Moffett Park Specific Plan

Environmental Checklist for Streamlined Review

This environmental checklist document has been prepared for streamlined review of the proposed project, pursuant to California Public Resources Code Sections 21083 and California Environmental Quality Act (CEQA) Guidelines Sections 15162, 15168, 15182, and 15183.

Project Name:	1215 Bordeaux Drive Residential Project
File Number:	PLNG-2025-0582
Assessor's Parcel Number(s):	110-25-017
Site Address/Location:	1215 Bordeaux Drive, Sunnyvale, California
Applicant/Property Owner:	Beam Reach

Determination: The proposed uses and density on the project site are consistent with the adopted 2023 Moffett Park Specific Plan and included as part of the analysis in the certified 2023 Moffett Park Specific Plan Final Environmental Impact Report (FEIR) (SCH# 2021080338). The analysis in this Environmental Checklist concludes that the proposed project would not trigger any of the criteria in CEQA Guidelines Sections 15162, 15168, 15182, and 15183 requiring preparation of a subsequent Negative Declaration or Environmental Impact Report and no additional environmental review is required.

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Date: May 2026

City of Sunnyvale

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All appendices are incorporated herein by reference.

Section 1.0 Introduction

1.1 Moffett Park Specific Plan and Environmental Review

In July 2023, the Sunnyvale City Council adopted an update to the Moffett Park Specific Plan (Specific Plan). Moffett Park is an integral part of Sunnyvale, consisting of approximately 1,270 acres in the northernmost portion of the City. Moffett Park is generally bounded by State Route (SR) 237 to the south; Moffett Federal Airfield and a golf course to the west; San Francisco Bay (Bay), the former/closed Sunnyvale landfill, Sunnyvale Materials Recovery and Transfer (SMaRT) Station©, Donald M. Somers Water Pollution Control Plant (WPCP), WPCP former salt ponds for wastewater treatment, an open-water pond, and Caribbean Drive to the north; and Caribbean Drive, Twin Creeks Sports Complex, and Baylands Park to the east. The boundaries of the Specific Plan are shown on Figure 1.1-1.

Through collaborative input from City Council, Planning Commission, local stakeholders, and the wider Sunnyvale community, a shared vision was created for Moffett Park to be a well-connected ecological innovation district with a diverse mix of uses that serves as a model of resilience, climate protection, equity, and economic opportunity through the implementation of the Specific Plan.

As part of the Specific Plan's approval, the City Council certified the Moffett Park Specific Plan Final Environmental Impact Report (FEIR) (SCH# 202108033), which evaluated the environmental impacts of the comprehensive Specific Plan update. The Specific Plan allows for a net increase of 20,000 residential units, 650,000 square feet of commercial uses,[1] 10.0 million square feet of office/industrial/R&D uses, and 200,000 square feet of institutional uses[2] beyond what was existing and approved at the time the Notice of Preparation was published on August 18, 2021. Ultimately, the buildout of the Specific Plan would result in a total of 20,000 residential units and approximately 33.5 million square feet of commercial, office/industrial/R&D, and institutional uses in Moffett Park.

[1] The 650,000 square feet of commercial uses include 500,000 square feet of retail uses and 150,000 square feet of hospitality uses.
[2] Institutional uses could include facilities such as schools, government facilities, and public/community facilities.

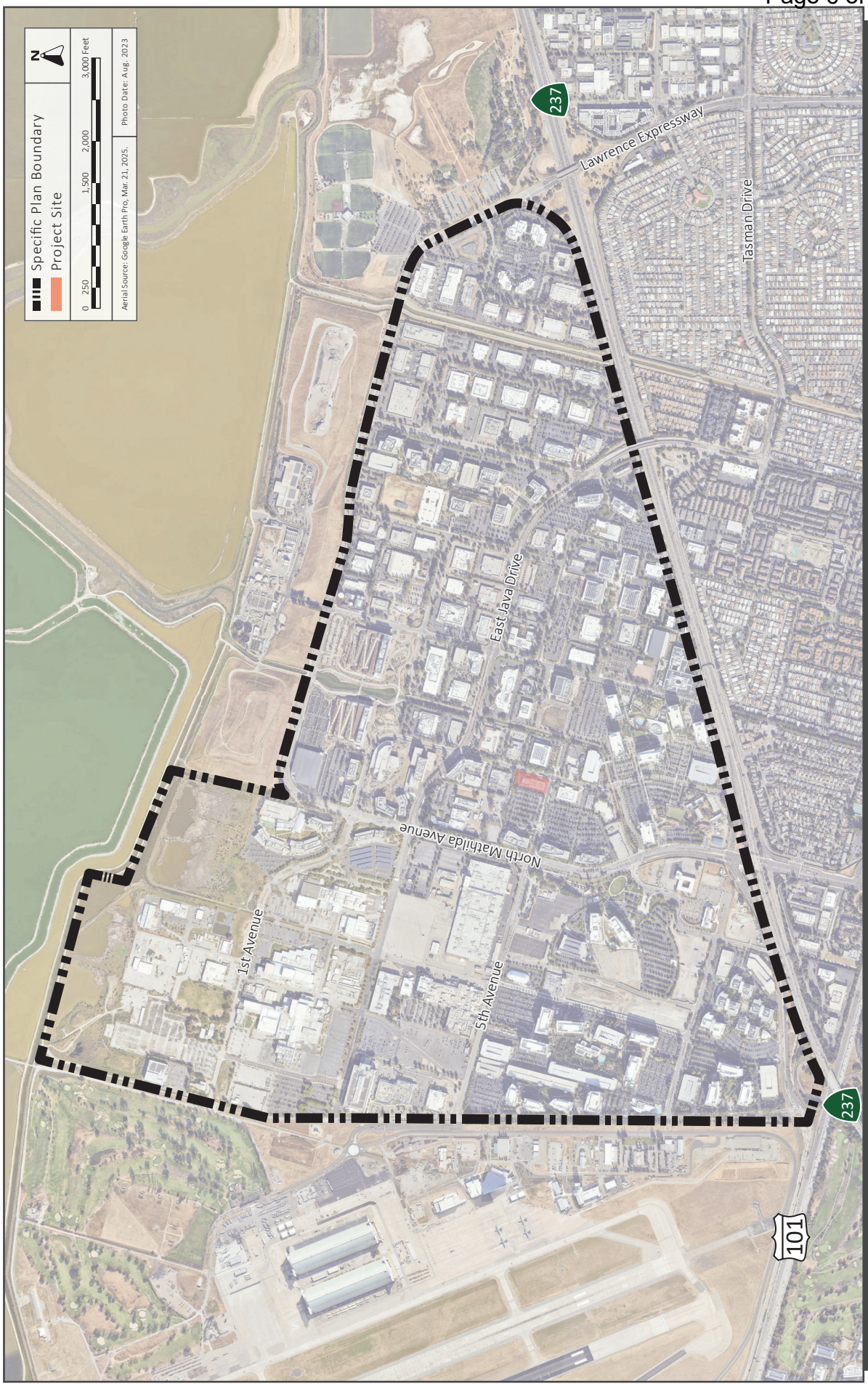


FIGURE 1.1-1

SPECIFIC PLAN BOUNDARIES

1.2 Streamlined Environmental Review

The FEIR allows for streamlined environmental reviews of subsequent development projects consistent with the Specific Plan and analysis in the FEIR. As documented in the analysis in this Environmental Checklist, development of the project site, as proposed, is generally consistent with the development assumptions for the site in the Specific Plan and evaluated in the FEIR.

CEQA encourages streamlining and tiering of environmental review for subsequent projects consistent with a plan for which environmental review has been completed, pursuant to California Public Resources Code Section 21083 and CEQA Guidelines Sections 15168, 15182, and 15183. When individual projects or activities under the Specific Plan are proposed, the City examines the projects or activities to determine whether their effects were adequately analyzed in the FEIR, as provided under the aforementioned CEQA Guidelines sections, and confirms whether any of the conditions for subsequent environmental review pursuant to CEQA Guidelines Sections 15162 and/or 15183 have been met.

The analysis in this environmental checklist provides information for the decision-makers and the public regarding the City's evidence and reasoning for determining the project's consistency with the assumptions (including conformance with uniformly applied development policies and standards) in the FEIR and whether there are project-specific significant effects which are peculiar to the project or its site. This Environmental Checklist hereby incorporates, by reference, the FEIR analysis of potential environmental topics, including background information regarding the environmental setting of the project and technical analyses. The FEIR is available for review at the City of Sunnyvale Community Development Department located at 456 West Olive Avenue during normal business hours.

Section 2.0 Project Information

2.1 Project Location and Existing Setting

Moffett Park consists of the Posolmi, Onizuka, NoJa, SoJa, Crossman, and Sunrise neighborhoods and the project site is located within the SoJa neighborhood. The SoJa Neighborhood is the largest neighborhood east of Mathilda Avenue and includes the area located south of Java Drive between Mathilda Avenue and Highway 237.

The 1.98-acre project site is comprised of one parcel (Assessor's Parcel Number [APN] 110-25-017) located at 1215 Bordeaux Drive. The site is bordered by Bordeaux Drive to the east, 5th Avenue to the south, and office uses to the north and west. The project site is currently developed with a one-story, approximately 25,820 square-foot office building and surface parking lot. There is an existing five-foot public utility easement parallel to the northern site boundary, a 10-foot public utility easement parallel to the eastern site boundary, and a 10-foot communication and 25-foot driveway easement on the southern portion of the site. A regional and vicinity map are shown on Figures 2.1-1 and 2.1-2, respectively. An aerial photograph with surrounding land uses is shown on Figure 2.1-3.

2.2 Specific Plan Zoning Designation and Consistency

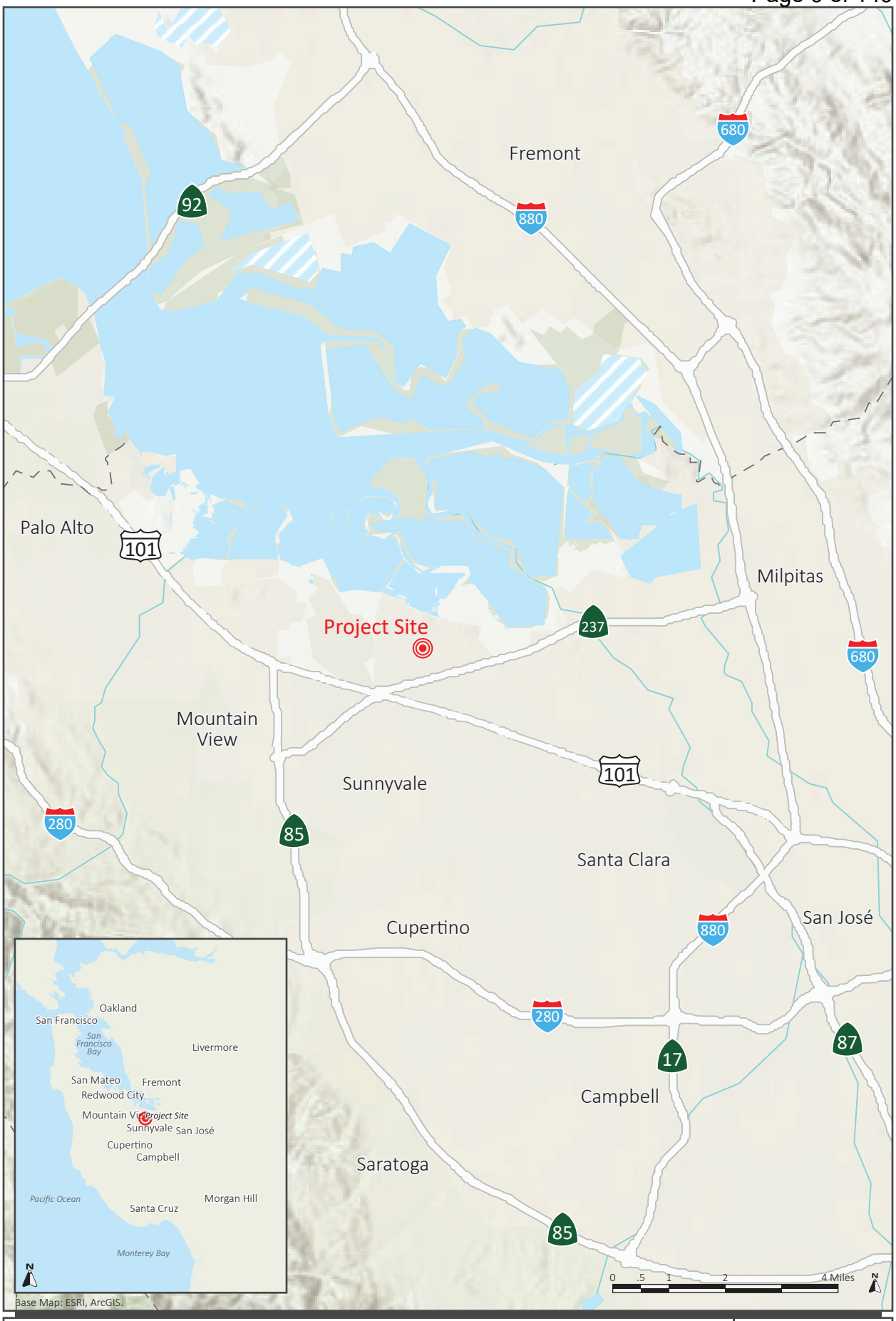
The project site is located within the Moffett Park Specific Plan in the City's General Plan. As noted above, the site is located within the SoJa neighborhood of the Specific Plan area. The site is zoned as MP-R, which is intended for very high-density residential uses.[3] The MP-R district has a minimum residential density requirement of 70 dwelling units per acre (du/ac) and maximum development potential in the MP-R district is limited through various form-based standards (e.g., setbacks, lot coverage, height limits, and publicly accessible open spaces and mobility connection requirements).

2.3 Project Approvals

The project is subject to the City's site-specific design review process and would require approval of the following discretionary action, in addition to ministerial permits for construction activities:

- Special Development Permit

[3] City of Sunnyvale. "Code of Ordinances: Chapter 19.29 Moffett Park Specific Plan District." Accessed January 7, 2026. https://ecode360.com/42730203.



