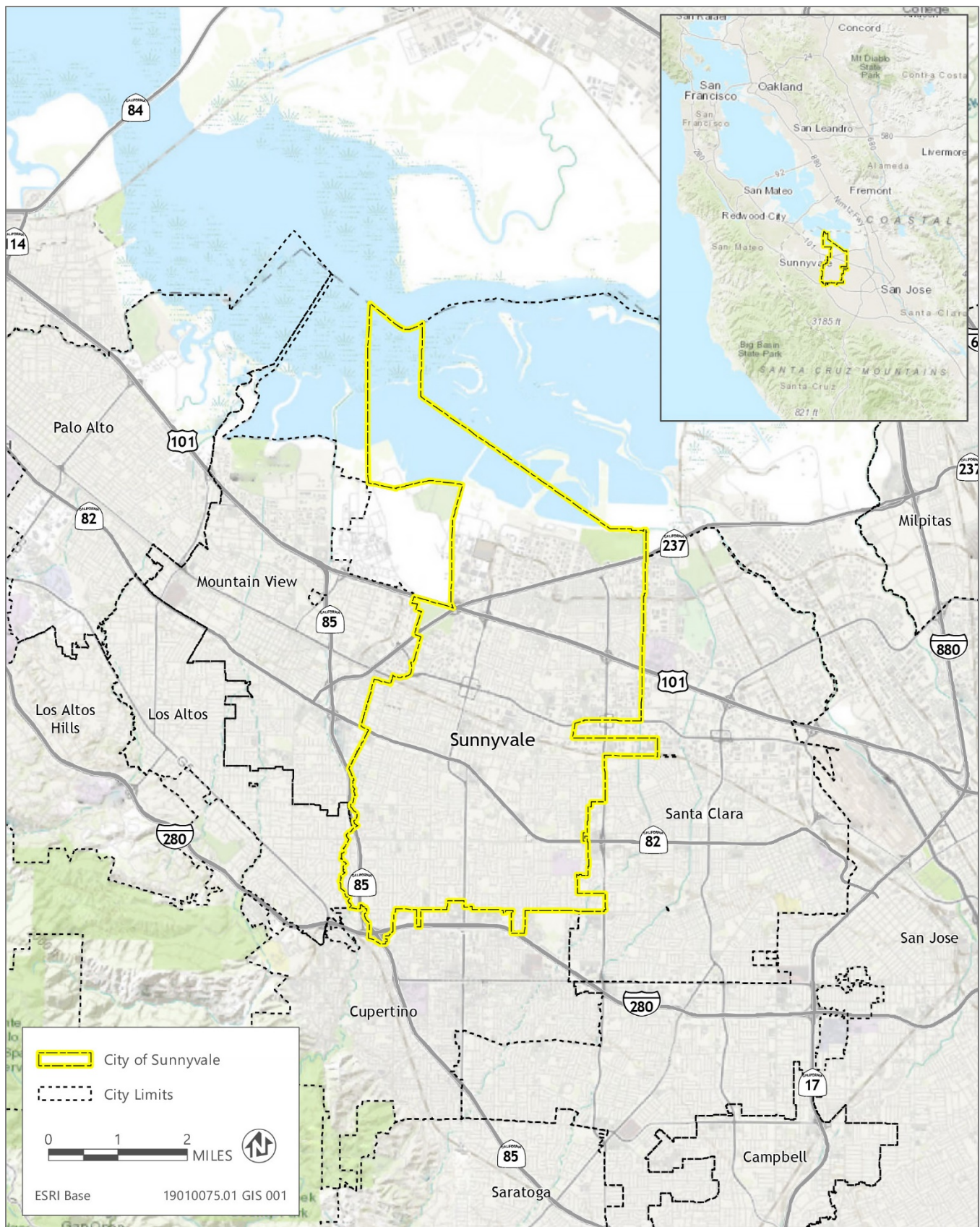
The planning area for the Playbook is the same planning area that was considered by the 2017 LUTE which encompasses approximately 24 square miles, as shown in Figure 2-2. This includes the City's sphere of influence.

2.3 DESCRIPTION OF PROPOSED PROJECT

Reducing GHG emissions in California has been the focus of the state government for approximately two decades (State of California 2018). GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). Executive Order S-3-05 calls for reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Executive Order B-55-18 calls for California to achieve carbon neutrality by 2045 and to achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015:3).

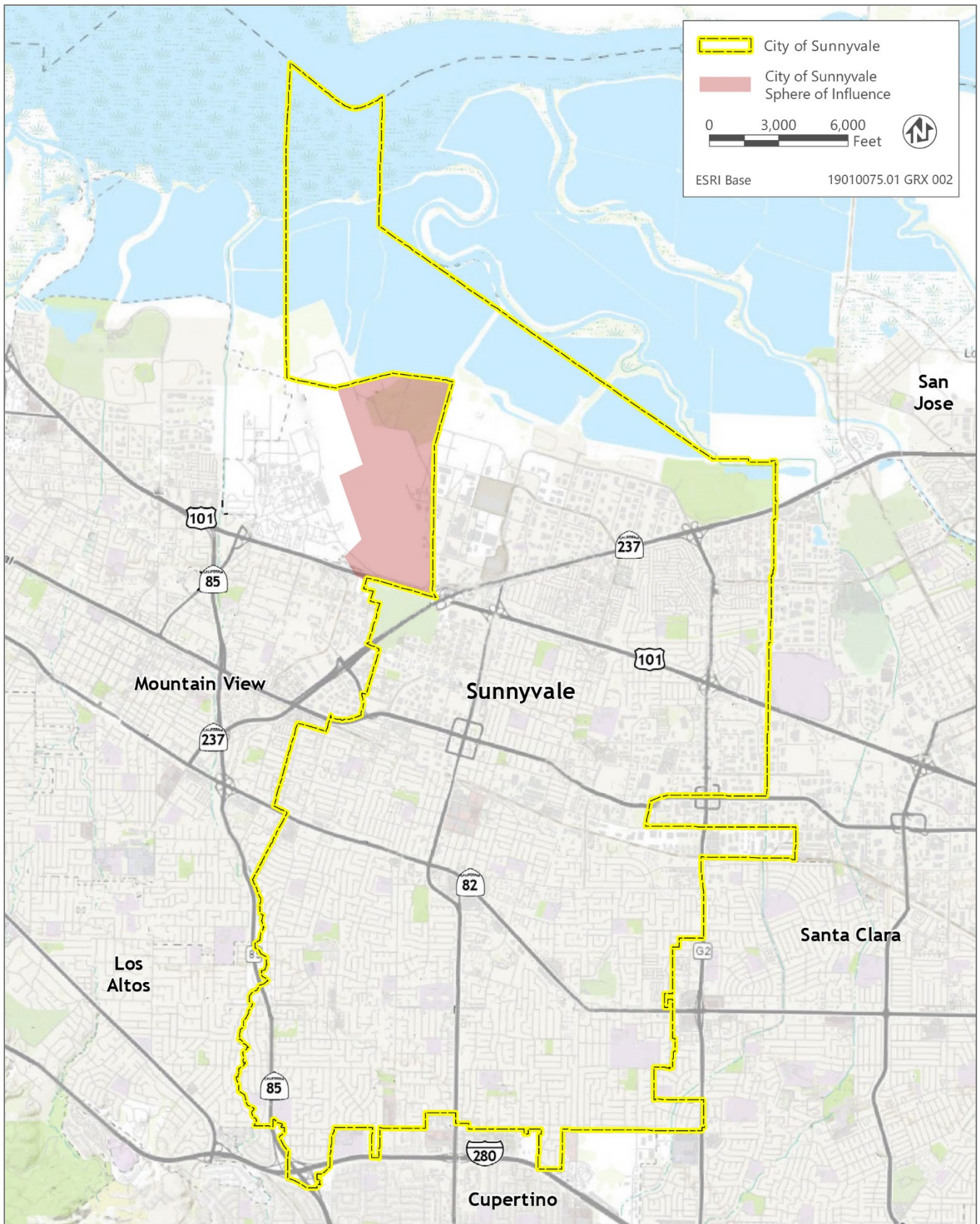
The City of Sunnyvale adopted the CAP 1.0 in 2014 and through implementation of both local actions and state policies, the City has already achieved its 2020 GHG emissions target ahead of schedule. The City of Sunnyvale also played an integral role in the launch of Silicon Valley Clean Energy (SVCE), a community choice aggregator that provides carbon-free electricity to most of the City and surrounding communities. Since SVCE's launch in 2017, it has provided clean electricity to 97 percent of Sunnyvale residents and businesses. Although CAP 1.0 helped the City exceed the state's 2020 GHG emissions reduction target, it was not designed to address state reduction targets for 2030 and 2050. The Playbook builds upon the policy framework established by CAP 1.0 and serves as a guide to achieve or exceed the state's 2030 and meet the 2050 GHG emissions reduction targets.

The following sections describe the project, including the contents of the Playbook.



Source: Adapted by Ascent Environmental in 2019

Figure 2-1 Regional Location



Source: Adapted by Ascent Environmental in 2019

Figure 2-2 Planning Area

2.3.1 Climate Action Playbook

The Playbook is being developed to be consistent with state legislation and policies that are aimed at reducing statewide GHG emissions. This includes:

- ▶ AB 32, which established a target of reducing statewide GHG levels to 1990 levels by 2020;
- ▶ SB 32, which established a mid-term target of reducing statewide GHG levels to 40 percent below 1990 levels by 2030; and
- ▶ Executive Order S-3-05, which recommends a 2050 statewide longer-term GHG reduction goal of reducing GHG emissions 80 percent below 1990 levels.

To develop the Strategies, Plays, and Next Moves in the Playbook, the City analyzed its baseline 2016 GHG emissions, forecasted future emissions while accounting based on growth projections aligned with the LUTE, applied moderating impacts of existing policies and programs, and determined future scenarios for emissions to estimate how emissions can be reduced through climate action. Based on this analysis, the Playbook aims to achieve the following GHG reduction targets:

- ▶ 56 percent below 1990 levels by 2030, and
- ▶ 80 percent below 1990 levels by 2050.

To achieve these GHG reduction targets, the Playbook accounts for actions taken by state and federal agencies and existing City initiatives including continued implementation of CAP 1.0 reduction measures, SVCE's clean electricity supply, and FoodCycle (food scraps collection) program. The Playbook identifies several sector-based Strategies, Plays, and Next Moves that can be implemented locally by the City or others. The City plans to initiate the first cycle in 2022 with subsequent cycles occurring every five years. At the close of each cycle, the City will review progress on implementation of the moves and on the future projections for communitywide emissions to determine the best Next Moves for the subsequent cycle.

CAP CONTENTS

The Playbook contains six chapters which are briefly summarized below:

- ▶ **Executive Summary:** Summarizes the key information contained in the Playbook.
- ▶ **At-a-Glance: Pathway to 2050:** Provides a comprehensive list of proposed key Strategies and Plays.
- ▶ **The Playing Field:** This chapter describes the purpose and context of the plan, provides a detailed accounting of GHG emissions within the City, and established a baseline inventory with 2016 GHG emissions from all sectors. Future GHG emission projections are described and the estimated reductions needed to achieve the state's 2050 target are calculated.
- ▶ **Six Climate Strategies for the Win:** This chapter outlines the Strategies and Plays to be implemented by the City to achieve its GHG reduction targets. The Strategies and Plays focus on locally-based actions to reduce GHG emissions in various categories as a complement to actions taken by state and federal agencies and ongoing City initiatives including CAP 1.0 reduction measures, SVCE's clean electricity supply, and FoodCycle program.
- ▶ **Game Plan: Our Next Moves:** This chapter identifies Next Moves or actions to be implemented by the City to ensure continued progress toward achieving GHG reduction targets. Each move corresponds to a specific Strategy and Play.
- ▶ **Future Work Planning and Resources:** This chapter describes the implementation cycles, potential financing Strategies, and reporting program.

GHG EMISSIONS INVENTORY

A community GHG emissions inventory is an estimate of a defined set of gases emitted to the atmosphere from local or regional sources that contribute to climate change. The City prepared a baseline GHG emissions inventory for the 2008 calendar year as part of the CAP 1.0 planning effort. The 2008 inventory identified and quantified the sources and amounts of GHG emissions that were generated from activities within the City. The 2008 inventory provided a baseline of GHG emissions to be established, against which future changes could be compared. The City's 2008 GHG inventory was guided by the protocols outlined in the U.S. Community Protocol for Accounting and Reporting Greenhouse Gas Emissions (ICLEI 2013). In accordance with the two-year reporting cycle committed to in the CAP 1.0 implementation plan, the City prepared subsequent GHG emission inventories for calendar years 2014 and 2016.

In 2016, Sunnyvale emitted 880,000 metric tons of carbon dioxide equivalent (MTCO_{2e}), representing a 12 percent decrease in emissions below 1990 levels. Prior to the implementation of SVCE, electricity and natural gas consumption in buildings were the largest source of emissions (48 percent), followed by on-road transportation (44 percent) and other sources. Following the implementation of SVCE in 2017, 98 percent of Sunnyvale's residents and businesses were purchasing carbon-free electricity from SVCE. To reflect the impact of SVCE's clean electricity, a modified 2016 GHG emissions inventory was created to estimate the GHG emissions impact as if the complete launch of SVCE had occurred in 2016. The 2016 modified inventory is shown in Table 2-1 below.

Table 2-1 2016 GHG Emissions Inventory with SVCE Lens

Emissions Sector	2016 with SVCE Lens (MTCO _{2e} /year)	Percent
Electricity (residential)	4,165	0.6
Electricity (commercial)	46,385	6
Natural gas (residential)	92,999	13
Natural gas (commercial)	119,659	17
On-road transportation (gasoline)	331,074	46
On-road transportation (diesel)	55,154	8
Water and wastewater	3,202	0.5
Solid waste	47,409	7
Off-road equipment	19,173	3
Caltrain	1,197	0.2
Total	720,418	100

Note: Columns may not add to totals due to rounding.

MTCO_{2e} = metric tons of carbon dioxide equivalent

Source: City of Sunnyvale 2019, *Draft Climate Action Playbook*, Appendix C.

As illustrated in Table 2-1, communitywide emissions are estimated to be 720,418 MTCO_{2e}. The largest source of these emissions is transportation (54 percent), with 46 percent from gasoline vehicles and 8 percent from diesel vehicles. Emissions from natural gas contribute nearly 30 percent to communitywide emissions, with consumption commercial buildings accounting for 17 percent and residential buildings accounting for 13 percent. Residential electricity consumption accounted for less than 1 percent of the City's emissions in 2016, due to clean electricity from SVCE. Therefore, to achieve the Playbook reduction targets, the City must take action to reduce emissions from four key sectors; natural gas, electricity, transportation, and waste.

