Summit Denali High School

Environmental Checklist

November 2018

Sunnyvale

PREPARED FOR:
City of Sunnyvale
Community Development
Department, Planning Division
465 W. Olive Avenue
Sunnyvale, California 94086

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for the

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November 2018

TABLE OF CONTENTS

Exhibits

LIST OF ABBREVIATIONS

AB 32	California Global Warming Solutions Act of 2006
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standard
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH_4	methane
CHRIS	California Historic Resources Information System
CLUP	comprehensive land use plan
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2-equivalent
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
IPCC	Intergovernmental Panel on Climate Change
LOS	level of service
LUTE	Land Use and Transportation Element
MM	mitigation measure
MMT	million metric tons
N_2O	nitrous oxide
NA	not applicable
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic Safety Administration
NO_X	oxides of nitrogen
NRHP	National Register of Historical Places
NWIC	Northwest Information Center
OHP HPD	Office of Historic Preservation, Historic Property Directory
PM_{10}	particulate matter with an aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 micrometers or less
PPSP	Peery Park Specific Plan
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board

SB	Senate Bill
SCS	Sustainable Communities Strategy
SFBAAB	San Francisco Bay Area Air Basin
SHPO	State Historic Preservation Officer
SO_2	sulfur dioxide
TAC	toxic air contaminant
TDM	transportation demand management
TMA	Transportation Management Association
VMT	vehicle miles traveled
VOCs	volatile organic compounds
VTA	Santa Clara Valley Transit Authority
UWMP	Urban water management plan

1 INTRODUCTION AND PROJECT HISTORY

On September 20, 2016, the Sunnyvale City Council approved the 450-acre Peery Park Specific Plan (PPSP) for development of 2,200,000 square feet (sf) of transit-oriented light industrial, office/R&D, and limited retail uses, and approximately 215 residential units within the Peery Park area. The City prepared an Environmental Impact Report (EIR) (State Clearinghouse No. 2015062013) for the PPSP that evaluated the environmental impacts associated with development of the entire plan area based on the land use and zoning designations established in the PPSP.

The project includes the re-purposing of an existing 27,012 square-foot building to create the Summit Denali High School for 400 students and 25 staff members. The project would reduce the footprint of the existing building to 25,590 square feet, which currently houses an industrial ceramics manufacturer (Pacific Ceramics).

The project would be consistent with the PPSP because the parcel was previously included in the PPSP and the general development assumptions (e.g., school facility) were evaluated in the PPSP EIR. Therefore, this project is considered a subsequent project as part of the implementation of the PPSP. The EIR was prepared at the program "first-tier" level of environmental review consistent with the requirements of California Environmental Quality Act (CEQA) Sections 15152 and 15168. The program-level analysis considered the broad environmental impacts of the overall PPSP. As development is proposed in the PPSP area, such as the project, it is evaluated to determine whether the entitlements/actions proposed fall within the scope of the approved EIR and incorporate all applicable performance standards and mitigation measures identified therein. Should the subsequent development phases not be consistent with the approved PPSP, additional environmental review through the subsequent review provisions of CEQA for changes to previously-reviewed and approved projects may be warranted (State CEQA Guidelines Sections 15162 through 15164).

Consistent with the process described, the City is evaluating the project application to determine whether additional environmental review would be required. This environmental checklist has been prepared to determine whether the environmental impacts of the Summit Denali High School Project are within the scope of the PPSP EIR, or if changed environmental conditions that are of sufficient magnitude result in new or substantially more severe environmental impacts, as compared to those considered in the PPSP EIR. This analysis also considers whether there is new information of substantial importance showing that new or substantially more severe environmental impacts would occur compared to that evaluated in the PPSP EIR.

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2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The project would re-purpose a 27,012 square-foot building to establish the Summit Denali High School consisting of 400 students and 25 staff members within the Peery Park Specific Plan (PPSP) area. The building square footage would be reduced to 25,590 square feet after completion of improvements. The project is considered a later activity as part of the implementation of the PPSP. The project is consistent with PPSP land use designations and zoning. The project would require approval of a Use Permit.

2.2 PROJECT LOCATION

The project site is located within the City of Sunnyvale, on a 1.52-acre parcel at 820 and 824 San Aleso Avenue. To the east of the project site there are residential areas and to the south contains industrial and commercial buildings but have been entitled for 118 townhouse developments that are currently under building permit review (Exhibits 2-1 and 2-2). To the north of the site is an apartment complex and west of the project site are industrial and commercial buildings.

2.3 EXISTING SETTING

The PPSP was certified in August 2016. The purpose of the PPSP is to provide the City, community, various property owners, and businesses with a guide for future development in the approximately 450-acre project area. The PPSP project area includes the Summit Denali High School project site. The PPSP set development policies, land use regulations, design standards, a capital improvement program, and a financing program. The project site is located in the Neighborhood Transition District as denoted by the PPSP. This district allows for land uses consisting of multi-family residential uses along with facilities and uses that support residential uses. The school would be compatible with the land uses designated by the Neighborhood Transition District with the approval of a Peery Park Conditional Use Permit.

The PPSP EIR analyzed the impacts of future developments and revitalization of the PPSP area. Given the project would be the redevelopment of an existing building for new uses, the environmental impact issues were analyzed in the PPSP EIR.

The existing site is a single building operated by a ceramics manufacturer (Pacific Ceramics) (see Exhibit 2-3). The entire site is currently paved for parking. The landscaping on-site is limited to the project site frontage along San Aleso Avenue. This landscaping consists of street trees. Surrounding the project site are four single-family residences to the east with trees and other landscaping on the residential parcels that provide a buffer between the residential areas and the project site. Light industrial and commercial uses border the site at the west and south. To the north, is the Ahwahnee Apartments both directly adjacent and across San Aleso Avenue to the northwest.

2.4 PROJECT OBJECTIVES

The Summit Denali High School project objectives are the following:

- Establish a community serving use consistent with the PPSP Neighborhood Transition District.
- Provide school facilities to support existing and planned residential uses in the project area.

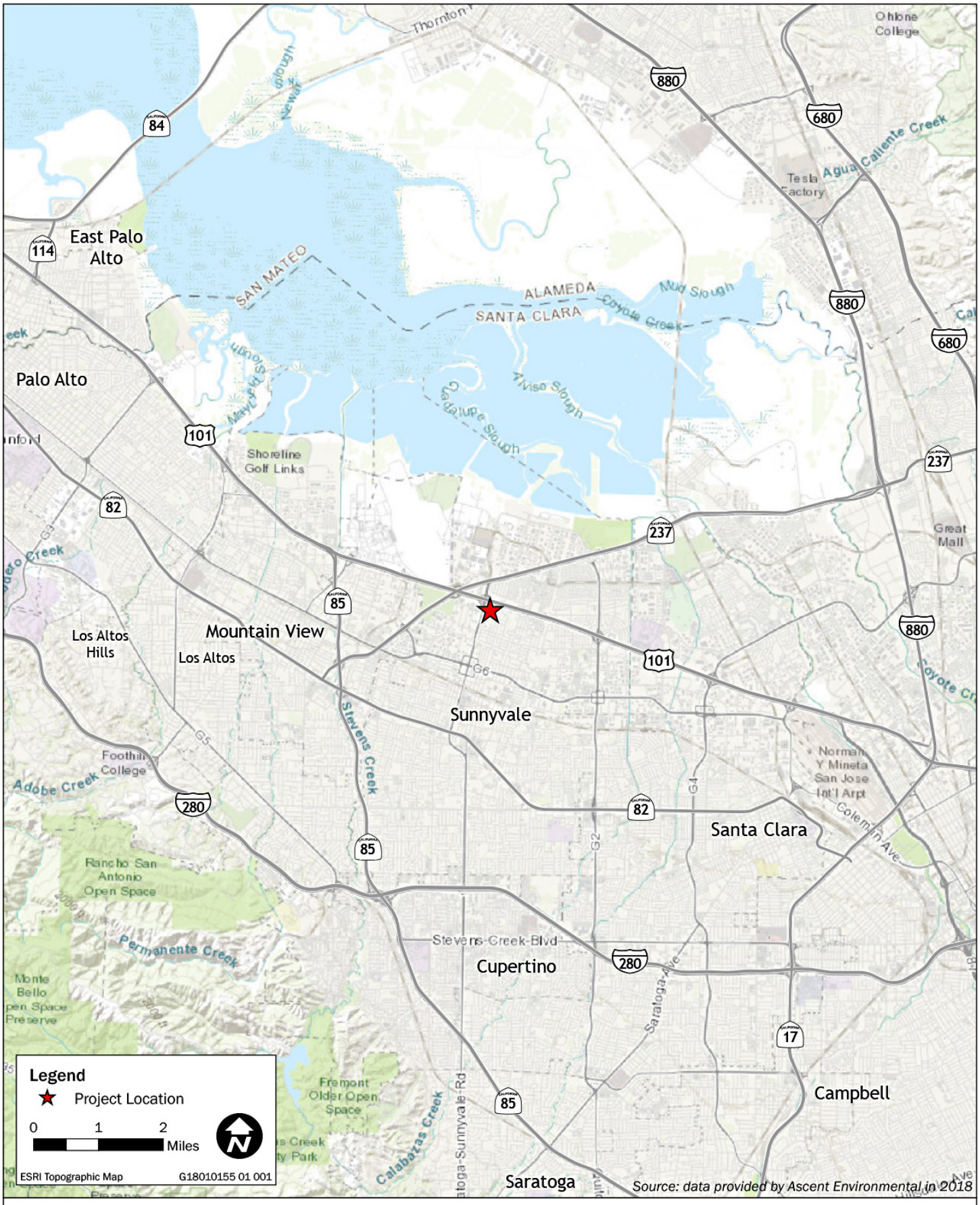
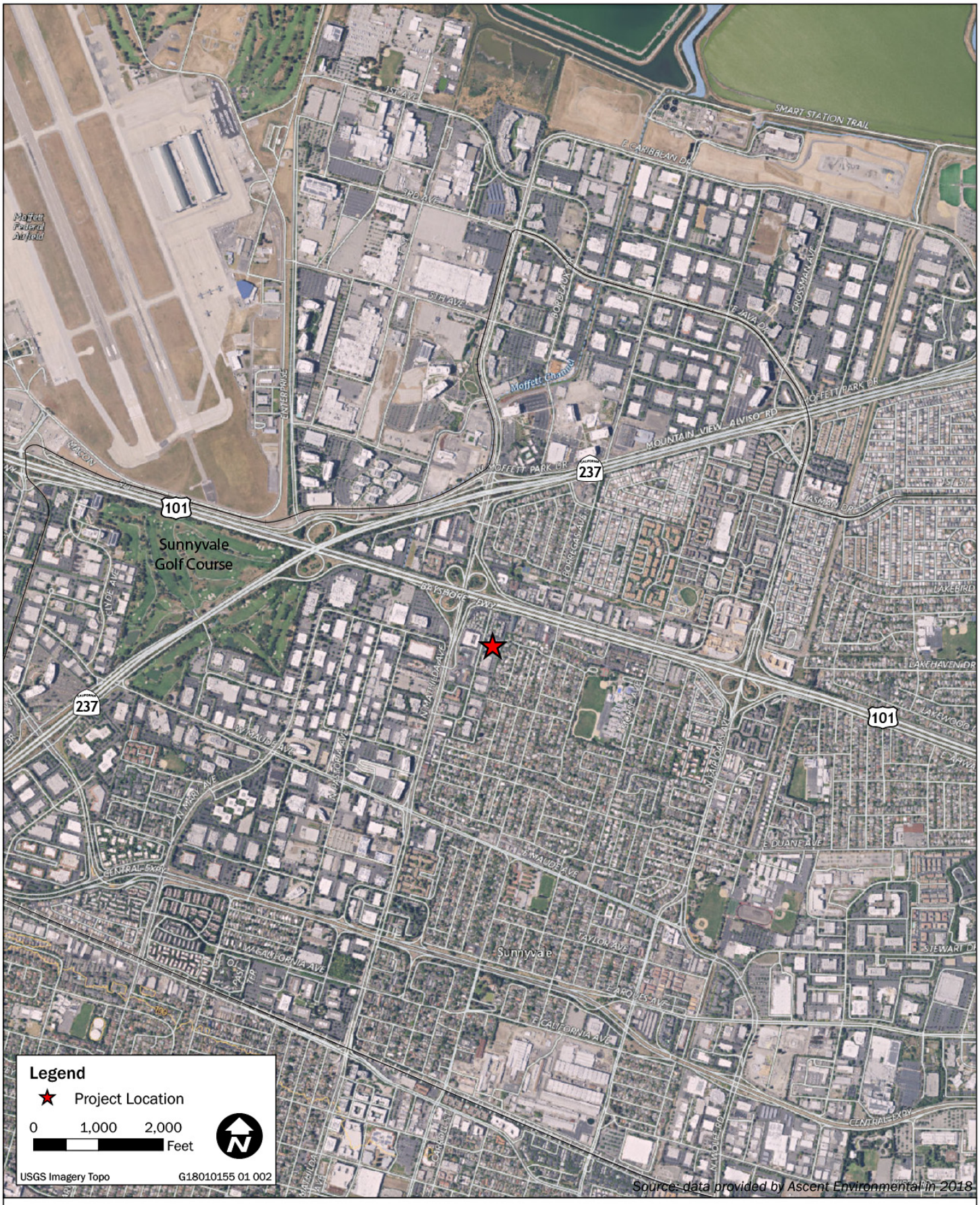


Exhibit 2-1 **Regional Location**



Source: data provided by Ascent Environmental in 2018

Exhibit 2-2 **Project Vicinity**

Exhibit 2-3 **Project Site**

2.5 PROJECT ELEMENTS

The project includes the modification of the existing on-site building into a 400-student capacity high school with the capacity for up to 25 teachers. Interior modifications would remove the existing mezzanine that would reduce the building floor area from 27,012 square feet to 25,590 square feet. Exterior modifications to the project site are shown in Exhibit 2-4, while architectural modifications to the building are shown in Exhibit 2-5. Hours of operation would have staff arriving between 7:00 a.m. and 7:15 a.m. and departing between 4:00 p.m. and 7:00 p.m. Students would arrive between 7:45 a.m. and 8:15 a.m. and departing between 3:25 p.m. and 5:00 p.m. Student drop-off and pick-up would be located on site. Traffic flow for drop-off and pick-up is shown in Exhibit 2-4. There will be no use of the back lot for student breaks or games as well as no outdoor public announcement system usage.