REGIONAL MAP | FIGURE 2.1-1

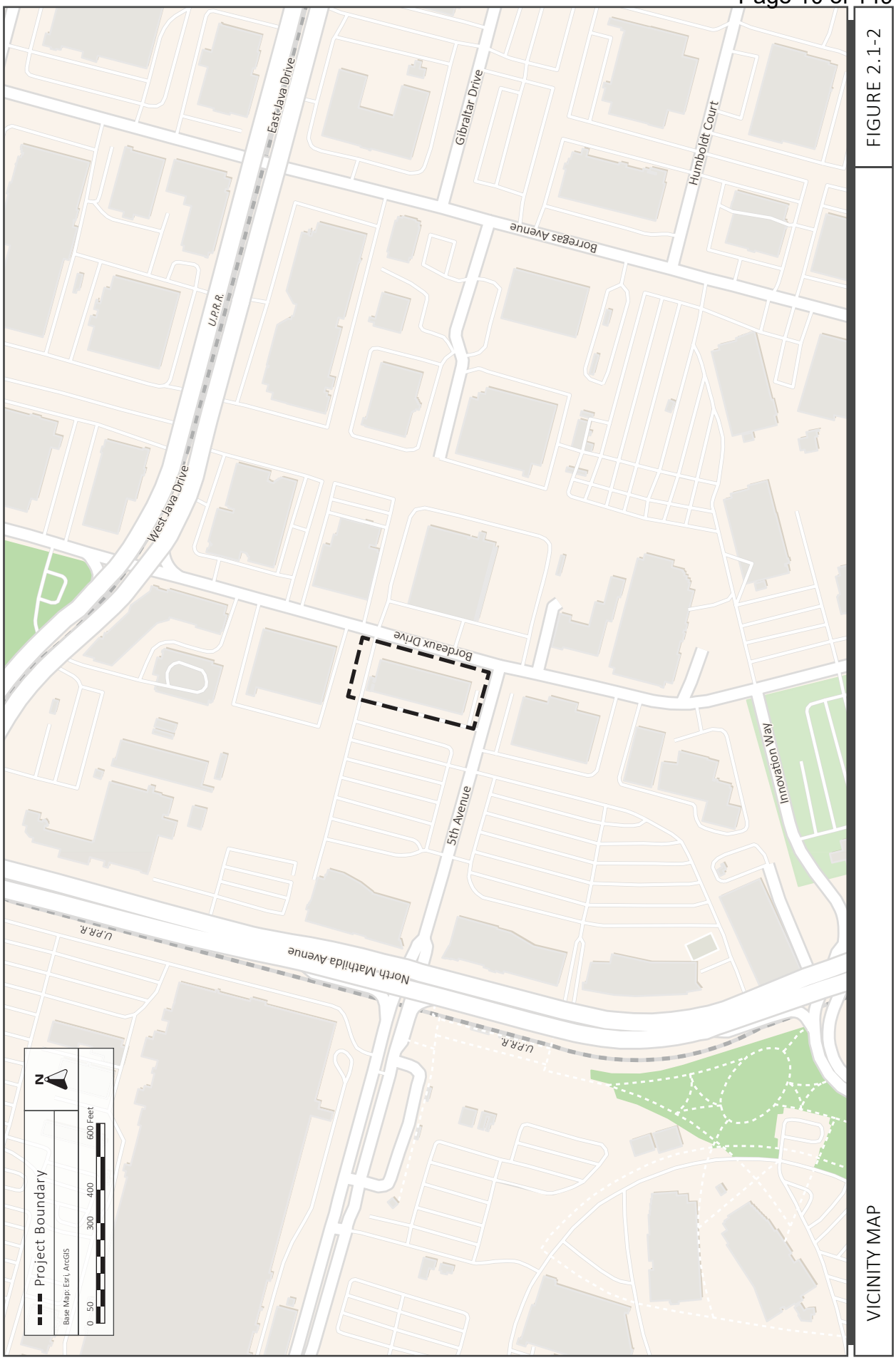


FIGURE 2.1-2

VICINITY MAP

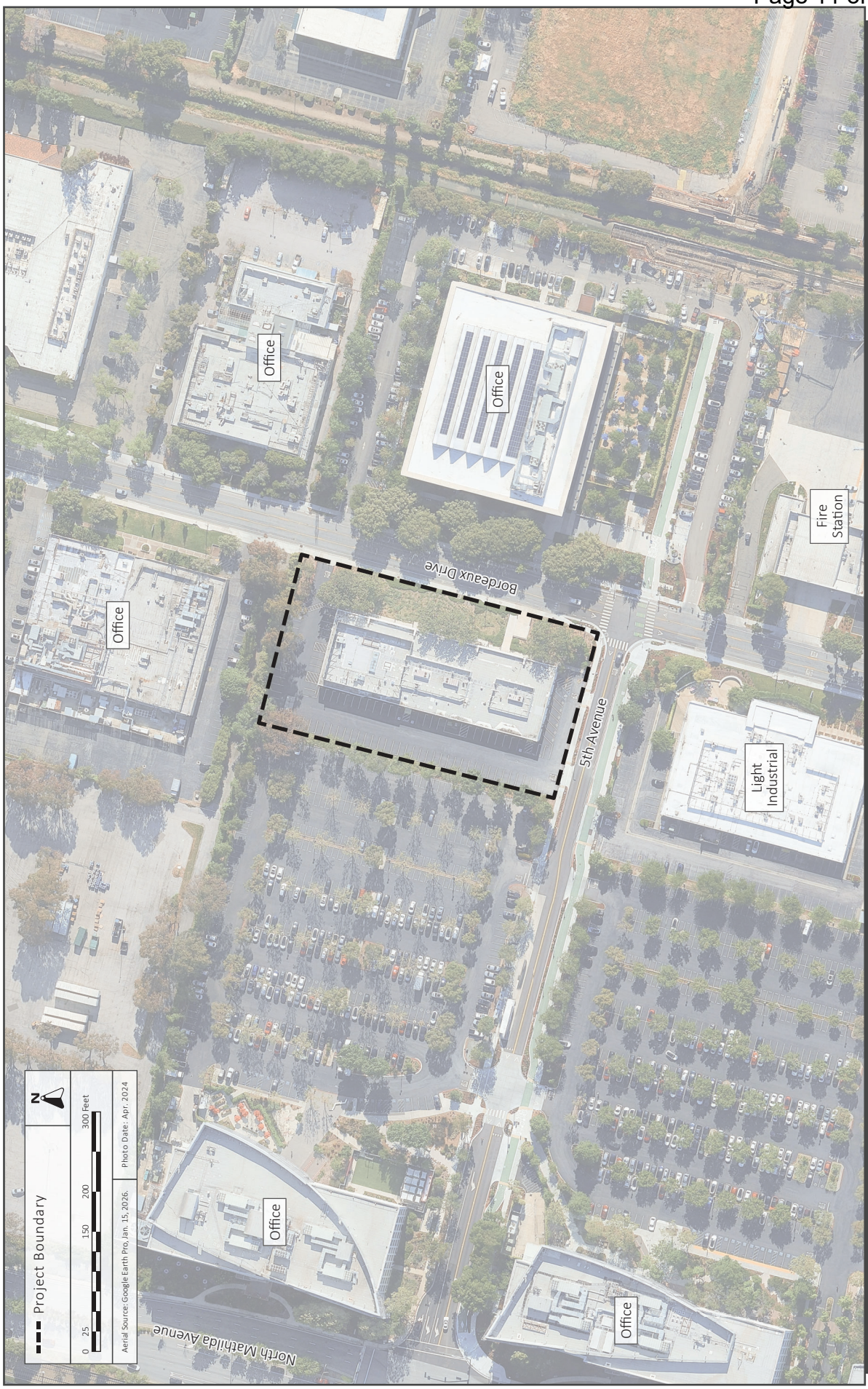


FIGURE 2.1-3

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

Section 3.0 Project Description

The proposed project would demolish the existing improvements on-site to construct an eight-story residential building with 265 multi-family residential units and 217 parking spaces. Pursuant to the State Density Bonus Law, development projects that provide a percentage of residential units at certain levels of affordability are entitled to various concessions and waivers for development standards. The project would reserve approximately 15 percent of the residential units on-site for low- and very low-income residents; therefore, it would qualify for concessions and waivers.

The project proposes to comply with all applicable Specific Plan requirements and standards (e.g., transportation demand measures) except those listed in Section 3.9 Waivers/Concessions. The primary project components are described in detail below.

3.1 Residential Building

The proposed eight-story residential building would total approximately 297,406 square feet and reach a maximum height of 91 feet as measured at the top of the parapet. The first two floors of the building would include ground-floor amenities and a double-height parking area to accommodate mechanical lift parking spaces (these features are detailed further below in Sections 3.2 and 3.3, respectively). The upper six floors would include 265 multi-family residential units. The project would provide 40 affordable units including 27 low-income and 13 very-low-income units. The project would result in a density of 134 du/ac.[4]

The conceptual site plan and project elevations are shown on Figure 3.1-1 and Figure 3.1-2, respectively.

3.2 Amenity Space

The project would include approximately 25,700 square feet of residential open space through a combination of private and common open space. The project would include an entry plaza with landscaping and seating areas adjacent to the primary entrance to the building on the southeast corner of the site. In addition, the project would include an approximately 0.3-acre privately owned, publicly accessible (POPA) open space area, which would include a dog park, picnic deck, landscaped walking paths, and seating areas. This POPA would be located on the northern portion of the site (see Figure 3.1-1) and would satisfy a portion of the 3.5-acre Bordeaux Neighborhood Park (see Figure 3.2-1), which spans across the project site and adjacent parcels to the north and west) and is identified as a Neighborhood Park – Habitat Patch in the Specific Plan.

[4] 265 dwelling units / 1.98 acres = 133.8 dwelling units / acre, rounded up to 134 du/ac.

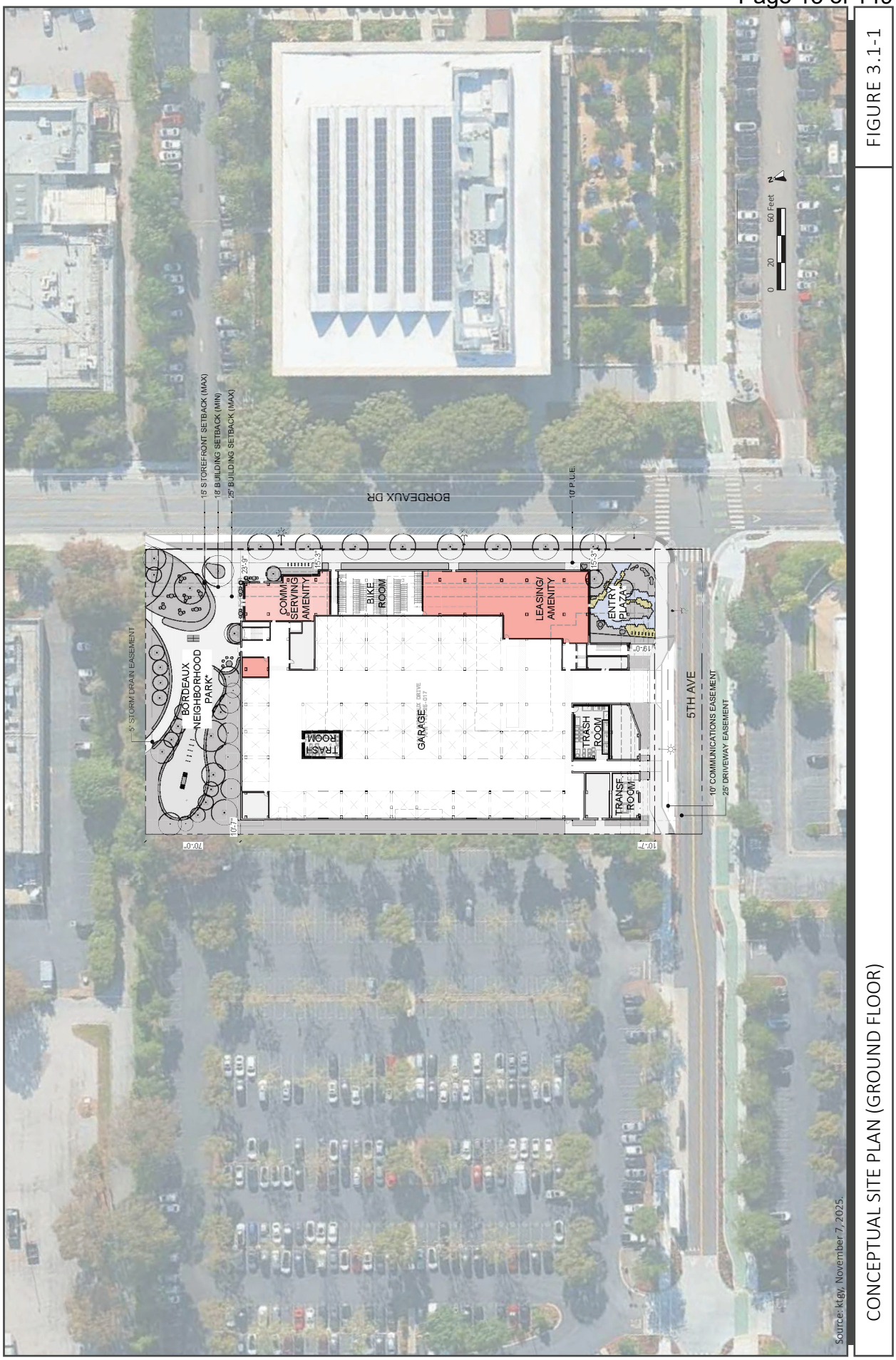


FIGURE 3.1-1

CONCEPTUAL SITE PLAN (GROUND FLOOR)

NORTH ELEVATION

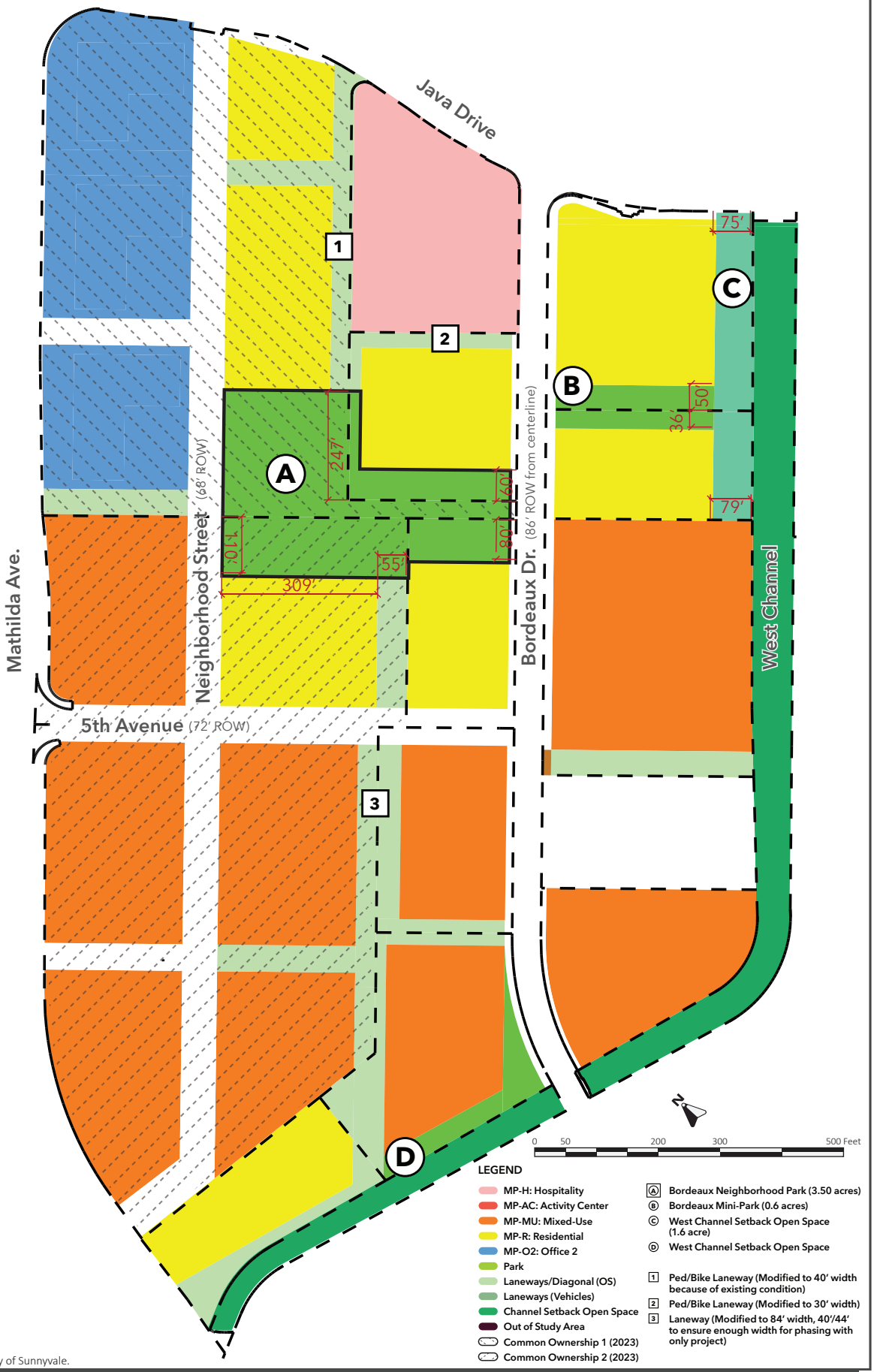
SOUTH ELEVATION

EAST ELEVATION

WEST ELEVATION

Source: ktgy, November 7, 2025.

CONCEPTUAL ELEVATIONS | FIGURE 3.1-2



Source: City of Sunnyvale.

SOJA NEIGHBORHOOD PLANNED OPEN SPACE | FIGURE 3.2-1

The residential building would include additional amenities such as ground floor community space, ground floor lobby, pet wash station, and a rooftop terrace. The third floor of the building would include an additional indoor amenity space and an outdoor courtyard area on top of the podium parking level that would include a pool, spa, fire pits with seating areas, an outdoor kitchenette area, and landscaping. The eighth floor would include an additional indoor amenity space and provide access to the rooftop terrace. The rooftop terrace would include a dining area with seating that would be accessible to residents. Most units would include a private balcony for residents.

