Environmental Information Supporting a Class 32 Categorical Exemption for the 845 Stewart Drive Residential Development Project

Prepared for:

City of Sunnyvale
Community Development Department

January 2026

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Prepared for:

City of Sunnyvale
Community Development Department
Planning Division
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January 2026

20240044.02

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LIST OF ABBREVIATIONS

ACM	asbestos-containing materials
APN	Assessor Parcel Number
BMP	best management practice
BMR	below market rate
CalEEMod	California Emissions Estimator Model
CE	Class 32 Categorical Exemption
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CVOC	chlorinated volatile organic compound
dBA	A-weighted decibels
DBL	Density Bonus Law
EPA	US Environmental Protection Agency
ESA	environmental site assessment
FTA	Federal Transit Administration
HVAC	heating ventilation and cooling
LBP	lead-based paint
$L_{eq\ (8\text{-}hour)}$	8-hour noise level equivalent
LUTE	Land Use and Transportation Element
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
$PM_{2.5}$	fine particulate matter
PRC	Public Resources Code
project	845 Stewart Drive Residential Project
REC	recognized environmental condition
sf	square feet
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminants
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
VIMS	vapor mitigation system
VMT	vehicle miles travelled
VTA	Valley Transportation Authority

1 INTRODUCTION

This report serves as the technical documentation of an environmental analysis performed by Ascent for the 845 Stewart Drive Residential Project named "The Arcade" ("project") in the City of Sunnyvale. The intent of the analysis is to determine whether the project is eligible for a Class 32 Categorical Exemption (CE) pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15332. The report provides an introduction, project description, and evaluation of the project's consistency with the requirements for a Class 32 exemption. The report concludes that the project is eligible for a Class 32 Exemption.

State CEQA Guidelines Section 15332 states that a CE is allowed when:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c. The project site has no value as habitat for endangered, rare, or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. The site can be adequately served by all required utilities and public services

In addition, State CEQA Guidelines Section 15300.2 outlines exceptions to the applicability of a CE, including cumulative impacts, significant effects due to unusual circumstances, scenic highways, hazardous waste sites, and historical resources. A full listing of these exceptions and an assessment of their applicability to the project is provided in this report.

Ascent evaluated the project's consistency with the above requirements, including its potential impacts in the areas of biological resources, air quality, traffic, noise, and water quality, as well as the exceptions to the applicability of a Class 32 exemption, to confirm the project's eligibility for the Class 32 CE.

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

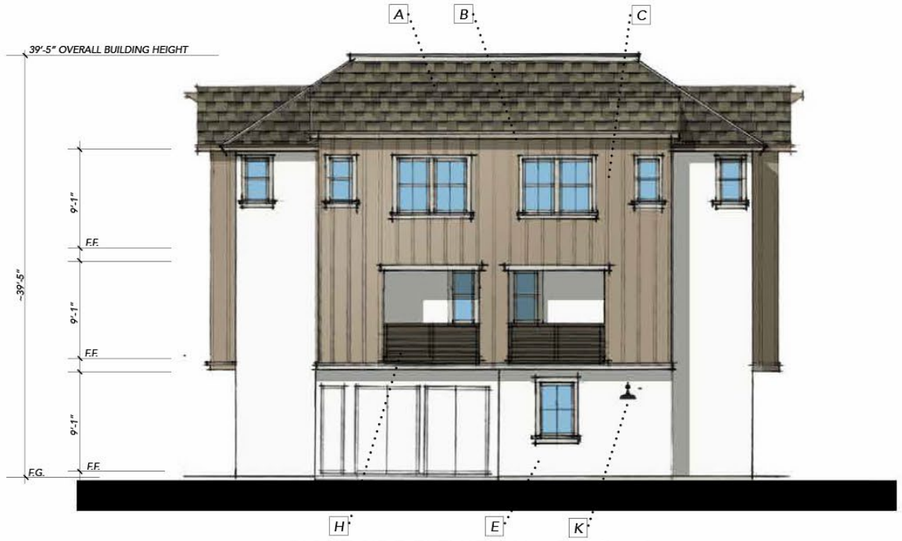
The project includes a proposed residential multi-family development located in Sunnyvale, California on a 1.16-acre parcel (Assessor Parcel Number [APN] 205-21-010) at 845 Stewart Drive on the corner of Stewart Drive and De Guigne Drive. The project site is developed with a surface parking and an existing office building that includes a restaurant. The project site is bounded by areas zoned as Industrial and Service (MS), with residential development located north and northeast of the site. The project site has a General Plan land use designation of Medium Density Residential (24 dwelling units/acre maximum) (RMED). Figure 1 shows the regional location, Figure 2 shows the proposed site plan, and Figures 3 through 6 show the proposed project's building elevations.

Source: Adapted by Ascent in 2025.

Figure 1 Project Vicinity

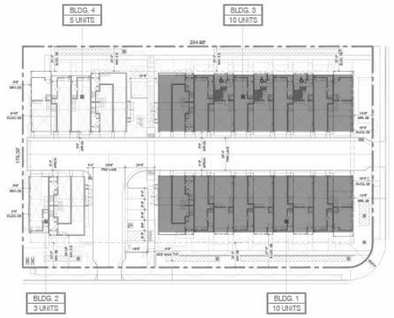
Source: Images prepared and produced by Fournier Design Studio in 2025; adapted by Ascent in 2025.