GHG EMISSIONS FORECASTS

GHG emissions forecasts for a community are used to estimate future emissions levels in the absence of climate action measures. The following four scenarios were developed to support the Playbook:

- ▶ **Business-as-usual (BAU) forecast:** analyzes how emissions will grow if per capita consumption trends and efficiencies remain at their 2016 level, while the number of jobs households, and people in Sunnyvale continues to grow. The BAU analyses incorporates the demographic projections included in the LUTE through 2035. In the absence of further growth projections through 2050, the BAU forecast assumes that the same rate of growth continues between 2035 and 2050.
- ▶ **BAU with state policies forecast:** analyzes how emissions will change under the moderating impact of state and federal policies currently in place that are expected to significantly reduce GHG emissions in Sunnyvale.
- ▶ **BAU with state policies and CAP 1.0 measures:** represents the most likely emissions trajectory for Sunnyvale in the absence of new climate action. This forecast considers ongoing implementation of the City's CAP 1.0, including the launch of SVCE.
- ▶ **Target reduction path (Playbook):** identifies the path to meet the state's 2050 GHG reduction target of 80 percent below 1990 levels. This path assumes a GHG reduction greater than 40 percent must be achieved by 2030 in order to meet the 2050 target. Emissions reductions achieved in the short-term (i.e., through 2030) will better position the City to meet its longer-term 80 percent reduction by 2050 target. Therefore, it is very important that the City exceed the state's interim target by meeting a 56 percent reduction by 2030 to stay on the pathway to 2050.

Projected 2030 and 2050 GHG emissions under each forecast scenario are shown in Table 2-2 below.

Table 2-2 City of Sunnyvale Projections (MTCO₂e/year)

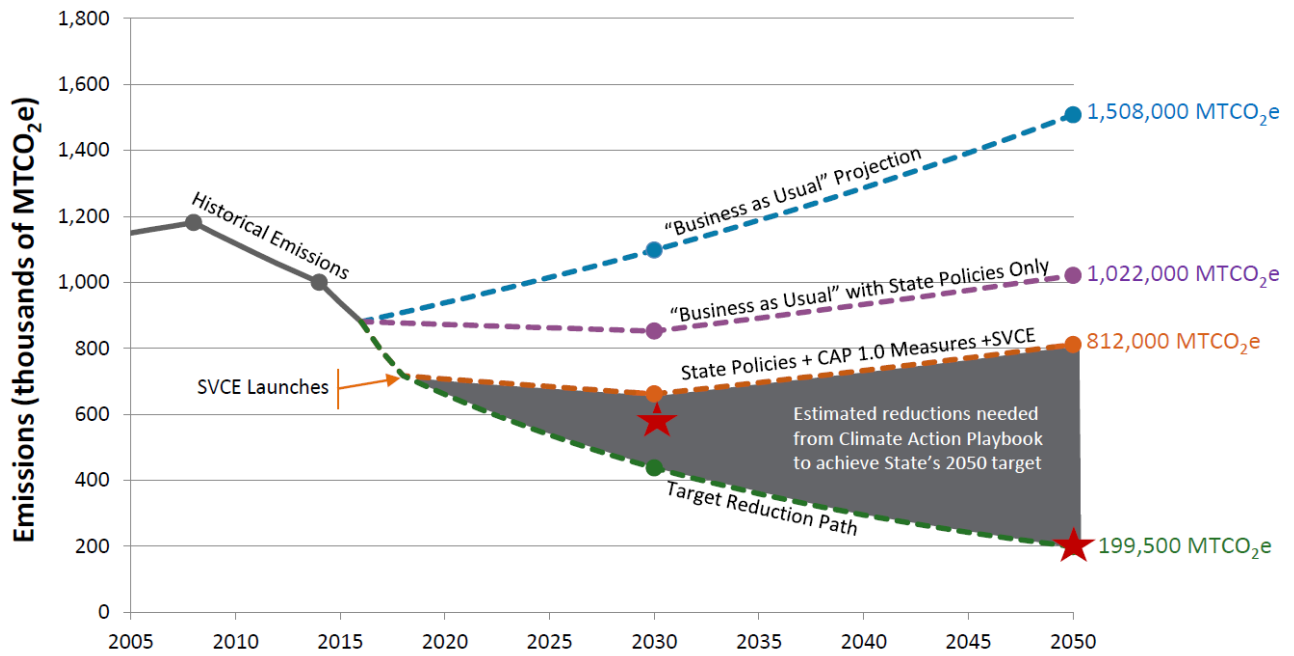
Emissions Forecast	2030	2050
BAU	1,097,846	1,507,877
BAU with State Policies	852,550	1,021,498
BAU with State Policies and CAP 1.0	662,055	812,012
Playbook Reduction Target	437,685	199,458
GHG Gap ^a	224,370	612,554

Notes: BAU = Business as usual, MTCO₂e/year = metric tons or carbon dioxide equivalent per year

^a. The value was calculated by taking the difference between the BAU with state policies and CAP 1.0 forecast and the Playbook reduction target forecast.

Source: City of Sunnyvale 2019, *Climate Action Playbook*, Appendix C

The Playbook contains key Strategies, Plays, and moves that are designed to address the GHG gap between the Playbook reduction target forecast and the BAU forecast that accounts for the state policies and CAP 1.0, as shown in Figure 2-3 below.



★ = State Targets: 40% by 2030; 80% by 2050

Source: City of Sunnyvale, Climate Action Playbook, 2019

Figure 2-3 Historical and Forecasted GHG Emissions

KEY STRATEGIES, PLAYS, AND MOVES

The Playbook includes a strategic framework that lays out the pathway to achieve the 2030 and 2050 targets. The framework includes the following elements:

- ▶ Key Strategies: six key Strategies for Sunnyvale to reduce communitywide GHG emission, as well as enhance resilience and adapt to climate change.
- ▶ Plays: eighteen Plays associated with key Strategies that specify a plan of action. Where possible, Plays are associated with measurable targets, which will be tracked and reported in progress reports.
- ▶ Game Plan: a compilation of Next Moves or more specific actions to be taken by the City in the next three years i.e., through 2022. The Game Plan of Next Moves will be revised every five years to ensure the City stays on track with the Plays and Strategies.

Refer to Tables 2-3 and 2-4 for a complete set of Strategies, Plays, and moves included in the Playbook.

2.4 POTENTIAL PERMITS AND APPROVALS RERQUIRED

The project would require the following actions by the City.

- ▶ approval of Climate Action Playbook

Table 2-3 Playbook Strategies and Plays

Key Strategies, Plays, and Moves
Strategy 1: Promoting Clean Electricity

Table 2-3 Playbook Strategies and Plays

Key Strategies, Plays, and Moves
<p>Play 1.1: Promote 100% clean electricity. The City is committed to working with Silicon Valley Clean Energy to expand 100% clean energy services to 100% of our community. Supporting and protecting this clean electricity supply is critical to other Strategies from this Playbook that rely on decarbonization (namely, Strategies 2 and 3).</p>
<p>Play 1.2: Increase distributed solar photovoltaics (PV) and storage. Targeted incentives, regulations and educational resources will be essential to increasing adoption of solar-plus-storage resources in Sunnyvale.</p>
<p>Play 1.3: Increase distributed electricity storage. Pursue opportunities for electricity storage at the building scale, separate from the utility-scale storage that SVCE plans to invest in as a part of its Decarbonization Roadmap. Promote and encourage the use of distributed (or behind-the-meter) electricity storage at commercial and residential buildings in Sunnyvale. Local electricity storage provides opportunities to lower peak electricity demand periods and improve grid resilience; improve cost-effectiveness of electricity for the consumer as time-of-use rates go into effect (anticipated in 2020); and supply emergency backup power for limited periods during power outages.</p>
<p>Strategy 2: Decarbonizing Buildings</p>
<p>Play 2.1: Reduce energy consumption in existing buildings. Increasing efficiency will mean continued program outreach and incentives to residents and businesses to encourage efficient designs for new construction and retrofits in existing buildings. System efficiencies such as insulation and upgrades to electric heat pump technologies are top priorities.</p>
<p>Play 2.2: Support electrification of existing buildings. Building energy optimization includes an innovative focus on installing efficient, electric systems to heat water and heat/cool interiors. Space and heat pump water heaters are high-efficiency alternatives to natural gas systems and have the added benefit of being powered by clean electricity.</p>
<p>Play 2.3: Achieve all-electric new construction. While the state requires moving toward Zero Net Energy (ZNE) for new construction, the City will also incentivize and promote all-electric new construction options for deep decarbonization.</p>
<p>Strategy 3: Decarbonizing Transportation & Sustainable Land Use</p>
<p>Play 3.1: Increase opportunities for and encourage development of mixed-use sites to reduce vehicle miles per person. The City is committed to creating places to live that are less dependent on automobiles, through ensuring access to nearby services and activity centers. Furthermore, Sunnyvale seeks to provide housing options for all incomes and lifestyles, particularly near transit corridors and Caltrain stations, to support alternative modes of transportation.</p>
<p>Play 3.2: Increase transportation options and support shared mobility. Multimodal transportation choices need to be enhanced to offer a variety of travel options in and around the city that are connected to regional transportation systems and destinations. Advocating for and increasing transportation options and shared mobility will create safer, healthier and more convenient movement throughout Sunnyvale.</p>
<p>Play 3.3: Increase zero-emission vehicles. Shifting to electric or alternatively fueled (e.g., hydrogen) vehicles has significant potential to reduce GHG emissions related to transportation. Since SVCE provides 100% carbon-free electricity, promoting a shift to electric vehicles away from fossil fuels would significantly reduce emissions. Other priorities include electrification of public transportation, car sharing, and electric bikes and scooters, and also improving availability of alternative fueling stations (e.g., EV charging facilities, hydrogen fueling stations).</p>
<p>Strategy 4: Managing Resources Sustainably</p>
<p>Play 4.1: Achieve zero waste goals for solid waste. Diverting waste away from landfills, either to recycling, energy recovery or composting facilities, is critical for the City to realize its Zero Waste goals as outlined in its Zero Waste Strategic Plan. This can be accomplished by waste prevention—consuming and throwing away less—and being smarter about the items that must be thrown away. Expanding Sunnyvale’s food scraps collection program (FoodCycle) will help to increase the amount of organic material diverted away from the landfill. However, state laws and policies limit access to diversion technologies so that 75% diversion is the current limit. Increasing diversion to 90% will require changes at the state level to allow use of technologies that recover energy from unrecyclable resident waste, primarily plastic and paper.</p>
<p>Play 4.2: Ensure resilience of water supply. As the region faces water supply challenges driven by recurring droughts and population growth, it will be critical to find ways to reduce the amount of water consumed and increase the sustainability of water supplies. Water conservation and water reuse, in the form of recycled and purified water, will help Sunnyvale reduce the stress placed on Northern California’s water resources.</p>
<p>Play 4.3: Enhance natural carbon sequestration capacity. The natural environment, including plants and soil, have an immense capacity to store carbon dioxide that would otherwise be released into the atmosphere. Through implementation of the City’s Urban Forest Management Plan and Green Stormwater Infrastructure Plan, Sunnyvale can continue to capture carbon by expanding its urban tree canopy and designing landscape features to address stormwater pollution and flood risk.</p>

Table 2-3 Playbook Strategies and Plays

Key Strategies, Plays, and Moves
<p>Play 4.4: Promote awareness of sustainable goods and services. The process of raising livestock, particularly methane emissions from cattle, are a major source of GHG emissions. Reducing consumption of carbon-intensive foods, such as meat or dairy, is a way for community members to directly lower their personal carbon footprints. Additionally, encouraging the production of food in local gardens can help reduce the emissions associated with transporting foods over long distances.</p>
<p>Strategy 5: Empowering Our Community</p>
<p>Play 5.1: Enhance community awareness and engagement. The City is committed to collaborating with the community for immediate and effective climate action through outreach and engagement programs. The City will provide tools, education, and resources (e.g., programs) to enable residents, businesses, corporations, and other stakeholders to work towards mitigating emissions across the Strategies in this Playbook.</p>
<p>Strategy 6: Adapting to a Changing Climate</p>
<p>Play 6.1: Assess climate vulnerabilities for Sunnyvale. The first step in addressing climate impacts is to assess our community's vulnerability to climate change. The City will continue to work with partners to develop tools and resources that enable a better understanding of the vulnerability of our social, environmental, economic, and physical resources to varied climate stressors.</p>
<p>Play 6.2: Protect shoreline area from sea level rise and coastal flooding. The City will continue to plan for and protect the shoreline area under its control against sea-level rise, working with Valley Water (formerly Santa Clara Valley Water District) and other regional partners to do so. Sunnyvale will explore the possible use of traditional levees as well as natural mitigation efforts to protect both its coastal infrastructure, including the City's Water Pollution Control Plant and closed landfill, as well as the natural and built land area along the Bay.</p>
<p>Play 6.3: Strengthen community resiliency. City departments will continue to collaborate with local volunteer and community groups to develop stronger social support systems to improve communication during emergencies and peer-to-peer education of preparedness and response. Pre-emptive rather than reactive strategies are needed to minimize exposure and improve resilience, particularly among the most vulnerable populations in Sunnyvale.</p>
Key Strategies, Plays, and Moves
<p>Move 1.A: Continue to support and steer Silicon Valley Clean Energy (SVCE) in providing clean power and decarbonization programs. Move 1.B: Collaborate with SVCE to target direct access customers to shift to 100% clean electricity.</p>
<p>Move 1.C: Research a mandatory solar roof ordinance for new commercial developments.</p>
<p>Move 1.D: Collaborate with SVCE to evaluate opportunities for energy storage to maximize utilization of local solar supply and enhance resiliency.</p>
<p>Move 2.A: Research energy disclosure and energy benchmarking requirements for commercial and multi-family residential buildings to encourage property owners and managers to invest in energy efficiency upgrades and building information systems Move 2.B: Advocate to regional providers of energy efficiency programs (such as Bay Area Regional Energy Network or BayREN, Silicon Valley Energy Watch or SVEW) that their offerings are more aggressively promoted to Sunnyvale residents and businesses.</p>
<p>Move 2.C: Develop a program to accelerate the adoption of heat pump water heaters and space heaters. Move 2.D: Electrify municipal buildings upon rebuild or significant remodel, including the Civic Center</p>
<p>Move 2.E: Evaluate code and permitting processes to streamline building electrification. Move 2.F: Investigate the potential for implementing a differential Utility Use Tax that is at least revenue neutral, such that local taxes on electricity are lower than on natural gas, to incentivize electrification. Move 2.G: Continue to incentivize energy efficient and high-performance buildings through the Green Building Program updates.</p>
<p>Move 3.A: Plan for additional housing, with the goal of diverse housing, to reduce long-distance commutes. Move 3.B: Identify areas that are most appropriate for parking strategies that discourage vehicle use, such as pricing, time limits and supply reductions.</p>
<p>Move 3.C: Enhance City Transportation Demand Management (TDM) program implementation and monitoring to facilitate further reductions in single-occupant automobile trips, citywide. Move 3.D: Advocate that regional service providers implement high quality transit service and a robust set of first-and last-mile strategies in over two-thirds of the cross-city corridors. Move 3.E: Update and implement the Integrated Bicycle, Pedestrian and Safe Routes to School Plan to achieve a connected, safe and active network. Move 3.F: Pilot and evaluate shared bicycle and scooter programs. Move 3.G: Pilot shuttle service in Peery Park and consider options for expansion of a similar service in other areas undergoing redevelopment.</p>