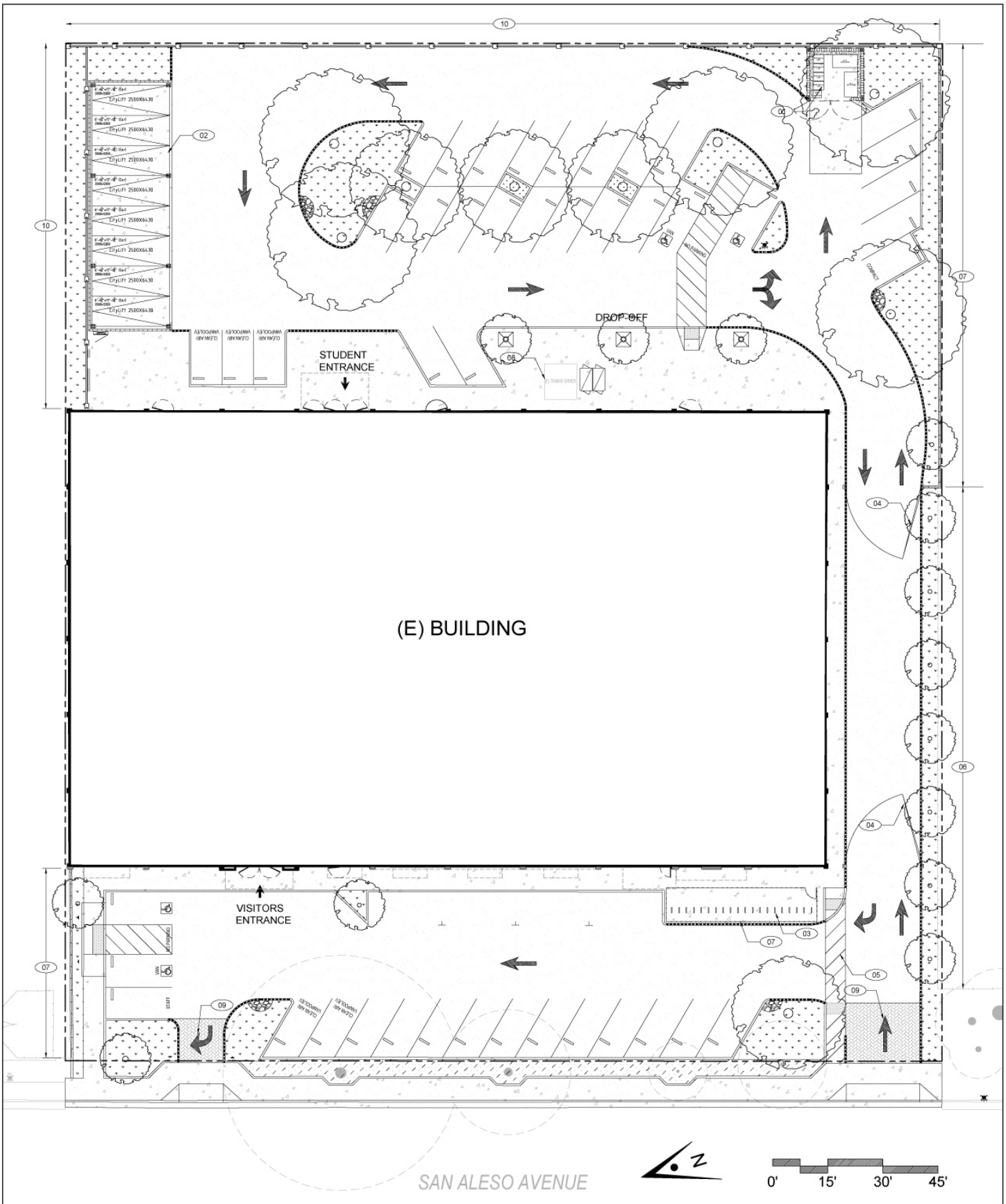
The project would require the modification to a parking lot to provide necessary off-street parking along with a new traffic flow for pick-up and drop-off. The parking area would include new landscaping and an installation of a 3-level parking lift structure for 22 parking spaces in the northeast corner of the property. The building modifications include changes to the first floor by adding classrooms in exchange for the open work spaces that previously existed in the building. The project also includes the removal of an existing mezzanine level located within the existing building. The mezzanine level is contained within the floor plan of the building. . The project site drainage flows would be changed to put more pervious surfaces along the sides of the building. Existing on-site utility connections for water, wastewater, sewer, and stormwater would not be used and are required to be upgraded with the existing connections demolished or abandoned per City requirements. Project site frontage improvements are based on the adopted PPSP. The PPSP created standards for sidewalk configuration but an exception from the standard for sidewalk configuration was made for this project to maintain and accommodate keeping three existing street trees, requiring the development to remove the existing curb, gutter, and sidewalk and only install new 2-inch gutter and curb with 6-inch wide attached sidewalk along the project frontage.

Project construction would be approximately 10 months. The school is expected to open in 2019.

2.6 REQUIRED ACTIONS

The project would require the following actions by the City. No other agency actions would be required.

- Use Permit approval



Source: Image prepared by Artik in2017 and provided to Ascent in 2018

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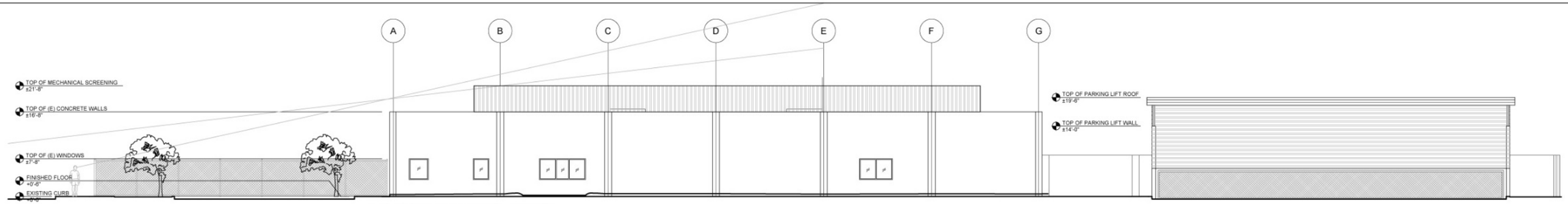
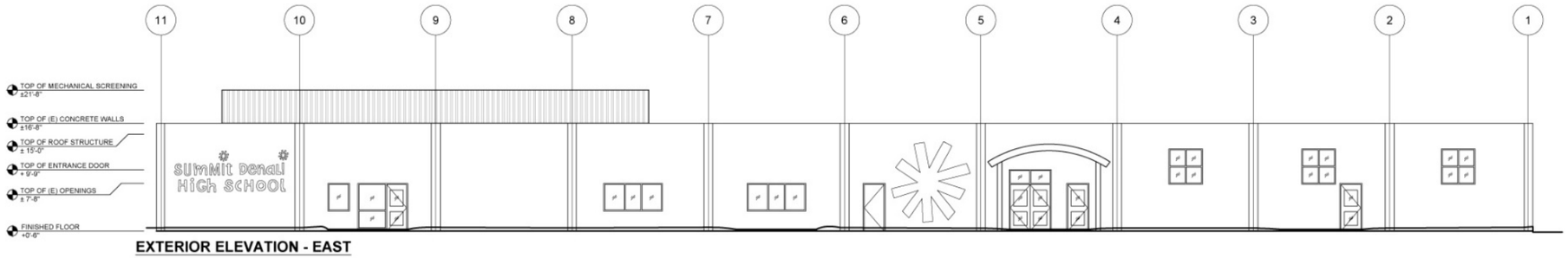
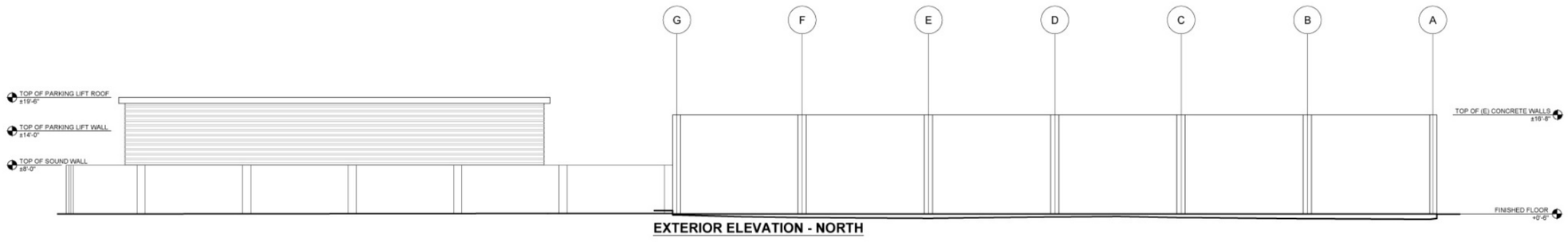
Exhibit 2-4 **Site Plan**



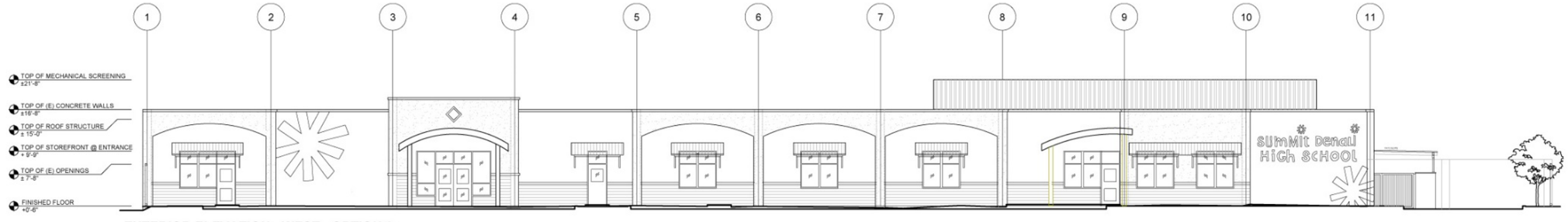
EXTERIOR ELEVATION - SOUTH



EXTERIOR ELEVATION - EAST



EXTERIOR ELEVATION - NORTH



EXTERIOR ELEVATION - WEST - OPTION 3a

Source: Image prepared by Artik in2017 and provided to Ascent in 2018

X18010155.01 002

Exhibit 2-5

Proposed Architectural Renderings

3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The Peery Park Specific Plan (PPSP) EIR was prepared at the program "first-tier" level of environmental review consistent with the requirements of California Environmental Quality Act (CEQA) Sections 15152 and 15168. The program-level analysis considered the broad environmental impacts of the overall PPSP. This project is being evaluated to determine whether the entitlements/actions proposed fall within the scope of the approved EIR and incorporate all applicable performance standards and mitigation measures identified therein. Should the subsequent development phases not be consistent with the approved PPSP, additional environmental review through the subsequent review provisions of CEQA for changes to previously-reviewed and approved projects may be warranted (State CEQA Guidelines Sections 15162 through 15164).

The purpose of this checklist is to evaluate the categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in environmental impact significance conclusions different from those found in the PPSP EIR. 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 CEQA Section 21166 and State CEQA Guidelines Section 15162. 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 PPSP 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 PPSP EIR, and the environmental impact significance conclusions of the PPSP 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 PPSP Final EIR where information and analysis may be found relative to the environmental issue listed under each topic.

Do Proposed Changes Involve New Significant Impacts?

The significance of the environmental impacts of the project-specific features not considered in the PPSP and its EIR (i.e., off-site intersection improvement), is indicated in the columns to the right of the environmental issues.

Any new Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or having substantial increases in the severity of previously identified significant impacts.

Any New Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether 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 environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that

significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the Mitigation Measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the Mitigation Measure or alternative, the question would be answered "yes" requiring the preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered "no" and no additional EIR documentation (supplement to the EIR or subsequent EIR) would be required.

Notably, where the only basis for preparing a subsequent EIR or a supplement to an EIR is a new significant impact or a substantial increase in the severity of a previously identified impact, the need for the new EIR can be avoided if the project applicant agrees to one or more mitigation measures that can reduce the significant effect(s) at issue to less than significant levels. (See *River Valley Preservation Project v. Metropolitan Transit Development Board* (1995) 37 Cal.App.4th 154, 168.)

Do Prior Environmental Documents Mitigations Address/Resolve Impacts?

This column indicates whether the prior environmental documents 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. A "yes" response will be provided in either instance. If "NA" is indicated, this Environmental Checklist Review concludes that there was no impact, 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 PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
1. Aesthetics. Would the project:					
a. Have a substantial adverse effect on a scenic vista?	Final EIR Setting pp. 3.1-1 to 3.1-16 Impact AES-1	Less Than Significant	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?	Final EIR Setting pp. 3.1-1 to 3.1-16 Impact AES-1	Less Than Significant	No	No	NA, no impact would occur.
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	Final EIR Setting pp. 3.1-1 to 3.1-16 Impacts AES-2, AES-3, AES-4, and AES-5	Less Than Significant	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?	Final EIR Setting pp. 3.1-1 to 3.1-16 Impact AES-6	Less Than Significant	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 PPSP EIR Section 3.1, Aesthetics and Visual Resources, has occurred since certification of the EIR in September 2016.

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

See discussion under item b) below.