Figure 2 Site Plan



RIGHT SIDE ELEVATION ~ Building 3

LEFT SIDE ELEVATION ~ Building 1
(Street A frontage)



BUILDING LOCATOR

SW 9009
Pearly White

SW 9117
Urban Jungle

SW 7050
Useful Gray

SW 7055
Enduring Bronze

SW 6221
Moody Blue

CERTAINTEED
Weathered Wood

Architectural lighting

EXTERIOR MATERIALS LIST

(or equal for all)

Asphalt Composition Shingle Roofing
Wood Rake - Fascia - Eaves
Cementous Siding
Cementous Trim Boards
Stucco
Garage Door
Entry Door
Wood Railings
Vinyl Windows
Downspouts
Architectural Lighting
Metal Vine Wire

COLOR SPECIFICATIONS

(or equal for all)

A	*Weatherd Wood; CertainTeed*
B	*SW 9117; 8x Rake Resawn, 6x Fascia gutter*
C	*SW 7050; .75x2.5 smooth batt @ 18"o.c.*
D	*SW 7050 ; 5/4x7 Head, 4/4x3.5 Sides, 2x3 Sill*
E	*SW 7009; Sand*
F	*SW 9117; Coplay*
G	*SW 6221; Thermatru 'Smooth Star' FibreGlass*
H	*SW 7055; 1x6 slats @ 8"o.c.*
I	*White; Milgard*
J	*Match adjacent color; 3.5" Round*
K	*Black Allenbury (Downward Lighting)*
L	*SW 7055*

FRONT ELEVATION
(Stewart Dr. Frontage @ Building 1)

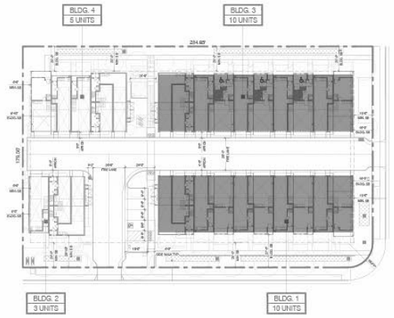
20240044.02 GRX 002

Source: Images prepared and produced by Fournier Design Studio in 2025; adapted by Ascent in 2025.

Figure 3 Conceptual Elevations- Buildings 1 & 3 (Front Elevation and Street A Frontage)

RIGHT SIDE ELEVATION ~ Building 1
DeGuigne Dr. frontage

LEFT SIDE ELEVATION ~ Building 3
DeGuigne Dr. frontage



BUILDING LOCATOR


SW 9009 Pearly White


SW 9117 Urban Jungle

SW 7050 Useful Gray


SW 7055 Enduring Bronze


SW 6221 Moody Blue


CERTAINTEED Weathered Wood


Architectural lighting

EXTERIOR MATERIALS LIST

(or equal for all)

Asphalt Composition Shingle Roofing
Wood Rake - Fascia - Eaves
Cementous Siding
Cementous Trim Boards
Stucco
Garage Door
Entry Door
Wood Railings
Vinyl Windows
Downspouts
Architectural Lighting
Metal Vine Wire

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(or equal for all)

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G	*SW 6221; Thermatru 'Smooth Star' FibreGlass*
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J	*Match adjacent color; 3.5" Round*
K	*Black Allenbury (Downward Lighting)*
L	*SW 7055*

20240044.02 GRX 003

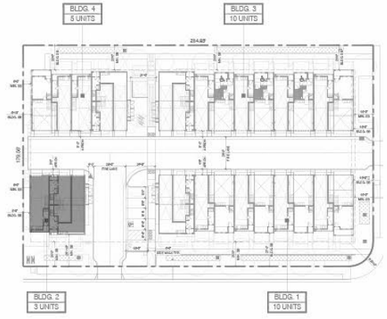
REAR ELEVATION

Source: Images prepared and produced by Fournier Design Studio in 2025; adapted by Ascent in 2025.

Figure 4 Conceptual Elevations- Buildings 1 & 3 (Rear Elevation and De Guigne Drive Frontage)

RIGHT SIDE ELEVATION
(Street A frontage)

REAR ELEVATION



BUILDING LOCATOR

LEFT SIDE ELEVATION

FRONT ELEVATION
(Stewart Drive frontage)

0 7 14 FEET

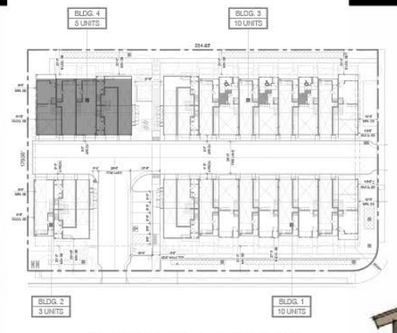
20240044.02 GRX 004

Source: Images prepared and produced by Fournier Design Studio in 2025; adapted by Ascent in 2025.

Figure 5 Conceptual Elevations- Building 2

RIGHT SIDE ELEVATION

REAL ELEVATION



BUILDING LOCATOR

LEFT SIDE ELEVATION

FRONT ELEVATION

0 7 14 FEET

20240044.02 GRX 005

Source: Images prepared and produced by Fournier Design Studio in 2025; adapted by Ascent in 2025.

Figure 6 Conceptual Elevations- Building 4

2.2 PROJECT CHARACTERISTICS

The project includes demolition of the existing building and construction of four residential buildings consisting of 28 three-story townhome-style condominium units, ranging from 1,980 to 2,329 total unit square feet (sf) with 3 to 4 bedrooms. Four of the units would be below-market-rate (BMR) homes and three units would be ADA accessible. The four BMR units would be deed restricted as affordable. Because the project would designate four BMR units as affordable housing, the project is covered under California Density Bonus Law (DBL) under California Government Code Sections 65915 – 65918. The project includes requests for several waivers due to the DBL (Fournier Design Studio in 2025).

The townhomes would be accessed from shared paseos, common open space areas, and/or common drive aisle. The site design would include perimeter sidewalks and an ingress/egress access points from Stewart Drive and De Guigne Drive. The project would include native plant species, trees, and flowers, as well as a central picnic area. Each townhome condominium unit would contain an attached two-car garage, as well as a deck and a private yard/patio. The proposed project would also contain 5 unassigned parking spaces for visitors, one of which would be for an electric vehicle (EV) and one would be ADA accessible. Bicycle racks would be included in public areas of the site as well as within unit garages.

2.2.1 Construction

Construction activities are anticipated to occur over a period of 24 months in two phases. Construction activities would involve demolition, site preparation and grading, paving, landscaping, and building construction; no pile driving is proposed. Construction staging would occur onsite. Because the project would include over 1 acre of ground disturbance, the project would be required to implement a stormwater pollution prevention plan (SWPPP) in compliance with the California Construction General Permit Order 2022-0057-DWQ as well as City's grading standards (Municipal Code Section 18.12.110).