Table 2-3 Playbook Strategies and Plays

Key Strategies, Plays, and Moves
Move 3.H: Develop design standards for streets and parking lots to accommodate increased pick-up and drop-off for rideshare passengers and apply as appropriate.
Move 3.I: Monitor autonomous vehicle testing and deployment to inform proactive policy.
Move 3.J: Develop a Community Electric Vehicle Readiness and Infrastructure Plan.
Move 3.K: Promote and seek incentives for community adoption of electric vehicles.
Move 3.L: Electrify Municipal Fleet as vehicles are replaced and continue to seek incentives for electric vehicles and charging infrastructure.
Move 4.A: Implement and expand food scraps diversion programs to include additional businesses and multi-family residences.
Move 4.B: Consider solid waste collection and processing improvements to increase waste diversion away from landfills as a part of service provider and facility transition planning.
Move 4.C: Implement campaigns for waste prevention.
Move 4.D: Promote and seek incentives for making water conservation a way of life and set a water reduction target consistent with new statewide requirements.
Move 4.E: Partner with Valley Water to evaluate opportunities to expand water reuse.
Move 4.F: Implement the City's Urban Forest Management Plan and continue to protect and greatly expand tree canopy.
Move 4.G: Implement the City's Green Stormwater Infrastructure Plan.
Move 4.H: Promote consumer awareness of sustainable food choices.
Move 4.I: Work with large businesses to identify best practices for implementing local food gardens.
Move 5.A: Pilot a targeted grassroots community engagement strategy (e.g., Cool Blocks Program) to create stronger connections between neighbors to advance climate action and emergency preparedness.
Move 5.B: Evaluate opportunities for the City to provide online resources and tools for community and small business climate action (e.g., resource center for retrofit electrification, online tool or app to track individual carbon emissions).
Move 5.C: Create a stronger social media and web presence for Sunnyvale climate action.
Move 5.D: Implement the Sustainability Speaker Series.
Move 5.E: Pilot and evaluate a program for youth engagement on climate, building on current engagement with school classrooms and green teams.
Move 5.F: Build relationships with largest employers to collaborate on climate action, such as: (a) engaging employees to participate in sustainability initiatives; (b) encouraging and facilitating investment in climate action programs or projects.
Move 6.A: Review and summarize assessment products developed by the County's Silicon Valley 2.0 project and by the State.
Move 6.B: Participate in regional forums on climate vulnerability and adaptation.
Move 6.C: Collaborate with Valley Water to advance a shoreline protection project with the US Army Corps of Engineers or other partners.
Move 6.D: Identify shoreline protection solutions as part of Moffett Park Specific Plan update.
Move 6.E: Update existing emergency preparedness and response plans to address climate-related impacts such as heat events, air quality issues and flooding.
Move 6.F: Develop a community resilience plan.

3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The LUTE EIR was prepared as a program EIR consistent with the requirements of California Environmental Quality Act (CEQA). The analysis considered the environmental impacts of policy implementation and development buildout that could occur under the LUTE (assumed to be year 2035). The LUTE EIR consists of two documents: the Draft EIR and the Final EIR. The Final EIR incorporates the Draft EIR by reference and it also includes responses to comments on the Draft EIR and any corrections to the Draft EIR. For purposes of this checklist the references to the LUTE EIR are found in the document labeled Draft EIR, unless (the term Final EIR is used to refer to the Final EIR document where changes were made to the Draft EIR).

As discussed in Chapter 1, the project is consistent with the LUTE policies and is considered an implementation action of the LUTE. CEQA Guidelines Section 15183 dictates that, in circumstances such as these, a lead agency “shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.” Section 15183 further indicates that an initial study or other analyses should be prepared by a lead agency to determine the scope of environmental review in light of this prohibition. The purpose of this process is to streamline the review of covered projects and reduce the need for the preparation of repetitive environmental studies.

Under Section 15183, the lead agency’s initial study checklist is used to determine whether the following types of impacts may merit additional environmental analysis:

1. Significant impacts that are peculiar to the project or area in which the project would be located,
2. Significant impacts that were not analyzed in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,
3. Potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
4. Previously identified significant effects which, as a result of substantial new information, were not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Unless an environmental effect satisfies one of these criteria, the lead agency can rely upon its previously certified EIR (CEQA Guidelines Section 15183[c]).

The purpose of this checklist is to evaluate the categories listed in CEQA Guidelines 15183 to determine whether, in light of the LUTE EIR, there are any significant environmental effects requiring additional environmental analysis. The row titles of the checklist include the full range of environmental topics, as presented in Appendix G of the State CEQA Guidelines. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to PRC Section 21083.3(b) and State CEQA Guidelines Section 15183. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact because it was analyzed and addressed with mitigation measures in the LUTE EIR. For instance, the environmental categories might be answered with a “no” in the checklist because the impacts associated with the project were adequately addressed in the LUTE EIR, and the environmental impact significance conclusions of the LUTE EIR remain applicable. The purpose of each column of the checklist is described below.

Where Impact was Analyzed?

This column provides a cross-reference to the pages of the LUTE EIR where information and analysis may be found relative to the environmental issue listed under each topic.

Any Peculiar Impact?

Pursuant to CEQA Guidelines Sections 15183(b)(1) and 15183(f), this column indicates whether the project could result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project or the project site and that peculiar impact is not substantially mitigated by the imposition of uniformly applied development policies or standards.

Any Impact Not Analyzed as Significant Effect in LUTE EIR?

Pursuant to CEQA Guidelines Section 15183(b)(2), this column indicates whether the project would result in a significant effect that was not analyzed as significant in the LUTE EIR. A new EIR is not required if such a project impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

Any Off-Site or Cumulative Impact Not Analyzed as Significant Effect in LUTE EIR?

Pursuant to CEQA Guidelines Section 15183(b)(3), this column indicates whether the project would result in a significant off-site or cumulative impact that was not discussed in the LUTE EIR. A new EIR is not required if such an off-site or cumulative impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

Any Adverse Impact More Severe Based on Substantial New Information?

Pursuant to CEQA Guidelines Section 15183(b)(4), this column indicates whether there is substantial new information that was not known at the time the LUTE EIR was certified, indicating that there would be a more severe adverse impact than discussed in the LUTE EIR. A new EIR is not required if such an impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?

This column indicates whether the LUTE EIR and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. This column also indicates whether uniformly applied development standards or policies address identified impacts. A "yes" response will be provided if the impact is addressed by a LUTE mitigation measure or uniformly applied development standards or policies. If "NA" is indicated, this Environmental Checklist Review concludes that there was no impact, the adopted mitigation measures are not applicable to this project, or the impact was less-than-significant and, therefore, no mitigation measures are needed.

3.2 DISCUSSION AND MITIGATION SECTIONS

Discussion

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

Mitigation Measures

Applicable mitigation measures from the prior environmental review that would apply to the project are listed under each environmental category. New mitigation measures are included, if needed.

Conclusions

A discussion of the conclusion relating to the need for additional environmental documentation is contained in each section.

4 ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

ENVIRONMENTAL ISSUE/AREA	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
I. Aesthetics.						
Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:						
a) Have a substantial adverse effect on a scenic vista?	LUTE EIR Section 3.12, Impact 3.12.1 and 3.12.5	No	No	No	No	NA, no impact would occur.
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LUTE EIR Section 3.12, Impact 3.12.2 and 3.12.5	No	No	No	No	NA, no impact would occur.
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LUTE EIR Section 3.12, Impact 3.12.3 and 3.12.5	No	No	No	No	NA, impact remains less than significant.
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LUTE EIR Section 3.12, Impact 3.12.4 and 3.12.5	No	No	No	No	NA, impact remains less than significant.

4.1.1 Discussion

No substantial change in the environmental and regulatory settings related to aesthetics, described in the LUTE Draft EIR Section 3.12, "Visual Resources and Aesthetics," has occurred since certification of the EIR in April 2017.

a) Have a substantial adverse effect on a scenic vista?

The City of Sunnyvale does not have any designated scenic vistas. Impact 3.12.1 of the LUTE EIR determined that no significant project or cumulative impacts (Impact 3.12.5) on scenic vistas would occur. Therefore, no project impact would occur under the LUTE or the Playbook.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no officially designated state scenic highways in Sunnyvale, and no portions of the city encompass the viewshed of a state scenic highway. Impact 3.12.2 of the LUTE EIR determined that no significant impact to scenic resources within a state scenic highway would occur. Therefore, no project impact would occur under the LUTE or the Playbook

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact 3.12.3 of the LUTE EIR identifies that new development under the LUTE would mostly be concentrated around transit nodes and other areas that are visually appropriate for increased development intensities in regards to densities and structure height similar to existing developed conditions. The LUTE would result in new urban uses that would complement the city's existing urban character. The LUTE policies and associated actions require compliance with design guidelines for future development subsequent to the LUTE adoption and would maintain compatibility with existing surrounding neighborhoods. These guidelines would further support the direction provided in the Citywide Design Guidelines. The LUTE EIR identified that no significant project or cumulative impacts (Impact 3.12.5) on visual character would occur.

Implementation of the Playbook does not include any development proposals that would directly result in physical changes to the existing visual character in the City of Sunnyvale, conflict with zoning, or other regulations adopted to protect scenic quality. Implementation of the Playbook, could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City and would appear similar to existing urban conditions. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. PV solar installations would be required to comply with the City of Sunnyvale Design Guideline 2.B3 and Municipal Code Chapter 19.56, "Alternative Energy Systems." Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding visual character remain valid and no further analysis is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact 3.12.4 of the LUTE EIR identifies that future development under the LUTE would not result in substantial increases in existing daytime glare or nighttime lighting conditions in the City. Citywide Design Guideline 3.B9 provides guidance on reducing light impacts and associated glare. Guideline 2.E3 provides design considerations to address glare, such as avoiding large expanses of highly reflective surfaces and mirror glass exterior walls. Furthermore, compliance with Sunnyvale Municipal Code Chapter 19.42.050 regarding restrictions on lighting would ensure that all lights, spotlights, floodlights, reflectors, and other means of illumination are shielded or equipped with special lenses in such a manner as to prevent any glare or direct illumination on any public street or other property. The LUTE EIR identified that no significant project or cumulative impacts (Impact 3.12.5) from glare and nighttime lighting would occur.

Implementation of the Playbook does not include any development proposals that would directly result in the construction and operation of facilities, including new sources of light or glare. Implementation of the Playbook, could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the

existing developed conditions of the City and would appear similar to existing urban conditions. These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. PV solar installations would be required to comply with the City of Sunnyvale Design Guideline 2.B3 and Municipal Code Chapter 19.56, "Alternative Energy Systems." Additionally, contemporary PV solar installations are typically designed to be nonreflective. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding light and glare remain valid and no further analysis is required.

Mitigation Measures

No significant aesthetic impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. No new impacts have occurred nor has any new information been found requiring new analysis or verification. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.2 AGRICULTURE AND FOREST RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE IER.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE IER?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
II. Agriculture and Forest Resources.						
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.</p> <p>In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p>						
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Scoped out at Notice of Preparation stage. Resources do not exist in the City.	No	No	No	No	NA
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	Scoped out at Notice of Preparation stage. No agricultural zoning or Williamson Act contracted lands exist in the City.	No	No	No	No	NA
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Scoped out at Notice of Preparation stage. Resources do not exist in the City.	No	No	No	No	NA
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Scoped out at Notice of Preparation stage. Resources do not exist in the City.	No	No	No	No	NA

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Scoped out at Notice of Preparation stage. Resources do not exist in the City.	No	No	No	No	NA

4.2.1 Discussion and Conclusion

Agricultural and forestry impacts were scoped out of the LUTE EIR at the Notice of Preparation stage as these resources do not exist in the City. The project site does not contain any of these resources and would also have no impact.

4.3 AIR QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
III. Air Quality.						
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.						
Are significance criteria established by the applicable air district available to rely on for significance determinations?						
Would the project:						
a) Conflict with or obstruct implementation of the applicable air quality plan?	LUTE EIR Section 3.5, Impact 3.5.1	No	No	No	No	NA, impact remains less than significant.
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LUTE EIR Section 3.5, Impact 3.5.2, 3.5.3, and 3.5.8	No	No	No	No	NA, but impact remains significant and unavoidable.
c) Expose sensitive receptors to substantial pollutant concentrations?	LUTE EIR Section 3.5, Impact 3.5.4, 3.5.5, 3.5.6, and 3.5.8	No	No	No	No	NA, but impact remains significant and unavoidable.
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LUTE EIR Section 3.5, Impact 3.5.7	No	No	No	No	NA, impact remains less than significant.

4.3.1 Discussion

There have been changes in the regulatory setting related to Air Quality, described in LUTE Draft EIR Section 3.5, Air Quality, has occurred since certification of the EIR in April 2017; however, these changes do not result in any new or more severe significant effects than were analyzed in the LUTE EIR. These changes are discussed below.

The Bay Area Air Quality Management District (BAAQMD) adopted the 2017 Clean Air Plan on April 19, 2017. Similar to the 2010 Clean Air Plan, the 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. The 2017 Clean Air Plan includes an update to the Bay Area ozone plan, the 2010 Clean Air Plan, pursuant to air quality planning requirements defined in the California Health & Safety Code. Consistent with the state ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—reactive organic gases and nitrogen oxides—and reduce transport of ozone and its precursors to

neighboring air basins. In addition, the 2017 Clean Air Plan builds on the BAAQMD's efforts to reduce emissions of fine particulate matter and toxic air contaminants.