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

Impact AES-1 of the PPSP EIR evaluated whether implementation of the PPSP would block or diminish public views of a scenic vista or views of scenic resources from a designated state scenic highway. The analysis noted that the PPSP area does not contain any designated scenic vistas, and that the topography of the area is flat and does not contain any unique topographic features that would offer a scenic view. The analysis also noted that there are no designated State scenic highways within the vicinity of the PPSP area, and no portions of the City encompass the viewshed of a state scenic highway.

As described in the PPSP EIR Section 3.1, Aesthetics and Visual Resources, there are no scenic vistas within the plan area, and the plan area is not located near or visible from any officially designated state or county scenic highway. Therefore, no impact would occur for build out under the PPSP or for the project.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Impact AES-2 of the PPSP EIR described the permanent changes to the visual character of the PPSP area from development, and concluded that impacts from implementation of the PPSP would be less than significant. While the changes to the existing visual character would be substantial, Sunnyvale's development review process along with PPSP development standards and design guidelines would ensure that the design of new structures in the PPSP would enhance the character and quality of the area.

Impact AES-3 addressed temporary impacts to visual character that would occur during construction and concluded that implementation of the PPSP would result in a less-than-significant impact. While construction activities would include views construction debris and construction equipment, these views would be temporary and would cease upon the completion of construction.

Impact AES-4 evaluated the potential for future development within the PPSP to adversely affect visual resources and concluded that impacts would be less than significant. While there are notable visual resources within or visible from the project, existing view corridors would be preserved or new corridors provided. Furthermore, the PPSP would retain the established public street grid and infrastructure, which would preserve existing channelized regional views.

Impact AES-5 evaluated the visual impacts that would occur with the loss of existing trees and concluded that compliance with the City Tree Ordinance would ensure that impacts would be less than significant. Sunnyvale's City Tree Ordinance and Urban Forest Management Plan (UFMP) require permits for removal and replacement for the loss of certain trees.

The project is entirely within and consistent with the land use development assumptions of the PPSP. Building and site designs proposed comply with PPSP design guidelines as evaluated in the PPSP EIR. No changes to the visual character of the site or surrounding areas have occurred since approval of the PPSP and certification of its EIR. The project also includes modifications to preserve three existing street trees on the site. Therefore, no new significant impacts or substantially more severe impacts would occur, and the findings of the certified PPSP EIR 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?

As identified in Impact AES-6, there are existing sources of nighttime lighting and glare in the plan area because it is in a developed, urban area. Under the PPSP, land use intensity and building heights may increase as existing low-rise buildings are replaced with taller structures. Impact AES-6 concluded that compliance with the Sunnyvale Municipal Code standards on lighting would ensure that PPSP impacts related to light and glare would not be significant.

The project would modify an existing building but would not increase its square footage, height, or substantially alter its character. The project would maintain the existing parking lot, would include new landscaping, and a 3-story parking structure. The parking structure would be constructed from nonreflective materials to prevent new sources of glare. Light within the structure would be downcast lighting in compliance with City Code and the PPSP EIR analysis to prevent substantial light affecting day or nighttime views. These features would not drastically change the existing lighting structure and they were fully addressed in the PPSP EIR. The project would not substantially change the type of intensity of development proposed for the project site as evaluated in the PPSP EIR. The project is consistent with the PPSP and there are no additional lighting or glare impacts not previously analyzed in the PPSP EIR. Compliance with city standards would ensure that potential light and glare impacts are reduced to a level that would be less than significant for the PPSP under project and cumulative conditions.

No changes in the proposed nighttime lighting conditions for the project site have occurred since approval of the PPSP. Therefore, no new significant impacts or substantially more severe impacts would occur. The findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

No significant aesthetic impacts were identified in the PPSP 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, the conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts to aesthetics.

4.2 AGRICULTURE AND FOREST RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
2. Agriculture and Forestry Resources. Would the project:					
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 PPSP area.		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 PPSP area.		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 PPSP area.		No	No	NA
d. Result in the loss of forest land or conversion of forest land to non-forest land?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA
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 PPSP area.		No	No	NA

4.2.1 Discussion and Conclusion

Agricultural and forestry impacts were scoped out of the PPSP EIR at the Notice of Preparation stage as these resources do not exist in the PPSP area. 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 PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
3. Air Quality. Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	Final EIR Setting pp. 3.2-1 to 3.2-9 Impact AQ-4	Less Than Significant	No.	No	NA, impact remains less than significant
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Final EIR Setting pp. 3.2-1 to 3.2-9 Impacts AQ-1 and AQ-5	Significant and Unavoidable	No.	No	Yes, but impact remains significant and unavoidable.
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Final EIR Setting pp. 3.2-1 to 3.2-9 Impact AQ-2	Significant and Unavoidable	No.	No	Yes, but impact remains significant and unavoidable
d. Expose sensitive receptors to substantial pollutant concentrations?	Final EIR Setting pp. 3.2-1 to 3.2-9 Impact AQ-3	Significant and Unavoidable	No.	No	Yes, but impact remains significant and unavoidable
e. Create objectionable odors affecting a substantial number of people?	Final EIR Setting pp. 3.2-1 to 3.2-9 Impact AQ-6	Less Than Significant	No.	No	NA, impact remains less than significant.

4.3.1 Discussion

Since certification of the PPSP Final EIR in September 2016, the Bay Area Air Quality Management District (BAAQMD) has certified the 2017 Clean Air Plan. The PPSP Final EIR analyzed consistency with the Bay Area Air Quality Management District's (BAAQMD's) 2010 Clean Air Plan. Since certification of the PPSP EIR, BAAQMD adopted the 2017 Clean Air Plan: Spare the Air—Cool the Climate (2017 Clean Air Plan) which will be the Plan used in this analysis. The analysis below utilizes the *Summit High School Air Quality and GHG Assessment* prepared by Illingworth & Rodkin in October 2018 (Illingworth & Rodkin 2018a).

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

Impact AQ-4 of the PPSP EIR evaluated whether the PPSP would conflict with or obstruct implementation of the applicable air quality plan. The analysis noted that while implementation of the PPSP would introduce new residential housing to the area, this growth is consistent with regional planning documents and aligns with the policies of the City's General Plan. Similar to the 2010 Plan, 2017 Clean Air Plan includes various control strategies to reduce emissions of local and regional pollutants and promote public health and energy conservation. As stated in Impact AQ-4 of the PPSP EIR, the PPSP is consistent with the 2010 Clean Air Plan. As summarized in the *Summit High School Air Quality and GHG Assessmen*t, the project would not produce emissions above the recommended BAAQMD adopted thresholds for construction and operational emissions

of air pollutants (i.e., 54 pounds per day [lb/day] for reactive organic gases [ROG], oxides of nitrogen [NO_X], and fine particulate matter [$PM_{2.5}$]; and 82 lb/day for respirable particulate matter [$PM_{2.5}$]). These thresholds were developed by BAAQMD in consideration of the attainment and nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB) for the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for criteria air pollutants. Based on the BAAQMD's justification report that accompanies the 2017 CEQA Air Quality Guidelines, projects that emit levels of criteria air pollutants and ozone precursors below these thresholds would not contribute to regional nonattainment of the NAAQS or CAAQS for ozone, PM_{10}, or $PM_{2.5}$. As such, the project would be consistent with the 2017 Clean Air Plan and would therefore not increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations. Therefore, this impact is considered less than significant for the project.

No changes in the air quality conditions for the project site have occurred since approval of the PPSP. The project would not include any development beyond that assumed and analyzed in the PPSP EIR. Therefore, no new significant impacts or substantially more severe impacts would occur related to conflicts with or obstruction of implementation of air quality plans. The findings of the certified PPSP EIR remain valid and no further analysis is required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction

Impact AQ-1 evaluated whether implementation of the PPSP would result in construction emissions that would substantially contribute to air pollution or result in a projected air quality violation. Construction of the PPSP would include demolition of existing buildings and construction of new buildings. Demolition and removal of existing buildings, parking lots, and other improvements can generate dust and possible hazardous emissions due to the use of hazardous materials used in older buildings. New construction could generate dust and particulate matter from soil disturbance. The use of heavy equipment for demolition and construction activities would generate exhaust emissions such as NO_X, sulfur dioxide (SO_2), carbon monoxide (CO), volatile organic compounds (VOCs), ROG, PM_{10}, $PM_{2.5}$ and other toxic air contaminants (TACs) including diesel PM. The analysis assumed that construction activities would begin in mid-2017 with most construction occurring within the first five years and continue through 2034.

Table 3.2-7 of the PPSP EIR identified maximum daily construction emissions for ROG, NO_X, PM_{10}, and $PM_{2.5}$ from the entire PPSP. Mitigation measure MM AQ-1 requires projects within the PPSP to comply with best management practices to reduce fugitive dust as required by BAAQMD, including watering of exposed surfaces and limits on vehicle speed. Mitigation measure MM AQ-2 requires projects within the PPSP to comply with measures to reduce emission generation, including limitations on diesel equipment idling and use of low-VOC coatings. While these measures would reduce emissions during construction, emissions were anticipated to exceed thresholds despite mitigation. Therefore, short-term construction-related emissions for the PPSP were determined to be a significant and unavoidable impact.

As discussed in the *Summit High School Air Quality and GHG Assessmen*t prepared for the project, the project would reuse an existing industrial building that would require minor improvements, which would not require the use of heavy-duty construction equipment. As such, construction emissions would be well below the relevant daily construction thresholds of significance for ROG, NO_X, PM_{10}, and $PM_{2.5}$ as recommended by BAAQMD. The report noted that no new or more severe construction impacts were identified, and that no new mitigation measures would be required.

Operation

Impact AQ-5 evaluated whether operation of the PPSP would result in a considerable net increase in criteria air pollutants. Operational emissions would be generated by energy, area, and mobile sources as part of the normal day-to-day activities within the PPSP. Energy related emissions would be indirectly emitted for space

and water heating. Area sources would include use of landscaping equipment, fireplaces, and consumer products (e.g., paint, aerosols). Mobile source emissions would occur from on-road vehicles traveling to and from the PPSP. Emissions from operation include ROG, NO_X, PM_{10}, and $PM_{2.5}$.

Table 3.2-13 of the PPSP EIR shows the maximum daily estimate for operational emissions for ROG, NO_X, PM_{10}, and $PM_{2.5}$ for the entire PPSPROG and NO_X emissions would exceed BAAQMD thresholds, while PM_{10} and $PM_{2.5}$ emissions would not exceed thresholds. The analysis noted that no mitigation measures were available to reduce these emissions, and this impact was determined to be significant and unavoidable.

As identified in *Summit High School Air Quality and GHG Assessmen*t, operational emissions associated with the project would be below BAAQMD's land use size screening criteria for a high school of 2,390 students. The estimated student population of the project is projected to be 400 students, which is below BAAQMD's screening criteria for operational criteria air pollutants. As such, The report noted that no new or more severe operational impacts were identified, and that no new mitigation measures would be required.

No changes in the air quality conditions for the project site have occurred since approval of the PPSP. As discussed above, the report prepared for the project determined that the project would not result in any new severe construction or operational emissions as compared those identified in the PPSP EIR. Therefore, no new significant impacts or substantially more severe impacts would occur. The findings of the certified PPSP EIR remain valid and no further analysis is required.

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Impact AQ-2 evaluated whether PPSP traffic, together with other cumulative traffic in the area, would incrementally increase CO levels in the vicinity. The analysis noted that the PPSP could contribute to decreased level of service (LOS) at nearby intersections, resulting in additional vehicle emissions and longer vehicle idling times. Increased congestion and vehicle idling could incrementally increase CO levels at area intersections. The analysis referenced the Traffic Study (included as Appendix H to the PPSP EIR), which identified intersections that would experience a decrease in LOS following implementation of the PPSP. Mitigation measure MM T-6a requires PPSP property owners to join a Transportation Management Association (TMA) to help facilitate traffic demand management (TDM) programs for tenants within the PPSP area. Mitigation measure MM T-6b requires project applicants to pay a fair share transportation impact fee to fund improvements required by increased development in the PPSP area. While these mitigation measures would help reduce emissions by reducing vehicle trips during project operation, this impact was determined to be significant and unavoidable.

As discussed in (b), above, the project would not exceed the BAAQMD CEQA thresholds for construction and operational emissions. The project's land use and development intensities are consistent with the PPSP and what was assumed in the PPSP EIR air quality analysis in Section 3.2, Air Quality. Therefore, no new significant impacts or substantially more severe impacts would occur. The findings of the certified PPSP EIR remain valid and no further analysis is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 evaluated whether construction activities would expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors include residences, schools, medical facilities, family day cares, and places of worship. Table 3.2-3 of the PPSP EIR listed 19 sensitive receptors within one mile of the PPSP. Because the SFBAAB was, and continues to be, in nonattainment for ozone (for which ROG and NO_X, are precursors) and $PM_{2.5}$ under the NAAQS and CAAQS, and nonattainment for the PM_{10} under the CAAQS, the analysis concluded that development in the PPSP could impact sensitive receptors. The majority of these emissions would occur primarily during building construction and the application of architectural coatings. Mitigation measures MM AQ-1 and MM AQ-2, discussed previously, would help reduce construction

emissions, but emissions would still be expected to exceed thresholds. While these emissions would be temporary, the impact to sensitive receptors was determined to be significant and unavoidable.

The *Summit High School Air Quality and GHG Assessmen*t considered whether the project would expose sensitive receptors to substantial pollutant concentrations and noted that the PPSP EIR did not include a project-level analysis of potential impacts to sensitive receptors. The report evaluated whether construction activities associated with the project would expose sensitive receptors to unhealthy concentrations of pollutants. As summarized in the Assessment, total project construction activities would generate 17 pounds per day (lb/day) of PM_{10} and 10 lb/day of $PM_{2.5}$, which are criteria air pollutants often used to represent the TAC, diesel PM. Using dispersion modeling techniques recommended by BAAQMD, these emissions would generate concentrations of diesel PM less than 0.1 in one million, which is below the BAAQMD thresholds of 10.0 in one million for cancer risk.

Beyond construction activity, the project does not introduce any sources of TACs; however, the project would introduce sensitive receptors (i.e., students) to existing sources of TACs.