Due to the presence of chlorinated volatile organic compounds from offsite contamination from the TRW Microwave Superfund site, the project would include the design and implementation of a vapor mitigation system (VIMS) during construction of residential buildings as well as a soils management plan. As part of construction activities, approximately 18 trees would be removed that consists of one tree (43-inch diameter Hollywood juniper tree) that meets the definition of a "protected tree" under Section 19.94.030 of the City Municipal Code. The applicant is requesting a tree removal permit pursuant to Chapter 19.94 of the City Municipal Code. New paving and coverage associated with the buildings and walkways would include approximately 4,275 sf of new impervious surface on-site compared to existing site conditions, resulting in 32,694 sf of total impervious surfaces. Construction of new landscaping and bioretention areas associated with the project site would result in 25,294 sf of pervious surfaces.

Construction activities within the project area would occur pursuant to the hours and days outlined in the City of Sunnyvale Municipal Code. Consistent with Section 16.08.030 of the Sunnyvale Municipal Code, working hours would be limited to between 7:00 a.m. to 6:00 p.m., daily, Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturday, and no construction on Sunday or federal holidays.

PROJECT PERMITS, ENTITLEMENTS, AND APPROVALS

The following project approvals would be required:

- Tree Removal Permit (Chapter 19.94 of the City Municipal Code)
- City Design Review
- Stormwater Pollution Prevention Plan (Construction General Permit)
- Vesting Tentative Map
- State Density Bonus Waivers (see Table 1)

3 CONSISTENCY ANALYSIS

3.1 CRITERION (A)

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

3.1.1 General Plan and Zoning

To qualify for the Class 32 exemption, a project must be "consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations" (CEQA Guidelines Section 15532[a]).

The project site is designated Medium Density Residential in the City General Plan and zoned as Industrial and Service (MS) with an Industrial to Residential/Medium Density Residential/Planned Development combining district (ITR/R3/PD) that allows residential uses. The project would include demolition of existing uses and construction of four buildings, totaling 28 three-story townhome-style condominium units with three or four bedrooms. This development would be consistent with the City's residential land use designation and zoning of the site as well as applicable General Plan policies that address environmental issues.

3.2 CRITERION (B)

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The project site is located on a 1.16-acre site within the City of Sunnyvale, and the proposed area of development would be 1.16 acres. Existing uses in the surrounding area include commercial and office uses to the north, west, and south, and existing commercial uses to the east across De Guigne Drive currently proposed to be redeveloped as a residential development. Additional residential uses surround the area approximately 300 feet to the north. The project would be consistent with criterion (b).

3.3 CRITERION (C)

This section describes biological resources on the project site and evaluates potential impacts to these resources as a result of project implementation. Data reviewed in preparation of this analysis include:

- results of California Natural Diversity Database (CNDDB) records search of the US Geological Survey (USGS) 7.5-minute quadrangles including and surrounding the project site (CNDDB 2025);
- results of CNPS Inventory of Rare and Endangered Plants search of the USGS 7.5-minute quadrangles including and surrounding the project site (CNPS 2025);
- lists of species that may be affected by activities implemented on the project site obtained from the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation electronic records search (USFWS 2025a);
- National Wetlands Inventory (NWI) mapping data downloaded from USFWS (USFWS 2025b);
- USFWS Critical Habitat for Threatened and Endangered Species online mapping program (USFWS 2025c); and
- aerial imagery of the project site and vicinity.

The project site is surrounded by industrial, commercial, and residential uses in a developed part of the City of Sunnyvale and consists of an existing office building, restaurant, and parking lot. The project site is developed, generally flat, and does not contain any natural terrestrial or aquatic habitat that provide value as habitat for endangered, rare, or threatened plant or wildlife species. Some ornamental landscaping is present between the

existing building and adjacent roadways. As part of construction activities, approximately 18 trees would be removed that consists of one tree (43-inch diameter Hollywood juniper tree) that meets the definition of a "protected tree" under Section 19.94.030 of the City Municipal Code. The applicant is requesting a tree removal permit pursuant to Chapter 19.94 of the City Municipal Code and would be required to address the loss of the protected tree under Section 19.94.110 of the City Municipal Code.

No special-status plant or wildlife species have the potential to occur on the project site due to the total absence of suitable habitat or substrates. Based on a review of NWI data and aerial imagery, the project site does not contain state or federally protected wetlands or any aquatic or riparian habitats (USFWS 2025b). The site does not serve as an important migration or movement corridor, or nursery site for any wildlife species. The project site does not overlap designated critical habitat for any federally listed species (USFWS 2025c). Therefore, the site has no value as habitat for endangered, rare, or threatened species. The following further discusses the reviews and analyses conducted in determining this conclusion. See Appendix B for additional information.

3.3.1 Special Status Species

To determine which special-status species could occur on or near the project site, an Ascent biologist queried the CNDDB and CNPS Rare Plant Inventory for reported occurrences of special-status fish, wildlife, and plant species in the region surrounding the project site. The nine-quadrangle search area included the Mountain View, Redwood Point, Newark, Niles, Milpitas, San Jose West, Cupertino, Mindego Hill, and Palo Alto USGS quadrangles (CNDDB 2025; CNPS 2025). The biologist also reviewed the USFWS Information for Planning and Consultation tool for lists of special-status species with the potential presence in the vicinity (USFWS 2025a).

Of the potentially occurring special-status plant species in the project vicinity, none were determined to have potential to occur on the project site because the geographic ranges of the species do not overlap the project site, or because suitable habitat for these species is not present due to the lack of natural vegetation and history of grading. Therefore, no special-status plant species are expected to occur on the site.

In addition, none of the special-status wildlife species with potential to occur in the project vicinity are expected to occur on the project site because the geographic ranges of the species do not overlap the project site, or because suitable habitat for these species is not present.

3.3.2 Migratory Nesting Birds

The project site does not provide suitable nesting habitat for common raptors; however, it may provide suitable nesting habitat for common native bird species or other birds that no not have special-status designation but are protected by the Migratory Bird Treaty Act (MBTA). If tree removal activities take place during the breeding/nesting season (February 1 through August 31), disturbance of nesting activities could occur. Take of any active raptor nest is prohibited under California Fish and Game Code sections 3503, 3503.5, and 3513. Loss of active nests of common migratory bird species would not constitute a significant impact under CEQA, as it would not substantially affect local or regional populations nor elevate their risk of endangerment. The proposed project is required to comply with MBTA and Section 3503 of the California Fish and Game Code, which prohibits destruction of migratory bird nests, by taking common and appropriate steps to protect nesting birds during construction. The project is also subject to LUTE Policy 1.10, Action LT-1.10e to ensure mitigation of impacts to biological resources, including nesting birds.