BAAQMD updated its CEQA Guidelines in May 2017. All CEQA impact thresholds applicable to land use development, such as the development contemplated by the LUTE, remain unchanged from the 2011 CEQA Guidelines.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Impact 3.5.1 evaluated whether implementation of the LUTE would conflict with or obstruct implementation of the 2010 Clean Air Plan. The 2010 Clean Air Plan includes various control strategies to reduce emissions of local and regional pollutants and promote health and energy conservation. As discussed in Impact 3.5.1, the LUTE establishes a policy framework that supports the 2010 Clean Air Plan strategies by accommodating anticipated growth in a compact urban form, including mixed-use development, and focusing development along transit corridors. Therefore, this impact is considered less than significant.

Implementation of the Playbook does not include any development proposals that would increase development potential beyond what was assumed and analyzed in the LUTE EIR or result in changes to existing land use and zoning designations. In addition, the Playbook includes Play 3.1, which encourages the City to provide housing options near transit corridors to reduce long-distance commutes and associated mobile air pollutant emissions consistent with LUTE Policy LT-1.6. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR concerning consistency with an air quality plan remain valid and no further analysis is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact 3.5.8 of the LUTE EIR determined that the LUTE's contribution to air quality impacts would be cumulatively considerable. However, the BAAQMD recommended significance thresholds, as applied to each project, would be used to determine whether an individual project's contribution to a significant impact to air quality would be cumulatively considerable.

Implementation of the Playbook does not include any development proposals that would increase emissions of criteria air pollutants and precursors associated with construction and operation of facilities beyond what was considered and evaluated in the LUTE EIR because the proposed strategic framework would not result in direct construction of new facilities or alternations to existing facilities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City that may generate construction air pollutant emissions. These activities would be minor and not expected to exceed BAAQMD recommended CEQA thresholds contained in their CEQA Guidelines and would not result in a cumulative considerable impact. Furthermore, solar energy systems are subject to Chapter 19.56, "Alternative Energy Systems," of the City's Municipal Code. In addition, the Playbook includes Play 1.1 and 1.2 which promote the use of clean energy would contribute to a reduction of air pollutant emissions consistent with LUTE Policy LT-2.7. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Impacts 3.5.4, 3.5.5, 3.5.6, and 3.5.8 of the LUTE EIR evaluated whether construction and operational activities would expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs). Sensitive receptors

within the City of Sunnyvale include residences, schools, medical facilities, family day cares, and places of worship. Construction-related TACs potentially affecting sensitive receptors include off-road diesel-powered equipment, and operational TACs include mobile and stationary sources of diesel particulate matter. Both of these impacts are identified in the LUTE EIR as potentially significant.

Implementation of the Playbook does not include any development proposals that would increase pollutant concentrations beyond what was considered and evaluated in the LUTE EIR because the proposed strategic framework would not result in direct construction of new facilities or alternations to existing facilities. Implementation of the Playbook, could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City that may generate construction air pollutant emissions. These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5 and would not involve large amounts of labor or extensive use of construction equipment. Maintenance activities would be minimal and would consist of occasional inspection and cleaning of facilities. Further, PV solar installations would be required to comply with Municipal Code Chapter 19.56, "Alternative Energy Systems." In addition, the Playbook includes Plays 1.1, 1.2, and 1.3, which promote the use of clean energy would contribute to a reduction of air pollutant emissions consistent with LUTE Policy LT-2.7. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact 3.5.7 of the LUTE EIR determined that the LUTE EIR could create objectionable odors affecting a substantial number of people. However, the LUTE EIR concluded that implementation Mitigation Measure 3.5.7 would reduce this impact to less than significant.

Implementation of the Playbook does not include development proposals or long-term uses that would generate sources of objectionable odors (e.g., landfill, wastewater treatment plant) because the proposed strategic framework would not result in direct construction of new facilities or alternations to existing facilities. The Playbook promotes clean energy (Plays 1.1, 1.2, and 1.3), reduction of GHG emissions (all Plays), and encourages multi-modal transportation options (Plays 3.2 and 3.3) consistent with the LUTE Policies LT-1.6, -2.1, -2.7, and -3.1. These activities would not result in new sources or contribute to existing sources of objectionable odors. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to odors remain valid and no further analysis is required.

Mitigation Measures

Mitigation Measure MM 3.5.3 was referenced in the LUTE EIR; however, the Playbook does not include development proposals that would require grading permits, building permits, or the use of off-road diesel-fueled equipment. Therefore, this Mitigation Measure is not applicable to the project.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.4 BIOLOGICAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
IV. Biological Resources.						
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LUTE EIR Section 3.9, Impact 3.9.1 and 3.9.5	No	No	No	No	NA, impact remains less than significant.
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LUTE EIR Section 3.9, Impact 3.9.2 and 3.9.5	No	No	No	No	NA, impact remains less than significant.
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LUTE EIR, Section 3.9, Impact 3.9.2 and 3.9.5	No	No	No	No	NA, impact remains less than significant.
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LUTE EIR Section 3.9, Impact 3.9.3 and 3.9.5	No	No	No	No	NA, impact remains less than significant.
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LUTE EIR Section 3.9, Impact 3.9.4 and 3.9.5	No	No	No	No	NA, impact remains less than significant.

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LUTE EIR Section 3.9, Impact 3.9.4, and 3.9.5	No	No	No	No	NA, impact remains less than significant.

4.4.1 Discussion

No new information pertaining to biological resources has become available since the LUTE EIR was certified in April 2017.

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?**

As discussed in LUTE EIR Impact 3.9.1, the urbanized portions of the city are largely built out and do not include large areas of natural habitat. Ruderal grassland areas could support special-status species such as the western burrowing owl and Congdon’s tarplant. Urban parks, open space, and riparian areas could support nesting birds. Future construction of private development projects and/or public projects within these areas could result in direct impacts on special-status species. The LUTE includes policies and actions that direct the City to protect the natural and human environment within Sunnyvale. The City of Sunnyvale is also required to comply with all applicable federal and state laws and regulations pertaining to species and habitat protection. Thus, the LUTE EIR concluded that implementation of the LUTE would result in a less than significant under project and cumulative conditions (Impact 3.9.5).

Implementation of the Playbook does not include development proposals that could result in direct impacts on special-status species because the proposed strategic framework would not result in ground disturbing activities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City’s tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. In addition, the proposed Playbook does not propose ground-disturbing activities that would result in modifications to natural habitats that support special-status species. Thus, the Playbook would not result in a substantial adverse effect on special-status species. The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR concerning special-status species remain valid and no further analysis is required.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?**

LUTE EIR Impact 3.9.2 and 3.9.5, determined that subsequent projects under the LUTE are required to comply with all applicable federal and state laws and regulations pertaining to species and habitat protection in addition to LUTE policies and actions and the City’s Municipal Code Section 12.60.010. This impact was identified as less than significant under project and cumulative conditions (Impact 3.9.5).

Implementation of the Playbook does not include development proposals that could result in direct impacts on riparian habitat or other sensitive natural community because the proposed strategic framework would not result in ground disturbing activities. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding biological impacts remain valid and no further analysis is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

LUTE EIR Impact 3.9.2 and 3.9.5 determined that subsequent projects under the LUTE are required to comply with all applicable federal and state laws and regulations pertaining to species and habitat protection in addition to LUTE policies and actions and the City's Municipal Code Section 12.60.010. This impact was identified as less than significant under project and cumulative conditions (Impact 3.9.5).

Implementation of the Playbook does not include development proposals that could result in direct impacts on wetland resources because the proposed strategic framework would not result in ground disturbing activities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. In addition, the proposed Playbook does not propose ground-disturbing activities that would result in modifications to wetland areas. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding wetlands and waters of the United States remain valid and no further analysis is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

LUTE EIR Impact 3.9.3 and 3.9.5 determined that no significant impacts to wildlife movement would result from implementation of the LUTE because planned development would occur within existing developed areas of the city and would not extend into wetlands and open space areas along San Francisco Bay that provide habitat and movement corridors for wildlife species in the region. In addition, creek and waterway corridors within the City (Stevens Creek, Calabazas Creek, and Moffett Channel) would be retained in their current condition under the LUTE. This impact was identified as less than significant under project and cumulative conditions (Impact 3.9.5).

Implementation of the Playbook does not include development proposals that could result in direct impacts on wildlife movement and native wildlife nursery sites because the proposed strategic framework would not result in direct construction of new facilities or alternations to existing facilities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. In addition, the proposed Playbook does not propose ground-disturbing activities that would result in modifications to areas within wildlife movement corridors. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding wildlife movement and use of native wildlife nursery sites remain valid and no further analysis is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As discussed in Impact 3.9.4, the LUTE includes policies that support key objectives in the Bay Plan to preserve open space adjacent to San Francisco Bay, protect water quality of the bay, and increase public access to the bay and associated shoreline. Additionally, the LUTE would not conflict with tree protection provisions of the City's Municipal Code Chapter 19.94. Thus, no significant impacts were identified.

Implementation of the Playbook does not include development proposals that would conflict with local policies or ordinances adopted to protect biological resources. In addition, the Playbook includes Play 4.3, which encourages the implementation of the City's Urban Forest Management Plan and Stormwater Infrastructure Plan, both of which promote the expansion of the City's tree canopy and green landscape features consistent with LUTE Policy LT-2.3. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The City is not located in a habitat conservation plan area. As a result, the LUTE EIR determined there would be no conflict with an adopted habitat conservation plan would occur, and no impact would result. Therefore, no significant impact was identified under project or cumulative conditions.

No new conservation plans have been adopted in the City since approval of the LUTE. Therefore, there are no (1) specific impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR concerning conflicts with adopted conservation plans remain valid and no further analysis is required.

Mitigation Measures

No significant biological resource impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.5 CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
V. Cultural Resources.						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	LUTE EIR Section 3.10, Impact 3.10.1 and 3.10.3.	No	No	No	No	NA, impacts would remain significant and unavoidable.
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	LUTE EIR Section 3.10, Impact 3.10.2.	No	No	No	No	NA, impacts would remain less than significant.
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	LUTE EIR Section 3.10, Impact 3.10.2.	No	No	No	No	NA, impacts would remain less than significant.

4.5.1 Discussion

No new information pertaining to cultural resources has become available since the LUTE EIR was certified in April 2017.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

As discussed in LUTE EIR Impact 3.10.1, identified that the City includes numerous buildings that have historical value and future actions under the LUTE have the potential to directly (i.e., demolition) or indirectly (i.e., adverse effects to historical setting from adjacent construction) impact historic buildings and structures that qualify as historic resources under CEQA. The Community Character chapter of the Sunnyvale General Plan includes various policies addressing this issue. Policy CC-5.1 states that the City will preserve existing landmarks and cultural resources and their environmental settings, Policy CC-5.3 seeks to identify and work to resolve conflicts between the preservation of historic resources and alternative land uses, and Policy CC-5.4 states that the City will seek out, catalog, and evaluate heritage resources that may be significant. However, the LUTE EIR concluded that the implementation of the LUTE would result in significant and unavoidable impacts under project and cumulative conditions (Impact 3.10.3).

The Playbook does not include development proposals that could result in direct impacts to historic resources. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with General Plan policies pertaining to the preservation of historic resources including Policy CC-5.1, CC-5.3, CC-5.4 and Municipal Code Section 19.96.090 which would require construction activities not result in impacts detrimental to a designated landmark. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding historical resources remain valid and no further analysis is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

LUTE EIR Impact 3.10.2 determined that implementation of the LUTE could impact buried archaeological resources during construction activities. The LUTE EIR determined that implementation of Action LT-1.10f, included below, would ensure that impacts to archaeological resources and human remains (in combination with Health and Safety Code Section 7050.5[b]) are reduced to a less-than-significant level under project and cumulative conditions (Impact 3.10.3).

LT-1.10f: Continue to condition projects to halt all ground-disturbing activities when unusual amounts of shell or bone, isolated artifacts, or other similar features are discovered. Retain an archaeologist to determine the significance of the discovery. Mitigation of discovered significant cultural resources shall be consistent with Public Resources Code Section 21083.2 to ensure protection of the resource.

Implementation of the Playbook would not result in direct impacts to buried archaeological resources or human remains because the proposed strategic framework does not include development proposals that would result in ground disturbing activities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with General Plan Policy LT-1.10f that requires protection and mitigation of discovered archaeological resources. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding archaeological resources remain valid and no further analysis is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

See analysis provided in Item b) above.

Mitigation Measures

No significant cultural resource impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.6 ENERGY

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
VI. Energy.						
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LUTE EIR Section 3.11, Impact 3.11.4.1.	No	No	No	No	NA, impact remains less than significant.
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LUTE EIR Section 3.11, Impact 3.11.4.1	No	No	No	No	NA, impact remains less than significant.

4.6.1 Discussion

Since completion of the LUTE EIR, the City of Sunnyvale as well as the cities of Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Morgan Hill, Mountain View, Saratoga, and unincorporated Santa Clara County became members of Silicon Valley Clean Energy (SVCE), which serves as the Community Choice Aggregation (CCA) for its member communities. SVCE works in partnership with Pacific Gas and Electric (PG&E) to deliver direct, renewable electricity to customers within its member jurisdictions. Consistent with State law, all electricity accounts within the city of Sunnyvale were automatically enrolled in SVCE; however, customers can choose to opt out or remain with PG&E. According to the Sunnyvale Climate Action Plan Biennial Progress Report released in 2018, 98 percent of residential and commercial accounts received carbon-free electricity from SVCE (City of Sunnyvale 2018). Electricity is supplied to the city using infrastructure built and maintained by PG&E.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

As discussed in Impact 3.11.4.1, implementation of the LUTE would increase energy consumption within the City of Sunnyvale. However, subsequent development would be required to comply with Building Energy Efficiency Standards included in Title 24 of the California Code of Regulations and implement the energy efficiency requirements of the City’s CAP 1.0. This would include obtaining carbon-free electricity from SVCE. Implementation of the LUTE would also result in an improvement in vehicle miles traveled (VMT) per capita as compared to citywide VMT under the previous General Plan. The LUTE EIR determined the impact would be less than significant under project and cumulative conditions.