Community risk thresholds address chronic or long-term exposures that include lifetime cancer risk and annual concentrations of $PM_{2.5}$. Due to the nature of the project, these lifetime and annual exposure values were adjusted to reflect the limited exposure of students as students are only present at a school for a relatively short portion of their life (i.e., 10 hours per day, 5 days per week, 180 days per year, and 4 years during a lifetime). These factors were adjusted based on BAAQMD and the Office of Environmental Health Hazards Assessment (OEHHA) guidance.

The report identified Highway 101 and Mathilda Avenue and two mobile sources of TACs as well as two BAAQMD-permitted stationary sources within 1,000 feet of the project site, which could affect the site. The report concluded that the combination of TACs from these sources would not produce concentrations in exceedance BAAQMD thresholds of significance for cancer risk and annual $PM_{2.5}$ exposure.

Typical construction activities generate TACs; however, as noted previously, implementation of the project would not require the use of heavy-duty construction equipment. Further, there are no sensitive receptors within 1,000 feet of the site. Therefore, construction-related TAC emissions associated with the project would be less than significant. The report concluded that project construction would not result in any new or more severe construction impacts, and no new mitigation measures were recommended.

The report also stated that operation of the project would not be expected to result in localized emissions that could expose sensitive receptors to unhealthy air pollutant levels. The report concluded that the project would not result in any new or more severe impacts, and no new mitigation measures were recommended.

For both construction and operation of the project, no new significant impacts or substantially more severe impacts would occur. The findings of the certified PPSP EIR remain valid and no further analysis is required.

e) Create objectionable odors affecting a substantial number of people?

Impact AQ-6 evaluated whether the PPSP would create objectionable odors affecting a substantial number of people. Potential sources of odor during construction include construction equipment exhaust and application of asphalt and architectural coatings. These impacts would be temporary and intermittent. Standard construction requirements would be imposed to minimize construction odors. Therefore, impacts from construction were determined to be less than significant.

Potential sources of odor during operation of the PPSP include cooking and temporary storage of typical household solid waste. However, these odors would be similar to existing food service and housing uses in the surrounding area, and would not typically be considered offensive. Also, any new project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Therefore, uses under the PPSP would not generate odors affecting a substantial number of people, and this impact would be less than significant.

The project is consistent with the development and use assumptions analyzed in the PPSP EIR, and would not be expected to result in the installation of any major odor emission sources. In addition, no existing major stationary sources of odors have been identified in the plan area. Therefore, long-term exposure to odorous emissions would be considered less than significant for the PPSP. The project consists of school uses and is not a major source of odorous emissions would also be less than significant.

Mitigation Measures

The following mitigation measures were referenced in the PPSP EIR analysis and would be implemented if the project were approved.

- **MM AQ-1: Fugitive Dust Plan.** New development and redevelopment within the Project shall comply with the following construction-related measures to reduce fugitive dust:

  1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

  2. All haul trucks transporting soil, sand, or other loose material offsite shall be covered.

  3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

  4. All vehicle speeds on unpaved roads shall be limited to 15 mph.

  5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

  6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

  7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

  8. A publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

- **MM AQ-2: Construction-Related Emissions Reduction Plan.** New development and redevelopment within the Project shall comply with the following construction-related measures to reduce emissions generation:

  1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.

  2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour (mph).

  3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.

4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.

5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.

6. All trucks and equipment, including tires, shall be washed prior to the vehicle leaving the site.

7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.

8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.

9. The idling time of diesel powered construction equipment shall be minimized to 2 minutes.

10. The Project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project-wide fleet average of 20 percent NOX reduction and 45 percent particulate matter reduction compared to the most recent California ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.

11. Low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings) shall be used.

12. All construction equipment, diesel trucks, and generators shall be equipped with Best Available Control Technology for emission reductions of NOx and particulate matter.

13. All contractors shall be required to use equipment that meets California ARB's most recent certification standard for off-road heavy duty diesel engines.

- **MM T-6a: Transportation Management Agency.** The City of Sunnyvale shall require individual property owners to join a Transportation Management Association (TMA) to help facilitate TDM programs for tenants within the Project area.

- **MM T-6b: Transportation Impact Fee.** Project applicants in the Project area shall be required to pay a fair share transportation impact fee to the City that funds costs associated with the increased development to the Project area.

CONCLUSION

As required by many of the air quality mitigation measures adopted as part of the PPSP, the project provides additional project-level air quality analysis. While the project-specific analyses provide additional detail for the project site, the project would not result in new or substantially more severe significant impacts to air quality. The conclusions of the PPSP EIR remain valid and no additional analysis is required.

4.4 BIOLOGICAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
4. Biological Resources. Would the project:					
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 U.S. Fish and Wildlife Service?	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA
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?	Scoped out at Notice of Preparation stage. Resources do not exist in the PPSP area.		No	No	NA

4.4.1 Discussion and Conclusion

Biological resources impacts were scoped out of the PPSP EIR at the Notice of Preparation stage as the PPSP area is currently developed and no sensitive habitat conditions exist. The project would not involve tree removal.

No new circumstances or project changes have occurred nor has any new information been identified requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of project would not result in new or substantially more severe significant impacts to biological resources.

4.5 CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
5. Cultural Resources. Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Final EIR Setting pp. 3.3-1 to 3.3-6 Impacts CR-1 and CR-2	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable.
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Final EIR Setting pp. 3.3-1 to 3.3-6 Impact CR-4	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Final EIR Setting pp. 3.3-1 to 3.3-6 Impact CR-3	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
d. Disturb any human remains, including those interred outside the formal cemeteries?	Final EIR Setting pp. 3.3-1 to 3.3-6 Impact CR-5	Less Than Significant	No	No	NA, impact remains less than significant.

4.5.1 Discussion

In September 2016, the project applicant requested a report from the Northwest Information Center (NWIC) of the California Historic Resources Information System (CHRIS). The letter report (CHRIS 2016) noted that a review of records indicates there is no record of any cultural resources studies that formally covered the Peery Park project area. While this project area contains no recorded archaeological resources, there is one archaeological site located adjacent to the project area that was determined eligible to the National Register of Historic Places (NRHP). The State Office of Historic Preservation Historic Property Directory (OHP HPD) (which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places) lists no recorded buildings or structures adjacent to the project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the project area. The report also noted the high potential for Native American archaeological resources, and recommended steps that should be taken in the event of discovery of previously-unknown resources. As discussed below, the PPSP EIR included mitigation measures (MM CR-5 and MM CR-6) to reduce impacts related to accidental discovery of previously-unknown resources. The building at 820 and 824 San Aleso Avenue has been evaluated for listing on the California Register of Historical Resources (CRHR) and Section 19.96.050 (heritage resource criteria) of the City of Sunnyvale Municipal Code (Ascent 2018). The building does not appear to meet CRHR or City criteria and therefore is not considered to be a historic resource under CEQA.

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Impact CR-1 of the PPSP EIR identified one Local Landmark within the PPSP area, the Libby Tower. While the PPSP does not propose removal of the Libby Tower, adjacent grading, demolition, and construction activities could potentially damage the Libby Tower. The PPSP EIR noted that any future activities that may result in impacts to the Libby Tower would be subject to review by the Heritage Preservation Commission. Assuming compliance with established resource protection policies, impacts to this resource would be less than significant.

Impact CR-2 evaluated potential impacts to the City-designated Heritage Resource, Mellow's Nursery and Farm. Mitigation measure MM CR-1 requires preparation of a historical record of Mellow's Nursery and Farm in the event of demolition, redevelopment, or alteration of the property. Mitigation measure MM CR-2 requires preservation and relocation of the Mellow's Nursery House in the event that the former nursery site is developed. Despite these mitigation measures, the PPSP EIR concluded that impacts to this City-designated Heritage Resource would be significant and unavoidable.

The project site does not include the Local Landmark or City-designated Heritage Resource, or land adjacent to these resources. The existing building does not appear to meet CRHR or City criteria and therefore is not considered to be a historic resource under CEQA (Ascent 2018). Therefore, the findings of the certified PPSP EIR remain valid.

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

Impact CR-4 of the PPSP EIR noted that while implementation of the PPSP would not directly impact known archaeological resources, there is a possibility that buried archaeological resources could be uncovered during construction activities. Mitigation measure MM CR-5 requires that projects that inadvertently discover buried archaeological resources apply a program to identify, evaluate, and mitigate impacts on those resources. Mitigation measure CR-6 requires cessation of work and notification of the City in the event that any archaeological resources is inadvertently discovered. Together, these mitigation measures would protect previously unknown archeological resources, and would reduce this impact to less than significant.

While the discovery of archaeological resources is not anticipated on the project site, mitigation measures MM CR-5 and MM CR-6 would reduce potential impacts of the project. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid.

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

Impact CR-3 stated the no paleontological resources have been identified in the PPSP area, but that previously unknown resources could be discovered during construction activities. Mitigation measure MM CR-3 requires a qualified Paleontological Monitor for excavation activities with a depth that exceeds six feet. Mitigation measure MM CR-4 requires identification, evaluation, and, if appropriate, protection of fossils discovered during construction activities. Together, these mitigation measures would reduce potential impacts to paleontological resources to a less-than-significant level.

While the discovery of paleontological resources is not anticipated on the project site, mitigation measures MM CR-3 and MM CR-4 would reduce potential impacts of the project. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid.

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

Impact CR-5 evaluated the potential for the PPSP to uncover previously undiscovered human remains, including Native American human remains. California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and California Public Resources Code Section 5097.98 mandate the process to be followed in the event of accidental discovery of human remains in a location other than a dedicated

cemetery. These sections also provide guidance if the remains are determined to be Native American. The PPSP EIR concluded that compliance with these existing regulations would protect human remains, and that implementation of the PPSP would result in less than significant impacts related to human remains, including Native American human remains. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid.

Mitigation Measures

The following mitigation measures were adopted with the PPSP and would continue to remain applicable if the project is approved.

- **MM CR-3: Paleontological Monitoring.** Construction activities involving excavation or other soil disturbance to a depth greater than 6 feet within the Project area shall be required to retain a qualified Paleontological Monitor as defined by the Society for Vertebrate Paleontology (SVP) (2010) equipped with necessary tools and supplies to monitor all excavation, trenching, or other ground disturbance in excess of 6 feet deep. Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected if necessary. The Paleontological Monitor will periodically assess monitoring results in consultation with the Principal Paleontologist. If no (or few) significant fossils have been exposed, the Principal Paleontologist may determine that full-time monitoring is no longer necessary, and periodic spot checks or no further monitoring may be recommended. The City shall review and approve all such recommendations prior to their adoption and implementation.

- **MM CR-4: Inadvertent Discovery of Fossils.** If fossils are discovered during excavation, the Paleontological Monitor will make a preliminary taxonomic identification using comparative manuals. The Principal Paleontologist or his/her designated representative will then inspect the discovery, determine whether further action is required, and recommend measures for further evaluation, fossil collection, or protection of the resource in place, as appropriate. Any subsequent work will be completed as quickly as possible to avoid damage to the fossils and delays in construction schedules. If the fossils are determined to be significant under CEQA, but can be avoided such that no further impacts will occur, the fossils and locality will be documented in the appropriate paleontological resource records and no further effort will be required. At a minimum, the paleontological staff will assign a unique field number to each specimen identified; photograph the specimen and its geographic and stratigraphic context along with a scale near the specimen and its field number clearly visible in close-ups; record the location using a global positioning system (GPS) with accuracy greater than 1 foot horizontally and vertically (if such equipment is not available at the site, use horizontal measurements and bearing(s) to nearby permanent features or accurately surveyed benchmarks, and vertical measurements by sighting level to point(s) of known elevation); record the field number and associated specimen data (identification by taxon and element, etc.) and corresponding geologic and geographic site data (location, elevation, etc.) in the field notes and in a daily monitoring report; stabilize and prepare all fossils for identification, and identify to lowest taxonomic level possible by paleontologists, qualified and experienced in the identification of that group of fossils; record on the outside of the container or bag the specimen number and taxonomic identification, if known. Breathable fabric bags will be used in packaging to avoid black mold.

  Upon completion of fieldwork, all significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossil specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Project proponent.

  At the conclusion of laboratory work and museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the Project. The report will include a summary of the field and laboratory methods, an overview of the Project area geology and

paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

- **MM CR-5: Archaeological Data Recovery.** For projects that inadvertently discover buried prehistoric or historic-period archaeological resources, the City shall apply a program that combines resource identification, significance evaluation, and mitigation efforts into a single effort. This approach would combine the discovery of deposits (Phase 1), determination of significance and assessment of the project's impacts on those resources (Phase 2), and implementation of any necessary mitigation (Phase 3) into a single consolidated investigation. This approach must be driven by a Treatment Plan that sets forth explicit criteria for evaluating the significance of resources discovered during construction and identifies appropriate data recovery methods and procedures to mitigate project effects on significant resources. The Treatment Plan shall be prepared prior to issuance of building permits by a Registered Professional Archaeologist (RPA) who is familiar with urban historical resources, and at a minimum shall include:

  - a review of historic maps, photographs, and other pertinent documents to predict the locations of former buildings, structures, and other historical features and sensitive locations within and adjacent to the specific development area;
  - a context for evaluating resources that may be encountered during construction;
  - a research design outlining important prehistoric and historic-period themes and research questions relevant to the known or anticipated sites in the study area;
  - specific and well-defined criteria for evaluating the significance of discovered remains; and
  - data requirements and the appropriate field and laboratory methods and procedures to be used to treat the effects of the project on significant resources.

  The Treatment Plan shall also provide for a final technical report on all cultural resource studies and for curation of artifacts and other recovered remains at a qualified curation facility, to be funded by the developer. To ensure compliance with City and state preservation laws, this plan shall be reviewed and approved by the Historic Landmarks Commission and the City of Sunnyvale Planning Division prior to issuance of building permits (Sunnyvale Planning Commission 2012).