3.4 CRITERION (D)

Approval of the project would not result in any significant effects relating to air quality, transportation, noise, or water quality.

Technical studies were prepared for Air Quality (Appendix C) and Noise (Appendix D). The following discussion provides an analysis of the project's potential effects with respect to air quality, traffic, noise, and water quality and is based on the findings and conclusions of project technical studies.

3.4.1 Air Quality

CRITERIA AIR POLLUTANTS AND OZONE PRECURSORS

Construction

Based on project-specific information, including building type and size, and location, emissions modeling was conducted using the latest version of the California Emissions Estimator Model (CalEEMod). Table 1 summarizes construction emissions associated with the project in comparison to the Bay Area Air District (formerly the Bay Area Air Quality Management District or BAAQMD) thresholds of significance. All emissions modeling inputs and outputs are presented in Appendix C.

Table 1 Estimated Construction Emissions by Year (2026–2027)

Construction Emissions	ROG	NOx	PM_{10} Exhaust	PM_{10} Total[1]	$PM_{2.5}$ Exhaust	$PM_{2.5}$ Total[1]
2026 Average Daily Emissions (lbs/day)	<1	<1	<1	<1	<1	<1
2027 Average Daily Emissions (lbs/day)	<1	<1	<1	<1	<1	<1
Bay Area Air District Construction Threshold (average daily)	**54**	**54**	**82**	**N/A**	**54**	**N/A**
Exceeds Threshold?	No	No	No	N/A	N/A	No

Notes: ROG = reactive organic gases; NOx = nitrogen oxides; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; lb/day = pounds per day.

[1] Total = Total of exhaust and fugitive emissions of PM. Note that thresholds are for exhaust portions of PM; thus, exhaust emissions are lower than reported totals. See Appendix C, CalEEMod outputs for a breakdown by pollutant type.

Source: First Carbon Solutions 2025a.

As shown in Table 1, project-generated construction emissions would not exceed any adopted the Bay Area Air District thresholds of significance for any criteria air pollutant or ozone precursor. Therefore, the project would not contribute to the nonattainment status of the region or contribute to an adverse health outcome from exposure to concentrations of criteria air pollutants.

Operations

Project operations would result in the generation of criteria air pollutants and precursors from mobile-source emissions related to vehicle trips to and from the project site, area sources associated with landscaping equipment, and energy-related emissions (i.e., indirect emissions from electricity generation). Modeling was conducted using project-specific information (e.g., building size/type, operational year) and model defaults. The operational modeling results are summarized in Table 2.

Table 2 Estimated Operational Emissions (2027)

Emissions Source	ROG	NO_x	PM_{10} Total	$PM_{2.5}$ Total
Mobile (tons/year)	0.080	0.053	0.112	0.029
Area (tons/year)	0.266	0.001	<0.001	<0.001
Energy (tons/year)	—	—	—	—
Total (tons/year)	0.346	0.054	0.112	0.029
Bay Area Air District Operations Threshold (tons/year)	**10**	**10**	**15**	**10**
Exceeds Threshold?	No	No	No	No
Average Daily Emissions (lbs/day)	1.895	0.298	0.615	0.159
Bay Area Air District Operations Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Threshold?	No	No	No	No

Notes: ROG = reactive organic gases; NOx = nitrogen oxides; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; lb/day = pounds per day.

[1] Total = Total of exhaust and fugitive emissions of PM. See Appendix C for a breakdown of exhaust, fugitive, and total PM emissions.

Source: First Carbon Solutions 2025a.

As shown in Table 2, the project operational emissions would not exceed adopted the Bay Area Air District thresholds of significance for any criteria air pollutant or ozone precursor. Because the project does not exceed the thresholds it would not contribute to the nonattainment status of the region. Further, the project would not include natural gas infrastructure and would include solar, consistent with the City's Climate Action Playbook Play 1.2 (Increase local solar photovoltaics with 3 of load from local solar by 2030 and 5 by 2045). These features all serve to reduce onsite emissions sources, consistent with the primary objectives of the 2017 Clean Air Plan.

The project's construction and operational emissions of criteria air pollutants and ozone precursors would not exceed adopted thresholds of significance and would not contribute to the nonattainment status of the region or conflict with the implementation of the 2017 Clean Air Plan. In addition, the project would not contribute to an adverse health outcome from exposure to concentrations of criteria air pollutants exceeding the National Ambient Air Quality Standards or California Ambient Air Quality Standards. Further, a Greenhouse Gas emissions checklist was prepared by the applicant; the project would comply with the City of Sunnyvale General Plan and Climate Action Playbook (City Ventures 2025).

CONSTRUCTION AND OPERATIONAL HEALTH RISK FOR TOXIC AIR CONTAMINANTS

An assessment was made of the potential health impacts on surrounding sensitive receptors resulting from TAC emissions during construction (See Appendix C). Diesel particulate matter (DPM) has been identified by the ARB as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery and vendor trucks and worker activities.

The Maximally Exposed Individual Resident (MEIR) of construction impacts was determined to be the multi-family residence 300 feet north of the project boundary, located on Julian Terrace. The Maximally Exposed Individual Worker (MEIW) of construction impacts was determined to be the commercial-use 160 feet south of the project boundary, located on Stewart Drive. The nearest school (Kings Academy) was also analyzed. Table 3, below, summarizes the cancer risk and chronic HI results for project construction and operation at the MEIR and MEIW. As shown in Table 3, the resultant cancer risk and chronic hazards from DPM and maximum annual fine particulate matter ($PM_{2.5}$) are below the Bay Area Air District's thresholds of significance.