3.3 Landscaping

The project site currently contains 58 trees, 25 of which are considered protected as defined in the City's Tree Preservation Ordinance (Chapter 19.94 of the SMC).[5] The project would remove a total of 14 existing trees, including nine protected trees. Six trees, including three protected trees, would be retained on-site and protected during construction activities. New landscaping and approximately 23 replacement trees would be planted around the perimeter of the site consistent with the Tree Replacement Guidelines in the City's Tree Preservation Ordinance.

3.4 Site Access and Parking

The project would remove the three existing driveways (two driveways on 5th Avenue and one driveway on Bordeaux Drive) and construct one new 24-foot-wide driveway on 5th Avenue. The new driveway would provide access to the project's ground-floor parking garage. The double-height parking garage would provide 217 total parking spaces, including 212 mechanical lift parking spaces[6] and five traditional parking spaces. The five traditional parking spaces would include one Level 2 EV charger space and four Level 2 EV-ready spaces.[7]Waste collection and trash staging would occur on 5th Avenue within a proposed designated dual-use loading zone.

The project would also provide 268 long-term and 28 short-term bicycle parking spaces. The long-term bicycle parking spaces would be located within a secure bike room on the ground floor of the building adjacent to Bordeaux Drive. The short-term bicycle parking

[5] A significant size tree, or protected tree, is defined as: Any single trunk tree 38 inches or greater in circumference (the circumference of the tree is measured at 4.5 feet above the ground); or any multi-trunk tree which has at least one trunk 38 inches or greater in circumference or where the measurements of the multi-trunks added together equal at least 113 inches. Source: City of Sunnyvale. Chapter 19.94 of the Municipal Code.
[6] Mechanical lift parking spaces provide multiple parking spaces per stall by stacking cars vertically and mechanically rearranging the stacks of cars when drivers need to enter or exit the space.
[7] Level 2 EV charger spaces are parking spaces equipped with installed electric vehicle supply equipment (EVSE) capable of charging electric vehicles. Level 2 EV-ready spaces are parking spaces provided with the electrical infrastructure necessary to support future installation of Level 2 EVSE, but that do not include installed charging equipment.

spaces would be provided on bike racks adjacent to the northeast and southeast corners of the building.

Direct pedestrian access to the project site would continue to be provided via sidewalks on 5th Avenue and Bordeaux Drive. Bicyclist access to the project site would continue to be provided via existing bike lanes in the vicinity, including along 5th Avenue and Bordeaux Drive. The project would add bike ramps at the northeast and southeast of the site, which would transition to the bike lane along Bordeaux Drive.

3.5 Utility and Right-of-Way Improvements

The proposed project involves the construction of new lateral connections to the existing 12-inch water, 12-inch sanitary sewer, 24-inch storm drain, and eight-inch recycled water main lines in Bordeaux Drive. The project would also construct a new lateral connection to the existing 24-inch storm drain main line in 5th Avenue. The project would include the installation of two new fire hydrants, including one on 5th Avenue and one on Bordeaux Drive adjacent to the project frontages.

The proposed project would result in a total increase of pervious area by approximately 3,260 square feet compared to existing conditions. The project would increase the on-site pervious area by 1,400 square feet and off-site pervious area by 1,860 square feet. The off-site pervious area is located along 5th Avenue and Bordeaux Drive. To control the amount of stormwater runoff from the site, the project would include approximately 2,487 square feet of bioretention facilities throughout the site where stormwater would be directed.

The proposed project would also include sidewalk reconstruction along 5th Avenue. The project would retain the existing bike lanes on 5th Avenue and northbound Bordeaux Drive and would alter the existing southbound bike lane on Bordeaux Drive.

3.6 Mechanical Equipment

The project would include heating, ventilation, and air conditioning (HVAC) equipment on the rooftop of the building which would be screened from public view. The rooftop of the building would also include space for solar photovoltaic panels (solar panels). The project would also include an emergency fire pump, located in a fire pump room on the ground floor, which would be powered by a 670 horsepower (hp) diesel-powered engine. In the event of an emergency, the diesel-powered engine would power the fire pump and supply energy to the building. The engine would meet U.S. Environmental Protection Agency (EPA) Tier 4 emissions standards.

3.7 Green Building Measures

The project would be built in accordance with the California Green Building Standards Code (CALGreen) requirements. The project would incorporate green building features, including drought-tolerant landscaping, water-efficient fixtures, high-efficiency appliances, EV charging infrastructure, solar panels, and recycled water for landscape irrigation. The project would be all-electric and designed to achieve a GreenPoint Gold Certification Level.

3.8 Construction Activities

Project construction activities would include demolition, site preparation, grading and excavation, building construction, architectural coatings, and paving. The proposed project would be constructed over approximately 15 months. Excavation and removal of approximately 26,000 cubic yards would be necessary to accommodate the proposed building foundations, footings, and utilities. Approximately 5,000 cubic yards would be imported as fill. Construction would require excavation at a maximum depth of seven feet below the ground surface (bgs).

3.9 Waivers/Concessions

Since the project would provide 40 units (or 15 percent of the total units) as affordable units to lower income families, the project is entitled to the State Density Bonus Law, which allows developers to increase density and obtain waivers/concessions for providing affordable units. The project applicant has submitted a Density Bonus Request Letter to the City.

The project applicant seeks waivers from the development standards of the General Plan designation and zoning district for the site, including the following:

- **Park Dedication Area:** The project applicant requests to provide a 70-foot-wide dedication area for Bordeaux Neighborhood Park where 80 feet would be required.
- **Residential Open Space** The project applicant requests to provide 44 to 52 feet wide interior courtyards where 55 feet would be required.
- **Green Roof:** The project applicant requests to deviate from the 20 percent green roof requirement by not including a green roof.
- **Storage:** The project applicant requests to deviate from the 125 cubic foot requirement for residential storage by not including residential storage.
- **Setbacks:** The project applicant proposes to deviate from the 18-foot setback requirements along the east and south, and the 10-foot setback requirements

along the north and west, by providing varied setbacks ranging from zero to 17 feet.

- **Loading Zone:** The project applicant proposes to provide an on-street loading zone within the modified 5th Avenue right-of-way instead of the required Type A off-street loading zone.
- **Façade Breaks:** The project applicant proposes to provide one major façade break rather than the two required façade breaks.
- **Bike Storage:** The project would provide 268 long-term bike parking spaces and 28 short-term bike parking spaces. The project applicant requests to deviate from the requirement to provide 200 bike lockers for each of these spaces.

Section 4.0 Environmental Checklist

The purpose of the checklist is to evaluate the categories in terms of any "changes" or "new information" that may result in a changed environmental impact evaluation. This Environmental Checklist compares the environmental impacts that would result from the implementation of the proposed project to the impacts previously identified for the site in the FEIR to determine whether the proposed project's environmental impacts were adequately addressed in the FEIR per CEQA Guidelines Sections 15168, 15182, and 15183.

The FEIR concluded the implementation of the Specific Plan would result in no impacts to agriculture and forestry, mineral resources, or wildfire impacts because:

- No sites in Moffett Park are zoned or used for agricultural use, forest land, or timberland,
- Moffett Park is not in the vicinity of any mineral extraction sites and no known mineral resources are present within Moffett Park, and
- Moffett Park is located in an urbanized location and is not in or adjacent to a fire hazard severity zone or state responsibility areas.

The above conditions have not changed since the certification of the FEIR. Therefore, the project (which is generally consistent with the Specific Plan and located within Moffett Park) would result in the same impact (i.e., no impact) on agriculture and forestry, mineral resources, or wildfire as disclosed in the FEIR and these resources are not evaluated further.

This section presents a discussion of impacts related to the following environmental resource areas:

The discussion for each environmental resource area includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that comprise the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

- **Impact Discussion** – This subsection provides an analysis of the potential environmental effects of the proposed project. Following the format of CEQA Guidelines Appendix G, the project has been analyzed to determine whether the project would result in the following factors:
    - Pursuant to CEQA Guidelines Section 15162:
        - One or more significant effects not discussed in the previous FEIR;
        - Significant effects previously examined will be substantially more severe than shown in the previous FEIR;
        - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
        - Mitigation measures or alternatives which are considerably different from those analyzed in the previous FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
    - Pursuant to CEQA Guidelines Section 15183:
        - A significant impact that is peculiar to the project or the parcel on which the project would be located;
        - A new significant impact that was not previously analyzed as a significant effect in the prior FEIR, with which the project is consistent;
        - A significant off-site impact and cumulative impact which was not discussed in the prior FEIR; or
        - A previously identified significant effect which, as a result of substantial new information which was not known at the time the EIR was certified, is determined to have a more severe adverse impact than discussed in the EIR.

A discussion for each of the checklist questions is provided following the table included for each environmental resource area. The discussion provides information about the environmental issue and what the analysis in the FEIR concluded about the issue, how the project relates to the issue, and the project's compliance with applicable Specific Plan requirements and policies, other uniformly applied development policies and standards,

and/or project-specific mitigation to reduce significant impacts. Pursuant to CEQA Guidelines Section 15162, no subsequent EIR or negative declaration shall be prepared for a project unless the lead agency determines, based on substantial evidence in light of the whole record, one or more of the above listed factors are met Pursuant to CEQA Guidelines Section 15183, where an impact is not peculiar to the project or the parcel, has been addressed as a significant effect in the prior EIRs, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, an additional EIR need not be prepared for the impact. As set forth in more detail below, none of the factors laid out in CEQA Guidelines Sections 15162 or 15183 have been triggered, and no further analysis is required.

4.1 Aesthetics

4.1.1 Environmental Setting

The existing aesthetic setting, including regulatory framework, has not substantially changed since the certification of the Specific Plan FEIR.

Visual Character and Quality

Project Site

The existing one-story, rectangular office building is constructed in the Modern style, characterized by a flat roof and reinforced concrete. All windows are set in aluminum sash and all doors are fully-glazed aluminum. The building's exterior is finished with smooth, light-colored concrete or stucco panels. The site contains ornamental landscaping (trees, shrubs, and groundcover) and is surrounded by surface parking.

The primary (east) façade features a recessed glass doorway and recessed vertical windows separated by plain columns. The east façade features projecting molding with rounded edges along a horizontal band above the building's entrance. The entryway is connected to the Bordeaux Drive sidewalk via a paved walkway and is framed by bollard lighting and ornamental landscaping. The rear (west), northern, and southern façades contain minimal architectural details. The rear façade is characterized by a blank wall, three pairs of recessed windows, one roll-up door, one paired door, and one single door. The northern façade is characterized by a blank wall and two single doors. The southern façade features a blank wall, six recessed vertical windows, and six EV charging receptacles.

Photos of the existing building are shown on Photos 1 through 3.

Surrounding Area

To the south of the project site, across 5th Avenue, there is a one-story, rectangular office building similar in scale and design to the existing building on the project site. The building features a flat roof, smooth exterior wall surfaces, and horizontal window bands. Across Bordeaux Drive, surrounding development comprises of larger office buildings and Fire Station #5, including a two-story structure with more modern architecture characterized by greater use of glass, vertical articulation, and recessed entry features.

The surrounding streetscape includes roadways, sidewalks, bicycle lanes, landscaped medians, and street trees. Mature vegetation, including large canopy trees and ornamental plantings, provide screening between buildings.

Photos of surrounding uses are shown on Photos 4 through 6.

Photo 1: View of 1215 Bordeaux Drive building frontage, facing west from Bordeaux Drive.

Photo 2: View of 1215 Bordeaux Drive building, facing north from Fifth Avenue.

PHOTOS 1 & 2

Photo 3: View of 1215 Bordeaux Drive building back facade, facing east from the adjacent parking lot.

Photo 4: View of adjacent office building across Fifth Avenue, facing south from the project site.

PHOTOS 3 & 4

Photo 5: View of adjacent office building across Bordeaux Drive, facing east from the project site.

Photo 6: View of Bordeaux Drive and 5th Avenue intersection, facing southeast from the project site.

PHOTOS 5 & 6

4.1.2 Impact Discussion

Except as provided in Public Resources Code Section 21099, would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Have a substantial adverse effect on a scenic vista?	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS	No	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[8] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	No	No	No	No

Note: LTS = less than significant.

Pursuant to SB 743, "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." The Specific Plan is a mixed-use residential and employment center project in an infill location. The FEIR determined that most of Moffett Park is within a TPA, and that future development projects located within a TPA would have a less than significant impact to aesthetics pursuant to SB 743. Whereas the subsequent environmental review for future development projects located in the northwestern and eastern portions of Moffett Park (outside of a TPA) would be required to address each CEQA checklist question. Additionally, all projects within the Specific Plan area would comply with the City's development review process, Specific

[8] Public views are those that are experienced from publicly accessible vantage points.

Plan Policy OSE-3.4 requiring integrating dark sky policies into site lighting, and Specific Plan Section 6.6.9 standards requiring compliance with the International Dark-Sky Association's Backlight-Uplight-Glare (BUG) rating system, automatic shutoffs for unnecessary lighting from 10 PM to sunrise, and other exterior lighting requirements.[9]

The project site is located within a TPA.[10] Therefore, pursuant to the FEIR and SB 743, the project would result in a less than significant aesthetics impact. The project would not meet any of the factors laid out in CEQA Guidelines Section 15162 and 15183. No further analysis is required. Notwithstanding, and as required of all developments within the Specific Plan area, the project would comply with applicable Specific Plan development standards related to exterior lighting, glare, and reflectivity (including Specific Plan Policy OSE-3.4 and Specific Plan Section 6.6.9).

[9] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 53.
[10] Metropolitan Transportation Commission/Association of Bay Area Governments. "Transit Priority Areas (2021)." Accessed January 26, 2026. https://opendata.mtc.ca.gov/datasets/MTC::transit-priority-areas-2021-1/explore?location=37.410718%2C-122.023664%2C16.10.

4.2 Air Quality

This section is based, in part, on a TDM Plan completed by Hexagon Transportation Consultants, Inc. in November 2025, and an Air Quality and Health Risk Assessment (HRA) completed for the project by Illingworth & Rodkin, Inc., in February 2026. The reports are attached as Appendices A and B, respectively.

4.2.1 Environmental Setting

The existing air quality setting, including regulatory framework, has not substantially changed since certification of the FEIR. Since the certification of the FEIR, the Bay Area Air Quality Management District (BAAQMD) changed their name to Bay Area Air District (Air District). References to BAAQMD and the Air District below refer to the same entity.

There are no existing sensitive receptors (i.e., residential areas, elementary schools, hospitals) within 1,000 feet of the project site. The closest receptors to the project site are the worker receptors in the surrounding office buildings.

4.2.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Conflict with or obstruct implementation of the applicable air quality plan?	SU	No	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	SU	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	LTS	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	No	No	No	No

Notes:

LTS = less than significant.

SU = significant unavoidable.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

a. The FEIR analyzed the consistency of the Specific Plan and future development under the Specific Plan with the 2017 Clean Air Plan (2017 CAP) using both plan- and project-level thresholds established by the Air District. A project is considered consistent with the CAP if it: (1) supports the primary goals of the 2017 CAP; (2) includes relevant control measures; and (3) does not interfere with implementation of CAP control measures. The goals of the 2017 CAP are: 1) protecting public health and 2) protecting the climate. An analysis of the project's consistency with the 2017 CAP goal of protecting the climate is discussed separately in Section 4.7 Greenhouse Gas Emissions.

Plan-Level Consistency

As discussed in the FEIR, the Air District thresholds of significance for protecting public health for land use plans such as the proposed Specific Plan are:

- Consistency with Current Air Quality Plan control measures, and
- Projected VMT or vehicle trip increase is less than or equal to projected population increase.