- **MM CR-6: Inadvertent Discoveries.** In the event of any inadvertently discovered prehistoric or historic-period archaeological resources during construction, the developer shall immediately cease all work within 50 feet of the discovery. The proponent shall immediately notify the City of Sunnyvale Planning and Community Development Department and shall retain a Registered Professional Archaeologist (RPA) to evaluate the significance of the discovery prior to resuming any activities that could impact the site. If the archaeologist determines that the find may qualify for listing in the California Register of Historic Resources (CRHR), the site shall be avoided or a data recovery plan shall be developed pursuant to MM CR-5. Any required testing or data recovery shall be directed by an RPA prior to construction being resumed in the affected area. Work shall not resume until authorization is received from the City.

CONCLUSION

No new significant or substantially more severe historic, archaeological, or paleontological resource impacts would occur with the project. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

4.6 GEOLOGY AND SOILS

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
6. Geology and Soils. Would the project:					
a. Expose people or structures to 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 Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA
b. Result in substantial soil erosion or the loss of topsoil?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA
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?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA
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?	Scoped out at Notice of Preparation stage. Resources do not exist in PPSP area.		No	No	NA

4.6.1 Discussion and Conclusion

Geology and Soils impacts were scoped out of the PPSP EIR at the Notice of Preparation stage as development under the PPSP would be required to address geologic and seismic stability as part of site design through required geotechnical review required under the California Building Code and the City's Municipal Code.

4.7 GREENHOUSE GAS EMISSIONS

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
7. Greenhouse Gas Emissions. Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Final EIR Setting pp. 3.4-1 to 3.4-4 Impact GHG-1	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable.
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Final EIR Setting pp. 3.4-1 to 3.4-4 Impact GHG-2	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable.

4.7.1 Discussion

Since the PPSP EIR was certified, several regulatory changes related to climate have occurred within California. Senate Bill 32 was adopted in 2016 and extends the previous state-wide greenhouse gas (GHG) emission reduction target of achieving 1990 emissions levels by 2020 as mandated by Assembly Bill 32 to 40 percent below 1990 emissions levels by the year 2030. However, the City of Sunnyvale GHG reduction targets are still regulated by its Climate Action Plan (CAP) that identifies measures for Sunnyvale to meet the GHG reduction targets of 15 percent below baseline levels by 2020 and progress toward the 80 percent below 1990 levels by 2050 (City of Sunnyvale 2014:ES-5). The CAP also establishes a GHG target of 3.6 metric tons per person in 2020 and 2.6 metric tons per person in 2035 (City of Sunnyvale 2014:ES-7). As stated in the California Air Resources Board's (CARB's) First Update to the Climate Change Scoping Plan (Scoping Plan), "[c]ontinuing progress to the 2050 objective requires California to maintain and build upon its existing programs, scale up deployment of clean technologies, and provide more low-carbon options to accelerate GHG emission reductions, especially after 2020" (CARB 2014:2).

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

Impact GHG-1 of the PPSP EIR evaluated the projected GHG emissions that would result from implementation of the PPSP. Utilizing the GHG emissions threshold of 1,100 tons per year adopted by the Bay Area Air Quality Management District (BAAQMD), the analysis quantified construction and operational GHG emissions, and concluded that the PPSP would exceed the threshold. Mitigation measure MM GHG-1 requires new development within the PPSP to reduce GHG emissions to the greatest extent feasible, including preparation of transportation demand management (TDM) programs and idling limitations for commercial vehicles. Mitigation measure MM GHG-1 would help reduce impacts from vehicle emissions, but the PPSP would still result in a significant and unavoidable impact related to GHG emissions.

As summarized in the *Summit High School Air Quality and GHG Assessment* prepared by Illingworth & Rodkin, the project would not require the use of heavy-duty construction equipment. Because the project would be constructed and operational by 2020, the severity of construction emissions would be evaluated against BAAQMD's 1,100 metric tons of carbon dioxide equivalent ($MTCO_2e$) bright-line threshold (Illingworth & Rodkin 2018a). Due to the project's limited scope of construction activities, annual GHG emissions would be well below this threshold.

Moreover, the project's size is below BAAQMD's operational screening criteria for GHG emissions. BAAQMD identifies land use projects less than 49,000 square feet would not generate significant operational emissions. The project proposed to reuse of an existing building. As such, operational emissions would be below BAAQMD's bright-line significance threshold of 1,100 $MTCO_2e$ for operation emissions. No new or more severe impacts would occur, and no new mitigation measures were recommended.

No changes in the GHG conditions for the project site have occurred since approval of the PPSP. The project would not include any development beyond that assumed and analyzed in the PPSP EIR. Therefore, no new significant impacts or substantially more severe impacts would occur related to GHG emissions. The findings of the certified PPSP EIR 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?

Impact GHG-2 evaluated the PPSP's consistency with standards in the City's LUTE and CAP. Compliance with the LUTE and CAP would ensure that GHG emissions would conform to local, State, and federal requirements. Policy 12 of the LUTE provides specific policies and requirements for new construction to ensure the City meets its GHG emissions reduction goal. The analysis presented the applicable policies, and discussed whether the PPSP would be consistent with each policy. The only policy for which the PPSP was determined to be potentially inconsistent was LUTE Policy 12 regarding GHG reduction. Policy 12 requires GHG emissions reductions through land use and transportation planning and development. While the PPSP is within an urban area and would include commercial, recreational, and residential uses within walking distance of each other, thus reducing GHG emissions, the analysis noted that the PPSP would result in 18,539 MTCO2e, which exceed the BAAQMD's 1,100 $MTCO_2e$ threshold. Therefore, the impact was determined to be significant and unavoidable.

Development under the project would be within the land use intensities and assumptions analyzed in the PPSP EIR. Therefore, the project would not result in new or more severe significant impacts related to conflicts with or obstruction of implementation of GHG reduction plans. The findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

The following mitigation measures were referenced in the PPSP EIR analysis and would be implemented if the project were approved.

- **MM GHG-1.** The following measures shall be implemented to reduce impacts from vehicle emissions:
  - To the greatest extent feasible, ensure new development within the Project area implements City programs to reduce GHG emissions, including requiring preparation of transportation demand management (TDM) plans for new development, which provide incentives to employees to carpool/vanpool, use public transportation, telecommute, walk, bike, as well as other approaches to reduce vehicle trips. Further, priority parking shall be assigned for car- and van-pooling employees, as supported by the City's TDM program requirements.
  - Limit idling time for commercial vehicles, including delivery and construction vehicles.

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts to GHG emissions.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
8. Hazards and Hazardous Materials. Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impacts HAZ-1 and HAZ-2	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impacts HAZ-1 and HAZ-2	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impacts HAZ-1 and HAZ-2	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
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?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impacts HAZ-1 and HAZ-2	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measures.
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 for people residing or working in the project area?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impact HAZ-3	Less Than Significant	No	No	NA, this impact would remain less than significant.
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	Final EIR page 3.5-11 No Impact	No Impact	No	No	NA
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Final EIR Setting pp. 3.5-1 to 3.5-5 Impacts HAZ-1 and HAZ-2	Less Than Significant With Mitigation	No	No	Yes, impacts would remain less than significant with the application of the adopted mitigation measure.

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
8. Hazards and Hazardous Materials. Would the project:					
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Final EIR page 3.5-11 No Impact	No Impact	No	No	NA

4.8.1 Discussion

No substantial change in the environmental and regulatory settings related to hazards and hazardous materials, described in PPSP Final EIR Section 3.5, Hazards and Hazardous Materials, has occurred since certification of the PPSP EIR.

Mitigation measure MM HAZ-1 of the PPSP EIR requires project applicants to prepare a Phase I Environmental Site Assessment (Phase 1 ESA) prior to demolition activities. A Phase I ESA was prepared for the Summit High School project by PES Environmental, Inc in 2017 and a Phase 2 also in 2017 (PES Environmental Inc. 2017a and 2017b).

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

See discussion under item d) below.

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?

See discussion under item d) below.

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

See discussion under item d) below.

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?

Impact HAZ-1 of the PPSP EIR evaluated whether demolition and construction activities associated with development under the PPSP would create hazards to the public and environment through the release of hazardous building materials and hazardous materials within existing buildings. The analysis noted that the majority of existing buildings in the PPSP were constructed in the 1960s and 1970s, and are therefore likely to have been constructed with hazardous building materials such as lead and asbestos. In addition, fluorescent light tubes containing mercury vapors, fluorescent light ballasts containing PCBs, and PCB-containing electrical equipment may be present in the buildings. Also, several buildings within the PPSP could use or store hazardous materials. Demolition of these buildings could expose hazardous materials if not handled properly.

Renovation and demolition activities are required to follow BAAQMD and California Department of Occupational Safety and Health (Cal/OSHA) regulations regarding abatement of asbestos-containing materials and lead-based paint. Additional regulations govern the handling and abatement of PCB-containing materials. The Sunnyvale Municipal Code also includes requirements for the management of hazardous materials. Mitigation measure MM HAZ-1 requires project applicants to prepare a Phase I ESA prior to demolition activities. The mitigation measure also requires preparation of a project-specific hazardous materials management plan and/or safety plan if the Phase I ESA determines that there is contamination on the project site. Implementation of MM HAZ-1 and compliance with federal, state, and local regulations related to hazardous materials would reduce the PPSP's impacts to less than significant.

Impact HAZ-2 evaluated whether implementation of the PPSP would increase the routine transport, use, or disposal of hazardous materials. The analysis stated that although implementation of the PPSP could result in greater use of hazardous materials and generation of hazardous waste, all activities would be required to comply with federal, state, and local regulations, including the Sunnyvale Municipal Code requirements for proper storage and handling of hazardous materials. Compliance with federal, state, and local regulations would ensure that the PPSP would have less than significant impacts related to the potential for exposing the public to the release of hazardous materials.

There are no schools located within one-quarter mile of the project site. The closest school to the project site is Columbia Middle School, located 0.4 miles east of the project site.

The project would include the redevelopment of one building, and would be subject to the federal, state, and local regulations discussed in the PPSP EIR. Mitigation measure MM HAZ-1 would also apply to the project and would reduce impacts to a less-than-significant level. A Phase I and II ESA have been prepared for the project (PES 2017a and 2017b). The Phase II ESA identifies the need to remove hazardous building materials (e.g., asbestos containing building materials) in accordance with federal, state, and local regulations, as well as sealing of the building pad to avoid the potential for vapor intrusion from contaminated groundwater. Thus, mitigation measure MM HAZ-1 has been satisfied for the project. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid.

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 for people residing or working in the project area?

Impact HAZ-3 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) designates specific permitted and prohibited uses within the runway safety zones, as well as identifies height restrictions near the airfield. This impact was determined to be less than significant because compliance with the CLUP restrictions would minimize aircraft-related safety hazards. The project site is located outside of the CLUP airport safety zones and would not conflict with airport operations. Thus, no new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The PPSP Final EIR page 3.5-11 identifies that the PPSP area does not include and is not proximate to any private airfield. Therefore, impacts related to private airfield safety were not discussed in the PPSP EIR. No new private airports have been developed near the project area. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

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

See discussion under items a) through d) above. The project would not modify the PPSP roadway network that would obstruct emergency access.

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

As identified on PPSP Final EIR page 3.5-11, the PPSP was determined to have no impact 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 PPSP. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

The following mitigation measures were referenced in the PPSP EIR analysis and would continue to remain applicable if the project was approved.

- **MM HAZ-1: Phase I Environmental Site Assessment (Phase I ESA).** Prior to demolition, project applicants in the Project area shall prepare a Phase I ESA. Consistent with local, state and federal regulations, the Phase I ESA shall be subject to City review and address the following:

  a. Asbestos-Containing Materials (ACM), Lead-Based Paints (LBP), and polychlorinated biphenyls (PCBs). Prior to the issuance of any demolition permit, the Applicant shall conduct a comprehensive survey of ACM, LBP, and PCBs. If such hazardous materials are found to be present, the Applicant shall follow all applicable local, state, and federal codes and regulations, as well as applicable best management practices, related to the treatment, handling, and disposal of ACM, LBP, and PCBs to ensure public safety.

  b. Potential Onsite Hazardous Materials or Conditions. A visual survey and reconnaissance-level investigation of the existing site shall be conducted to determine if there are any structures or features within or near the buildings that are used to store, contain, or dispose of hazardous materials. For any development within the Project area that has not been subject to a Phase I ESA or successful remediation efforts in the past, a Phase I ESA shall be performed to determine the likelihood of contaminants in areas beyond what has already been assessed in accordance with EPA ASTM Practice E 1527- 05 as may be amended. If the Phase I ESA finds that contaminated soil or other hazardous materials are suspected to be present within the area, the Applicant shall follow all applicable local, state and federal codes and regulations, as well as applicable best management practices, related to the treatment, handling, and disposal of each hazardous material. If the Phase I ESA finds contamination, the applicant shall prepare a Project specific hazardous materials management and/or safety plan, which shall require:

     - implementation of a worker health and safety plan (HASP) covering project construction workers and post-construction maintenance workers and groundskeepers who may be potentially exposed to hazardous materials. At a minimum, the HASP shall comply with state and federal worker safety regulations and be protective of worker health consistent with state and federal guidelines. The HASP shall include measures such as training, signage, and personal protective equipment;

     - the site management plan or similar response plan shall include health based goals, consistent with state and federal standards and guidance documents (taking into account the presence of naturally occurring constituents). These goals shall be achieved through one or more of the of the following or similar site management strategies or approaches:

  - excavation or extraction of impacted soil or groundwater and disposal in accordance with applicable regulations;
  - implementation of effective engineering controls (e.g., barriers, caps, onsite encapsulation, mechanical ventilation);
  - onsite treatment of soil or groundwater; or
  - implementation of institutional controls (e.g., land use covenants prohibiting the use of groundwater);
- procedures to provide notice to the City of Sunnyvale Fire Department for the removal of USTs and comply with the substantive City requirements should an UST or other underground structure be discovered on the project site, and address any associated soil impacts;
- procedures for evaluating and discharging dewatering water; and
- provisions to visually inspect for staining soil underlying existing buildings for potential unknown residual environmental constituents, to stop work in the vicinity of such discovery until notice to the oversight agency and appropriately credentialed environmental professional has been provided, and direction for further action received.