Table 3 Estimated Cancer Risks and Chronic Non-Cancer Hazards

Cancer Risk Scenario	Cancer Risk (per million)	Chronic Non-Cancer Hazard Index	Acute Non-Cancer Hazard Index	Maximum Annual $PM_{2.5}$ ($\mu g/m^3$)
Maximally Exposed Individual Resident[1]	1.71	<0.01	—	0.014
Maximally Exposed Individual Worker[2]	2.33	0.04	—	0.249
The Kings Academy (K-12)[3]	0.54	0.001	—	0.007
Thresholds of Significance	10	1	1	0.3
Exceeds Individual Source Threshold?	**No**	**No**	**No**	**No**

Notes: $\mu g/m^3$ = micrograms per cubic meter, MEIR = Maximally Exposed Individual Receptor, MEIW = Maximally Exposed Individual Worker, and $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter.

[1] The Maximally Exposed Individual Resident (MEIR) of construction impacts was determined to be the multi-family residence 300 feet north of the project boundary, located on Julian Terrace (587748 UTM E UTM 4138107 North).

[2] The Maximally Exposed Individual Worker (MEIW) of construction impacts was determined to be the commercial use 160 feet south of the project boundary, located on Stewart Drive (587836 UTM E UTM 4137873 North).

[3] Maximum Impacted School receptor is located at 587665 UTM E 4138178 UTM N, approximately 400 feet northwest of the site.

Risk was evaluated for Diesel Exhaust Particulate Matter, which does not have an established Acute Reference Exposure Level.

Source: Attachment A. First Carbon Solutions 2025a.

The proposed project includes residential land uses, which do not generate a significant amount of DPM emissions during operation because most passenger vehicles are gasoline-fueled. Therefore, the proposed project would not result in significant health impacts on sensitive receptors during operation.

CUMULATIVE HEALTH RISK

A cumulative Health Risk Assessment (HRA) was performed for the project (See Appendix C) that examined the cumulative impacts of the proposed project's construction emissions and sources of TAC emissions within 1,000 feet of the proposed project. As shown in Table 4, above, the MEIW would experience the highest level of health risks related to project construction; therefore, the cumulative health impacts were estimated for the MEIW.

The cumulative health risk results during project construction, including health risks from the existing stationary sources, roadway, and rail data from the BAAQMD sources above, are summarized in Table 4, below.

Table 4 Summary of Cumulative Health Impacts

Source	Source Name/Type	Cancer Risk (per million)	Chronic Hazard Index	Maximum Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Proposed Project	Diesel Equipment – Impacts at MEIW	2.33	0.04	0.249
Stationary Sources				
17334	Lowe's HIW Inc.–Generator	2.47	0.00	0.00
20966	Telenav–Generator	0.55	0.00	0.00
17353	Trimble Navigation	1.30	0.00	0.00
Existing Roadways		4.43	0.02	0.11
Existing Railways		0.00	0.00	0.00
Cumulative Health Risks with Project				
Cumulative Total with Project		11.08	0.06	0.359
Bay Area Air District Cumulative Thresholds of Significance		100	10	0.8
Exceeds Threshold?		No	No	No

Notes: BAAQMD = Bay Area Air Quality Management District, $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter, $\mu g/m^3$ = micrograms per cubic meter, MEIR = Maximally Exposed Individual Receptor, and TAC = toxic air contaminant.

Project and stationary source risks and hazards are for diesel exhaust, which does not have an established Acute Reference Exposure Level.

Source: First Carbon Solutions 2025a.

As shown in Table 5, any cumulative impacts from project construction and existing sources of TACs would be less than the Bay Area Air District's cumulative thresholds of significance for cancer risk and non-cancer chronic hazard and annual $PM_{2.5}$ concentrations. Therefore, the project, along with cumulative sources of TAC emissions within 1,000 feet, would be below the Bay Area Air District's cumulative thresholds of significance and would not be cumulatively considerable nor result in any impact.

EMISSIONS THAT GENERATE ODORS

The project would not introduce new odor sources to the project area. The use of heavy-duty diesel equipment during project construction would be intermittent and short-term in nature and would dissipate rapidly with increasing distance from the source. Once operational, the project may generate common residential odors such as those associated with laundry cleaning, vehicle exhaust, and waste disposal. Such odors would be small in quantity and duration and would not pose an objectionable, permanent operational odor. Therefore, the project would not result in substantial odor impacts adversely affecting a substantial number of people.

CARBON MONOXIDE EMISSIONS

In accordance with the Bay Area Air District guidance, if a project would result in increased traffic volumes at affected intersections to more than 44,000 vehicles per hour or more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited, the project could potentially increase localized concentrations of carbon

monoxide (CO) resulting in a CO impact. The proposed project would generate approximately 182 daily weekday trips, meaning the hourly volume would be a fraction of the daily trips. The proposed project's hourly trips, combined with existing traffic, are significantly lower than the threshold levels of 24,000 and 44,000 vehicles per hour (Appendix C). Therefore, the project would not result in localized concentrations that could exceed the applicable thresholds or expose sensitive receptors to substantial concentrations of CO.

3.4.2 Traffic

POTENTIAL TO CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM

The project site is in proximity to multiple Valley Transportation Authority (VTA) transit stops. Various bus stops, including the Altamont Corridor Express Gray Shuttle and VTA Routes 55, 255, and 20 are within 0.5-mile of the project site. Per the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA, the addition of new transit users is not considered an adverse impact to the transit network (OPR 2018)[1]. Finally, the proposed project would not introduce any features that would block access to a transit stop or block a transit route.

The project would provide bicycle racks within the site, space for bicycles in each of the unit garages, and improved sidewalks along the project roadway frontages. Publicly accessible pedestrian sidewalks and bicycle lanes are located (and would be maintained) along De Guigne Drive and Stewart Drive consistent with General Plan Policy LT-3.1 and Action LT-3.1a and policies LT-3.8 and LT-3.22. For these reasons, the project would not adversely affect an existing or planned roadway, transit, bicycle, or pedestrian facility; and would not conflict with any adopted plans, policies, or standards related to such facilities.