Implementation of the Playbook would not increase energy consumption because the proposed strategic framework does not include development proposals and would not induce population growth. The Playbook builds upon the policy framework established by CAP 1.0 and serves as a guide to achieve or exceed the state’s 2030 and 2050 GHG emissions reduction targets. In addition, the Playbook Strategies and Plays complement the policy framework in the LUTE by promoting clean electricity, decarbonizing transportation and buildings, encouraging sustainable land use and resource management, enhancing community awareness, and assessing climate vulnerabilities for Sunnyvale. Specifically, proposed Play 1.1 which encourages the City to collaborate with SVCE to provide Sunnyvale residents with direct access 100 percent clean energy, Play 1.2 encourages the City to support installation of energy efficient systems in existing buildings, Play 1.3 enhances local electricity storage, Play 2.1 to reduce energy consumption in

existing buildings, Play 2.2 which supports electrification of existing buildings, and Play 2.3 which aims to achieve all-electric new construction. Further, Plays within Strategy 3, such as Play 3.2 to encourage the City to increase multi-modal transportation options, and Play 3.3, which encourages the City to promote a shift to electric or alternative fueled vehicles, can further reduce energy use from fossil fuels. Implementation of the proposed Plays would encourage efficient use of energy resources consistent with the policy framework included in both the LUTE and CAP 1.0. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

See discussion in a) above.

Mitigation Measures

No mitigation measures were identified in for the certified LUTE EIR regarding energy, nor are any additional mitigation measures required the project.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.7 GEOLOGY AND SOILS

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
VII. Geology and Soils.						
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	LUTE EIR Section 3.7, Impact 3.7.1	No	No	No	No	NA, impact remains less than significant.
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)						
ii) Strong seismic ground shaking?						
iii) Seismic-related ground failure, including liquefaction?						
iv) Landslides?						
b) Result in substantial soil erosion or the loss of topsoil?	LUTE EIR Section 3.7, Impact 3.7.2	No	No	No	No	NA, impact remains less than significant.
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LUTE EIR Section 3.7, Impact 3.7.3	No	No	No	No	NA, impact remains less than significant.
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	LUTE EIR Section 3.7, Impact 3.7.3	No	No	No	No	NA, impact remains less than significant.

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	LUTE EIR Section 3.7, page 3.7-14	No	No	No	No	NA, impact remains less than significant.
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LUTE EIR Section 3.7, Impact 3.7.4	No	No	No	No	NA, impact remains less than significant.

4.7.1 Discussion

No substantial change in the environmental and regulatory settings related to geology and soils, described in the LUTE Draft EIR Section 3.7 Geology, Soils, and Paleontological Resources, has occurred since certification of the LUTE EIR. The regional and local settings remain the same as stated Section 3.7.

Since preparation of the LUTE EIR, a California Supreme Court decision (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, 377) has clarified CEQA with regard to the effects of existing environmental conditions on a project’s future users or residents. The effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions. Local agencies are not precluded from considering the impact of locating new development in areas subject to existing environmental hazards; however, CEQA cannot be used by a lead agency to require a developer or other agency to obtain an EIR or implement mitigation measures solely because the occupants or users of a new project would be subjected to the level of hazards specified. Previous discussions of effects of the environment related to geology and soils is included herein for disclosure purposes.

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**
 - ii) **Strong seismic ground shaking?**
 - iii) **Seismic-related ground failure, including liquefaction?**
 - iv) **Landslides?**

As discussed in LUTE EIR Impact 3.7.1, the City’s Municipal Code Chapter 16.16.020 adopted the California Building Code (CBC) by reference, with changes and modifications providing a higher standard of protection. All new development and redevelopment would be required to comply with the current adopted CBC, which includes design criteria for seismic loading and other geologic hazards. Compliance with the CBC requires that new developments

incorporate design criteria for geologically induced loading that governs sizing of structural members and provides calculation methods to assist in the design process. The LUTE EIR concludes that impacts related to landslides would be less than significant under project and cumulative conditions.

Implementation of the Playbook would not expose people or structures to adverse effects resulting from geological hazards because the Playbook's strategic framework does not include development proposals. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with provisions for geological stability established by Municipal Code Chapter 16.16.020. In addition, the Playbook would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR regarding geologic hazards remain valid.

b) Result in substantial soil erosion or the loss of topsoil?

As discussed in Impact 3.7.2, implementation of the LUTE would allow new development, redevelopment, and infrastructure improvements. Grading and site preparation activities associated with such development could temporarily remove buildings and pavement, which could expose the underlying soils to wind and water erosion. Ground-disturbing activities would be required to comply with CBC Chapter 70 standards, which would ensure implementation of appropriate site-specific measures during grading activities to reduce and control soil erosion. Additionally, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres would be required to prepare and comply with a stormwater pollution prevention plan (SWPPP), which provides a schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design details and a time schedule. In addition, the City's grading standards (Municipal Code Section 18.12.110) specify that when grading will create a nuisance or hazard to other properties, public way, or public facilities due to erosion from storm runoff or rainfall, grading cannot commence or continue without specific consent in writing from the Director of Public Works or the Director of Community Development. The grading standards also regulate gradients for cut-and-fill slopes. The LUTE EIR concluded that impacts from soil erosion and loss of topsoil would be less than significant under both project and cumulative conditions (Impact 3.7.5).

Implementation of the Playbook would contribute to soil erosion or loss of topsoil because the Playbook's strategic framework does not include development proposals that would result in ground disturbing activities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with provisions for soil and geological stability established by Municipal Code Chapter 16.16.110 and 16.16.020. In addition, the Playbook would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR regarding soil erosion remain valid.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The LUTE EIR determined that future structures and improvements that could be developed in the City under the LUTE could experience stresses on various sections of foundations and connected utilities, as well as structural failure

and damage to infrastructure if located on expansive or unstable soils (Impact 3.7.3). The City requires preparation of geotechnical reports for all development projects, which include soil sampling and laboratory testing to determine the soil's susceptibility to expansion and differential settlement and would provide recommendations for design and construction methods to reduce potential impacts, as necessary. The LUTE EIR concluded that impacts from geologic instability would be less than significant under both project and cumulative conditions (Impact 3.7.5).

Implementation of the Playbook would not expose people or structures to adverse effects resulting from soil instability because the Playbook's strategic framework does not include development proposals that would site future structures on unstable or expansive soils. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with provisions for geological stability established by Municipal Code Chapter 16.16.020. In addition, the Playbook would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR regarding soil erosion remain valid.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

See analysis under item c) above.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

As described in the LUTE EIR, the City's Municipal Code Section 12.08.010 requires sewer connections for all new development in the City. Implementation of the Playbook would not require the use of septic systems. The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR regarding waste water disposal systems where sewers are not available remain valid and no further analysis is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

LUTE EIR Impact 3.10.2 determined that implementation of the LUTE could impact undiscovered paleontological resources during construction activities. The LUTE EIR determined that implementation of Action LT-1.10f, included below, would ensure that impacts to paleontological resources are reduced to a less-than-significant level under project and cumulative conditions (Impact 3.10.3).

LT-1.10f: Continue to condition projects to halt all ground-disturbing activities when unusual amounts of shell or bone, isolated artifacts, or other similar features are discovered. Retain an archaeologist to determine the significance of the discovery. Mitigation of discovered significant cultural resources shall be consistent with Public Resources Code Section 21083.2 to ensure protection of the resource.

Implementation of the Playbook would not result in direct impacts to undiscovered paleontological resources because the proposed strategic framework does not include development proposals that would result in ground disturbing activities. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to

comply with General Plan Policy LT-1.10f that requires protection and mitigation of discovered paleontological resources. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding paleontological resources remain valid and no further analysis is required.

Mitigation Measures

No significant geologic impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
VIII. Greenhouse Gas Emissions.						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	LUTE EIR Section 3.13, Impact 3.13.1	No	No	No	No	NA, impact remains less than significant.
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LUTE EIR Section 3.13, Impact 3.13.1	No	No	No	No	NA, impact remains less than significant.

4.8.1 Discussion

The City tracks the progress of the CAP 1.0 through biennial progress reporting. According to the Sunnyvale Climate Action Plan Biennial Progress Report released in 2018, communitywide GHG emissions in 2016 were approximately 12 percent less than 1990 levels and that an estimated 28 percent less than 1990 levels is achievable by 2017 if the full impact of clean electricity from SVCE was applied (City of Sunnyvale 2018). According to the report, the City is ahead of schedule in meeting its GHG reduction goals.

There have been several new or updated GHG executive orders, plans, policies, or regulations issued since certification of the LUTE EIR, but none of these new items, which are part of the regulatory setting, constitute substantial information indicating that the project would have a significant impact not analyzed in the LUTE EIR. For references, updates to the regulatory setting are briefly summarized below:

- ▶ Executive Order B-55-18: Executive Order B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.”
- ▶ Scoping Plan Update: Executive Order B-30-15 and SB 32 require CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 24, 2017, the California Air Resources Board (CARB) approved the 2017 Climate Change Scoping Plan Update, which outlines potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target.
- ▶ 2017 Update to the SB 375 Targets: Under SB 375, CARB is required to update the emission reduction targets for the metropolitan planning organizations (MPOs) every eight years. CARB adopted the updated targets and methodology in March 2018 and subsequent sustainable community strategies (SCSs) adopted after this date are subject to these new targets.
- ▶ Senate Bill 100: SB 100 raises California’s RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon free electricity target.
- ▶ Building Energy Efficiency Standards: Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now

the CEC) in June 1977 and most recently revised in 2016 (Title 24, Part 6, of the California Code of Regulations). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Building Energy Efficiency Standards, which were recently adopted on May 9, 2018, go into effect starting January 1, 2020.

- ▶ CALGreen Updates: CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The recently adopted 2019 Standards will take effect on January 1, 2020. Each iteration of the CALGreen standards improves the energy efficiency and sustainability of new development from the prior iteration.

The Playbook outlines a pathway to achieve GHG emission reductions of 56 percent below 1990 levels by 2030 (exceeding the State's interim target) and 80 percent below 1990 levels by 2050. Consistent with the LUTE EIR Mitigation Measure 3.13.1, the Playbook's GHG emissions forecast uses Sunnyvale-specific growth projections from the LUTE. The Playbook is being developed to be consistent with the state legislation and policies, listed above, that are aimed at reducing statewide GHG emissions.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

LUTE EIR Impact 3.13.1 evaluated the projected GHG emissions associated with implementation of the LUTE (176,672 MTCO_{2e} per year at buildout in 2035). The LUTE is intended to implement local land use and transportation planning efforts in a manner consistent with the adopted CAP 1.0 and MTC's Sustainable Communities Strategy (Plan Bay Area) and seeks to reduce the environmental impact (including GHG emissions) of land use development as described above.

However, the LUTE has different growth projections than what were utilized in the CAP 1.0. The GHG estimates presented in the LUTE EIR included different assumptions and inputs than the activity-based modeling used in CAP 1.0, and results of the analysis cannot be equivalently compared to demonstrate compliance with 2035 GHG reduction targets outlined in CAP 1.0. To demonstrate compliance with 2020 and 2035 GHG reduction targets, the LUTE EIR resulted in the adoption of Mitigation Measure 3.13.1, which required the City to update the CAP 1.0 to include the new LUTE growth projections. Therefore, the development of an updated climate action plan that incorporates the new LUTE growth projections is an implementation action of the LUTE.

As previously noted, the Playbook outlines a pathway to achieve GHG emission reductions of 56 percent below 1990 levels by 2030 (exceeding the State's interim target) and 80 percent below 1990 levels by 2050. Consistent with the LUTE EIR Mitigation Measure 3.13.1, the Playbook's GHG emissions forecast uses Sunnyvale-specific growth projections from the LUTE. The Playbook identifies six key Strategies and eighteen Plays that specify a plan of action to reduce GHG emissions across all sectors. These Strategies and Plays complement the policy framework in the LUTE by promoting clean electricity, decarbonizing transportation and buildings, encouraging sustainable land use and resource management, enhancing community awareness, and enhancing community resilience to climate change. Therefore, implementation of the Playbook would not contribute to GHG emissions but rather would help the City achieve 2030 and 2050 GHG reduction targets. There are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding GHG emissions remain valid and no further analysis is required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

See discussion in a) above.

Mitigation Measures

Adoption and implementation of the Playbook implements LUTE EIR Mitigation Measure 3.13.1, which required the City will update the Climate Action Plan to include the new growth projections of the LUTE and make any necessary adjustments to the CAP to ensure year 2020 and 2035 greenhouse gas emission reduction targets are attained.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
IX. Hazards and Hazardous Materials.						
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LUTE EIR Section 3.3, Impact 3.3.1	No	No	No	No	NA, impacts would remain less than significant
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	LUTE EIR Section 3.3, Impact 3.3.2	No	No	No	No	NA, impacts would remain less than significant
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LUTE EIR Section 3.3, Impact 3.3.3	No	No	No	No	NA, impacts would remain less than significant
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LUTE EIR Section 3.3, Impact 3.3.2	No	No	No	No	NA, impacts would remain less than significant
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	LUTE EIR Section 3.3, Impact 3.3.4	No	No	No	No	NA, impacts would remain less than significant
f) Impair implementation of or physically interfere with an adopted emergency response plan or	LUTE EIR Section 3.3, Impact 3.3.5	No	No	No	No	NA, impacts would remain less than significant

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
emergency evacuation plan?						
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	LUTE EIR page 3.3-15 No Impact	No	No	No	No	NA, no impact would occur.

4.9.1 Discussion

No substantial change in the environmental and regulatory settings related to hazards and hazardous materials, described in LUTE EIR Section 3.3, Hazards and Human Health, has occurred since certification of the LUTE EIR.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact 3.3.1 in the LUTE EIR determined that implementation of the LUTE hazardous materials use would not be expected to expand appreciably because the types of new businesses that would be expected would not involve extensive use of hazardous materials, as has occurred historically, but rather primarily green technology and office/R&D uses. The analysis also stated that the transport, storage, use, and storage of hazardous materials in land use activities associated with the LUTE would be required to comply with all applicable federal, state, and local regulations during construction and operation. Facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous materials releases. Compliance with federal, state, and local regulations and implementation of LUTE policies (Policy LT-11.5, Policy LT-13.8, Action LT-13.8c, and Policy LT-14.5, Action LT-14.5b) would ensure that the LUTE would have less-than-significant impacts related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and that the LUTE would make a less than cumulatively considerable contribution to significant cumulative impacts (Impact 3.3.6).