The FEIR concluded the Specific Plan would be consistent (i.e., result in a less than significant plan-level impact) with the 2017 CAP because the Specific Plan would support and be consistent with 2017 CAP control measures and would increase traffic at a rate less than the increase in service population.[11]

The project is consistent with the findings in the FEIR because, as discussed below, the project would not generate substantial amounts of criteria air pollutant emissions or result in significant health risks. The project is consistent with the findings in the FEIR because the project is considered urban infill and located near bike paths and transit with regional connections. As such, implementation of the project would not inhibit the Air District or partner agencies from continuing progress toward attaining federal and state air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 Clean Air Plan. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[11] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 65-69.

Project-Level Consistency

The Air District's project-level thresholds of significance for protecting public health pertain to construction and operational criteria air pollutant emissions, fugitive dust, and health risk.

Construction Criteria Pollutant Emissions

The FEIR concluded future development projects would implement Specific Plan Project Requirements 10.3.3-1 and 10.3.3-2, listed below, to reduce construction emissions to less than significant levels:

Requirement	Description
10.3.3-1	**BAAQMD Construction Management Practices.** All future construction projects under the Specific Plan shall implement the following BAAQMD basic best management practices (BMPs) to reduce diesel particulate matter (DPM) and particulate matter ($PM_{2.5}$ and PM_{10}) emissions during construction: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples of moisture probe. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • 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. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • 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. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. 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. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour and visible dust extends beyond site boundaries. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity. • 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.

Requirement	Description
	• The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities in 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. • Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) site accesses to a distance of 100 feet from public paved roads shall be treated with a six to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site. • 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.
10.3.3-2	**Construction and Operations Modeling.** If future construction projects do not meet the screening level size identified by the BAAQMD for less than significant construction criteria air pollutant emissions, future construction projects shall estimate construction and operation period emissions using modeling methodologies recommended BAAQMD and approved by the City. Average daily emissions predicted for construction projects shall be estimated and compared against project level thresholds identified in Table 3.3-4 (in the FEIR). Projects that have emissions exceeding the thresholds shall implement appropriate measures to achieve emissions that are below the thresholds, such as the following: • Use construction equipment that has zero or low diesel particulate matter exhaust and NO_x emissions. Exhaust emission (NO_x and PM) control measures include: a. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for NO_x and PM (PM_{10} and $PM_{2.5}$), if feasible, otherwise, ▪ If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 85-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination). ▪ Use of alternatively fueled equipment with lower NO_x emissions that meet the NO_x and PM reduction requirements above. ▪ Special equipment that cannot meet the above requirements must be approved as exempt by the City after considering reasons for requesting an exemption. b. Use electric equipment such as aerial lifts, air compressors, cement mortar mixers, concrete/industrial saws, cranes, and welders c. Diesel engines, whether for off road equipment or on road vehicles, shall not be left idling for more than two minutes, except as provided in exceptions to the applicable state regulations (e.g., traffic conditions, safe operating conditions). The construction sites shall have posted legible and visible signs in designated queuing areas and at the construction site to clearly notify operators of idling limit. d. Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.

Requirement	Description
	e. Use of zero emission construction equipment. • Use low volatile organic compound or VOC (i.e., reactive organic compounds) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 80 percent of all residential and non-residential interior paints and 80 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 80 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used. Examples of "super-compliant" coatings are contained on the South Coast Air Quality Management District's website.

The proposed 265-unit project falls below the 416-unit threshold outlined by the Air District's screening criteria for construction criteria air pollutant emissions. The project, however, includes demolition activities, which preclude the project from screening out of the quantitative analysis recommended by the Air District. Therefore, the project's construction criteria air pollutant emissions were modeled in compliance with Specific Plan Requirement 10.3.3-2. The results are summarized in Table 4.2-1 below. Refer to Appendix B for details about the modeling.

Table 4.2-1: Daily Construction Period Emissions (lbs./day)

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
2027-2028[1]	12.77	12.83	0.40	0.37
Air District thresholds	*54*	*54*	*82*	*54*
Exceed Threshold?	No	No	No	No

Notes:

[1] Emissions per year are combined because the project would be built out over a period of 324 construction workdays (excluding building painting and exterior work).

Source: Illingworth & Rodkin, Inc. *1215 Bordeaux Drive Construction Emissions Assessment.* February 6, 2026.

As shown in Table 4.2-1 above, construction activities would not result in criteria air pollutant emissions above the Air District thresholds of significance. Consistent with guidance from the Air District and the FEIR, the project would comply with Specific Plan Requirement 10.3.3-1 by implementing the Air District's BMPs to reduce fugitive dust effects to a less than significant level. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Operational Criteria Pollutant Emissions

The FEIR concluded that buildout of the Specific Plan would result in significant and unavoidable operational criteria air pollutant emissions and future development would be required to implement Specific Plan Project Requirement 10.3.3-2 listed above, along with Specific Plan Requirement 10.3.3, Specific Plan Standard 8.2.4.c, and Specific Plan Policies TDMP-2.1 through -2.5, listed below, to reduce operational emissions to the maximum extent feasible.[12]

Requirement	**Description**
10.3.3-3	**Generator Emissions.** All diesel standby emergency generators powered by diesel fuel shall meet U.S. EPA Tier 4 engine standards. • Future development projects in Moffett Park that include installation of permanent stationary emergency generators shall ensure generators have engines that meet or exceed U.S. EPA Tier 4 standards for particulate matter emissions.

Standard	**Description**
8.2.4.c	New development must meet the following peak hour trip reduction rates through efforts defined in a submitted TDM and through participation in progress of the Moffett Park Transportation Management Association (TMA).

Land Use	Initial TDM Peak Hour Reduction Rate	Long Term TDM Peak Hour Reduction Rate
Office/R&D	50%	65%
Commercial/Retail	0%	10%
Residential	15%	30%
Other Uses	50%	65%

Policy	**Description**
TDMP-2.1	Establish a TMA to oversee mobility improvements, coordinate efforts, and manage a district-wide TDM strategy.
TDMP-2.2	Ensure new development reduces vehicle trips through a required TDM Plan and TMA membership.
TDMP-2.3	Establish clear metrics, data points, and processes for applying TDM measures at the site level across Moffett Park.
TDMP-2.4	Continue to collaborate with Santa Clara Valley Transportation Authority (VTA) to align local development with transit infrastructure improvements.
TDMP-2.5	Work with TMA to achieve a 50 percent single-occupancy vehicle rate at full buildout.

[12] Ibid., pages 73-78.

The proposed project is consistent with the Specific Plan's land use assumptions for the project site and is, therefore, accounted for in the FEIR analysis. Consistent with Specific Plan Requirements 10.3.3-2 and 10.3.3-3, the project would use low VOC architectural coatings and the emergency diesel-powered engine would meet U.S. EPA Tier 4 standards.

The Specific Plan established minimum TDM requirements for both residential and non-residential projects. Residential projects with 10 or more units are required to provide TDM program elements at a minimum, with additional measures required if implementation of the minimum elements does not meet the 50 percent single-occupancy vehicle goal. Consistent with Specific Plan Standard 8.2.4.c, a TDM plan was prepared for the proposed project (see Appendix A). As mentioned in Section 3.0 Project Description, the plan includes the following minimum required and project-specific TDM measures:

- Enrollment in the Moffett Park TMA (minimum required)
- On-site Transportation Coordinator (minimum required)
- TDM marketing materials for employees (minimum required)
- Unbundled parking (minimum required)
- Carpool/vanpool parking (minimum required)
- Bicycle parking (minimum required)
- Annual monitoring and reporting program (minimum required)
- Proximity to transit (project-specific)
- Proximity to commercial uses (project-specific)

Implementation of the TDM measures would result in a trip reduction consistent with the requirements of Specific Plan Standard 8.2.4.c. Refer to Appendix A for more details about the trip reduction calculations. The City (rather than specific development projects) is responsible for complying with Specific Plan Policies TDMP-2.1 through TDMP-2.5. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Health Effects Associated with Significant Operational Emissions

The FEIR disclosed that buildout of the Specific Plan would result in a reduction in operational NO_X emissions, resulting in a less than significant impact from NO_X to public health, but would increase ROG emissions to levels above the Air District's threshold of 10 tons per day. Through a comparison of project emissions to Bay Area air basin emissions, the FEIR concluded the Specific Plan's operational emissions would only constitute 0.25 percent of the regional inventory for ROG. The FEIR, therefore, concluded buildout of the Specific Plan would result in a less than significant impact with regards to health effects from NOx and ROG.[13]

[13] Ibid., pages 77-78.

Since the proposed land use and density on-site is consistent with the Specific Plan, the project was accounted for in the FEIR analysis. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Construction and Operational Health Risks

The FEIR concluded that future development under the Specific Plan would result in less than significant impacts to construction and operational health risk. The project's consistency with the FEIR health risk analysis and conclusion is discussed in detail under checklist question c below.

Incorporation and Implementation of Relevant Control Measures

The FEIR concluded that future development under the Specific Plan would support and be consistent with the 2017 CAP control measures to reduce automobile trips, conserve energy, and conserve water.[14]

As discussed in Section 3.0 Project Description, the proposed project would be all-electric and include drought-tolerant landscaping; higher efficiency appliances, lighting, and HVAC systems; EV charging infrastructure; and solar panels. The project would meet the CALGreen Mandatory Measures and GreenPoint Rated Checklist and achieve at least 100 points and a BIG Certification. For these reasons, the project would be consistent with the 2017 CAP control measures, consistent with the findings of the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. A discussion of the project's cumulatively considerable net increase in criteria pollutants for which the project region is non-attainment under is discussed above under checklist question a) and concluded to not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

c. Buildout of the Specific Plan would introduce new sources of toxic air contaminants (TACs) during construction (i.e., on-site construction activity and truck hauling emissions) and operation (i.e., mobile sources and stationary sources). Construction and operational health risk impacts are discussed below.

Construction Health Risks

The FEIR concluded buildout of the Specific Plan would not expose sensitive receptors to substantial pollutant concentrations (i.e., result in a less than significant impact) because future development projects located within 1,000 feet of existing or planned sensitive

[14] Ibid., pages 66-68.

receptors would be required to implement Specific Plan Project Requirement 10.3.3-4 below to reduce construction TACs and $PM_{2.5}$ emissions during construction below Air District thresholds of significance.[15]

Requirement	Description
10.3.3-4	**Health Risk Assessment.** Future development proposed within 1,000 feet of existing or planned sensitive receptors as defined by the BAAQMD (e.g., residences, schools) shall prepare a site-specific construction and operational health risk assessment (HRA) pursuant to the BAAQMD CEQA Air Quality Guidelines. If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors would be less than the BAAQMD project-level and cumulative thresholds, then no further study or measures are required. If the HRA demonstrates the health risks would exceed BAAQMD project-level thresholds or the project results in a considerable contribution to a significant cumulative health risk impact, additional feasible on- and off-site mitigation shall be analyzed to reduce risks to a less than significant level. Measures to avoid and/or reduce significant construction health risk impacts, could include the following: • Use Tier 4 engines for all off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities. • Use diesel trucks with 2010 or later compliant model year engines during construction. • Use renewable diesel during construction. • Use low-VOC coatings during construction. • Implement fugitive dust best management practices and if necessary, enhanced measures recommended by BAAQMD. • Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules. • Phase construction appropriately to lower the intensity of emissions at any one location with sensitive receptors. • Provide enhanced air filtration for sensitive receptors adversely affected by project emissions.

Consistent with Specific Plan Requirement 10.3.3-4, the project's construction risk impacts were assessed by predicting increased lifetime cancer risk, increased annual $PM_{2.5}$ concentrations, and computing the Hazard Index for non-cancer health risks. The modeled maximum annual DPM and $PM_{2.5}$ concentrations were identified at nearby worker receptors to find the maximally exposed individual (MEI). The property identified as the MEI represents the area with the highest exposures to TACs generated from

[15] Ibid., pages 79-81.

construction of the proposed project and, therefore, their exposures are used to assess whether a significant impact would occur. The MEI was identified as a worker receptor on the first floor of the building to the south of the project site. Project risk impacts to the off-site MEI are summarized in Table 4.2-2 below. The location of the MEI and nearby TAC and $PM_{2.5}$ sources are shown on Figure 4.2-1. Refer to Appendix B for details about the health risk modeling done for the project.

Table 4.2-2: Project Health Risk Impacts at the Off-Site MEI

Source	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)[1]**	**Hazard Index**
Project Construction (years 0-1)			
Uncontrolled	1.03	**0.38**	0.04
Controlled[2]	0.18	0.21	0.01
Project Operation (years 1-30)			
Fire Pump	0.04	<0.01	<0.01
Total/Maximum Project Impact			
Uncontrolled	1.07	**0.38**	0.04
Controlled[2]	0.22	0.21	0.01
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold?	No	No	No

Source: Illingworth & Rodkin, Inc., February 6, 2026.

FIGURE 4.2-1

LOCATION OF MEI AND NEARBY TAC AND $PM_{2.5}$ SOURCES

As shown in Table 4.2-2, project construction would exceed Air District thresholds for annual $PM_{2.5}$ emissions if dust and exhaust controls are not implemented. To reduce levels below the thresholds, the following specific measures contained in Specific Plan Requirements 10.3.3-1 and 10.3.3-4 would be implemented:

- All construction equipment larger than 25 hp used at the site for more than 20 continuous days or 20 hours total shall meet U.S. EPA Tier 4 final emission standards for PM_{10} and $PM^{2.5}$, if feasible, and
- Electric powered building cranes.
- Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel PM emissions by 70 percent or greater. Elements of the plan could include a combination of the following measures:
    - Installation of electric power lines during early construction phase to avoid use of diesel portable equipment,
    - Use of electrically-powered equipment,
    - Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
    - Change in construction build-out plans to lengthen phases, and
    - Implementation of different building techniques that result in less diesel equipment usage.

    Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

With the above requirements implemented, the project's annual $PM_{2.5}$ levels during construction would be reduced to below Air District single-source thresholds. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Consistent with Specific Plan Project Requirement 10.3.3-4, the project's cumulative health risks were also assessed by analyzing the substantial sources of TACs, located within 1,000 feet of the project site, that could affect sensitive receptors. Sources typically include rail lines, highways, busy surface streets, and stationary sources identified by the Air District. Ten stationary sources of TACs were identified with the potential to affect the project MEI. Cumulative impacts are summarized in Table 4.2-3 below.

Table 4.2-3: Health Risk Impacts from Combined Sources at the Off-Site MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)[1]	Hazard Index
Project			
Uncontrolled	1.07	0.38	0.04
Controlled[2]	0.22	0.21	0.01
Cumulative Roadways	<5.26	<0.18	<0.02
Fire Station 5, MEI at 180 feet	0.00	0.00	0.00
Google LLC, MEI at 670 feet	1.04	<0.01	0.00
Google LLC, MEI at 700 feet	0.07	0.00	0.00
JSR Micro Inc, MEI at 950 feet	1.13	0.08	0.04
Nanosys Inc, MEI at 700 feet	0.00	0.00	0.00
OEpic Inc, MEI at 580 feet	0.30	0.00	0.00
Pacific Bell, MEI at 800 feet	0.30	<0.01	0.00
Star One Credit Union, MEI at +1,000 feet.	0.00	0.00	0.00
Verizon Wireless, MEI at 780 feet	0.12	0.00	0.00
Google LLC, MEI at +1,000 feet	0.00	0.00	0.00
Cumulative Totals			
Uncontrolled	<9.29	<0.66	<0.10
Controlled[2]	<8.44	<0.49	<0.07
Air District Cumulative Sources Threshold	*>100*	*>0.8*	*>10.0*
Exceed Threshold?	No	No	No

Notes:

Bolded values denote an exceedance of the respective cumulative threshold.

[1] $\mu g/m^3$ = micrograms per cubic meter.

[2] Controls refer to measures to control dust and exhaust and use of Tier 4 equipment and electric cranes during construction (i.e., Specific Plan Requirements 10.3.3-1 and 10.3.3-4).

[3] Refer to Appendix B for details about facility locations.

Source: Illingworth & Rodkin, Inc. *1215 Bordeaux Drive Construction Emissions Assessment.* February 6, 2026.