POTENTIAL TO CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3(B)

The City of Sunnyvale has developed and adopted vehicle miles travelled (VMT) guidelines and thresholds (i.e., Council Policy 1.2.8) to meet the state requirements set by SB 743 and to address CEQA Guidelines Section 15064.3. Therefore, the VMT analysis herein primarily relies on the guidance provided in Council Policy 1.2.8 and CEQA Guidelines Section 15064.3. State CEQA Guidelines Section 15064.3(b) identifies four criteria for analyzing the transportation impacts of a project. To determine how the proposed project should be considered, the applicable criteria are discussed below.

Section 15064.3(b)(1) addresses land use projects. The proposed project would be considered a land use project. Section 15064.3(b)(1) describes that projects with specified proximity to "major" or "high-quality" transit should be presumed to cause a less than significant transportation impact. As defined in Public Resources Code (PRC) Section 21064.3, a "major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. PRC Section 21155(b) defines a high-quality transit corridor as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. Additionally, Section 15064.3(b)(1) describes that projects resulting in a decrease of VMT in the project area as compared to existing conditions should also be presumed to have a less-than-significant effect. Section 15064.3(b)(4), Methodology, explains that the lead agency (in this case, the City of Sunnyvale) has discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards, such as CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

[1] The Governor's Office of Planning and Research is now known as the Governor's Office of Land Use and Climate Innovation

Sunnyvale Council Policy 1.2.8 defines the requirements for VMT analysis by project type, the criteria under which projects are presumed to result in a less-than-significant VMT impact and are not required to analyze it, and the thresholds of significance for determining VMT-based transportation impacts under CEQA. As detailed in Council Policy 1.2.8, a set of criteria is set forth under which conforming projects are assumed to be exempt from preparing a detailed VMT analysis. By virtue of conforming to the exemption criteria, a project would further the City's goals and policies and would be presumed to result in a less-than-significant impact to VMT. For residential land use projects, Council Policy 1.2.8 established the Countywide Average VMT as the City's baseline with a VMT reduction threshold set at 15 percent below the baseline to identify potential transportation impacts. The Countywide average (baseline) residential VMT per capita is 13.33, resulting in a VMT threshold of 11.33 (City of Sunnyvale 2021).

The project site is located in a high-quality transit corridor and is mapped in area below the City's 15 percent threshold for residential VMT (City of Sunnyvale 2021). Because of this, the proposed project would not have a VMT impact per the City's VMT policy.

POTENTIAL TO SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR INCOMPATIBLE USE

The project would be subject to and comply with all City design standards and safety regulations that are intended to reduce transportation hazards. The project applicant would be required to prepare and submit a traffic control plan to ensure that construction activity would minimize potential safety impacts during construction in the public right-of-way. In addition, the project plans would be subject to review by City staff to ensure that applicable design standards and specifications are met to minimize transportation hazards during operations. For these reasons, the project would not substantially increase hazards due to a design feature or incompatible use.

POTENTIAL TO RESULT IN INADEQUATE EMERGENCY ACCESS

Existing emergency access to the site would be maintained with access to Stewart Drive and De Guigne Drive. The project design is required to comply with applicable California Fire Code (CFC) and the California Building Code (CBC) standards for fire access. For these reasons, the project would be designed to meet applicable access and design standards, and the project would not result in inadequate emergency access.

3.4.3 Noise

POTENTIAL TO RESULT IN SUBSTANTIAL TEMPORARY (CONSTRUCTION) NOISE

Construction activities associated with the project would include demolition, site preparation, grading, and building construction. No pile driving or blasting is expected. City Municipal Code Section 16.08.030 requires that project construction activity to be limited to the hours of 7:00 a.m. – 6:00 p.m. daily Monday through Friday, 8:00 a.m. – 5:00 p.m. on Saturday, and no construction on Sunday or federal holidays. While the City does not establish substantial temporary noise level increase thresholds for construction activities, the project's Noise Technical Study (Appendix D) uses the noise limits established by the Federal Transit Administration (FTA) to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual.2 During daytime hours, a significant temporary increase would be an increase in excess of the average daily noise levels of 80 dBA L_{eq} (8-hour) as measured at a receiving residential land use and 85 dBA L_{eq} (8-hour) as measured at a receiving commercial land use.

During the construction of the proposed project, noise from construction activities would temporarily add to the noise environment in the project vicinity. Appendix D, "Noise Technical Study," worst-case construction noise levels would not exceed FTA average daily thresholds of 80 dBA L_{eq} (8-hour) as measured at the nearest residential receptors, and 80 dBA L_{eq} (8-hour) as measures at the nearest commercial receptors. Noise would also be generated during the construction phase by increased truck traffic on area roadways. A project-generated noise source would

be truck traffic associated with transport of heavy materials and equipment to and from the construction site. This noise increase would be of short duration and would occur during daytime hours. Thus, no significant construction noise impacts would occur.

POTENTIAL TO RESULT IN LONG-TERM (OPERATIONAL) NOISE (MOBILE AND STATIONARY)

Stationary Noise

The project would result in long-term operational stationary source noise associated with residential land uses (e.g., HVAC systems, people congregating/talking) and mobile source noise associated with project-generated vehicle trips. The project would comply with Goal SN-8 of the City of Sunnyvale General Plan Safety and Noise Element, which requires site-specific noise studies for development of new land uses to ensure acceptable interior noise levels, enforced through development review and the building permit process. According to City Municipal Code Section 19.42.030, operational residential noise shall not exceed 50 dBA during nighttime or 60 dBA during daytime hours at any point on the property line of the adjacent single-family or duplex uses; 55 dBA during nighttime or 65 dBA during daytime hours on the primary usable open space of multi-family uses; and 60 dBA during nighttime or 70 dBA during daytime hours on the primary usable open space of residential uses located along major transportation corridors or mixed-use residential properties. Furthermore, operational noise shall not exceed 60 dBA during nighttime or 70 dBA during daytime hours at any point on the property line of nonresidential uses.

The combined reasonable worst-case operational noise level of multiple mechanical ventilation systems operating simultaneously would be 37 dBA L_{eq} as measured at the nearest receiving commercial property line. Operational noise levels would not exceed the City's most restrictive daytime or nighttime noise performance thresholds as measured at the nearest receiving residential land uses. In addition, operational noise levels would not exceed existing ambient noise levels in the project vicinity (Appendix D). The proposed project stationary noise levels (i.e., those that may be associated with transformers, HVAC systems, etc.) would be required to comply with the City's noise level standards. Therefore, exceedances of the City's maximum noise level standards are not anticipated to occur.