Implementation of the Playbook would not create a significant hazard or expose the public or the environment to hazards or hazardous materials because the Playbook’s strategic framework would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. In addition, the Playbook would not result in development proposals that would require the use or transport of hazardous materials. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding impacts from the routine transport, use, or disposal of hazardous materials remain valid and no further analysis is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

As discussed in Impact 3.3.2, implementation of the LUTE policies and actions would provide for land uses that would involve the transportation, storage, use, and disposal of hazardous materials. These activities could result in the release of hazardous materials into the environment and exposure of the public to hazardous materials as a result of inadvertent releases or accidents. The analysis states that the transport, storage, and use of hazardous materials by developers, contractors, business owners, and others must occur in compliance with local, state, and federal regulations. Facilities that store or use hazardous materials are required to obtain permits and comply with

appropriate regulatory agency standards designed to avoid hazardous material releases. Special regulations apply to operations that may result in hazardous emissions or use large quantities of regulated materials to ensure accidental release scenarios are considered and measures included in project design and operation to reduce the risk of accidents. In addition, transportation of hazardous materials into and within the City of Sunnyvale is regulated to reduce the potential for transportation accidents involving hazardous materials. The LUTE EIR concludes that such impacts would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.3.6).

Implementation of the Playbook would not create a significant hazard to the public or the environment hazardous materials because the Playbook's strategic framework would not result in development or provide for land uses that would involve the transportation, storage, use, or disposal of hazardous materials. In addition, the Playbook would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to hazardous materials handling remain valid and no further analysis is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact 3.3.3 in the LUTE EIR analyzes the potential for implementation of the LUTE to locating schools in the vicinity of land uses involving the use, transport, disposal, or release of hazardous materials. The LUTE EIR concludes that such impacts would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.3.6).

Implementation of the Playbook would not emit hazardous emissions because the strategic framework would not result in development or land uses that would handle hazardous materials. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to hazardous materials handling remain valid and no further analysis is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

See discussion under b) above.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

LUTE EIR Impact 3.3.4 evaluated the potential for hazards associated with exposing additional workers and visitors to aircraft-related safety hazards by locating additional development within the approach path of the Moffett Federal Airfield. The analysis noted that the Moffett Federal Airfield Comprehensive Land Use Plan (CLUP) includes land use policies and height restrictions for construction and new structures near the airfield. The LUTE also contains several policies and actions that would assist in reducing airport hazards (Policy LT-1.8 and associated Actions LT-1.8a and LT-1.8d). In the LUTE EIR, this impact was determined to be less than significant because compliance with FAA regulations and Santa Clara County Airport Land Use Commission requirements, including CLUP restrictions, as well as implementation of LUTE policies and actions would reduce airport safety hazards. The LUTE EIR concludes that the LUTE's contribution to aircraft-related safety hazards would be less than cumulatively considerable under cumulative conditions (Impact 3.3.6).

Implementation of the Playbook would not result in development projects that would be located within CLUP boundaries. Implementation of Play 1.2 could support future PV solar installations. PV solar installations would be required to comply with CLUP Policy G-6 which prohibits uses that may cause a hazard to aircraft in flight from increased glare (ALUC 2016). Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to airport safety hazards remain valid and no further analysis is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

LUTE EIR Impact 3.3.5 determined that the proposed roadway system in the LUTE would improve city roadway conditions from existing conditions, allowing better emergency vehicle access to residences as well as evacuation routes for area residents. Thus, impacts from implementation of the LUTE would result in a less-than-significant impact under project conditions and would make a less than cumulatively considerable contribution under cumulative conditions related to interference with an adopted emergency response plan or emergency evacuation plan.

Implementation of the Playbook would not modify the existing roadway network in the City in a manner that would obstruct emergency access. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR related to impacts from interference with emergency plans remain valid and no further analysis is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As identified on page 3.3-15 in the LUTE EIR, the LUTE was determined to have no impact under project or cumulative conditions related to this threshold.

No changes to the location of the project have occurred and no changes to the risks from wildfires has occurred since approval of the LUTE. The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR related to impacts from wildland fires remain valid and no further analysis is required.

Mitigation Measures

No significant hazard impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.10 HYDROLOGY AND WATER QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
X. Hydrology and Water Quality.						
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	LUTE EIR Section 3.8, Impact 3.8.1 and 3.8.4	No	No	No	No	NA, impacts would remain less than significant.
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LUTE EIR Section 3.11, Impact 3.11.1.1 and 3.11.1.2	No	No	No	No	NA, impacts would remain less than significant.
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						
i) Result in substantial on- or offsite erosion or siltation;	LUTE EIR Section 3.8, Impact 3.8.1 and 3.8.4	No	No	No	No	NA, impacts would remain less than significant.
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	LUTE EIR Section 3.8, Impact 3.8.1 and 3.8.4	No	No	No	No	NA, impacts would remain less than significant.
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	LUTE EIR Section 3.8, Impact 3.8.1 and 3.8.4	No	No	No	No	NA, impacts would remain less than significant.

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
iv) Impede or redirect flood flows?	LUTE EIR Section 3.8.2 and 3.8.5	No	No	No	No	NA, impacts would remain less than significant.
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LUTE EIR Section 3.8, Impact 3.8.3	No	No	No	No	NA, impacts would remain less than significant.
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LUTE EIR Section 3.1 and 3.8, Impacts 3.1.2, 3.8.1 and 3.8.4	No	No	No	No	NA, impacts would remain less than significant.

4.10.1 Discussion

No substantial change in the environmental and regulatory settings related to hydrology and water quality, described in LUTE EIR Section 3.8, Hydrology and Water Quality, has occurred since certification of the LUTE EIR.

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

As discussed in LUTE EIR Impact 3.8.1, construction activities associated with development of projects allowed under the LUTE would include grading, demolition, and vegetation removal which would disturb and expose soils to water erosion, potentially increasing the amount of silt and debris entering downstream waterways. In addition, refueling and parking of construction equipment and other vehicles onsite during construction could result in oil, grease, or related pollutant leaks and spills that may discharge into storm drains. Subsequent development projects would be required to comply with Municipal Code Chapter 12.60 Stormwater Management, as well as implement best management practices (BMPs) for the prevention of erosion and the control of loose soil and sediment, to ensure that construction does not result in the movement of unwanted material into waters within or outside the plan area. Municipal Code Chapter 12.60 requires project applicants to comply with the City’s National Pollutant Discharge Elimination System (NPDES) permit requirements, implement a SWPPP, perform monitoring of discharges to stormwater systems to ensure compliance with State regulations, and General Plan Policy EM-8.5 which requires implementation of construction site inspections and a control program to prevent soil erosion. The LUTE EIR determined that construction impacts would be less than significant under project and cumulative conditions (Impact 3.8.4).

Implementation of the Playbook would not violate water quality standards or waste discharge requirements because the Playbook’s strategic framework would not result in ground disturbing activities that would contribute to soil erosion or water quality issues. Implementation of the Playbook could support future PV solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), EV charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City’s tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with Municipal Code Chapter 12.60, “Stormwater Management,” as well as implement BMPs for the prevention of erosion and the control of loose soil and sediment, to ensure that construction does not result in the movement of unwanted material into waters. Municipal Code Chapter 12.60 also requires project applicants to comply with the City’s NPDES permit requirements. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The

findings of the certified LUTE EIR related to impacts from conflicts with water quality standards and waste discharge requirements remain valid and no further analysis is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The LUTE EIR determined that implementation of subsequent projects by the LUTE would have little or no effect on groundwater recharge because the City is largely built out and would not reduce the amount of permeable surfaces. The City has historically relied on groundwater to meet between 4 and 11 percent of its total demand (approximately 1,000–2,700 acre-feet per year [AFY]). Currently, the City projects producing approximately 1,000 AFY from the groundwater basin through 2035 (LUTE EIR page 3.11-5). Groundwater production is not expected to increase beyond 1,000 acre-feet per year except in multiple dry year conditions and is actively managed by the Santa Clara Valley Water District to avoid groundwater overdraft through its conjunctive use efforts. The LUTE EIR concludes that impacts related to groundwater would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.11.1.3). No mitigation was required.

Implementation of the Playbook would not decrease water supply because the Playbook's strategic framework does not include projects that would reduce the amount of permeable surfaces or require the use of groundwater. In addition, the Playbook includes Play 4.2, which encourages the City to promote water conservation and increase the sustainability of water supplies consistent with LUTE Policy LT-1.9. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to groundwater impacts remain valid and no further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or offsite erosion or siltation;

See discussion under a) above.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

As discussed in LUTE EIR Impact 3.8.2, Municipal Code Chapter 16.62 provides standards for construction in 100-year flood hazard areas. The standards for construction generally require that the lowest floor of any structure be elevated to or above the base flood elevation, anchoring, and the use of flood damage-resistant materials and methods. Municipal Code Section 12.60.160 requires project applicants to demonstrate that the project would not increase runoff over pre-project rates and durations. In addition, General Plan Policy EM-9.1 requires that the City maintain and operate the storm drain system so that stormwater is drained from 95 percent of the streets within one hour after a storm stops. For flood-prone locations, Policy EM-10.2 requires incorporation of appropriate controls to detain excess stormwater. Compliance with the existing regulations contained in the City's Municipal Code would reduce potential impacts associated with flooding and stormwater drainage to a level that is less than significant for the LUTE under project and cumulative conditions (Impact 3.8.5). With respect to groundwater, the LUTE EIR determined that implementation of subsequent projects by the LUTE would have little or no effect on groundwater recharge because the City is largely built out and would not reduce the amount of permeable surfaces.

Implementation of the Playbook would not increase the rate or amount of surface runoff because the Playbook's strategic framework would not result in development within flood hazard areas, designated floodways, or result in alterations to existing storm drain systems. In addition, the Playbook includes Play 4.3, which encourages implementation of the City's Stormwater Infrastructure Plan which promotes the expansion of the City's urban tree

canopy and landscape features to address stormwater pollution and flood risk, consistent with LUTE Policy LT-2.3. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to flooding impacts remain valid and no further analysis is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

See discussion under item a) and d) above.

iv) Impede or redirect flood flows?

See discussion under item d) above.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

As discussed in LUTE EIR Impact 3.8.3, seiches and tsunamis would not be expected to affect areas developed as part of the LUTE. There are no published maps or hazard information on seiche hazards in the Bay Area. Tsunamis would only be expected to affect low-lying marsh areas and bayward portions of sloughs. Mudflow (a type of landslide) would not be a hazard in Sunnyvale because of the city's generally flat terrain and distance from hilly or mountainous areas. The LUTE EIR determined that impacts related to inundation by seiche, tsunami, or mudflow would be less than significant under project conditions. The LUTE would not exacerbate the likelihood for inundation by seiche, tsunami, or mudflow.

Implementation of the Playbook would not result in inundation by flood hazard, seiche, or tsunami because the Playbook's strategic framework would not result in development within flood hazard areas or in marsh areas of the bay. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to impacts from inundation by flood hazard, seiche, and tsunami remain valid and no further analysis is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed in LUTE EIR Impact 3.8.1, all private development projects would be required to include appropriate features to meet applicable regional Municipal Regional Stormwater Permit (MRP) Provision C.3 requirements and implement low impact design (LID). Common LID strategies that would be appropriate for the plan area would include treatment methods such as bio-retention basins and flow-through planters, green roofs, media filtration devices, and pervious surfaces. These features would be included within individual sites on a project-by-project basis. Compliance with existing requirements of Chapter 12.60 of the Municipal Code, the City's Municipal Code Chapter 12.60, the City of Sunnyvale Urban Runoff Management Plan, and MRP Provision C.3 requirements, along with implementation of General Plan policies EM-8.6, EM-10.1, and EM-10.3, would reduce surface water quality impacts associated with occupancy of projects in the LUTE to a less than significant level under project and cumulative conditions (Impact 3.8.4). With respect to groundwater, the LUTE EIR determined that implementation of subsequent projects by the LUTE would have little or no effect on groundwater recharge because the City is largely built out and would not reduce the amount of permeable surfaces. Therefore, the LUTE would not conflict with a sustainable groundwater management plan.

As discussed in LUTE EIR Impact 3.1.2, the LUTE would support key San Francisco Bay Plan objectives of preserving open space adjacent to San Francisco Bay, protecting the water quality of the bay, and increasing public access to the bay and associated shoreline. All lands in the Planning Area under the City's jurisdiction adjacent to San Francisco Bay would remain designated as parks or open space and thus would be protected from extensive development and

remain accessible to the public. The LUTE EIR determined that impacts related to consistency with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects would be less than significant under project and cumulative conditions (Impact 3.1.5).

Implementation of the Playbook would not conflict or obstruct with a water quality control plan or sustainable groundwater management plan because the Playbook's strategic framework would not require the use of groundwater or result in ground disturbing activities that would contribute to soil erosion or water quality issues. Implementation of the Playbook could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3). These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with Municipal Code Chapter 12.60, "Stormwater Management," as well as implement best management practices (BMPs) for the prevention of erosion and the control of loose soil and sediment, to ensure that construction does not result in the movement of unwanted material into waters. Municipal Code Chapter 12.60 also requires project applicants to comply with the City's NPDES permit requirements, implement a SWPPP, perform monitoring of discharges to stormwater systems to ensure compliance with State regulations. In addition, the Playbook includes Play 4.2 which encourages the City to promote water conservation and increase the sustainability of water supplies consistent with LUTE Policy LT-1.9. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR related to water quality and groundwater management remain valid and no further analysis is required.

Mitigation Measures

No significant hydrology impacts were identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, with the application of uniformly applied development standards and policies, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there are no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The conclusions of the LUTE EIR regarding impacts to hydrology and water quality remain valid and the project does not require additional analysis under CEQA.

4.11 LAND USE AND PLANNING

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XI. Land Use and Planning.						
a) Physically divide an established community?	LUTE EIR Section 3.1, Impact 3.1.1 and 3.1.5	No	No	No	No	NA, this impact would remain less than significant.
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LUTE EIR Section 3.1, Impact 3.1.2, 3.1.3, and 3.1.5	No	No	No	No	NA, this impact would remain less than significant.

4.11.1 Discussion

No substantial change in the environmental and regulatory settings related to land use and planning, described in LUTE EIR Section 3.1, Land Use, has occurred since certification of the LUTE EIR.

a) Physically divide an established community?

Impact 3.1.1 of the LUTE EIR, identifies that the LUTE does not include large-scale infrastructure projects such as new freeways or high-volume roadways that would divide an established community. Likewise, critical transportation infrastructure linking one neighborhood to another would not be removed as part of the LUTE. Implementation of the policy provisions of the LUTE would ensure integration and compatibility of new development with existing land use conditions. This impact was determined to be less than significant under project and cumulative conditions (Impact 3.1.5).