As shown in Table 4.2-3, the combined cancer risk, annual $PM_{2.5}$, and hazard index emissions of the project, roadways, and stationary sources would not exceed the cumulative-source thresholds. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Operational Health Risks

Traffic Emissions

The FEIR concluded buildout of the Specific Plan would have a less than significant operational health risk impact from traffic emissions because the operational traffic sources would not result in exceedances of the Air District single-source or cumulative source significance thresholds for cancer risk, annual $PM_{2.5}$, or Hazard Index.[16]

Since the proposed land use and density is consistent with the assumptions of the FEIR, traffic emissions associated with project trips were analyzed and accounted for in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Emergency Generators

The FEIR concluded buildout of the Specific Plan would have a less than significant operational health risk impact from stationary equipment (e.g., emergency fire pumps with diesel powered engines and emergency generators) because future development would comply with Specific Plan Requirement 10.3.3-3, ensuring that future generators have engines that meet or exceed U.S. EPA Tier 4 standards for PM emissions. Additionally, any proposed diesel engines would be subject to CARB's Stationary Diesel Airborne Toxic Controls Measure (ATCM) and require permits from the Air District, which would ensure Best Available Control Technology for Toxics requirements are implemented to limit DPM emissions.

The project includes one emergency fire pump that would be located in a fire pump room on the ground floor along the southern side of the proposed building. The fire pump would be powered by a 670 hp diesel-powered engine during emergencies. The fire pump's diesel-powered engine would comply with CARB's ATCM and Air District permits. Sources of air pollutant emissions complying with applicable Air District regulations are not considered to have a significant air quality health risk impact. Further, consistent with Specific Plan Requirement 10.3.3-4, operational health risk impacts associated with the emergency operation of the fire pump's diesel generator were assessed due to the project's proximity to worker receptors. As shown in Table 4.2-2, the regular testing of the fire pump's diesel generator would not exceed Air District thresholds. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Section 15162 and 15183. No further analysis is required.

[16] Ibid., pages 81-82.

d. The FEIR concluded buildout of the Specific Plan would have a less than significant odor impact because construction-related odorous emissions would be temporary and the future residential, office, retail, hotel, and institutional uses would not generate substantial operational odors.[17] The FEIR concluded that future industrial and R&D projects could generate substantial odors that would be reduced to less than significant levels through implementation of Specific Plan Project Requirement 10.3.3-5 below.

Requirement	Description
10.3.3-5	**Odor Control Plan.** Future projects that would generate odors shall develop an odor control plan that addresses plant design to control odors, operating and maintenance procedures to prevent odors, and an action plan to respond to upset conditions that could cause odors and measures to respond to odor complaints. The odor control plan shall describe the design elements and BMPs built into the facility that include: • Ventilation of the system using carbon absorption, biofiltration, ammonia scrubbers, or other effective means to treat exhausted air from the enclosed facility; • Odor proofing of refuse containers used to store and transport any odorous materials (e.g., biosolids); and • Injection of chemicals to control odorous compounds (e.g., hydrogen sulfide). • The plan shall describe procedures to address upset conditions caused by equipment failures, power outages, flow control, or treatment issues. A publicly visible sign with the telephone number and person to contact regarding odor 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. A log of odor complaints and procedures implemented to respond to complaints shall be maintained and provided to the City upon request.

Construction of the proposed project would not result in significant construction-related odorous emissions because the emissions would be temporary and diffusive. The proposed project includes residential uses which, as discussed in the FEIR, do not generate substantial operational odors. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

4.2.3 Non-CEQA Effects

Per California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (BIA v. BAAQMD), effects of the environment on the project are not considered CEQA impacts. However, the City of Sunnyvale has policies (including General Plan Policies EM-11.3 and EM-11.4) that address existing air quality conditions affecting a proposed project.

[17] Ibid., pages 82-85.

To comply with General Plan Policy EM-11.3, the FEIR disclosed community health risk from TAC emissions from local roadways would need to be re-evaluated on a project-level basis due to potential increases in traffic volumes over time. Air quality effects on future sensitive receptors within the Specific Plan associated with stationary sources would also be addressed at a project-level on a project-by-project basis. Additionally, the FEIR noted that industrial sources of TACs and air pollutants in the northwestern portion of Moffett Park could affect future sensitive receptors.[18]

The FEIR disclosed new developments constructed within 1,000 feet of the WPCP and SMaRT Station® would need to assess and account for odor effects on future residents, pursuant to General Plan Policy EM-11.3.[19] The project site is not within 1,000 feet of the WPCP and SMaRT Station®; therefore, this is not applicable.

General Plan Policy EM-11.4 requires development projects that are located within 1,000 feet of a major pollution source, and that includes sensitive uses, to implement all applicable BMPs to reduce exposure to TACs and PM2.5, or to require a site-specific HRA. The proposed project would introduce sensitive receptors (i.e., residences) to the project site; therefore, an HRA was prepared to assess the effect that existing TAC sources would have on project residents and the results are listed in Table 4.2-4.

Table 4.2-4: Health Risk Impacts from Combined Sources to Project Receptors

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)*	Hazard Index
Single-Source Impacts			
Fire Station 5, MEI at 180 feet	0.00	0.00	0.00
Google LLC, MEI at 670 feet.	1.56	<0.01	0.00
Google LLC, MEI at 700 feet.	0.06	0.00	0.00
JSR Micro Inc, MEI at 950 feet.	1.05	0.07	0.04
Nanosys Inc, MEI at 700 feet.	0.00	0.00	0.00
OEpic Inc, MEI at 580 feet.	0.80	0.00	0.00
Pacific Bell, MEI at 800 feet.	0.20	<0.01	0.00
Star One Credit Union, MEI at +1,000 feet.	0.00	0.00	0.00
Verizon Wireless, MEI at 780 feet.	0.12	0.00	0.00
Google LLC, MEI at +1,000 feet.	0.00	0.00	0.00
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold?	No	No	No
Cumulative-Source Impacts			
Cumulative Roadways	<6.05	<0.27	<0.03

[18] Ibid., page 86.
[19] Ibid., pages 87-88.

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)*	Hazard Index
Cumulative Total (Roadways and Stationary Sources)	<9.84	<0.36	<0.07
Air District Cumulative Sources Threshold	*>100*	*>0.8*	*>10.0*
Exceed Threshold?	No	No	No

Notes:

* $\mu g/m^3$ = micrograms per cubic meter.

Source: Illingworth & Rodkin, Inc. *1215 Bordeaux Drive Construction Emissions Assessment.* February 6, 2026.

As shown in Table 4.2-4, the existing sources of TAC emissions would not exceed the Air District single-source or cumulative-source thresholds for cancer risk, annual $PM_{2.5}$ concentration, or Hazard Index. Therefore, project residents would not be exposed to substantial health risks.

4.3 Biological Resources

This section is based, in part, on an Arborist Report prepared by the project by H.T. Harvey & Associates, Inc. in September 2025, and a Bird Safe and Landscape Design Review prepared by WRA, Inc. in February 2026. The reports are attached as Appendices C and D, respectively.

4.3.1 Environmental Setting

The existing biological resources setting, including regulatory framework, has not substantially changed since certification of the FEIR.

The project site is within an urban area and provides habitat and foraging opportunities for urban-adapted birds. No rare, threatened, endangered, or special-status species are known to inhabit the site. The primary biological resources on-site are trees, which are summarized in Table 4.3-1. The nearest waterways to the site are the Sunnyvale West Channel (530 feet east) and Sunnyvale East Channel (4,900 feet east).

Table 4.3-1: Trees on the Project Site

Species (Common Name)	Number of Protected Trees[1]	Total Number of Trees
Blackwood acacia	0	1
Red gum	2	2
Red ironbark	1	1
Evergreen ash	10	12
Southern magnolia	12	17
Mayten	0	1
Olive	0	2
Canary Island pine	0	1
Lombardy poplar	0	4
Portuguese laurel	0	15
Valley oak	0	2
Total	**25**	**58**

[1] Per Section 19.94 of the SMC, "protected trees" are defined as trees of significant size, i.e., a tree 38 inches or greater in circumference measured 4.5 feet above ground for single-trunk trees.

4.3.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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 (CDFW) or United States Fish and Wildlife Service (USFWS)?	LTS	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	LTS	No	No	No	No
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS	No	No	No	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	LTS	No	No	No	No

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	No	No	No	No
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?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would have a less than significant impact on special-status species because Moffett Park is mostly developed, and future development projects located in the undeveloped, northwestern corner of Moffett Park would comply with Specific Plan Project Requirements 10.3.5-1 through 10.3.5-9 to reduce impacts to special status plants (i.e., alkali milk-vetch and Congdon's tarplant), special status animals (i.e., burrowing owls, Crotch's bumble bee, western bumble bee, steelhead, western pond turtle, roosting bats, salt-marsh harvest mouse, San Francisco Dusky-Footed woodrat, and migratory nesting birds and raptors).[20]

Due to the project site's existing, developed condition (i.e., lack of on-site ruderal and riparian habitats) and location in the central, developed portion of Moffett Park, the project is not subject to Specific Plan Requirements 10.3.5-1 through 10.3.5-5, 10.3.5-7, or 10.3.5-8 which are required for development in the northwestern corner of Moffett Park or for development proximate to wetlands.

The following Specific Plan Requirements are applicable to the project.

Requirement	Description
10.3.5-6	**Roosting Bat Assessment.** A bat assessment shall be completed by a qualified biologist and submitted to the City for approval, no more than 30 days prior to removal of trees or buildings. If a non-breeding bat colony is found, or if the tree

[20] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 109-118.

Requirement	Description
	supports suitable roosting habitat that cannot be fully visibly surveyed (such as peeling bark or cavities in trees, especially high up in trees), the individuals shall be humanely evicted via two-step removal as directed by a qualified biologist to ensure no harm or "take" would occur to any bats as a result of demolition activities. Two-step removal shall occur during the volant seasons in fair weather and outside of the maternity season for bats (March 1 to April 15 or September 1 to October 15). Two-step removal consists of one day of disturbance and removing portions of buildings or trees, as directed by a qualified biologist, followed by the removal of that building or tree the following day; the goal is to disturb the bats and render the trees and structures unsuitable for them. This passive effort allows bats using these structures or trees to nocturnally relocate to a suitable nearby roost. Measures would not be required for the loss of roosting or foraging habitat for bats, as such habitat is abundantly available regionally. If a breeding colony is observed, two-step removal shall not occur until breeding season is over (September 1) or until all young are independent of their parents. An appropriate buffer, as determined by a qualified biologist, based on the site conditions and location of the maternity colony would be established. This buffer may be up to 350 feet, depending on site-specific conditions, and shall remain until breeding season is over (September 1) or until all young are independent of their parents. A report shall be submitted to the City summarizing the results of the survey, any buffer zones, and measures to prevent impacts to roosting bats.
10.3.5-9	**Construction During Migratory Bird and Raptor Nesting Season.** To the extent feasible, construction activities shall be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code shall be avoided. The nesting season for most birds in Santa Clara County extends from February 1 through August 31. If initial site disturbance activities, including tree, shrub, or vegetation removal, are to occur during the bird breeding season (February 1 through August 31), a qualified biologist shall conduct a pre-construction survey for nesting migratory birds and raptors. The survey for nesting migratory birds shall cover the project site itself and the immediate vicinity of the site, with the survey for nesting raptors encompassing the site and surrounding lands within 250 feet, where accessible. The survey shall occur within seven days prior to the onset of ground disturbance. If active nests are detected, appropriate construction-free buffers shall be established. The buffer sizes shall be determined by the project biologist based on species, topography, and type of activity occurring in the vicinity of the nest. Typical buffers are 25 to 50 feet for passerines and up to 250 feet for raptors. The project buffer shall be monitored periodically by the project biologist to ensure compliance. After the nesting is completed, as determined by the biologist, the buffer shall no longer be required.

Requirement	Description
	A report shall be submitted to the City that summarizes the results of the survey, identifies any buffer zones, and outlines measures implemented to prevent impacts to nesting birds.

As mentioned above, the project site is developed and does not contain any sensitive habitat. The project site, including the 58 on-site trees, could provide foraging and nesting opportunities for a variety of bird species. The project would remove a total of 14 existing trees, including nine protected trees. Accordingly, the project would comply with Specific Plan Requirements 10.3.5-6 and 10.3.5-9 requiring preconstruction surveys and establishment of buffer zones, if necessary, for roosting bats and migratory birds and raptors. Consistent with the findings in the FEIR, with implementation of the requirements above, the project's impacts to roosting bats and migratory nesting birds and raptors would be less than significant. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would have a less than significant impact on riparian habitat and other sensitive natural communities because future development projects would comply with Specific Plan Project Requirement 10.3.5-10 and design standards in Chapter 6 of the Specific Plan to protect sensitive habitat (including riparian and wetland habitats) within the Ecological Combining District (ECD).[21,22] In addition, the FEIR disclosed that future development adjacent to riparian habitat or waterways would also be subject to the Guidelines and Standards for Land Use Near Streams, SMC Chapter 19.81 Streamside Development Review, and Water Resources Protection Ordinance, as applicable.

The project site is developed, does not contain sensitive habitat, and is not located within 250 feet of riparian areas or near the ECD. Therefore, Specific Plan Requirement 10.3.5-10, Chapter 6 design standards to protect sensitive habitat within the ECD, and the other aforementioned regulations are not applicable to the project. The project would not have an impact on sensitive or riparian habitat. The project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. The FEIR concluded buildout of the Specific Plan would have a less than significant impact on wetlands because future development containing a wetland or potential wetland would comply with Specific Plan Project Requirement 10.3.5-10 and 10.3.5-11 , and the statewide National Pollutant Discharge Elimination System (NPDES) Construction

[21] The Specific Plan established an ECD in the northwest corner of Moffett Park for the purpose of expanding and enhancing the ecological value of existing and potential wetlands.
[22] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 118-119.

General Permit to reduce runoff and pollution in runoff from construction activities (which includes preparation of a NOI and Stormwater Pollution Prevention Plan [SWPPP], and implementation of stormwater control BMPs).[23]

The project site is developed, does not contain wetlands, and is not within 250 feet of a riparian area. Therefore, Specific Plan Requirements 10.3.5-10 and 10.3.5-11 are not applicable to the project and the project would not have an impact on wetlands or potential wetlands. As discussed further in Section 4.9 Hydrology and Water Quality, the project would comply with the NPDES General Construction Permit, SWPPP, Provision C.3 of the MRP, and SMC requirements pertaining to water quality and would implement stormwater control BMPs. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR disclosed how Moffett Park does not support a major terrestrial or aquatic wildlife movement corridor and how the compliance of future development with Specific Plan Project Requirements Specific Plan Project Requirements 10.3.5-2 through 10.3.5-9 to reduce impacts to special status animals (i.e., Crotch's bumble bee, western bumble bee, steelhead, western pond turtle, burrowing owl, saltmarsh common yellowthroat, salt-marsh harvest mouse, Townsend's big-eared bat, pallid bat, or San Francisco dusky-footed woodrat) to a less than significant level. The FEIR concluded buildout of the Specific Plan would have a less than significant impact on avian movement because future development projects would comply with Specific Plan Chapter 5 standards and guidelines pertaining to the movement of resident and migratory birds through Moffett Park; Specific Plan Policy OSE-3.4 regarding integrating dark sky policies into site lighting; and Specific Plan Section 6.6.9 standards requiring compliance with the International Dark-Sky Association's BUG rating system, automatic shutoffs for unnecessary lighting from 10 PM to sunrise, and other requirements.[24]

As discussed under checklist question a) above, the project would not impact the Crotch's bumble bee, western bumble bee, steelhead, western pond turtle, burrowing owl, saltmarsh common yellowthroat, salt-marsh harvest mouse, Townsend's big-eared bat, pallid bat, or San Francisco dusky-footed woodrat. Accordingly, Specific Plan Requirements 10.3.5-2 through 10.3.5-5, 10.3.5-7, and 10.3.5-8 are not applicable to the project. The project would implement Specific Plan Requirements 10.3.5-6 and 10.3.5-9 pertaining to roosting bats and migratory nesting birds and raptors, which would ensure impacts to these species are less than significant. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[23] Ibid., pages 119-121.
[24] Ibid., pages 121-123.