CONCLUSION

No new circumstances or project changes related to hazards and hazardous materials have occurred nor has any new information been identified requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts. No additional analysis is required.

4.9 HYDROLOGY AND WATER QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
9. Hydrology and Water Quality. Would the project:					
a. Violate any water quality standards or waste discharge requirements?	Scoped out at Notice of Preparation stage.		No	No	NA
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	Scoped out at Notice of Preparation stage.		No	No	NA
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Scoped out at Notice of Preparation stage.		No	No	NA
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Scoped out at Notice of Preparation stage.		No	No	NA
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	Scoped out at Notice of Preparation stage.		No	No	NA
f. Otherwise substantially degrade water quality?	Scoped out at Notice of Preparation stage.		No	No	NA
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Scoped out at Notice of Preparation stage.		No	No	NA
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Scoped out at Notice of Preparation stage.		No	No	NA

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
9. Hydrology and Water Quality. Would the project:					
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Scoped out at Notice of Preparation stage.		No	No	NA
j. Inundation by seiche, tsunami, or mudflow?	Scoped out at Notice of Preparation stage.		No	No	NA

4.9.1 Discussion and Conclusion

Hydrology and water quality impacts were scoped out of the PPSP EIR at the Notice of Preparation stage as the Initial Study concluded that there would not be any potentially significant impacts related to hydrology and water quality.

4.10 LAND USE AND PLANNING

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
10. Land Use and Planning. Would the project:					
a. Physically divide an established community?	Final EIR Setting pp. 3.6-1 to 3.6-6 Impact LU-1	Less Than Significant	No	No	NA, this impact would remain less than significant.
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Final EIR Setting pp. 3.6-1 to 3.6-6 Impact LU-2	Less Than Significant	No	No	NA, this impact would remain less than significant.
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	Final EIR Setting pp. 3.6-1 to 3.6-6 Impact LU-3	Less Than Significant	No	No	NA, no impact would occur.

4.10.1 Discussion

No substantial change in the environmental and regulatory settings related to land use and planning, described in PPSP EIR Section 3.6, Land Use and Planning, has occurred since certification of the PPSP EIR.

a) Physically divide an established community?

Impact LU-1 of the PPSP EIR evaluated whether implementation of the PPSP would physically divide an established community and concluded that the PPSP would result in a less-than-significant impact. The PPSP and the project would be considered infill and would not obstruct bicycle and pedestrian connections within the PPSP. No changes in development at the site have occurred since approval of the PPSP. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 evaluated whether the PPSP would be consistent with adopted land use plans and policies, and concluded that the PPSP's impact would be less than significant. The project's land uses are consistent with the PPSP and are subject to PPSP policies and guidelines for design. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Impact LU-3 noted that there are no habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) have been adopted that apply to the PPSP or immediate surrounding area. As a result, no conflict with an adopted habitat conservation plan would occur, and no impact would result. No new conservation plans have been adopted since approval of the PPSP. Therefore, there are no new significant impacts or substantially more severe impacts that would occur pertaining to conflicts with adopted conservation plans. The findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

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

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been identified requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts to land use and planning.

4.11 MINERAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
11. Mineral Resources. Would the Project:					
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?	Scoped out at Notice of Preparation stage. Mineral resources do not exist in PPSP area.		No	No	NA
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?	Scoped out at Notice of Preparation stage. Mineral resources do not exist in PPSP area.		No	No	NA

4.11.1 Discussion and Conclusion

Mineral resource impacts were scoped out of the PPSP EIR at the Notice of Preparation stage as no mineral resources exist in the PPSP area and the area is already developed with urban land uses. The project site does not contain any of these resources and would also have no impact.

4.12 NOISE

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
12. Noise. Would the project result in:					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impact NOI-1	Less Than Significant With Mitigation	No	No	NA, impact remains less than significant
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impact NOI-2	Less Than Significant With Mitigation	No	No	NA, impact remains less than significant
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impacts NOI-3 and NOI-7	Significant and Unavoidable	No	No	NA, impact would remain significant and unavoidable
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impact NOI-4	Significant and Unavoidable	No	No	Yes, but impact would remain significant and unavoidable
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 expose people residing or working in the project area to excessive noise levels?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impact NOI-5	Less Than Significant	No	No	NA, impact remains less than significant
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Final EIR Setting pp. 3.7-1 to 3.7-9 Impact NOI-6	No Impact	No	No	NA

4.12.1 Discussion

No substantial change in the environmental and regulatory settings related to noise and vibration, described in PPSP EIR Section 3.7, Noise, has occurred since certification of the EIR. No new substantial noise sources have been introduced near the project since the PPSP EIR was prepared.

An environmental noise assessment was prepared for the project by Illingworth & Rodkin (September 26, 2018). The assessment quantified the noise environment at the project site, and compared it with existing standards. The evaluation concluded that future environmental noise levels would fall within the City's land-use compatibility category of normally acceptable (Illingworth & Rodkin 2018b). Additionally, the assessment performed noise measurements for the parking lot lift system component of the project and found that maximum sound levels would be well below ambient weekday noise levels (Illingworth & Rodkin 2018b), The

assessment also reviewed the noise contours of the Santa Clara County Moffett Federal Airfield Comprehensive Land Use Plan (CLUP), and determined that future aircraft noise at the project site would be within normally acceptable and conditionally acceptable levels (Illingworth & Rodkin 2018b).

A construction noise reduction plan was not prepared for this project. The project would comply with the measures set by the City of Sunnyvale for the purpose of reducing construction noise.

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Impact NOI-1 evaluated the potential for construction of the PPSP to generate noise that exceeds the City's Noise Ordinance standards. While the City's Municipal Code restricts the days and hours of construction activities, mitigation measure MM NOI-1 requires additional project review to further assess impacts related to increase in ambient noise levels. During the review required by MM NOI-1, the City may impose additional measures to reduce potential noise impacts. The PPSP EIR concluded that compliance with City requirements and implementation of MM NOI-1 would ensure that the PPSP would result in less than significant impacts related to construction noise.

Because the project encompasses a parcel within the PPSP and the project would be required to comply with City noise restrictions, no new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 of the PPSP EIR evaluated the potential for construction activities to generate excess groundborne vibration or noise and noted that the use of heavy equipment, power tools, and other construction equipment could result in short-term impacts on receptors within and surrounding the project area. Mitigation measure MM NOI-1 requires additional project review to further assess impacts related to noise, including groundborne vibration and noise. Because projects under the PPSP would be subject to the additional review required under MM NOI-1, construction impacts related to groundborne vibration and noise were determined to be less than significant.

No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact NOI-3 evaluated the potential for operation of the PPSP to result in an increase in ambient noise levels. The analysis determined that the increase would be temporary and incremental, and that project impacts would be less than significant.

Impact NOI-7 evaluated whether the PPSP would contribute to a substantial increase in permanent traffic noise levels when considered along with other planned developments. While transportation demand management (TDM) programs for the PPSP and other projects would assist in reducing vehicle trips and, by extension, traffic noise, these impacts would be significant and unavoidable.

As discussed in Impact NOI-3, implementation of the PPSP would result in an incremental increase in ambient noise, but this impact would be less than significant. Because the project is within the scope of the PPSP, its contribution to traffic noise is addressed in the PPSP EIR. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact NOI-4 evaluated whether the PPSP would result in a temporary or permanent increase in ambient noise levels. The analysis noted that project construction could take place in close proximity to sensitive receptors, which could cause a substantial temporary or periodic increase in ambient noise levels at sensitive receptor locations. Mitigation measure MM NOI-4a requires the applicant to employ construction noise control measures. Mitigation measure MM NOI-4b requires noise-reducing techniques and muffling devices for pile driving activities. Mitigation measure MM NOI-1 would also apply to this impact. While the mitigation measures would help reduce noise impacts, the impact would remain significant and unavoidable. The project is within the scope of the PPSP as evaluated in the PPSP EIR. Activities evaluated in the PPSP EIR included demolition, construction, and operation within the PPSP. The project would include demolition, construction, and operation. All of these activities were covered by the PPSP EIR. As a project within the PPSP, the project would be subject to the mitigation measures included in the PPSP EIR. No new significant impacts or substantially more severe impacts would occur as the project use was considered in the PPSP EIR. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

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 expose people residing or working in the project area to excessive noise levels?

Impact NOI-5 evaluated whether the PPSP would expose onsite uses to noise associated with operations at the Moffett Federal Airfield. The analysis noted that while PPSP would expose new buildings to noise from aircraft operations, no noise sensitive uses would be sited within the airfield's noise contours. Additionally, building insulation and features would attenuate interior noise. The analysis concluded that this impact would be less than significant.

The environmental noise assessment prepared for the project evaluated impacts from aircraft noise, and determined that the project land uses would be within the normally compatible and conditionally compatible land uses as defined by the Moffett Federal Airfield CLUP (Illingworth & Rodkin 2018b). Therefore, there are no new circumstances or new information requiring new analysis or verification, and the conclusions of the PPSP EIR remain valid and no further analysis is required.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-6 evaluated whether the PPSP or near term projects would expose onsite uses to noise from a private airfield. The analysis noted that there are no private airstrips in the vicinity, and no impact would occur.

The project site is within the PPSP, and there are no private airstrips in the vicinity. Therefore, there are no new circumstances or new information requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

The following mitigation measures were identified in the PPSP EIR and would continue to remain applicable if the project were approved.

- **MM NOI-1: Additional Project Review.** The Project shall be subject to review by City staff to further assess impacts resulting from increases in ambient noise levels generated by Project construction and operation activities. The City staff shall determine whether additional analysis of noise-related impacts is required to adequately assess impacts resulting from Project construction and operation activities. During this review, City staff may propose additional measures appropriate to reduce potential noise related impacts, with regards to nearby sensitive land uses. To verify that acceptable noise levels are met and/or maintained, the Applicant shall retain a City approved acoustical consultant to monitor noise

during construction activities within close proximity to nearby sensitive receptors. Review of the Project shall be made by City staff prior to the issuance of a development permit.

- **MM NOI-4a: Construction Noise Control Measures.** The applicant shall employ site-specific noise attenuation measures during Project construction to reduce the generation of construction noise. These measures shall be included in a Noise Control Plan that shall be submitted for review and approval by the City of Sunnyvale Building Services Division to ensure that construction noise is consistent with the standards set forth in the City's Noise Ordinance. Measures specified in the Noise Control Plan and implemented during Project construction shall include, at a minimum, the following noise control strategies:

  - equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds;

  - impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used; and

  - stationary noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.

- **MM NOI-4b: Pile Driving Noise-Reducing Techniques and Muffling Devices.** Noise reducing pile-driving techniques shall be employed during Project construction. These techniques shall include:

  - installing intake and exhaust mufflers on pile-driving equipment;

  - vibrating piles into place when feasible, and installing shrouds around the pile driving hammer where feasible;

  - implement "quiet" pile-driving technology (such as pre-drilling of piles and the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions;

  - use cushion blocks to dampen impact noise, if feasible based on soil conditions. Cushion blocks are blocks of material that are used with impact hammer pile drivers. They consist of blocks of material placed atop a piling during installation to minimize noise generated when driving the pile. Materials typically used for cushion blocks include wood, nylon and micarta (a composite material); and

  - at least 48 hours prior to pile-driving activities, the applicant shall notify building owners and occupants within 600 feet of the Project area of the dates, hours, and expected duration of such activities.

As discussed above, an environmental noise assessment (Salter 2016a) and construction noise reduction plan (Salter 2016b) were prepared for the project. These reports demonstrate implementation of the three mitigation measures detailed above.

CONCLUSION

No new circumstances or project changes have occurred nor has any substantially important new information been found requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval project would not result in new or substantially more severe significant noise impacts. No further analysis is required.

4.13 POPULATION AND HOUSING

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
13. Population and Housing. Would the project:					
a. Induce substantial 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)?	Final EIR Setting pp. 3.8-1 to 3.8-5 Impacts PH-1, PH-2, and PH-3	Less Than Significant	No	No	NA, impact remains less than significant
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Final EIR Setting pp. 3.8-1 to 3.8-5 No Impact	No Impact	No	No	NA
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Final EIR Setting pp. 3.8-1 to 3.8-5 No Impact	No Impact	No	No	NA

4.13.1 Discussion

No substantial change in the regulatory settings related to population and housing, described in PPSP EIR Section 3.8, Population and Housing, has occurred since certification of the PPSP EIR. As described in the project description, the project is consistent with PPSP and would contribute to the anticipated employment growth expected under the PPSP.

a) Induce substantial 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)?

Impact PH-1 evaluated whether new development within the PPSP would induce new growth. The analysis noted that the number of additional jobs that would be generated by the PPSP would be within the overall employment growth projections identified in the City's General Plan and by the Association of Bay Area Governments (ABAG). Because the number of new jobs is within the overall projections, the increase is not considered substantial. While the PPSP would add 215 new residential units to the area, this small amount of new residences would be negligible relative to Sunnyvale's existing population. For these reasons, the PPSP would result in less-than-significant impacts related to growth inducement.

Impact PH-2 evaluated whether the PPSP would substantially exacerbate the jobs-to-housing ratio imbalance. The analysis noted that additional housing units would be required to accommodate the additional number of new workers, but that this need could be met within Sunnyvale or Santa Clara County. As such, project impacts would be less than significant.

Impact PH-3 evaluated whether the PPSP would potentially exceed City growth projections. As discussed in Impact PH-1 above, the number of jobs added by the PPSP would be within existing employment growth projections. While the additional jobs may increase population by bringing new workers to the area, housing needs could be met within Sunnyvale or Santa Clara County. Therefore, impacts on growth projections from the PPSP would be less than significant.