Implementation of the Playbook would not divide an established community because the strategic framework would not result in development projects that would alter local land use patterns or obstruct movement through established neighborhoods. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to the physical division of established communities remain valid and no further analysis is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

LUTE EIR Impact 3.1.2 and 3.1.3 determined that the LUTE would be consistent with adopted City and regional land use plans and policies and concluded that the LUTE's impact would be less than significant under project and cumulative conditions (Impact 3.1.5).

Implementation of the Playbook would not conflict with applicable land use plan, local policies and regulations because the strategic framework would not amend, revise, or be inconsistent with regulations related to land use planning and development because it is a policy level document that promotes clean electricity, decarbonizing transportation and buildings, encourages sustainable land use and resource management, enhancing community

awareness, and assessing climate vulnerabilities for Sunnyvale. Further, consistent with LUTE EIR Mitigation Measure 3.13.1, the Playbook GHG emissions forecast uses Sunnyvale-specific growth projections from the LUTE. Therefore, the Playbook is an implementation action of the LUTE and is, therefore, consistent with the City's adopted land use plan. The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding consistency with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects remain valid and no further analysis is required.

Mitigation Measures

No mitigation measures were needed for the LUTE regarding land use. No additional mitigation measures are required for project for this topic.

CONCLUSION

There are no significant impacts that are peculiar to the project. No new impacts have occurred nor has any new information been found requiring new analysis or verification. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.12 MINERAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XII. Mineral Resources.						
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	LUTE EIR Section 3.7, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	LUTE EIR Section 3.7, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.

4.12.1 Discussion and Conclusion

As discussed in LUTE EIR Section 3.7, there are no active mines and no known areas with mineral resource deposits or resources of statewide importance in the city. Therefore, no impact to availability of a known mineral resource would result. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to mineral resources remain valid and no further analysis is required.

4.13 NOISE

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XIII. Noise.						
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	LUTE EIR Section 3.6, Impact 3.6.1	No	No	No	No	NA, impact remains less than significant.
b) Generation of excessive groundborne vibration or groundborne noise levels?	LUTE EIR Section 3.6, Impact 3.6.3	No	No	No	No	NA, impact remains less than significant.
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LUTE EIR page 3.6-28, Scoped out of impact analysis	No	No	No	No	NA, no impact would occur.

4.13.1 Discussion

No substantial change in the environmental and regulatory settings related to noise and vibration, described in LUTE EIR Section 3.6, Noise, has occurred since certification of the EIR. No new substantial noise sources have been introduced near the project since the LUTE EIR was prepared.

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?**

LUTE EIR Impact 3.6.1 determined less significant impacts related to subsequent development generating noise levels that exceed City noise standards.

Implementation of the Playbook would not exceed City noise standards set forth in the City's Municipal Code because the strategic framework does not include development of stationary noise sources. Implementation of the Playbook could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3). These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities also would require some mechanical equipment and worker trips. Because of the scale and nature of the potential improvements, which are generally small, localized, and because the installation would require little use of heavy-duty construction equipment, excessive construction-related noise would not be anticipated. Furthermore, solar

installations would be consistent with the City's General Plan noise standards and Municipal Code Chapter 19.42, "Operating Standards," that provide additional requirements. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR pertaining to exposure of persons to noise in excess of applicable standards remain valid and no further analysis is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

LUTE EIR Impact 3.6.3 evaluated the potential for construction activities to generate excess groundborne vibration and identified that damage to older buildings can occur at 0.25 inches per second of peak particle velocity (PPV) and at 0.5 for conventional buildings. This impact was identified as potentially significant. Mitigation Measure 3.6.3 requires noise and vibration reducing pile-driving techniques shall be employed during construction and will be monitored to ensure no damage to nearby structures occurs (i.e., vibrations above PPVs of 0.25 inch per second at nearby structures). The LUTE EIR identified that implementation of this mitigation measure would reduce the construction vibration impact to a less-than-significant level.

Implementation of the Playbook would not exceed City noise standards set forth in the City's Municipal Code because the strategic framework does not include development projects that would result in groundborne vibration or groundborne noise levels. Implementation of the Playbook could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3). These activities would be consistent with LUTE Policies LT-2.3, LT-2.7, LT-3.1, and LT-11.5. Implementation of these Plays could require construction equipment that would generate groundborne vibration. Because of the scale and nature of the potential improvements, solar installations would be consistent with the standards set forth in Mitigation Measure 3.6.3. Furthermore, these activities would be required to comply with the City's General Plan noise standards and Municipal Code Chapter 19.42, "Operating Standards." Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to groundborne vibration and noise remain valid and no further analysis is required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

LUTE EIR Impact 3.6.5 determined that compliance with the Comprehensive Land Use Plan (CLUP) for Moffett Field Airfield and with the City's normally acceptable noise level standards effectively reduces potential aircraft noise impacts. As identified in LUTE EIR page 3.6-28, there are no private airfields located near the city and thus there would be no impact.

Implementation of the Playbook would not result in development projects that would be located within CLUP boundaries. No private airstrips have been developed in the project area since certification of the LUTE EIR. Therefore, there are no new circumstances or new information requiring new analysis or verification. The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding exposure of people to excessive noise from airports remain valid and no further analysis is required.

Mitigation Measures

Mitigation Measure MM 3.6.3 was referenced in the LUTE EIR; however, the Playbook does not include development proposals that would generate new construction noise and vibration that was not evaluated in the LUTE EIR. Therefore, this Mitigation Measure is not applicable to the project.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.14 POPULATION AND HOUSING

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XIV. Population and Housing.						
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LUTE EIR Section 3.2, Impact 3.2.1 and 3.2.3	No	No	No	No	NA, impacts would remain less than significant.
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LUTE EIR Section 3.2, Impact 3.2.2 and 3.2.4	No	No	No	No	NA, impacts would remain less than significant.

4.14.1 Discussion

No substantial change in the regulatory settings related to population and housing, described in LUTE EIR Section 3.2, Population, Housing, and Employment, has occurred since certification of the LUTE EIR.

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

LUTE EIR Impact 3.2.1 evaluated whether new development in Sunnyvale under the LUTE would induce new growth. The analysis noted that the number of additional jobs that would be generated by the LUTE would be within the overall employment growth projections identified by the Association of Bay Area Governments (ABAG). The LUTE does not propose any new housing and would not directly induce population growth in the area under project or cumulative conditions (Impact 3.2.3).

Implementation of the Playbook would not induce population growth directly or indirectly because it does not propose changes to policies or regulations related to land use or residential zoning. The Playbook includes Strategies that would encourage the City to promote clean energy, decarbonize buildings, and encourage multi-modal transportation options. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to population growth remain valid and no further analysis is required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As discussed in LUTE EIR Impact 3.2.3, the intent of the LUTE is to accommodate anticipated growth through a compact urban form that seeks to make efficient use of existing infrastructure and public services, thus minimizing the need for new or significantly expanded infrastructure that could be the impetus for the removal of housing units and/or businesses. Because most of Sunnyvale has been developed with urban uses, the LUTE focuses on

redeveloping existing properties. It is not expected that residential uses would convert to nonresidential uses. The LUTE EIR concludes that impacts related to displacement of people are less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.2.4).

Implementation of the Playbook would not remove existing housing or displace existing populations because it does not propose changes to policies or regulations related to land use or residential zoning. The Playbook includes Strategies that would encourage the City to promote clean energy, decarbonize buildings, and encourage multi-modal transportation options. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to population growth remain valid and no further analysis is required.

Mitigation Measures

No mitigation measures were needed for the certified LUTE EIR regarding population and housing. No additional mitigation measures are required for the project for this issue.

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The conclusions of the LUTE EIR pertaining to population and housing remain valid and no further analysis is required.

4.15 PUBLIC SERVICES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XV. Public Services.						
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
Fire protection?	LUTE EIR Section 4.0, Impacts 4.1.1 and 4.1.2	No	No	No	No	NA, Impact remains less than significant.
Police protection?	LUTE EIR Section 4.0, Impacts 4.2.1 and 4.2.2	No	No	No	No	NA, Impact remains less than significant.
Schools?	LUTE EIR Section 4.0, Impacts 4.3.1 and 4.3.2	No	No	No	No	NA, Impact remains less than significant.
Parks?	LUTE EIR Section 4.0, Impacts 4.4.1 and 4.4.2	No	No	No	No	NA, Impact remains less than significant.

4.15.1 Discussion

No substantial change in the regulatory settings related to public services, described in LUTE EIR Chapter 4, Public Services, has occurred since certification of the LUTE EIR.

- a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

Fire protection?

LUTE EIR Impact 4.1.1 determined that population and employment growth resulting from implementation of the LUTE would increase the demand for fire protection services. LUTE Policy LT-14.8 directs the City to ensure that

development projects provide appropriate resources to meet facility needs of the City and the Sunnyvale General Plan contains Policies SN-3.1 and SN-5.1 which address maintaining timely response to emergencies and ensuring adequate equipment and facilities are maintained. Additionally, Impact 4.1.2 notes that development under the LUTE would be subject to developer fees, which would provide sufficient resources to serve the projected needs of the Sunnyvale Department of Public Safety Bureau of Fire Services (Fire Bureau) under cumulative conditions. The LUTE EIR concludes that implementation of the LUTE would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions (Impact 4.1.2).

Implementation of the Playbook would not directly affect the provision of public services, nor contribute to population growth that could result in an increase for demand for public services. The strategic framework would not result in development proposals with a population-generating component. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR pertaining to fire protection services remain valid and no further analysis is required.

Police protection?

LUTE EIR Impact 4.2.1 determined that population, the number of housing units, and increase in employment resulting from implementation of the LUTE would increase the demand for law enforcement services. The LUTE includes Policy LT-14.8 directs the City to ensure that development projects provide appropriate resources to meet facility needs of the City and the Sunnyvale General Plan contains Policy SN-3.1 that addresses maintaining timely response to emergencies. Implementation of the LUTE would result in a less-than-significant impact under project conditions and be less than cumulatively considerable under cumulative conditions (Impact 4.2.2).

Implementation of the Playbook would not directly affect the provision of law enforcement services, nor contribute to population growth that could result in an increase for demand for law enforcement services. The strategic framework would not result in development proposals with a population-generating component. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR pertaining to law enforcement services remain valid and no further analysis is required.

Schools?

LUTE EIR Impact 4.3.1 determined that subsequent development under the LUTE, including residential and commercial development, would be subject to school facility fees to pay for additional school facility needs. With payment of school facility fees, this impact from buildout of the LUTE would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 4.3.2).

Implementation of the Playbook would not directly affect the provision of school services, nor contribute to population growth within the local school districts' service areas that could result in an increase in student enrollment in local schools. The strategic framework would not result in development proposals with a population-generating component. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR pertaining to schools remain valid and no further analysis is required.

Parks?

See discussion under items a) and b) in Section 4.16, "Recreation."

Mitigation Measures

No mitigation measures were needed for the certified LUTE EIR regarding public services. No additional mitigation measures are required for the project.

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The conclusions of the LUTE EIR pertaining to public services remain valid and no further analysis is required.

4.16 RECREATION

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XVI. Recreation.						
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LUTE EIR Section 4.4, Impact 4.4.1 and 4.4.2	No	No	No	No	NA, impact remains less than significant
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	LUTE EIR Section 4.4, Impact 4.4.1 and 4.4.2	No	No	No	No	NA, impact remains less than significant.

4.16.1 Discussion

- a) **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

See discussion under item b) below.

- b) **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

LUTE EIR Impact 4.4.1 and 4.4.2 evaluated whether the increase in employees and residents from implementation of the LUTE would increase demand for public parks. Per the City's Municipal Code Chapter 18.10, new residential development would also be required to dedicate land, pay a fee in lieu thereof, or both, for park or recreational purposes at a ratio of 5 acres per 1,000 residents. These fees may be used to upgrade existing park facilities. The LUTE EIR also programmatically evaluated the environmental impacts of upgrading existing parks and the development of new park facilities as part of the overall development analyzed in the EIR (LUTE EIR page 4.0-17), and therefore the impact conclusions in the LUTE EIR capture the impacts from construction of new parks and recreational facilities. The LUTE EIR concludes that the LUTE's impact on recreational facilities and parks would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 4.4.2).

Implementation of the Playbook would not directly require the construction or expansion of recreational facilities, nor contribute to population growth as that could result in an increase the use of existing neighborhood parks, regional parks, or other recreational facilities. The strategic framework would not result in development proposals with a population-generating component. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the findings of the certified LUTE EIR pertaining to recreation remain valid and no further analysis is required.

Mitigation Measures

No mitigation measures were identified in for the certified LUTE EIR regarding recreation, nor are any additional mitigation measures required the project.

CONCLUSION

The project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR pertaining to recreation remain valid and no further analysis is required.

4.17 TRANSPORTATION

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XVII. Transportation.						
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	LUTE EIR Section 3.4, Impacts 3.4.1, 3.4.2, 3.4.3, 3.4.4, and 3.4.7	No	No	No	No	NA, impacts remains significant and unavoidable.
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	LUTE EIR Section 3.4.3-	No	No	No	No	NA
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LUTE EIR Section 3.4, Impact 3.4.5	No	No	No	No	NA, impact remains less than significant.
d) Result in inadequate emergency access?	LUTE EIR Section 3.4, Impact 3.4.6	No	No	No	No	NA, impact remains less than significant.

4.17.1 Discussion

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

LUTE EIR Impact 3.4.7 determined that implementation of the LUTE could result in substantial contributions to a number of intersections and freeway segments within the City and the region resulting in unacceptable levels of service (LOS). These operational impacts would also significantly impact transit travel times (Impact 3.4.2). The EIR identifies a number of mitigation measures to reduce these impacts; however, because implementation of some of these mitigation measures is uncertain or infeasible some impacts would remain significant and unavoidable (mitigation measures MM 3.4.7a and MM 3.4.7b were determined to be feasible). The analysis also identifies LUTE policies (e.g., Policy LT-3.5, LT-3.6, LT-3.7, LT-3.13, and LT-11.4) that constitute elements of a Transportation Demand Management (TDM) program, which is a combination of services, incentives, facilities, and actions that reduce single-occupant vehicle trips to help relieve traffic congestion. Implementation of a TDM program helps proposed developments to meet City requirements for reducing vehicle trips by 20 to 35 percent, depending on the proposed land use and its location. The LUTE EIR concluded that Impact 3.4.2 and 3.4.7 were significant and unavoidable for project and cumulative conditions.