As discussed in Section 3.0 Project Description, the project would construct an approximately 0.3-acre POPA to satisfy its portion of the planned Bordeaux Neighborhood Park. Because the planned Bordeaux Neighborhood Park is identified as a Neighborhood Park – Habitat Patch in the Specific Plan, the project is subject to the bird safe design standards and guidelines in Chapter 5 of the Specific Plan. These standards and guidelines are listed below, followed by a discussion of the project's consistency.

Bird Safe Standards

- **Applicability.** All new construction, building additions, and/or building alterations shall adhere to the Bird Safe Design standards in this section.
- **Skywalks, walkways, or glass walls.** New construction and building additions shall avoid building glass skyways or walkways, freestanding glass walls, and transparent building corners. If such features are incorporated, all glazing on those features shall be treated as described under 3a, Glazing treatment.
- **Façade treatment.** At a minimum no more than 10% of the surface area of a building's total exterior façade between the ground and 60 feet or within 15 feet above a green roof shall have untreated glazing. Buildings within 300 feet of a body of water larger than one acre in size or located immediately adjacent to a landscaped area, open space or park larger than one acre in size shall have treated glazing at all heights. Bird-friendly glazing treatments can include the use of opaque glass, the covering of clear glass surface with patterns, the use of paned glass with fenestration patterns, and the use of external screens and/or netting over non-reflective glass. All façade glazing shall have reflectivity ratings no greater than 15%.
    a. **Glazing treatment.** Bird-friendly glazing treatments shall include elements with a minimum horizontal width of 1/4 inch and minimum vertical height of 1/8 inch with a maximum vertical spacing of 2 inches and maximum horizontal spacing of 2 inches.
- **Interior occupancy sensors.** Occupancy sensors or other switch control devices in non-residential development shall be installed on non-emergency interior lights. These lights should be programmed to shut off during non-work hours and between 10:00 pm and sunrise. Using smaller zones in internal lighting layouts will increase the effectiveness of occupancy sensors.
- **Exceptions to the bird safe design requirements.** The City may waive or reduce bird safe design requirements based on analysis by a qualified ornithologist with bird safety expertise which indicates that proposed construction will not pose a collision hazard to birds.

Bird Safe Guidelines

- **Flight paths.** New construction shall avoid the funneling of flight paths along buildings or trees towards a building façade
- **Reduced glazing.** New construction and building additions should reduce glass at tops of buildings, especially when incorporating a green roof into the design.
- **Avoiding visual traps.** Visual traps such as areas of glass through which trees, landscape areas, water features or the sky are visible from the exterior, should be avoided unless a bird safety treatment is used.
- **Collision monitoring.** Building owners and tenants are encouraged to monitor locations of bird collisions (e.g., based on dead or injured birds or imprints of feathers on windows) and implement retrofit measures, such as application of bird-friendly patterns to existing windows or use of internal blinds, where collisions occur.
- **Interior lighting.** Building design and operation should reduce the amount of light that escapes through windows during the night.

- **Window coverings.** Building owners and tenants are encouraged to install window coverings above the ground floor to reduce the amount of light escape from the building at night.
- **Workstation lighting.** Businesses are encouraged to turn off lighting at employee workstations and draw office window coverings at the end of the day.
- **Migration periods.** Building managers should place particular focus on limiting nighttime light escape during bird migration periods (February 15 - May 31 and August 15 - November 30th).
- **Maintenance.** Businesses are encouraged to schedule maintenance during the day or to conclude before 10:00 pm.

The Bird Safe and Landscape Design Review found that the proposed building design includes features that could increase bird collision risk, including glass railings, transparent building corners, and extensive untreated glazing, as well as lighting elements (e.g., uplighting) that are not consistent with Specific Plan bird-safe and exterior lighting standards (refer to Appendix D for additional details). The Bird Safe and Landscape Design Review identified recommendations to address these issues, which the project applicant would be required to implement per the following Condition of Approval.

Condition of Approval: Bird Safe Design. Prior to the issuance of building permits, the project applicant shall implement and document compliance with all bird safe standards and guidelines listed in Chapter 5 of the Specific Plan (and above) and all recommendations in the project-specific Bird Safe and Landscape Design Review conducted by WRA, Inc. dated February 2026.

Compliance with this Condition of Approval would ensure the project is consistent with the Specific Plan bird-safe design standards and guidelines. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

e. The FEIR concluded buildout of the Specific Plan would comply (i.e., have a less than significant impact) with local policies or ordinances protecting biological resources. Future development adjacent to waterways would comply with the Water Resources Protective Collaborative's Guidelines, Standards for Land Use Near Streams and SMC Chapter 19.81 Streamside Development Review, and Valley Water's Water Resources Protection Ordinance. Future development would also comply with SMC Section 19.94 to protect trees.[25]

While the West Channel waterway is located further to the east, it is not adjacent to the project site. As such, the Water Resources Protective Collaborative's Guidelines, Standards for Land Use Near Streams and SMC Chapter 19.81 Streamside Development Review, and Valley Water's Water Resources Protection Ordinance are not applicable to

[25] Ibid., page 123.

the project.

As discussed in Section 3.0 Project Description, the project would remove 14 trees (including nine protected trees) of the 58 existing trees on-site. The project would obtain tree removal permits and plant 23 replacement trees on-site, consistent with SMC Section 19.94.

Also as discussed in Section 3.0 Project Description, the project would construct an approximately 0.3-acre POPA to satisfy its portion of the planned Bordeaux Neighborhood Park. Because the planned Bordeaux Neighborhood Park is identified as a Neighborhood Park – Habitat Patch in the Specific Plan, the project is subject to the standards pertaining to Neighborhood Parks and Habitat Patches in Chapter 6 of the Specific Plan. These standards are listed below, followed by a discussion of the project's consistency with them.

Design Criteria	**Standards for Habitat Patches**	**Standards for Neighborhood Parks**
Scale	• Two or more acres of high-quality native habitat.	• Three to eight acres in size with a minimum dimension of 100 feet.
Service Area	• Community/District	• Neighborhood one-fourth to one-half mile from residential buildings
Shape	• Square or circular in shape, rather than long and narrow, to contain more core habitat and be more suitable for edge-sensitive species.	• N/A
Minimum Resources	• N/A	• Play space (all abilities and ages) • Reservable and drop-in picnic areas • At least two active recreation resources from potential programs
Potential Programs	• Preservation and restoration of habitat • Programming shall be balanced with high-quality native habitat • Multi-use trails • Nature trails and bird watching • Picnicking in designated areas • Limited public and pet access	• Multi-purpose sports field • Sports courts (basketball court, tennis court, volleyball court) • Other small-scale active recreation resources (skate spot, horseshoe pits, bocce court, shuffleboard lane, lawn bowling, mini skate park) • Interactive water feature (small-scale) • Shelter or gazebo • Neighborhood-activity building • Restroom • Shade structures for appropriate facilities • Community gathering and event spaces • Community gardens • Dog park

Design Criteria	Standards for Habitat Patches	Standards for Neighborhood Parks
		• Fitness equipment • Stormwater treatment for areas within the park
Landscape Design and Lighting	• Minimize impervious areas and maximize groundcover, water, and tree cover. • Landscape design shall be per Specific Plan Section 6.6.6 Landscape Design. Plant palette for the high-quality native habitat shall be comprised of 100% native species per Specific Plan Appendix B. • Landscape lighting shall be per Specific Plan Section 6.6.9 Exterior Lighting. • Landscape design shall be reviewed by a qualified ecologist to ensure that the design is consistent with best practices for urban ecology including the planting plan (plant palettes, structure, and species distribution) and the lighting plan.	• Minimize impervious areas and maximize groundcover, water, and tree cover. • Active programming shall be balanced with high quality native habitat in non-programmed areas. • Landscape design shall be per Specific Plan Section 6.6.6 Landscape Design. • Landscape lighting shall be per Specific Plan Section 6.6.9 Exterior Lighting. • Landscape design shall be reviewed by a qualified ecologist to ensure that the design is consistent with best practices for urban ecology including the planting plan (plant palettes, structure, and species distribution) and the lighting plan

The Specific Plan anticipated full compliance for the entirety of the park (i.e., its full scale, resources, and programs) would be completed incrementally across multiple properties as nearby properties are redeveloped. As shown in Chapter 6 of the Specific Plan, the neighborhood park area of the project site is approximately one-fifth of the anticipated Bordeaux Neighborhood Park area. As such, the proposed project would implement design elements that are feasible for its portion of the park including a dog park, picnic deck, landscaped walking paths, and seating areas.

In addition, the applicant would be conditioned upon approval to incorporate the recommendations of the Bird Safe and Landscape Design Review, which include minimizing impervious areas; maximizing groundcover, tree cover, and habitat-supportive landscaping; using landscape design consistent with Specific Plan Section 6.6.6; ensuring exterior lighting complies with Specific Plan Section 6.6.9; and incorporating planting and lighting design features that support urban ecology and habitat function (refer to Appendix D for additional details).

Condition of Approval: Landscape Design. Prior to the issuance of building permits, the project applicant shall implement and document compliance with relevant landscape design standards listed in Chapter 6 of the Specific Plan and all recommendations in the

project-specific Bird Safe and Landscape Design Review conducted by WRA, Inc. dated February 2026.

Future development of the remaining portions of the Bordeaux Neighborhood Park would also be required to comply with the Specific Plan's standards and guidelines for Habitat Patches and Neighborhood Parks, including requirements related to lighting, size, programming, native habitat composition, and ecological function. Accordingly, consistency with these park-level requirements would be achieved at full buildout of the park through contributions by individual development projects. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

f. The FEIR disclosed how Moffett Park is not located within a local, regional, or state habitat conservation plan and, while Moffett Park is not within the main Santa Clara Valley Habitat Plan (Habitat Plan) boundary, future development impacting burrowing owls would comply with Specific Plan Project Requirement 10.3.5-2 requiring collaboration with the Habitat Plan because the Habitat Plan mitigates for burrowing owls within an extended burrowing owl conservation boundary outside of the main Habitat Plan boundary.[26] For this reason, the FEIR concluded the Specific Plan would not conflict with the Habitat Plan and result in a less than significant impact.[27]

As discussed under checklist question a), the project site does not contain ruderal habitat and would not impact burrowing owls. Therefore, Specific Plan Requirement 10.3.5-2 is not applicable to the project, and the project would not conflict with the Habitat Plan or any other habitat conservation plan. The project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[26] Ibid., pages 123-124.
[27] Ibid.

4.4 Cultural Resources

The following discussion is based, in part, on a Historic Resources Evaluation (HRE) and Archaeological Sensitivity Assessment (ASA) prepared for the project by Archaeological/Historical Consultants in February 2026. The HRE is attached as Appendix E. The ASA is confidential and is on file with the Sunnyvale Community Development Department.

4.4.1 Environmental Setting

The existing cultural resources setting, including regulatory framework, has not substantially changed since certification of the FEIR.

Archaeological Resources

Native American Sensitivity

Sites with prehistoric resources are typically located in relatively flat areas proximate to sources of freshwater. The nearest source of freshwater[28] is a series of sloughs, the closest of which is approximately 1.3 miles southwest of the project site. The perennial Stevens Creek and Sanjon Creek are located approximately 2.5 miles to the west and east of the project site, respectively. The project site is underlain with alluvial soils, which have potential for buried prehistoric resources. The project site's distance to freshwater, however, results in low sensitivity for archaeological resources.

A records search at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) was completed to identify all recorded archaeological sites on and near the project site. There are several archaeological resources recorded within one mile of the project vicinity, with the closest being one quarter mile away from the project site. There are no identified archaeological sites or resources on-site.

Historic-Period Sensitivity

The project site was used for agricultural purposes throughout its history, until the office building was constructed in 1973, and is unlikely to contain buried archaeological deposits. The project site has a low sensitivity for buried historic-era cultural resources and for historic-era archaeological deposits.

[28] The Sunnyvale West and East Channels, located 530 feet and 4,900 feet east, respectively, are not sources of freshwater.

Historic Resources

Historic Context of the Project Area

The project site was used as agricultural land until 1968. The existing building was constructed in 1973, making it over 50 years old. From 1980 to 1984, the building was occupied by Lockheed Missiles and Space Company (Lockheed) and was primarily used for office and boardroom/conference purposes. There were no known tenants from 1984 to 1990. Occupants after 1992 included Startech Semiconductor, Orbit Semiconductor, E Flow Incorporated, Mira Point Inc, Nissan Research Center, and Google.

The building is not listed in the City's Heritage Resources Inventory (HRI), California Register of Historic Resources (CRHR), National Register of Historic Properties (NRHP), or the Office of Historic Preservation's (OHP's) Built Environmental Resources Directory (BERD) as a property with architectural or historic significance.[29]

Description of Building On-Site

The building at 1215 Bordeaux, constructed in 1973, is a rectangular, one-story building designed in the Modern style, characterized by a flat roof and reinforced concrete. All windows are set in aluminum sash and have a reflective coating. The east (front) façade features a projecting bullnose cornice and stringcourse, with a frieze of plain concrete panels. The windows appear to be replacements, while the bullnose cornice and stringcourse are additions that likely date to the 1990s. The walls are plain, except for two horizontal scored lines. There are five pairs of recessed, vertical windows separated by plain pilasters. The southern and northern façades feature fully-glazed aluminum doors.

Evaluation of Building On-Site

The building was evaluated for eligibility against the significance criteria for the CRHR and City's HRI.[30] The buildings were determined to be ineligible due to a lack of significance under the four criteria, as summarized below.

CRHR Criterion 1: Event or Pattern of Events

The building is associated with the transition of this area of Sunnyvale from agricultural to office/light industrial uses in the 1970s. This transition was regional and, therefore, the building is not a significant example of this historical pattern. Additionally, research did

[29] National Park Service. "National Register Database and Research." Accessed February 24, 2026. https://www.nps.gov/subjects/nationalregister/database-research.htm.
California State Parks. "California Historical Resources." Accessed February 24, 2026. https://ohp.parks.ca.gov/listedresources/.
City of Sunnyvale. "Heritage Resources Inventory Update." Accessed February 24, 2026. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/long-range-planning-initiatives/heritage-resources-inventory-update.

[30] The building was not evaluated for eligibility against the significance criteria for the NRHP because the project is being analyzed under CEQA, not the National Environmental Policy Act.

not reveal any important events associated with the property. Therefore, the building is not eligible for the CRHR under Criterion 1.

CRHR Criterion 2: Important Person(s)

As discussed earlier, the earliest tenant of the building is identified as Lockheed, with various other tenants after the 1990s. The building was not a headquarters, well-known, or long-term location for any of these tenants. Therefore, the building is not eligible for the CRHR under Criterion 2.

CRHR Criterion 3: Design/Construction/Architecture

The building has been modified over time. Although the extent of the alterations is unknown, the front entry façades have been updated, with likely changes to the building's exterior. The building, therefore, does not express its original style. Additionally, the architect and builder are unknown. Therefore, the building is not eligible for the CRHR under Criterion 3.

CRHR Criterion 4: Information Potential

The "potential to yield information important to the prehistory or history of California" typically relates to archaeological resources rather than built resources. When Criterion 4 does relate to built resources, it is relevant for cases when the buildings themselves are the principal source of important construction-related information. The building on-site does not appear to be individually significant as buildings that have the potential to provide information important to the prehistory or the history of the City of Sunnyvale, state, or nation. The building does not feature construction or material types, or embody engineering practices, that would provide important information. Further, as discussed earlier, archival research provided no indication that the property has the potential to yield information important to the prehistory or history of the City, state, or nation. Therefore, the building does not have the potential to yield information such that it would be eligible for the CRHR under Criterion 4.

City HRI Criteria

A built environment resource may be designated a heritage resource if it meets the criteria of the NRHP or one or more of the following criteria:

a) It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic engineering, architectural, or natural history;
b) It is identified with persons or events significant in local, state, or national history;
c) It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
d) It is representative of the work of a notable builder, designer, or architect;

e) It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically or by plan or physical development;

f) It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Sunnyvale;

g) It embodies elements of architectural design, detail, materials, or craftsmanship that represents a significant structural or architectural achievement or innovation;

h) It is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif;

i) It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

j) It is one of the few remaining examples in the city, region, state, or nation possessing distinguishing characteristics of an architectural or historic type or specimen;

k) With respect to a local landmark, it is significant in that the resource materially benefits the historical character of a neighborhood or area, or the resource in its location represents an established and familiar visual feature of the community or city;

l) With respect to a local landmark district, a collective high integrity of the district is essential to the sustained value of the separate individual resources;

m) With respect to a designated landmark and designated landmark district, the heritage resource shall meet criteria of the NRHP, which are incorporated by reference into the HRI.