Traffic Noise

The project would result in new vehicle trips and an associated increase in traffic noise. Typically, a doubling of the Average Daily Traffic hourly volumes on a roadway segment is required to result in an increase of 3 dBA in traffic noise levels; this is the lowest change that can be perceptible to the human ear in outdoor environments. Stewart Drive adjacent to the project site is currently estimated to have 692 PM peak-hour trips, which would produce approximately 6,920 average daily trips. Based on the air quality modeling (Appendix C) performed for this project, construction of the proposed project would generate a maximum of 37 total trips per day during any phase of project construction; 25 of these trips would be truck haul trips. These average daily trips would not double traffic volumes along roadway segments accessing the project site. For this reason, short-term intermittent noise from construction trips would not be expected to result in a perceptible increase in hourly or daily average traffic noise levels in the project vicinity.

Once operational, the proposed project is anticipated to generate 182 average daily trips. The trip generation table is provided in Attachment B of Appendix D. As a result, the proposed project would not double average daily trips on Stewart Drive adjacent to the project site and would not generate a 3 dBA increase in traffic noise levels.

Therefore, project-generated traffic noise would not exceed the City's allowable increase in residential areas or result in a long-term increase in traffic noise.

POTENTIAL TO RESULT IN EXCESSIVE VIBRATION

Development of the project would not result in the long-term operation of a significant source of ground vibration (i.e., train or highway). Construction vibration impacts include human annoyance and building structural damage. Human annoyance occurs when construction vibration rises significantly above the threshold of perception. Building damage

can take the form of cosmetic or structural. With the exception of vibratory compactors, construction vibration levels from small vibratory rollers anticipated for the project range up to 0.101 in/sec PPV at 25 feet from the operating equipment. The nearest off-site structure is located approximately 50 feet west from the nearest construction footprint where small vibratory rollers would potentially operate, where groundborne vibration levels would range up to 0.035 in/sec PPV, below the FTA's construction vibration damage criteria of 0.2 in/sec PPV. As a result, construction of the proposed project would not expose nearby buildings to groundborne vibration levels in excess of their applicable FTA damage criteria.

Implementation of the proposed project would not include any permanent sources that would expose people in the project vicinity to groundborne vibration levels that could be perceptible. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed. The project would not result in excessive construction or operation related vibration.

POTENTIAL TO EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE AIRPORT NOISE LEVELS

The project site is not located within an airport land use plan area, or within 3 miles of a public airport, public use airport, or within 2 miles of a private airstrip. San Jose International Airport is the closest airport and is located approximately 3.7 miles east of the project site. For these reasons, the project would not result in noise impacts related to the exposure of people residing or working in the project area to excessive aircraft-related noise levels.

3.4.4 Water Quality

POTENTIAL FOR THE PROJECT IMPLEMENTATION TO RESULT IN VIOLATIONS OF WATER QUALITY STANDARDS/WASTE DISCHARGE REQUIREMENTS/SURFACE OR GROUNDWATER QUALITY

The project would disturb over 1 acre of soil and would therefore be required to comply with the California Construction General Permit Order 2022-0057-DWQ. The Permit requires the implementation of a SWPPP which identifies site-specific temporary best management practices (BMPs) (e.g., tarping of any stockpiled materials or soil) and permanent BMPs to reduce pollutants in construction stormwater discharges and reduce the potential for soil erosion and sedimentation. The SWPPP would also include BMPs for hazardous waste and contaminated soils management and a spill prevention and control plan. Individual development projects would be required to comply with Chapter 12.60 Stormwater Management of the City Municipal Code, 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 within or outside the plan area. During construction of projects in the City, the dischargers, through individual coverage under the State's General Construction National Pollutant Discharge Elimination System (NPDES) permit must develop and implement a SWPPP and perform monitoring of discharges to stormwater systems to ensure compliance with State regulations and City Municipal Code. Thus, no significant construction water quality impacts are expected to occur.

The project design includes onsite water quality and stormwater protection features, such as installation of bioretention areas along the site perimeter and permeable pavers in compliance with City Municipal Code Chapter 12.60. Thus, the project would not violate any water quality standards or waste discharge requirements during construction or operation due to adherence to the California Construction General Permit and the City of Sunnyvale Municipal Code.

POTENTIAL FOR PROJECT IMPLEMENTATION TO RESULT IN ALTERATION OF EXISTING DRAINAGE PATTERN OR THE SITE THROUGH ADDITION OF IMPERVIOUS SURFACE WHICH WOULD RESULT IN EROSION, INCREASE RUNOFF WHICH WOULD RESULT IN FLOODING, EXCEED EXISTING STORM DRAIN SYSTEM, OR IMPEDE FLOOD FLOWS

The project site is designated as Zone X and is not located in a Federal Emergency Management Agency-designated Zone A floodplain (Appendix A). As described above, the project would be required to prepare and implement SWPPP to address construction water quality and includes onsite water quality and stormwater protection features consistent with NPDES and City requirements, such as installation of bioretention areas along the site perimeter and permeable pavers in compliance with City Municipal Code Chapter 12.60. Thus, no significant impacts from project drainage on water quality or flooding would occur.

POTENTIAL FOR PROJECT IMPLEMENTATION TO OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN

The City of Sunnyvale is entirely within the Santa Clara Subbasin recharge area. The Santa Clara Subbasin is not subject to the Sustainable Groundwater Management Act. As described above, the project would be required to prepare and implement SWPPP to address construction water quality and includes onsite water quality and stormwater protection features consistent with NPDES and City requirements, such as installation of bioretention areas along the site perimeter and permeable pavers in compliance with City Municipal Code Chapter 12.60. No, no significant impact would occur.

3.5 CRITERION (E)

The site can be adequately served by all required utilities and public services.

The project would be located within an existing urban area served by existing public utilities and services provided by the City. The project would connections to existing utility infrastructure (e.g., sewer, water, electric) along De Guigne Drive and Stewart Drive to serve the site. The project would pay applicable fees for sewer, water, electric, parkland dedication, and other applicable fees that contribute to the costs of service provision to the site. The project would be consistent with criterion (e).