Implementation of the Playbook does not include any development proposals that would adversely impact multimodal transit facilities or conflict with an adopted program, plan, or ordinance. In addition, the Playbook includes Play 3.1, which encourages encourage development of mixed-use sites to reduce driving, and Play 3.2, which advocates for enhancing multimodal transportation options in the City consistent with LUTE Policy LT-3.1 and LT-3.21. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information

indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

LUTE EIR Section 3.4.3 disclosed the potential for implementation of the LUTE to increase VMT. The LUTE EIR determined that implementation of the LUTE would improve the City of Sunnyvale and Santa Clara County VMT per capita conditions as compared to the current LUTE in 2035.

Implementation of the Playbook would establish a plan of action to reduce of GHG emissions, encourage multi-modal transportation options, and promote the use of alternatively fueled vehicles consistent with LUTE Policies LT-1.6, LT-3.1, and LT-11.5. In addition, the Playbook does not include any development proposals that would increase VMT. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

LUTE EIR Impact 3.4.5 evaluated the potential for implementation of the LUTE to increase the risk of vehicle and bicycle/pedestrian conflicts and intensify urban uses in areas adjacent to the Caltrain tracks. Proposed LUTE policies incorporated a “complete streets” approach for circulation planning that accommodates all travel modes and improves safety. The LUTE EIR also notes that the anticipated circulation improvements in the LUTE would help reduce the potential for pedestrian/bicycle and vehicle conflicts and all roadway and pedestrian/bicycle facilities would be designed in accordance with City standards. The LUTE EIR concludes that hazard impacts from design features would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions.

Implementation of the Playbook not include any development proposals that would result in changes to roadways. In addition, the Playbook includes Play 3.1, which encourages development of mixed-use sites to reduce driving, and Play 3.2, which advocates for enhancing multimodal transportation options in the City consistent with LUTE “complete streets” including LT-3.1 and LT-3.21. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

d) Result in inadequate emergency access?

As discussed in LUTE EIR Impact 3.4.6, LUTE policies incorporate a complete streets approach for circulation planning that accommodates all travel modes as well as improves safety and access. Complete streets are designed and operated to enable safe and convenient access for all users. Additionally, all improvements would be required to meet City of Sunnyvale roadway design standards. The LUTE EIR concludes that impacts related to inadequate emergency access would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions.

Implementation of the Playbook not include any development proposals that would directly obstruct or result in inadequate emergency access. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR remain valid and no further analysis is required.

Mitigation Measures

Mitigation Measure 3.4.7a was referenced in the LUTE EIR; however, the Playbook does not include development proposals that would require participation in the transportation impact fee program. Therefore, this Mitigation Measure is not applicable to the project.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XVIII. Tribal Cultural Resources.						
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?						
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	LUTE EIR Section 3.10, Impact 3.10.1 and 3.10.3.	No	No	No	No	NA, impacts would remain significant and unavoidable.
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	LUTE EIR page 3.10-11	No	No	No	No	NA, there would be no impact

4.18.1 Discussion

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "tribal cultural resources." It requires that lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation once the lead agency determines that the application for the project is complete, prior to the issuance of a Notice of Preparation (NOP) of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration. This requirement took effect on July 1, 2015. The revised NOP for the LUTE EIR was published on June 17, 2015, prior to the effective date of this requirement.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

As discussed in LUTE EIR Impact 3.10.1, identified that the City includes numerous buildings that have historical value and future actions under the LUTE have the potential to directly (i.e., demolition) or indirectly (i.e., adverse effects to historical setting from adjacent construction) impact historic buildings and structures that qualify as historic resources under CEQA. The Community Character chapter of the Sunnyvale General Plan includes various policies addressing this issue. Policy CC-5.1 states that the City will preserve existing landmarks and cultural resources and their environmental settings, Policy CC-5.3 seeks to identify and work to resolve conflicts between the preservation of historic resources and alternative land uses, and Policy CC-5.4 states that the City will seek out, catalog, and evaluate heritage resources that may be significant. However, the LUTE EIR concluded that the implementation of the LUTE would result in significant and unavoidable impacts under project and cumulative conditions (Impact 3.10.3).

Implementation of the Playbook would not result in direct impacts to tribal cultural resources because the proposed strategic framework does not include development proposals that would result in ground disturbing activities. Implementation of the Playbook could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with General Plan Policy LT-1.10f that requires protection and mitigation of discovered resources. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding historical resources remain valid and no further analysis is required.

- b) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

As discussed on page 3.10-11 of the LUTE EIR, in 2010 the City initiated a consultation process with Native American tribes pursuant to SB 18. Similar to AB 52, SB 18 requires the city must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts on, specified Native American places, features, and objects located within that jurisdiction. No request for consultation was received by the City.

Implementation of the Playbook would not result in direct impacts to buried tribal cultural resources because the proposed strategic framework does not include development proposals that would result in ground disturbing activities. Implementation of the Playbook could support future photovoltaic (PV) solar installations (Play 1.2), multimodal transportation improvements (Play 3.2), electric vehicle (EV) charging stations (Play 3.3), reducing landfilled waste (Play 4.1), and expansion of the City's tree canopy (Play 4.3) within the existing developed conditions of the City. These activities would be consistent with LUTE Polices LT-2.3, LT-2.7, LT-3.1, and LT-11.5. These activities would also be required to comply with General Plan Policy LT-1.10f that requires protection and mitigation of discovered resources. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new

information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding historical resources remain valid and no further analysis is required.

Mitigation Measures

No significant tribal cultural resource impacts are expected as identified in the LUTE EIR, and no mitigation measures were required.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XIX. Utilities and Service Systems.						
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	LUTE EIR Section 3.8 and 3.11, Impacts 3.8.1, 3.11.1.2, 3.11.2.2, and 3.11.4.1	No	No	No	No	NA, impact remains less than significant.
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LUTE EIR Section 3.11, Impacts 3.11.1.1 and 3.11.1.3	No	No	No	No	NA, impact remains less than significant.
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	LUTE EIR 3.11, Impacts 3.11.2.2 and 3.11.2.3	No	No	No	No	NA, impact remains less than significant.
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LUTE EIR Section 3.11, Impacts 3.11.3.1 and 3.11.3.3	No	No	No	No	NA, impact remains less than significant.
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LUTE EIR Section 3.11, Impact 3.11.3.2	No	No	No	No	NA, impact remains less than significant.

4.19.1 Discussion

No substantial change in the settings related to water supply, described in LUTE EIR Section 3.11, "Utilities and Service Systems, has occurred since certification of the LUTE EIR.

Since completion of the LUTE EIR, the City of Sunnyvale as well as the cities of Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Morgan Hill, Mountain View, Saratoga, and unincorporated Santa Clara County became members of SVCE, which serves as the CCA for its member communities. SVCE works in partnership with PG&E to deliver direct, renewable electricity to customers within its member jurisdictions. Consistent with State law, all electricity accounts within the city of Sunnyvale were automatically enrolled in SVCE; however, customers can choose to opt out or remain with PG&E. According to the Sunnyvale Climate Action Plan Biennial Progress Report released in 2018, 98 percent of residential and commercial accounts received carbon-free electricity from SVCE (City of Sunnyvale 2018). Electricity is supplied to the city using infrastructure built and maintained by PG&E.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

LUTE Impact 3.11.1.2 and 3.11.2.2 determined that the City's wastewater collection system has the capacity to convey sewage and industrial wastes generated when the city is fully developed in accordance with the development potential (with an approximately 55.7 million gallons per day [mgd] collection capacity) of the City. The LUTE EIR concludes that impacts related to construction of wastewater treatment facilities would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.11.2.3). LUTE EIR Impact 3.8.1 determined that the amount and type of runoff generated by various projects under the LUTE would be greater than that under existing conditions due to increases in impervious surfaces. These impacts would be reduced through compliance with existing regulatory programs, including the City's Municipal Code Chapter 12.60, and the City's Urban Runoff Management Plan. Implementation of the LUTE would result in a less-than-significant impact under project conditions and would be less than cumulatively considerable under cumulative conditions (Impact 3.8.4). With respect to utility services, LUTE EIR Impact 3.11.4.1 determined that implementation of the LUTE would increase the consumption of energy. However, subsequent development would comply with Building Energy Efficiency Standards included in Title 24 of the California Code of Regulations and implement the energy efficiency requirements of the City's CAP. This would include obtaining carbon-free electricity from SVCE. Implementation of the LUTE would also result in an improvement in VMT per capita as compared to citywide VMT under the previous General Plan. This impact was identified as less than significant under project and cumulative conditions.

Implementation of the Playbook would not result in the relocation or construction of new or expanded utility services systems because the proposed strategic framework does not include development proposals that would increase demand for services nor contribute to population growth. In addition, the Playbook Strategies and Plays complement the policy framework in the LUTE by promoting clean electricity, decarbonizing transportation and buildings, encouraging sustainable land use and resource management which would reduce the reliance on electrical power and promote water conservation. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As described in LUTE EIR Impact 3.11.1.1 and 3.11.1.3, cumulative development in Sunnyvale would result in a net additional water demand of 2,274 acre-feet per year. The LUTE Water Supply Assessment (WSA) identifies that there is adequate water supply available to meet build out of the City in year 2035 under normal, single-dry and multiple-dry years. This impact was identified as less than significant under project and cumulative conditions.

Implementation of the Playbook does not exceed existing water capacity because the proposed strategic framework does not include development projects that would directly contribute to population growth. In addition, the Playbook includes Play 4.2, which promotes water conservation consistent with LUTE Policy LT-11.5. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

LUTE EIR Impact 3.11.2 determined identifies that the City's wastewater collection system has the capacity to convey sewage and industrial wastes generated when the city is fully developed in accordance with the development potential (with an approximately 55.7 mgd collection capacity) of the City. The City's Wastewater Collection System Master Plan and Capital Improvement Program identify the conveyance improvements projects including improvements to lift stations, pump stations 1 and 2, and pipeline improvements. Wastewater treatment capacity is addressed under a) above. This impact was identified as less than significant under project and cumulative conditions.

Implementation of the Playbook does not exceed existing wastewater capacity because the proposed strategic framework does not include development projects that would directly contribute to population growth. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

LUTE EIR Impact 3.11.3.1 and 3.11.3.3 determined that the City would generate approximately 54,020 tons annually of solid waste at buildout. The LUTE EIR identifies that there is available combined remaining capacity of 32.8 million tons at three local landfills. This includes the Waste Management-owned Guadalupe Landfill, which has 11,055,000 tons of remaining capacity. By 2035, approximately 412,979 pounds (206.49 tons) of solid waste would be generated per day in Sunnyvale (including the LUTE, Peery Park Specific Plan, and Lawrence Station Area Plan). This amount of waste represents approximately 12.6 percent of the permitted daily throughput of the Kirby Canyon Landfill or 5.9 percent of the throughput at the Monterey Peninsula Landfill. This impact was identified as less than significant under project and cumulative conditions.

Implementation of the Playbook does not exceed existing solid waste capacity because the proposed strategic framework does not include development projects that would directly contribute to population growth. In addition, the Playbook includes Play 4.1, which encourages the diversion of waste from landfills consistent with LUTE Policy LT-11.5. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed in LUTE EIR Impact 3.11.3.2, Sunnyvale had a waste diversion rate of 66 percent as of 2011, and under current methods for tracking progress with AB 939, the per capita disposal rates are less than the targets. The City has developed its new Zero Waste Strategic Plan, intended to identify the new policies, programs, and infrastructure that will enable the City to reach its Zero Waste goals of 75% diversion by 2020 and 90 percent diversion by 2030.

Additionally, the City of Sunnyvale has committed to the waste reduction programs, plans, and policies that would apply to new development. Construction of subsequent projects under the LUTE that would result in demolition or renovation of existing structures would generate solid waste, and the City requires the recycling and reuse of materials to reduce landfill disposal. Therefore, implementation of the LUTE would not conflict with a federal, state, or local statute or regulation related to solid waste disposal. This impact would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions (Impact 3.11.3.3).

Implementation of the Playbook does not conflict with solid waste regulations or exceed existing solid waste capacity because the proposed strategic framework does not include development projects that would directly contribute to population growth. In addition, the Playbook includes Play 4.1, which encourages the diversion of waste from landfills consistent with LUTE Policy LT-11.5. Therefore, there are no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR regarding energy efficiency remain valid and no further analysis is required.

Mitigation Measures

No mitigation measures were identified in for the certified LUTE EIR regarding utilities or energy, nor are any additional mitigation measures required the project.

CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the LUTE EIR. Therefore, the conclusions of the LUTE EIR remain valid and approval of the project would not require additional environmental review.

4.20 WILDFIRE

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XX. Wildfire.						
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?						
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LUTE EIR Section 3.3, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LUTE EIR Section 3.3, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	LUTE EIR Section 3.3, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LUTE EIR Section 3.3, Scoped out of impact analysis.	No	No	No	No	NA, no impact would occur.

4.20.1 Discussion and Conclusion

As discussed in Section 3.3, there are No Fire Hazard Severity Zones or state responsibility areas or Very High Fire Hazard Severity Zones or local responsibility areas located in or adjacent to Sunnyvale (CAL FIRE 2012). The city is urbanized and not adjacent to large areas of open space or agricultural lands that are subject to wildland fire hazards. The LUTE EIR determined that no impacts associated with exposure to wildland fire would result. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, (3) significant off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR. The findings of the certified LUTE EIR pertaining to wildfire risk remain valid and no further analysis is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Area	Where Impact Was Analyzed in the LUTE EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in LUTE EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?
XXI. Mandatory Findings of Significance.						
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	LUTE EIR Sections 3.9, "Biological Resources," and 3.10, "Cultural Resources."	No	No	No	No	Yes, but impact remains significant and unavoidable
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	LUTE EIR Sections 3.1 through 3.13, and Sections 4.1 through 4.4	No	No	No	No	Yes, but impact remains significant and unavoidable
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	LUTE EIR Sections 3.3, "Hazards and Human Health," 3.5, "Air Quality," and 3.6, "Noise"	No	No	No	No	Yes, but impact remains significant and unavoidable

CONCLUSION

As noted throughout the checklist, there have been several changes to the regulatory setting since certification of the LUTE EIR. However, these regulatory changes would not affect the analysis or conclusions of the LUTE EIR. Regarding the above-listed mandatory findings of significance, with the application of uniformly applied regulatory standards and policies, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the LUTE EIR, or (3) significant

ATTACHMENT 2

off-site impacts and cumulative impacts not discussed in the LUTE EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the LUTE EIR.

All applicable mitigation measures in the LUTE EIR would continue to be implemented with the project. Therefore, no new significant impacts would occur with implementation of the project.

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5 LIST OF PREPARERS AND PERSONS CONSULTED

5.1 LIST OF PREPARERS

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- Pat Angell Project Director
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