As discussed above, the existing office building has been altered and does not express its original style. It is not associated with special elements of Sunnyvale's history, significant persons, or a prominent architect, builder, or designer (a, b, d). It is also a fairly typical office building, of which there are many from this time period in the immediate vicinity (c, g, h, j). It is not a contributor to a significant historic area, nor is it in a unique location or associated with a distinctive vista (e, f). The building is not a local landmark (k, l, m). Therefore, the building does not qualify for listing in the City's HRI.

4.4.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	LTS	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	LTS	No	No	No	No
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would have a less than significant impact on historic resources because future development would comply with General Plan Policies (including CC-5.1 and CC-5.3) and Specific Plan Project Requirements 10.3.2-1 and 10.3.2-2, which require evaluation of buildings 45 years of age or older, preservation of historic resources, and appropriate treatments to retain the historic integrity (including compliance with the Secretary of Interior's Standards and other regulations).[31] If a future project could adversely affect historic resources, supplemental analysis would be required to identify mitigation measures necessary to reduce the impact to a less than significant level.

[31] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 133-134.

Requirement	Description
10.3.2-1	**Historic Resource Evaluation.** A Historic Resource Evaluation shall be required for future development that would impact properties that may meet the CEQA definition of historic resources, including resources 45 years of age or older and not currently listed/identified. • At a minimum, the supplemental review effort shall include preparation of a site-specific historic resources report that involves a records search at the Northwest Information Center (NWIC), a review of the Sunnyvale Heritage Resources Inventory, and where there is no evaluation within the last five years (using the Department of Parks and Recreation 523A and B forms), evaluation by a qualified historian or architectural historian to determine if the property meets the CEQA definition of a historic resource. • If the supplemental review effort does not identify any site or structure that meets the definition of a historic resource that could be affected by construction activities, then no further study or protection is necessary prior to project implementation.
10.3.2-2	**Standards for the Treatment of Historic Properties.** New construction within historic districts or adjacent to a historic resource, rehabilitation of a historic resource, replacement of an existing historic resource, addition to a historic resource, or a renovation of a historic resource shall conform to the Secretary of Interior's Standards for the Treatment of Historic Properties, California Historic Building Code, and other applicable regulations.

As discussed in Section 4.4.1 Environmental Setting, the existing building on-site is not listed in the City's HRI, CRHR, NRHP, or OHP's BERD, and is ineligible for listing on the CRHR or HRI. Accordingly, the proposed project would not cause a substantial adverse change in the significance of a historical resource. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would result in a less than significant impact to archaeological resources because future development would comply with General Plan Policies CC-5.5 and LT-1.10f and Specific Plan Project Requirements 10.3.2-3 through 10.3.2-5, all of which require protection of archaeological resources, monitoring for potential unknown resources during construction, halting construction if a resources is encountered, and implementing appropriate treatment of resources if found.[32] The Specific Plan Requirements are listed below.

[32] Ibid., page 135.

Requirement	Description
10.3.2-3	**Archaeological Literature Review.** For any new proposed development or improvements within Moffett Park, an archaeological literature review shall be completed at the Northwest Information Center of the California Historical Resources Information System. If the site, prior to development, contains any visible soils, a field inspection shall also be conducted. Recommendations for additional archaeological efforts beyond these initial studies shall be commensurate with the scale of the project and range of proposed impacts. Development shall include subsurface exploration and monitoring as warranted by a qualified archaeologist.
10.3.2-4	**Finding of Archaeological Deposits or Materials.** If buried, or previously unrecognized archaeological deposits or materials of any kind are inadvertently exposed during any monitoring work, work within 50 feet of the find shall cease until a qualified archaeologist can assess the find and provide recommendations for further treatment, if warranted. Construction and potential impacts to the area(s) within a radius determined by the archaeological shall not recommence until the assessment is complete.
10.3.2-5	**Finding of Human Remains During Excavation.** In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the NAHC immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

Consistent with Specific Plan Requirement 10.3.2-3, an ASA was prepared for the project. As discussed in Section 4.4 Cultural Resources, the proposed project is located in an area of low sensitivity for Native American and historic-era archaeological resources. Consistent with the FEIR, the proposed project would comply with Specific Plan Requirements 10.2.3-4 and 10.3.2-5 in the event archaeological resources are discovered on-site to protect the resources. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. The FEIR concluded buildout of the Specific Plan would result in a less than significant impact to human remains (if discovered) because future development would comply with Specific Plan Project Requirement 10.3.2-5 above, which requires protection of human remains and proper reinterment.[33]

Consistent with the FEIR, the proposed project would comply with Specific Plan Requirement 10.3.2-5 in the event human remains are discovered. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[33] Ibid., page 136.

4.5 Energy

4.5.1 Environmental Setting

The existing energy setting, including regulatory framework, has not substantially changed since certification of the FEIR, with the exception of one aspect of the City's Reach Code.

The City's Reach Code contains language prohibiting gas appliances (e.g., cooking range, water heater, space heater, fireplace, etc.) in new construction. The enforcement of that requirement, however, is currently suspended due to a recent federal court decision.

In addition, the City's Climate Action Playbook was updated in June 2024 to outline strategies to further reduce emissions in the City. The updated playbook, titled Game Plan 2028, was adopted as a qualified greenhouse gas reduction strategy pursuant to CEQA Guidelines. The updated playbook includes six strategies with "plays" that identify areas for action to reduce GHG emissions (including air pollutant emissions). The following plays are applicable to the proposed project.

Play	Description
Strategy 1: Promoting Clean Electricity	
1.1	Promote 100 percent clean electricity
1.2	Increase local solar photovoltaics
Strategy 2: Decarbonizing Buildings	
2.3	Achieve all-electric new construction
Strategy 4: Managing Resources Sustainably	
4.1	Achieve Zero Waste goals for solid waste
4.3	Enhance natural carbon sequestration capacity

The project site is currently developed with one office building that uses energy in the form of electricity and natural gas to operate the building, and gasoline as fuel for vehicles traveling to and from the site.

4.5.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	No	No	No	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	No	No	No	No
c) Result in a substantial increase in demand upon energy resources in relation to projected supplies?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded the implementation of the Specific Plan would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Separate discussions were provided regarding the construction and operational impacts of the Specific Plan.

Construction

The FEIR concluded that construction of future development allowed under the Specific Plan would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources because:

- Construction processes are generally designed to be efficient,
- Moffett Park is located in an urbanized area proximate to roadways, construction supplies and workers (compared to outlying, undeveloped areas),
- Future development projects would implement Specific Plan Project Requirements 10.3.3-1 and 10.3.3-2 (which are listed in Section 4.2 Air Quality) to reduce the potential for energy waste by unnecessary idling of construction equipment, and

- Future development would comply with CALGreen and City requirements to recycle and/or salvage for reuse a minimum of 65 percent of nonhazardous construction and demolition waste.[34]

The project is consistent with the FEIR assumptions listed above. There is nothing atypical about the project's construction. The project would implement Specific Plan Project Requirements 10.3.3-1 and 10.3.3-2 and comply with the CALGreen and City construction and demolition waste diversion requirements by diverting 65 percent of nonhazardous waste from landfills. For these reasons, the proposed project would be consistent with the findings of the FEIR and would not result wasteful, inefficient, or unnecessary energy consumption during construction. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

Operation

The FEIR concluded that operation of future development allowed under the Specific Plan would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources because:

- The Specific Plan would result in a more efficient operation of uses because it would result in a greater mix of complementary land uses at a higher density,
- At buildout, the Specific Plan would include a robust multi-modal transportation network,
- Future development would implement Specific Plan Policies TDMP-2.1 through 2.5 (which are listed in Section 4.2 Air Quality) to reduce gasoline consumption,
- Future development would comply with the City's Green Building Program, Reach Code, Title 24 of the California Building Standards Code (Title 24), and CALGreen requirements to increase energy efficiency, and
- Future development would implement the Specific Plan policies listed below to facilitate energy efficiency.[35]

Policy	Description
DS-4.1	Decarbonize new developments with low embodied carbon materials, renewable energy generation, and resource efficient design (energy, water, and waste) through development standards and incentives for higher performing new developments.
DS-4.8	Encourage the productive use of roof space for PV, solar thermal, and vegetation.
DS-5.4	Provide the use of vegetation at the site and building level to provide natural shade, reduce energy consumption, reduce reliance on indoor climate control systems, and address urban heat island effects.

[34] Ibid., page 144.
[35] Ibid., pages 145-146.

Policy	Description
IU-5.1	Prohibit new natural gas services in all buildings and infrastructure to transition to all electric.
IU-5.2	Encourage the installation of solar arrays on roofs, parking lots, and as shade structures paired with battery storage.
IU-5.3	Plan energy systems collaboratively with SVCE, PG&E, property owners, and the City to ensure that Moffett Park maintains affordable, resilient, reliable, and 100 percent renewable energy.
IU-5.4	Increase energy infrastructure to build capacity for Moffett Park, with a clear phasing program.

The proposed land use and density is consistent with the Specific Plan and, therefore, the project's energy use is accounted for in the FEIR analysis. Consistent with the FEIR, the project would comply with the City's Green Building Program; Reach Code; Title 24; CALGreen; and Specific Plan Policies TDMP-2.1 through TDMP-2.5, DS-4.1, DS-4.8, DS-5.4, and IU-5.1 through IU-5.4 listed above to increase energy efficiency. Specifically, the project would install higher efficiency appliances, lighting, and HVAC systems to reduce energy consumption; drought-tolerant landscaping; EV charging infrastructure; and solar panels. In addition, the project would voluntarily be 100 percent electric. As discussed in Section 3.9 Waivers/Concessions, the project requests a waiver from the MP-R district's 20 percent green roof requirement for the site under the State Density Bonus Law, which allows applicants to request waivers projects to deviate from development standards when necessary to physically accommodate the project's density bonus and incentives. With approval of this waiver, the project would not incorporate the green roof component of Specific Plan Policy DS-4.8. While providing a green roof could result in increased insulation for the project, resulting in potential savings related to heating and cooling needs, the exclusion of a green roof from the project would not result in a significant energy impact.

For these reasons, the proposed project would not result in wasteful, inefficient, or unnecessary energy consumption during operation, and would be consistent with the findings of the FEIR and applicable state law. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency because future development would obtain 100 percent GHG-emission free electricity from Silicon Valley Clean Energy (SVCE); meet or exceed state mandated Title 24 energy efficiency, CALGreen, and City Green Building standards by complying with Specific Plan Policies

DS-4.1, DS-4.8, DS-5.4, and IU-5.1 through IU-5.4 listed above; and comply with the City's Reach Code requirements and Climate Action Playbook.[36]

The proposed project would obtain energy from SVCE and comply with Title 24, CALGreen, and City Green Building Standards. As explained in more detail under checklist question a), the project would comply with Specific Plan Policies DS-4.1, DS-4.8, DS-5.4, and IU-5.1 through IU-5.4. The project would comply with the Reach Code and voluntarily be 100 percent electric. As mentioned in Section 4.5.1 Environmental Setting, since the certification of the FEIR, the City updated the Climate Action Playbook and adopted the Game Plan 2028. The project would comply with the Game Plan 2028 by providing clean energy through SVCE; including higher efficiency appliances, lighting, and HVAC systems; EV charging infrastructure; solar panels; and complying with the City's construction and demolition waste diversion program. While the project would not comply with the green roof component of Specific Plan Policy DS-4.8, the project requests a waiver from the 20 percent green roof requirement pursuant to the State Density Bonus Law. Under the State Density Bonus Law, qualifying projects may receive waivers or reductions of development standards when necessary to physically accommodate the project's density bonus and incentives.

For these reasons, the proposed project would not conflict with a state or local plan and would be consistent with the findings of the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

c. The FEIR concluded the Specific Plan's demand on energy resources in relation to projected supplies was less than significant. Separate discussions were provided for electricity, natural gas, and fuel for motor vehicles.

Electricity

The FEIR disclosed how the energy demand from buildout of the Specific Plan would not impact the state's annual energy usage in relation to supply, and how efficiency and production capabilities (such as improving energy efficiency in existing and future buildings, establishing energy efficient targets, inclusion of microgrids and zero-net energy buildings, and integrating renewable technologies) would help meet overall increased electricity demand in the state in the future. For these reasons and the reasons discussed under checklist question a), the FEIR concluded the Specific Plan's electricity usage would not have a substantial effect on the state's electricity supply.[37]

As discussed under checklist a), the proposed project would be consistent with all the energy efficient regulations and Specific Plan requirements and policies for energy

[36] Ibid., page 145.
[37] Ibid., page 146.

efficiency. The project, therefore, would result in the same impact as disclosed in the FEIR and the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Natural Gas

The FEIR disclosed how natural gas demand in the state is expected to decline due to policies such as SB 100 and local reach code ordinances, which prohibit the use of natural gas infrastructure in new construction. The analysis in the FEIR assumed that all residential uses in the Specific Plan would be 100 percent electric per the Reach Code requirements. The analysis conservatively assumed all non-residential uses in the Specific Plan would use natural gas, which is only permitted by the Reach Code as exceptions. The FEIR concluded that, compared to the growth trends in natural gas supply and the existing available supply in the state and the conservative amount of natural gas projected to be used at buildout, the Specific Plan would not result in a significant increase in natural gas demand relative to projected supply.[38]

Since the certification of the FEIR, enforcement of the Reach Code's natural gas prohibition is suspended due to a federal court decision. Nevertheless, the project voluntarily proposes to be 100 percent electric and not use natural gas. For this reason, the project is consistent with the findings of the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Fuel for Motor Vehicles

The FEIR concluded that buildout of the Specific Plan would not result in a significant increase in gasoline demand relative to projected supply given the context of gasoline supply and demand for the State of California, new automobile fuel economy and efficiency standards, the location of Moffett Park in proximity to existing transit services (i.e., Caltrain and VTA bus service), and Specific Plan Policies TDMP-2.1 through -2.5 (which are listed in Section 4.2 Air Quality) that require future development to implement a TDM program.[39]

The City (rather than specific development projects) is responsible for complying with Specific Plan Policies TDMP-2.1 through -2.5. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[38] Ibid., page 147.
[39] Ibid., page 147.

4.6 Geology and Soils

The following discussion is based, in part, on a Geotechnical Investigation prepared for the project by Rockridge Geotechnical in April 2025. A copy of the Geotechnical Investigation is attached as Appendix E.

4.6.1 Environmental Setting

The existing geology and soils setting, including regulatory framework, has not substantially changed since certification of the FEIR.

On-site Geologic Conditions

Topography and Soils

The project site is underlain by alluvial soils characterized by clay and sandy clay with layers of silty sand.[40] The medium stiff clay zones are moderately compressible while the stiff to very stiff clay zones have low compressibility.

Groundwater

Groundwater at the site ranges between five to 10.5 feet bgs.[41] Fluctuations in the groundwater level may occur due to seasonal changes, variations in rainfall and underground drainage patterns, and other factors.

Seismic Hazards

The project site is not located within an Alquist-Priolo Earthquake Fault Zone and no known active faults exist on the project site.[42] Active faults near the project site are listed in Table 4.6-1. The nearest active fault to the site is the Monte Vista – Shannon fault.

Table 4.6-1: Active Faults Near Project Site

Fault Segment	Approximate Distance from Site
Monte Vista – Shannon	5.9 miles southwest
Hayward	8.1 northeast
San Andreas	9.9 southwest
Calaveras	11.8 east

[40] Rockridge Geotechnical. *Geotechnical Investigation Proposed Office Development 1215 Bordeaux Drive*. April 2025. Pages 3 and 9.
[41] Ibid., page 3.
[42] Ibid., pages 4-5.