4 EXCEPTIONS TO THE EXEMPTION

4.1 CUMULATIVE IMPACTS CRITERION

The project's land uses are consistent with the General Plan and were factored in the cumulative impact analysis in the certified City of Sunnyvale Land Use and Transportation Element Update EIR (State Clearinghouse No. 2012032003). As addressed above, the project would not create any significant environmental impacts.

4.2 SIGNIFICANT EFFECTS DUE TO UNUSUAL CIRCUMSTANCES CRITERION

CEQA Guidelines Section 15300.2 states that "a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." There are no unusual circumstances that exist in connection with the project, project site, or surrounding environmental conditions. The project site is located within an existing, developed area surrounded by

residential and office uses. The project's residential land uses would complement the existing physical arrangement of residential properties within the vicinity of the project site. Development of new multi-family residential units adjacent to an developed urban area is not unusual. In addition, the project site does not possess any characteristics which could qualify as unusual. Further, the unusual circumstances exception requires findings of both unusual circumstances and a potentially significant effect from the unusual circumstances. As discussed above, there are neither potentially significant effects from the project, nor any unusual circumstances. There are no unique or unusual circumstances at the project site or related to construction and operation of the project that have the potential to result in a significant environmental impact to the environment. This exception would not apply to the project.

4.3 SCENIC HIGHWAYS CRITERION

CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway." The project site is located on the corner of Stewart Drive and De Guigne Drive. The project is located 3.56 miles north of Route 280, an eligible State-designated Scenic Highway (Caltrans 2025). Existing land uses between Route 280 and the project site include several residential neighborhoods, community parks, and commercial spaces. The project site would not be visible from Route 280. Therefore, the project would not damage scenic resources including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This exception would not apply to the project.

4.4 HAZARDOUS WASTE SITES CRITERION

CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code," which is known as the Cortese list. The project is not listed as a Cortese site (DTSC 2025a; SWRCB 2025).

A search of the California Department of Toxic Substances Control EnviroStor Database (DTSC) and the State Water Resources Control Board GeoTracker Database was conducted in December 2025. Results of the database search indicated that the property west of the project site, 825 Stewart Drive, is one of three sites contributing contamination to a groundwater plume in the City and contains contaminated groundwater and soil with volatile organic compounds (VOCs). Cleanup was initiated at the 825 Stewart Drive site in 1973; the US Environmental Protection Agency (EPA) continues to oversee ongoing environmental investigation and cleanup activities. A passive subslab ventilation system was installed in 2014 to address vapor intrusion issues and that the building is acceptable for occupancy (DTSC 2025b; EPA 2025a).

An additional superfund site that contributes to the groundwater plume (described above) is located at 901 Thompson Place, approximately 740 feet south of the project site (DTSC 2025c). Groundwater beneath the site is contaminated by VOCs, including trichloroethene (TCE). Remediation and cleanup activities were initiated in 1983, and the 901 Thompson Place site was redeveloped in 2007 as a self-storage facility. Construction of all cleanup remedies selected for the 901 Thompson Place site have been completed (EPA 2025b).

The records review, as well as the Phase I and Phase II Environmental Site Assessments (ESA) prepared for the subject project site, indicated that another federal superfund is located at a neighboring proposed residential project site, at 510, 920, 930, and 950 De Guigne Drive and 935 and 945 Stewart Drive (APNs 205-22-022 and 205-22-023). This neighboring site is undergoing remediation. The Phase I and Phase II ESAs for the subject site indicated presence of chlorinated volatile organic compounds (CVOCs), perchloroethylene, and TCE within the project site. The Phase I and Phase II ESAs determined that these materials likely originate from the nearby superfund plume and constitute a recognized environmental condition (REC). However, none of the concentrations were in exceedance of environmental screening levels (Partner 2024a; Partner 2024b). As stated in the Phase II ESA, development and implementation of a soil and groundwater management plan and a health and safety plan would ensure that redevelopment of the site would appropriately address any encountered RECs during construction. Further, the

project would include the design and implementation of a vapor mitigation system (VIMS) during construction of residential buildings that would address any vapor concerns associated with CVOCs. As concluded in the Phase I ESA, the installation of vapor barriers and passive venting systems would be sufficient for future residential use of the project site (Partner 2024a).

The Phase I ESA also identified a potential asbestos-containing materials (ACM) and lead-based paint (LBP) in the existing onsite building (Partner 2024a). As part of demolition activities, the project would be subject to State regulations related to the disposal and handling of hazardous materials. The City's Department of Public Services is the Certified Unified Program Agency for Sunnyvale and is responsible for managing enforcement activities for the storage, use, and disposal of hazardous materials in the City. Thus, any hazardous conditions associated with building demolition would not result in exposure of ACM and LBP to sensitive receptors.

The project site is not listed on the Cortese List. The project would comply with existing regulations and requirements related to handling of hazardous materials during project demolition and would implement appropriate soil management and safety plans during construction activities in the event that hazardous conditions or materials are encountered. Further, the project would include design and implementation of VIMS to ensure that future residences would not be affected by potential vapor intrusion from onsite affected soils. As a result, this exception does not apply to the project.

4.5 HISTORICAL RESOURCES CRITERION

Section 15332 of the State CEQA Guidelines allows for the use of a categorical exemption for infill development, provided that the contemplated development meets certain criteria, and that none of the exceptions to the exemptions apply (CEQA Guidelines Section 15300.2). This includes not causing a substantial adverse change in the significance of a historical resource; this includes both built environmental features and archaeological sites. The project site is currently developed and existing structures are not listed or eligible for listing in the California Register of Historical Resources or the City of Sunnyvale Heritage Resource Inventory (First Carbon Solutions 2025b).

In the event of inadvertent cultural resource discovery, actions from City of Sunnyvale Code of Ordinances Chapter 19.96 Heritage Preservation apply.

5 SUMMARY

Based on this analysis, the project meets all criteria for a Class 32 Categorical Exemption pursuant to CEQA Guidelines Section 15332. Further, none of the exceptions to the Categorical Exemption listed in CEQA Guidelines Section 15300.2 apply to the project.

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