The project would be generally consistent with the land use designations and anticipated employment growth (teachers) set forth in the PPSP. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

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

See discussion under item c) below.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The project site does not include any existing housing. As such, the PPSP would have no impact related to the displacement of housing or people.

The project would not result in the removal of existing housing. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

No mitigation measures were needed for the certified PPSP 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 conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts to population and housing.

4.14 PUBLIC SERVICES

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
14. Public Services.					
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any public services:					
i. Fire protection?	Final EIR Setting pp. 3.9-1 to 3.9-6 Impact PS-1	Less Than Significant	No	No	NA, impact remains less than significant
ii. Police protection?	Final EIR Setting pp. 3.9-1 to 3.9-6 Impact PS-1	Less Than Significant	No	No	NA, impact remains less than significant
iii. Schools?	Final EIR Setting pp. 3.9-1 to 3.9-6 Impact PS-2	Less Than Significant	No	No	NA, impact remains less than significant
iv. Parks?	Final EIR Setting pp. 3.9-1 to 3.9-6 Impact PS-3	Less Than Significant	No	No	NA, impact remains less than significant

4.14.1 Discussion

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?

See discussion below under police protection.

Police protection?

Impact PS-1 evaluated whether the PPSP would substantially impact acceptable service ratios, response times, or other performance standards for fire protection and police protection. The analysis noted that while the PPSP would result in an increase in service demand, the increase would not significantly impact

response time or coverage ability under project or cumulative conditions. Therefore, this impact would be less than significant.

The project is consistent with development assumptions analyzed in the PPSP EIR. Further, the project would be required to meet all City requirements regarding fire protection and public safety, including fire access. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Schools?

Impact PS-2 evaluated whether the new students generated by residential development in the PPSP would substantially impact school. The analysis noted that payment of development fees would be adequate to address impacts on school facilities, and the impact was determined to be less than significant. The project would construct an additional school to provide additional facilities to new students generated by residential development in the PPSP.

No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Parks?

Impact PS-3 evaluated whether the increase in employees and residents in the PPSP would increase demand for public parks. The analysis noted that while the PPSP would result in an incremental increase in the use of existing parks, this additional use would not result in substantial deterioration of these facilities. Therefore, this impact was determined to be less than significant.

The project is within the development assumptions analyzed in the PPSP EIR. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

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

CONCLUSION

The conclusions of the PPSP EIR remain valid and approval of the project would not result in new or substantially more severe significant impacts to public services.

4.15 RECREATION

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
15. Recreation.					
a. Would the project 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?	Draft EIR Setting p. 3.9-4 and 3.9-5 Impact PS-3	Less Than Significant	No	No	NA, impact remains less than significant
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Draft EIR Setting p. 3.9-4 and 3.9-5 Impact PS-3	Less Than Significant	No	No	NA, impact remains less than significant

4.15.1 Discussion

No substantial change in the regulatory settings related to recreation, described in the PPSP Final EIR Section 3.9, Public Services, has occurred since certification of the PPSP EIR.

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?

Impact PS-3 evaluated whether the increase in employees and residents in the PPSP would increase demand for public parks. The analysis noted that while the PPSP would result in an incremental increase in the use of existing parks, this additional use would not result in substantial deterioration of these facilities. Therefore, this impact was determined to be less than significant.

The project is a high school and would not generate a direct demand for recreation facilities. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

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

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been identified requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of project would not result in new or substantially more severe significant impacts to recreation.

4.16 TRANSPORTATION/TRAFFIC

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
16. Transportation/Traffic. Would the project:					
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Final EIR Setting pp. 3.10-1 to 3.10-17 Impacts T-1, T-2, T-3, T-4, T-9, and T-10	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Final EIR Setting pp. 3.10-1 to 3.10-17 Impacts T-1, T-2, T-3, T-4, T-9, and T-10	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Final EIR p. 3.10-22 No Impact	No Impact	No	No	NA
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Final EIR Setting pp. 3.10-1 to 3.10-17 Impact T-1	Less Than Significant With Mitigation	No	No	Yes, impact would remain less than significant with application of adopted mitigation measure
e. Result in inadequate emergency access?	Final EIR Setting pp. 3.10-1 to 3.10-17 Impact T-1	Less Than Significant With Mitigation	No	No	Yes, impact would remain less than significant with application of adopted mitigation measure
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Final EIR Setting pp. 3.10-1 to 3.10-17 Impacts T-5, T-6, and T-7	Less Than Significant With Mitigation	No	No	NA, impact remains less than significant

4.16.1 Discussion

No substantial change in the settings related to transportation and traffic, described in PPSP EIR Section 3.10, Transportation, Circulation, and Traffic, has occurred since certification of the PPSP EIR. As described in the project description, the project is consistent with PPSP. The Summit School Final Traffic Impact Analysis (TIA) is used in the analysis below (Hexagon 2018).

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

See discussion under item b) below.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction

Impact T-1 evaluated whether PPSP construction activities would potentially create short-term traffic impacts due to congestion from construction vehicles. The analysis noted that due to the long-term planning horizon of the PPSP, the precise number of construction-related truck trips cannot be accurately calculated. However, typical major office or light industrial construction projects require export of fill and demolition debris, often resulting in dozens of truck trips per day. The analysis noted that construction-related increases in traffic for individual projects within the PPSP would be short-term in nature, and would incrementally contribute to road or intersection congestion over the planning horizon. Mitigation measure MM T-1 requires future development within the PPSP to prepare a Construction Impact Mitigation Plan to manage traffic during construction. With implementation of mitigation measure MM T-1, impacts related to construction-related traffic impacts would be reduced to a less-than-significant level.

Intersections

Impact T-2 evaluated whether the increased traffic from the PPSP would substantially increase congestion at intersections under the 2035 General Plan conditions. The traffic analysis prepared for the PPSP found that 64 of the 90 intersections analyzed would be expected to remain at an acceptable level of service (LOS). The remaining 26 intersections were projected to operate at unacceptable LOS under the 2035 General Plan buildout conditions. Detailed calculations of PPSP impacts revealed that implementation of the PPSP alone would cause significant impacts at five intersections. Mitigation measure T-2a requires installation of a third westbound left-turn lane at the intersection of Mary Avenue and Central Expressway. Because this improvement is part of the August 2015 update of the County of Santa Clara Expressway Plan 2040, project applicants within the PPSP shall pay a fair share contribution towards this planned improvement. Mitigation measure T-2b requires additional long-range intersection improvements, which are also part of the August 2015 update of the County of Santa Clara Expressway Plan 2040. For MM T-2b, the project applicant shall pay a fair share contribution to these improvements. While these mitigation measures would help alleviate intersection impacts, the implementation and availability of overall funding are controlled by the County of Santa Clara, making this impact significant and unavoidable.

Impact T-9 evaluated the potential for the PPSP to result in significant cumulative impacts to intersections. As discussed in Impact T-2, the PPSP would result in significant impacts to six intersections. While mitigation measure MM T-2a would help reduce peak hour trips, this mitigation would not be sufficient to reduce the cumulative impact to a less-than-significant level. Therefore, the analysis concluded that the PPSP would result in a substantial contribution to a cumulatively significant impact at five intersections.

Freeway Segments

Impact T-3 evaluated whether buildout of the PPSP, under 2035 General Plan buildout conditions, would increase traffic congestion on freeway segments. The traffic study prepared for the PPSP determined that implementation of the PPSP would result in a significant impact to 10 freeway segments and six high-occupancy vehicle (HOV) segments. Many of the impacted segments are included in the Santa Clara Valley Transit Authority's (VTA) Valley Transportation Plan (VTP) 2040. Mitigation measures MM T-3 requires project applicants within the PPSP area to pay their fair share to VTA's VTP 2040 program. While this mitigation measure would help alleviate freeway impacts, the implementation and availability of overall funding are controlled by VTA, making this impact significant and unavoidable.

Impact T-10 evaluated the potential for the PPSP to result in significant cumulative impacts related to freeway segment congestion. The analysis referenced the finding in Impact T-3 and concluded that the PPSP would result in cumulatively significant impacts to 10 freeway segments and nine HOV segments. While mitigation measure MM T-3 would reduce the PPSP's contribution to this impact, the PPSP would continue to result in a substantial contribution to the cumulatively significant impact. Therefore, this impact was determined to be significant and unavoidable.

Freeway Ramp Capacities

Impact T-4 evaluated whether buildout of the PPSP, under 2035 General Plan buildout conditions, would result in significant impacts to freeway ramp capacities. The traffic study prepared for the PPSP concluded that implementation of planned improvements as part of the 2035 General Plan would provide adequate freeway ramp capacity under the 2035 General Plan with implementation of the PPSP. Therefore, this impact was determined to be less than significant.

Project

The TIA identifies that the project is expected to generate a net 510 trips (273 in and 237 out) during the AM peak hour, 315 trips (154 in and 161 out) during the PM school peak hour, and 113 trips (50 in and 63 out) during the PM commute peak hour (Hexagon 2018). The TIA presents recommendations consistent with the mitigation measures found in the PPSP EIR along with project-proposed on-site crosswalks and recommended signage to control traffic during drop off and pick up times (Hexagon 2018). The proposed uses and intensities are consistent with the assumptions analyzed in the PPSP EIR. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

As noted on page 3.10-22 of the PPSP EIR, this threshold is not applicable to the PPSP because the PPSP area does not include an airport facility, nor would implementation of the PPSP have any substantial impacts to nearby airports. Because the project is within the PPSP as evaluated in the PPSP EIR, no new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

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

See discussion under item e) below.

e) Result in inadequate emergency access?

Impact T-1 evaluated whether PPSP construction activities would potentially create short-term traffic impacts due to congestion from construction vehicles. The analysis noted that due to the long-term planning horizon of the PPSP, the precise number of construction-related truck trips cannot be accurately calculated. However, typical major office or light industrial construction projects require export of fill and demolition debris, often resulting in dozens of truck trips per day. The analysis noted that construction-related increases in traffic for individual projects within the PPSP would be short-term in nature, and would incrementally

contribute to road or intersection congestion over the planning horizon. Mitigation measure MM T-1 requires future development within the PPSP to prepare a Construction Impact Mitigation Plan to manage traffic during construction. With implementation of mitigation measure MM T-1, impacts related to construction-related traffic impacts would be reduced to a less-than-significant level.

The PPSP area is fully developed with an existing network of roadways. As such, implementation of the PPSP would not be expected to increase hazards due to a design feature because there are no major changes planned for the existing roadway network. Additionally, hazards due to incompatible uses are unlikely because of existing zoning regulations, none of which would be changed by implementation of the PPSP.

All roadway improvements would be required to meet City of Sunnyvale roadway design standards. These improvements would include crosswalks and proper signage. Because the PPSP would provide adequate access for emergency vehicles, impacts would be less than significant for the PPSP and for the project. Further, mitigation measure MM T-1 would ensure adequate access during project construction. No new significant impacts or substantially more severe impacts would occur with implementation of the project. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Impact T-5 evaluated whether implementation of the PPSP would result in significant transit vehicle delays associated with increased congestion. The analysis acknowledged that the PPSP could increase congestion at the intersection of Mary Avenue and Central Expressway, which could result in delays for Bus Route 32 and the Mary Moffett Caltrain Shuttle. As described in Impact T-2, application of proposed TDM programs would reduce overall traffic volumes, which would result in an associated reduction in transit travel times. Therefore, this impact would be less than significant.

Impact T-6 evaluated whether the PPSP would result in increased demand for transit, including VTA buses and the Caltrain shuttle. The analysis acknowledged that existing bus lines do not serve the entire PPSP area and may not be sufficient to meet increased demand associated with the PPSP. Also, the PPSP would be expected to increase the number of Caltrain riders. Mitigation measure MM T-6a requires individual property owners within the PPSP to join a Transportation Management Association (TMA) to facilitate TDM programs within the PPSP area. Mitigation measure MM T-6b requires project applicants within the PPSP to pay a fair share transportation impact fee to the City. The analysis concluded that with implementation of these two mitigation measures, impacts from the PPSP would be reduced to a less-than-significant level.

Impact T-7 evaluated potential impacts of the PPSP on pedestrian facilities and bike lanes. The analysis noted that the PPSP would "add crosswalks where they do not exist, increase landscaping and pedestrian amenities through the district, and create new routes to create a more connected pedestrian network." The PPSP also includes a policy to "add or improve bike lanes/paths and make connections with the existing bike network." Because of these policies, the analysis determined that the PPSP would have a beneficial impact on pedestrian and bike facilities.

The project would not obstruct or impact existing or planned, pedestrian, bicycle, or transit facilities and services. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

The following mitigation measures were adopted with the PPSP and would continue to remain applicable if the project were approved. The TIA includes recommendations for pedestrian improvements that would implement PPSP policies related to pedestrian improvements.

- **MM T-1.** Future development occurring under the proposed Peery Park Specific Plan shall be required to prepare a Construction Impact Mitigation Plan for review and approval prior to issuance of a grading or building permit to address and manage traffic during construction and shall be designed to:

- prevent traffic impacts on the surrounding roadway network,
- minimize parking impacts both to public parking and access to private parking to the greatest extent practicable,
- ensure safety for both those constructing the project and the surrounding community, and
- prevent substantial truck traffic through residential neighborhoods.

The Construction Impact Mitigation Plan shall be subject to review and approval by the following City departments: Community Development, Public Works, and Public Safety to ensure that the Construction Impact Mitigation Plan has been designed in accordance with this mitigation measure. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:

Ongoing Requirements throughout the Duration of Construction

- A detailed Construction Impact Mitigation Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The Construction Impact Mitigation Plan shall include specific information regarding the project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such plans shall be reviewed and approved by the Community Development Department prior to commencement of construction and implemented in accordance with this approval.
- Per Sunnyvale Municipal Code Section 16.08.030 work within the public right-of-way shall be performed between 7:00 AM and 6:00 PM Monday through Friday, and 8:00 AM to 5:00 PM on Saturday. With limited exceptions described in Sunnyvale Municipal Code Section 16.08.030, no construction work would be permitted on Sundays and national holidays that City offices are closed. Construction work includes, but is not limited to dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an afterhours construction permit.
- Streets and equipment shall be cleaned in accordance with established Public Works requirements.
- Trucks shall only travel on a City-approved construction route. Limited queuing may occur on the construction site itself.
- Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit.
- Any requests for work before or after normal construction hours within the public right-of-way shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division.
- Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City.

- Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction
  - The traveling public shall be advised of impending construction activities which may substantially affect key roadways or other facilities (e.g., information signs, portable message signs, media listing/notification, Hotline number, and implementation of an approved Construction Impact Mitigation Plan).

- A Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way shall be obtained.

- Timely notification of construction schedules shall be provided to all affected agencies (e.g., VTA, Police Department, Fire Department, Public Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet.

- Construction work shall be coordinated with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal.

- Public Works Department approval of any haul routes for earth, concrete, or construction materials and equipment hauling shall be obtained.

- **MM T-2a: Third Westbound Left-Turn Lane.** At the intersection of Mary Avenue with the Central Expressway a third westbound left-turn lane would mitigate Project-related increases to vehicle delay and V/C ratio. This project is identified as a Tier 3 project as a part of the August 2015 update of the County of Santa Clara Expressway Plan 2040. The third westbound left-turn lane could be feasibly accommodated within the existing right-of-way with minimal secondary impacts to pedestrian and bicycle facilities. Therefore, project applicants within the Project area shall pay a fair share contribution towards the planned third westbound left-turn lane at this intersection.

- **MM T-2b: County of Santa Clara Expressway Plan 2040 Fee.** The August 2015 update of the County of Santa Clara Expressway Plan 2040 identifies a number of long-range intersection improvements, including at the intersections of Lawrence Expressway with Cabrillo Avenue, Benton Street, Homestead Road, and Pruneridge Avenue. These planned Tier 1 and Tier 3 projects would reduce potentially significant impacts to less than significant levels. Therefore, project applicants within the Project area shall pay a fair share contribution towards the planned County of Santa Clara Expressway Plan 2040 improvements at these intersections.

- **MM T-3: VTA VTP 2040 Fee.** The VTA's VTP 2040 identifies a number of long-term improvement projects, including freeway express lane projects along U.S. 101 between Cochran Road and Whipple Avenue and along SR 85. The existing HOV lanes along these segments are proposed to be converted to express lanes and a second express lane is proposed to be implemented in each direction. Therefore, project applicants within the Project area shall pay a fair share contribution towards the planned VTA VTP 2040 improvements.

- **MM T-6a: Transportation Management Agency.** The City of Sunnyvale shall require individual property owners to join a Transportation Management Association (TMA) to help facilitate TDM programs for tenants within the Project area.

- **MM T-6b: Transportation Impact Fee.** Project applicants in the Project area shall be required to pay a fair share transportation impact fee to the City that funds costs associated with the increased development to the Project area.

CONCLUSION

No new significant or substantially more severe transportation or traffic impacts would occur. Therefore, the conclusions of the PPSP EIR remain valid.

4.17 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
17. Utilities and Service Systems. Would the project:					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Final EIR Setting pp. 3.11-15 to 3.11-19 Impact UT-3	Less Than Significant	No	No	NA, impact remains less than significant
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Final EIR Setting pp. 3.11-1 to 3.11-6 and 3.11-15 to 3.11-19 Impacts UT-1, UT-4, and UT-5	Less Than Significant With Mitigation	No	No	Yes, impact remains less than significant with application of adopted mitigation measures
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Final EIR Setting pp. 3.11-15 to 3.11-19 Impact UT-4	Less Than Significant With Mitigation	No	No	Yes, impact remains less than significant with application of adopted mitigation measures
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Final EIR Setting pp. 3.11-1 to 3.11-6 Impact UT-2	Less Than Significant	No	No	NA, impact remains less than significant
e. Result in a determination by the wastewater treatment provider which 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?	Final EIR Setting pp. 3.11-15 to 3.11-19 Impact UT-5	Less Than Significant	No	No	NA, impact remains less than significant
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Final EIR Setting pp. 3.11-27 to 3.11-28 Impact UT-6	Less Than Significant	No	No	NA, impact remains less than significant
g. Comply with federal, state, and local statutes and regulations related to solid waste?	Final EIR Setting pp. 3.11-27 to 3.11-28 Impact UT-7	No Impact	No	No	NA, no impact
h. Create demand for natural gas, electricity, telephone, and other utility services that cannot be met.	Final EIR Setting pp. 3.11-34 to 3.11-35 Impact UT-8	Less Than Significant	No	No	NA, impact remains less than significant

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
17. Utilities and Service Systems. Would the project:					
i. Result in inefficient, wasteful, and unnecessary consumption of energy.	Final EIR Setting pp. 3.11-34 to 3.11-35 Impact UT-8	Less Than Significant	No	No	NA, impact remains less than significant

4.17.1 Discussion

On June 21, 2016, the Sunnyvale City Council adopted the 2015 Urban Water Management Plan (UWMP). The analysis of water demand and supply in the PPSP EIR (water supply assessment) was based in part on information from the City's 2010 UWMP. While there is some variation between the PPSP EIR and 2015 UWMP in the estimates of water supply and demand for build out of the City, both the PPSP EIR and 2015 UWMP conclude that there is adequate water supply available to meet additional demand that would occur with implementation of the PPSP. Thus, the 2015 UWMP does not substantial change water supply impact analysis provided in the PPSP EIR.

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Impact UT-3 evaluated whether the PPSP would exceed wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), and concluded that the PPSP would not exceed the requirements. Therefore, the impact was determined to be less than significant.

The project consists of school uses that would replace an existing light industrial use and is expected to generate constituents in the wastewater flows to the plant would remain similar to existing conditions. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact UT-1 evaluated whether implementation of the PPSP would require the construction of new or expanded water facilities. The analysis noted that implementation of the PPSP would generate additional water demand of approximately 340,550 gallons per day (gpd), and would also require upsizing of many pipeline segments. Mitigation measure MM UT-1 requires project applicants to provide funding for capital improvements, which would reduce impacts related to additional facilities to a less-than-significant level by ensuring adequate funding for necessary infrastructure improvements.

Impact UT-4 evaluated whether the PPSP would require the construction of new or expanded wastewater facilities. The analysis noted that implementation of the PPSP would require upsizing of several pipeline segments and replacement of several sewer mains. Mitigation measure MM UT-2 requires new development under the PPSP to pay into a program to fund these capital improvements. With mitigation, the impact was determined to be less than significant.

Impact UT-5 evaluated whether the increase in wastewater generated under the PPSP would exceed the wastewater treatment provider's capacity. The analysis noted that while the PPSP would generate additional wastewater beyond existing conditions, the City's Wastewater Pollution Control Plant (WPCP) has sufficient capacity to accommodate the small increase in flow that would result from implementation of the PPSP. Therefore, this impact was determined to be less than significant.

The project is within the development scope of the PPSP EIR and is required to adhere to the applicable mitigation measures. No off-site infrastructure improvements are proposed for the project, and no additional development not anticipated in the PPSP EIR would occur. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact UT-4 evaluated whether the PPSP would require the construction of new or expanded wastewater facilities. The analysis noted that implementation of the PPSP would require upsizing of several pipeline segments and replacement of several sewer mains. Mitigation measure MM UT-2 requires new development under the PPSP to pay into a program to fund these capital improvements. With mitigation, the impact was determined to be less than significant.

The project is within the development scope of the PPSP EIR and is required to adhere to the applicable mitigation measures. No off-site infrastructure improvements are proposed for the project, and no additional development requiring additional stormwater provisions not anticipated in the PPSP EIR would occur. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Impact UT-2 evaluated whether implementation of the PPSP would require additional water supplies. The analysis noted that while the PPSP would increase water demand within Sunnyvale, the City has adequate water supplies to serve the PPSP under buildout of both the City and the PPSP. Therefore, this impact was determined to be less than significant.

The project is consistent with PPSP land use designations and development intensities that were analyzed in the PPSP EIR. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

e) 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?

Impact UT-5 evaluated whether the increase in wastewater generated under the PPSP would exceed the wastewater treatment provider's capacity. The analysis noted that while the PPSP would generate additional wastewater beyond existing conditions, the City's Wastewater Pollution Control Plant (WPCP) has sufficient capacity to accommodate the small increase in flow that would result from implementation of the PPSP under buildout of both the City and the PPSP. Therefore, this impact was determined to be less than significant.

The project's contribution to additional wastewater flows were generally factored in the PPSP EIR given that its land use and intensities are consistent with the PPSP. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Impact UT-6 evaluated whether there was sufficient landfill capacity to accommodate the PPSP. The analysis noted that while the PPSP would increase solid waste generation, the landfills serving the City have adequate capacity to accommodate increased solid waste from the PPSP under cumulative buildout conditions. Therefore, this impact was determined to be less than significant.

The project's contributions to solid waste generation were generally factored in the PPSP EIR given that its land use and intensities are consistent with the PPSP. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Impact UT-7 evaluated whether implementation of the PPSP would generate waste that would conflict with federal, state, or local statutes and regulations related to solid waste. The discussion noted that State law requires a 50 percent diversion of solid waste from landfills, which Sunnyvale achieved in 1997. 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 in the PPSP. Construction of subsequent projects under the PPSP 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, the PPSP would not conflict with a federal, state, or local statute or regulation related to solid waste disposal.

The project would not generate solid waste in excess of what was evaluated in the PPSP EIR and is required to comply with solid waste reduction standards. No new significant impacts or substantially more severe impacts would occur. Therefore, the findings of the certified PPSP EIR remain valid and no further analysis is required.

h) Create demand for natural gas, electricity, telephone, and other utility services that cannot be met.

See discussion under item i) below.

i) Result in inefficient, wasteful, and unnecessary consumption of energy.

Impact UT-8 evaluated whether implementation of the PPSP would result in an increase in energy demand, or whether the PPSP would result in the wasteful, inefficient, and unnecessary consumption of energy. The analysis noted that while the PPSP would increase demand for electricity and natural gas, Pacific Gas and Electric (PG&E) has sufficient capacity to provide these services. The analysis also noted that compliance with the energy efficiency standards of Title 24 of the California Code of Regulations, the City's Climate Action Plan (CAP), Zero Waste Policy, Green Building Program, and Landscaping Requirements would reduce impacts associated with increased energy demands for buildout of the PPSP and the City. Therefore, impacts related to energy demand and the inefficient, wasteful, or unnecessary consumption of energy were determined to be less than significant.

The project would be required comply with Title 24 requirements as well as the City's CAP, which is consistent with the assumptions in the PPSP EIR. Therefore, no new significant impacts or substantially more severe impacts would occur. The findings of the certified PPSP EIR remain valid and no further analysis is required.

Mitigation Measures

The following mitigation measures were adopted with the PPSP and would continue to remain applicable is the project were approved:

- **MM UT-1: Peery Park Infrastructure Fee.** The City shall ensure adequate financing for funding of infrastructure improvements to serve the Project area. The PPIF shall be calculated prior to the approval of the first entitlements for a development within the Project area, following adoption of the Project. All agencies or developers responsible for new development within the Project area shall be conditioned to be subject to payment of its fair share of any impact fees identified under this program. The PPIF shall determine the costs of and establish a funding program for capital improvements to upgrade water delivery as needed to serve the demands of new land uses anticipated to occur under the Project. As part of the PPIF, a supplemental water system impact fee shall be established to assess developers their proportional cost of water line improvements to accommodate the planned development capacity in Peery Park. Each project will be required to prepare a hydraulic analysis to determine the required fire flow requirement for the site. As determined by the City, a developer would either pay an impact fee for its proportional share of the cost of Peery Park improvements, or be required to upgrade/replace specific water lines that serve the project site.

  The PPIF shall also:

  a. Identify the cost of improvements to or replacement of undersized water and wastewater lines within the Project area needed to serve the Project;

  b. Clearly apportion existing and projected demand on these facilities and costs between existing users, the City and proposed future development.

  c. Identify potential funding mechanisms for sewer and water line construction, including the equitable sharing of costs between new development, the City and existing users, including development impact fees, grants, assessments, etc.

  d. Identify the impact fees for all residential and non-residential development to ensure that development pays its fair share of public infrastructure costs; and

  e. Include a regular fee update schedule, consistent with the City's Capital Improvement Program.

- **MM UT-2: Peery Park Infrastructure Fee.** In addition to the improvements to the water delivery system described in MM U-1, the City shall ensure adequate financing for funding of infrastructure improvements to the wastewater system. The PPIF shall determine the costs of and establish a funding program for capital improvements to wastewater conveyance as needed to serve the demands of new development occurring under the Project. (HydroScience 2018 provides an update on water infrastructure needs in the PPSP area)

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been identified requiring new analysis or verification. Therefore, the conclusions of the PPSP EIR remain valid and approval of project would not result in new or substantially more severe significant impacts to utilities or energy.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Area	Where Impact Was Analyzed in the PPSP Final EIR.	Impact Conclusion of PPSP Final EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
18. Mandatory Findings of Significance.					
a. Does the project have the potential to 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?	Final EIR Section 3.3, Cultural Resources. Impacts to biological resources scoped out at the Notice of Preparation stage.	Significant and Unavoidable	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 view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Final EIR Sections 3.1 through 3.11	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable.
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Draft EIR Sections 3.2, Air Quality, 3.5, Hazards and Hazardous Materials, and 3.7, Noise	Significant and Unavoidable	No	No	Yes, but impact remains significant and unavoidable.

CONCLUSION

Since the PPSP EIR was certified, there have been regulatory changes noted in the above checklist. However, no new significant impacts or substantially more severe impacts were identified.

All approved mitigation in the PPSP EIR would continue to be implemented with the project to address project and cumulative impacts. 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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Julia Wilson ..... Air Quality, Greenhouse Gases, and Noise
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