Liquefaction

Liquefaction occurs when water saturated soil loses integrity due to seismic activity. Soils that are most susceptible to liquefaction are loose to moderately dense, saturated granular soils with poor drainage. The project site is located within a liquefaction zone.[43] Based on site investigation, several layers of potentially liquefiable material were encountered between depths of five and 80 feet bgs.[44] However, the non-liquefiable soil overlying the liquefiable soil layers is sufficiently thick such that the potential for liquefaction-induced ground failure at the ground surface is low.[45]

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open area, such as a steep bank of a stream channel. Since the layers of liquefiable soils are not continuous, the potential for lateral spreading to occur at the project site is low.[46]

Landslide

Landslides are natural geologic phenomena that range from slow moving, deep-seated slumps to rapid, shallow debris flows. The project site is not located within a landslide zone.[47] Landslide risk can be exacerbated by development. Since the project area is relatively flat, the probability of landslides occurring at the site during a seismic event is low.

[43] California Department of Conservation. "CGS Seismic Hazards Program: Liquefaction Zones." Accessed January 26, 2026. https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=37.534114%2C-122.226939%2C13.33.
[44] Rockridge Geotechnical. *Geotechnical Investigation Proposed Office Development 1215 Bordeaux Drive*. April 2025. Page 8.
[45] Ibid.
[46] Ibid.
[47] California Department of Conservation. "CGS Seismic Hazards Program: Landslide Zones." Accessed January 26, 2026. https://gis.data.ca.gov/datasets/cadoc::cgs-seismic-hazards-program-landslide-zones/explore?location=37.410996%2C-122.009575%2C11.91.

4.6.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
– 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)?	LTS	No	No	No	No
– Strong seismic ground shaking?	LTS	No	No	No	No
– Seismic-related ground failure, including liquefaction?	LTS	No	No	No	No
– Landslides?	LTS	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	LTS	No	No	No	No

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS	No	No	No	No
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	LTS	No	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTS	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would result in less than significant impacts with respect to fault ruptures and landslides because there are no mapped faults through Moffett Park, and the risk of seismically induced landsliding is low due to the flat topography of Moffett Park. Further, the FEIR concluded buildout of the Specific Plan would result in a less than significant impact from seismic and seismic-related hazards because future development would comply with the CBC and prepare site-specific geotechnical investigation reports to evaluate seismic and geologic conditions and implement any identified recommendations to avoid/minimize risk due to seismic and

seismic-related hazards (including ground shaking and liquefaction) to acceptable levels.[48]

In conformance with the CBC and consistent with the FEIR, a site-specific Geotechnical Investigation was prepared for the site, which analyzed subsurface conditions and identified specific recommendations for site preparation and grading, mat foundations, retaining walls, pavement design, pavers, and seismic design. The primary geotechnical issue for the project is the presence of relatively weak and compressible soils underlying the site. Accordingly, the Geotechnical Investigation includes recommendations for site preparation, grading, and foundation design (e.g., including a minimum 12-inch-thick compacted aggregate cushion and water vapor retarder beneath the mat foundation).[49] Further, to minimize risks associated with the potentially liquefiable soils, the Geotechnical Investigation recommended seismic design parameters to account for liquefaction-induced settlement following a major earthquake. For additional details regarding the Geotechnical Investigation recommendations, refer to Appendix E.

Consistent with the Specific Plan FEIR, the project would comply with the CBC and be built in conformance with the recommendations of the Geotechnical Investigation to avoid exposing people or structures to substantial adverse effects due to ground shaking or exacerbate existing geological hazards such that it would impact off-site geological and soil conditions. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would result in a less than significant soil erosion impact because future development would comply with the NPDES General Construction Permit (which includes the implementation of SWPPP) and City grading and excavation requirements.[50]

The project site would be excavated to a maximum of seven feet bgs. Any ground disturbance would expose soils and increase the potential for wind- or water-related erosion and sedimentation until project construction is complete. As discussed in Section 4.9 Hydrology and Water Quality, the proposed project would comply with the NPDES General Construction Permit and adhere to the City's grading and excavation requirements by implementing measures during and after construction to ensure that impacts from soil erosion or loss of topsoil are reduced to a less than significant level. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Section 15162 and 15183. No further analysis is required.

[48] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 156.
[49] Rockridge Geotechnical. *Geotechnical Investigation Proposed Residential Building 1215 Bordeaux Drive*. April 28, 2025. Pages 12-18.
[50] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 157.

c. The FEIR concluded buildout of the Specific Plan would result in less than significant impacts related to liquefaction, lateral spreading, subsidence from groundwater pumping, and collapse because future development would comply with CBC requirements, recommendations in site-specific geotechnical reports, Cal/OSHA Title 8 of the California Code of Regulations and Excavation Rules.[51]

As discussed under checklist question a), the project would comply with existing regulations (CBC and Cal/OSHA Title 8 of the California Code of Regulations and Excavation Rules) and be built in conformance with the site-specific Geotechnical Investigation prepared for the project. Since groundwater at the site ranges from five to 10.5 feet bgs and the project proposes excavation to a maximum depth of seven feet, dewatering may be required during construction. The project would prepare a dewatering management plan in compliance with Specific Plan Requirement 10.3.1-5 (described in Section 4.8 Hazards and Hazardous Materials) which would ensure groundwater is tested and disposed of appropriately. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR concluded future development would comply with the CBC, prepare site-specific geotechnical reports, and implement identified recommendations for building design and engineering practices to reduce impacts from expansive soils to a less than significant level.[52]

The project would comply with the CBC and would be built in conformance with the recommendations of the Geotechnical Investigation, which did not identify expansive soils on-site. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

e. The FEIR analysis assumed future development under the Specific Plan would connect to the existing sanitary sewer system and, therefore, septic tanks or alternative wastewater disposal systems would not be required.[53] The FEIR acknowledged that, in the event private district utilities systems were proposed, a design-level geotechnical report would be required, pursuant to the CBC to ensure on-site soil conditions are adequate.[54]

The proposed project is located in an urbanized area of the City and would connect to the existing sanitary sewer system, and does not require septic tanks or alternative wastewater disposal systems. Therefore, the project would result in the same impact as

[51] Ibid., pages 157-158.
[52] Ibid., page 161.
[53] Ibid.
[54] Ibid.

disclosed in the FEIR and not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

f. The FEIR concluded buildout of the Specific Plan would not impact geological features because there are none located within Moffett Park. As discussed in the FEIR, paleontological resources (if present within Moffett Park) would be found at depths of eight feet or greater. The FEIR concluded buildout of the Specific Plan would result in less than significant impact to paleontological resources through implementation of Specific Plan Project Requirement 10.3.2-6 below, which requires monitoring construction work at depths where paleontological resources could be present (eight feet or greater) and properly protecting, recovering, and documenting resources (if found).[55]

The project would excavate at a maximum of seven feet bgs. Accordingly, Specific Plan Project Requirement 10.3.2-6 is not applicable. The project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[55] Ibid., pages 161-162.

4.7 Greenhouse Gas Emissions

4.7.1 Environmental Setting

The existing greenhouse gas (GHG) emissions setting, including regulatory framework, has not substantially changed since certification of the FEIR, with the exception of one aspect of the City's Reach Code. The City's Reach Code contains language prohibiting gas appliances (e.g., cooking range, water heater, space heater, fireplace, etc.) in new construction. As discussed in Section 4.5 Energy, the enforcement of that requirement is currently suspended due to a recent federal court decision.

In addition, the City's Climate Action Playbook was updated in June 2024 to outline strategies to further reduce emissions in the City. The updated playbook, titled Game Plan 2028, was adopted as a qualified greenhouse gas reduction strategy pursuant to CEQA Guidelines. The updated playbook includes six strategies with "plays" that identify areas for action to reduce GHG emissions (including air pollutant emissions). Refer to Section 4.5 Energy for applicable plays.

The existing office building on-site generates GHG emissions as a result of energy consumption, vehicle trips to and from the site, solid waste generation, and water usage.

4.7.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	SU	No	No	No	No

Note: SU = significant unavoidable.

a. The FEIR evaluated the Specific Plan's impact regarding generation of GHG emissions during construction and operation.

Construction GHG Emissions

The FEIR concluded buildout of the Specific Plan would result in a less than significant impact from construction-related GHG emissions because future development would comply with Specific Plan Project Requirement 10.3.3-2 (which restricts idling of construction equipment and utilize energy-efficient equipment and is described fully in Section 4.2 Air Quality), CALGreen, and the City's construction and demolition waste diversion regulations.[56]

There is nothing atypical about the project's construction. The project would comply with Specific Plan Requirement 10.3.3-2, CALGreen, and the City's construction and demolition waste diversion regulations, to reduce its impacts from construction-related GHG emissions. Therefore, the project would result in the same impact as disclosed in the FEIR and not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Operational GHG Emissions

Plan-Level Impact

Per the Air District, for plans to have a less than significant GHG impact, the plan would need to 1) meet the state's goals to reduce emission 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, or 2) be consistent with a local GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b). The FEIR disclosed that, while the buildout of the Specific Plan would result in an increase in GHG emissions compared to existing conditions, the implementation of the Specific Plan would decrease the amount of GHG emissions per capita compared to existing conditions.

Future development projects would implement Specific Plan General Plan Project Requirements 8.3.3-4, 10.4-20, and 10.6 below, comply with Specific Plan Policies TDMP 2.1 through 2.5 (listed in Section 4.2 Air Quality), and comply with the City's Reach Code (which, at the time the FEIR was certified, prohibited the construction of new natural gas infrastructure with exceptions for certain uses) and CALGreen Tier 2 requirements to reduce operational GHG emissions.

[56] Ibid., pages 172-175.

Requirement	Description
8.3.3-4	The number, design, and infrastructure for electric vehicle parking shall be provided per Table 15 of the Specific Plan or CALGreen Tier 2, whichever is more stringent.
10.4-20	Develop solid waste minimization programs that include increased rates of recycling, composting of food, and reuse of construction materials.
10.6	Update Specific Plan policies and implementing measures on a regular basis (e.g., every five years) to measure progress and incorporate new measures to progress toward achieving carbon neutrality. Future updates to the Specific Plan would address the goals of new local and state plans (e.g., state's upcoming scoping plan) to achieve GHG emissions reductions as well as new methods to more accurately model GHG emissions and implement innovative measures or project designs.

Because achieving carbon neutrality would require state regulations and solutions that were not known or available at the time of preparation of the FEIR, there was no clear pathway toward achieving carbon neutrality for the Specific Plan. As such, the FEIR conservatively concluded buildout of the Specific Plan would result in a significant and unavoidable plan-level operational GHG impact.[57]

The proposed land use and density is generally consistent with the Specific Plan, and the project would comply with the City's Reach Code and voluntarily be 100 percent electric. As discussed in Section 3.4 Site Access and Parking, the project proposes one Level 2 EV charger space and four Level 2 EV-ready spaces. However, CALGreen requires that a minimum of 40 percent of applicable non-exempt parking spaces be equipped with Level 2 EV chargers, which results in a requirement for two Level 2 EV charger spaces for the proposed project.[58] Accordingly, the project applicant would be required to implement the following Condition of Approval.

Condition of Approval: EV Parking. The project applicant shall install Level 2 EV chargers for a minimum of 40 percent of the project's non-exempt surface parking spaces.

Compliance with this Condition of Approval would ensure consistency with CALGreen EV parking requirements and, therefore, with Specific Plan Requirement 8.3.3-4. Specific Plan Greenhouse Gas Emission Project Requirements 10.4-20 and 10.6 and Specific Plan Policies TDMP 2.1 through 2.5 are not applicable to the project because they are to be implemented by the City rather than private development projects. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[57] Ibid., page 175.
[58] The 212 mechanical parking spaces are exempt from CALGreen EV infrastructure requirements.

Project-Level Impact

The FEIR outlined the Air District criteria used to determine whether land use projects would result in significant operational GHG emissions. As discussed in the FEIR, future development projects that: 1) do not include natural gas; 2) are consistent with the VMT impact of the Specific Plan (which would result in VMT 15 percent below the existing, countywide average and/or meet the City's VMT Policy); 3) do not result in wasteful, inefficient or unnecessary energy usage; and provide off-street EV requirements in the most recently adopted version of CALGreen Tier 2 would not result in significant, project-level, operational GHG emissions. The FEIR disclosed, however, that some future non-residential buildings may include natural gas appliances and plumbing in accordance with exceptions in the Reach Code. For this reason, the FEIR conservatively concluded buildout of the Specific Plan would result in a significant and unavoidable project-level operational GHG impact. Mitigation for future development that results in significant, project-level, operational GHG emissions could include purchase of carbon offset credits or compliance with a qualified GHG reduction strategy.[59]

The proposed project would not result in a significant, project-level operational GHG emissions impact because it: 1) would be all-electric and does not propose the use of natural gas; 2) is consistent with the land use and density assumed for the site in the Specific Plan and, therefore, consistent with the less than significant VMT impact disclosed in the FEIR (as discussed in more detail under checklist question b) in Section 4.15 Transportation); 3) would not result in wasteful, inefficient or unnecessary energy usage (as discussed in more detail under checklist question a) in Section 4.5 Energy); and 4) would provide off-street EV requirements. Therefore, the project would not result in a new or substantially more severe significant impact than disclosed in the FEIR. The project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. As discussed in detail in the FEIR, the buildout of the Specific Plan was concluded to be consistent with Plan Bay Area 2050, CALGreen, Title 24, and the City's Climate Action Playbook. However, the FEIR concluded the Specific Plan would not be consistent with AB 1279 (which codified the statewide goal of carbon neutrality by 2045) or the 2017 CAP. The Specific Plan would conflict with AB 1279 because the Specific Plan did not have a clear path toward achieving carbon neutrality and the Specific Plan would conflict with the 2017 CAP due to a conservative analysis that resulted in significant and unavoidable operational criteria air pollutant emissions.[60]

As mentioned in Section 4.7.1 Environmental Setting, since the certification of the FEIR, the City updated the Climate Action Playbook and adopted the Game Plan 2028 (refer to Section 4.5 Energy for more details). The proposed project would be consistent with Plan Bay Area 2050, CALGreen, Title 24, the City's Climate Action Playbook, and the City's

[59] Ibid., page 175.
[60] Ibid., page 176.

Game Plan for the same reasons as documented in the FEIR of installing drought-tolerant landscaping; higher efficiency appliances, lighting, and HVAC systems; EV charging infrastructure; and solar panels. In addition, the project would provide clean energy through SVCE, be 100 percent electric, and comply with the City's construction and demolition waste diversion program. There continues to be no clear pathway to achieve carbon neutrality pursuant to AB 1279 and, as discussed in Section 4.2 Air Quality, the project would result in the same conservative significant and unavoidable operational criteria air pollutant emissions impact as disclosed in the FEIR. The project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

4.8 Hazards and Hazardous Materials

The following discussion is based, in part, on a Phase I and Phase II Environmental Site Assessment (ESA) prepared for the project by Cornerstone Earth Group, Inc. in April 2025. The reports are combined and attached as Appendix F.

4.8.1 Environmental Setting

The existing hazards and hazardous materials setting, including regulatory framework, has not substantially changed since certification of the FEIR.

Historic and Current of the Project Site

A land use history of the project site was compiled based on a review of historical sources including Sanborn fire insurance maps, aerial photographs, City directory listings, and topographic maps. Prior to 1968, the project was undeveloped and used as agricultural land. The existing office building on-site was constructed in 1973. Since the 1980s, the existing building has been used for CAD design purposes, semiconductor design work, and self-driving car research. By 1981, surrounding sites were also developed with commercial office buildings.

Database Records

A database records search and site reconnaissance were completed in order to identify recognized environmental conditions (RECs), controlled RECs, and/or historical recognized RECs.[61] While the project site has been previously listed on databases, the listings relate to regulatory filings associated with hazardous material use/storage and generation/disposal of hazardous waste, which are common for commercial/office facilities and are not indicative of hazardous materials releases. Further, the project site is not listed on any sites compiled pursuant to Government Code Section 65962.[62] Refer to Appendix F for additional information (including the results) of the database records search.

On-Site Sources of Contamination

The Phase I ESA identified potential RECs associated with 1) historical agricultural use of the site and 2) the reported presence of volatile organic compounds (VOCs) in groundwater in the vicinity of the project site. The Phase II ESA's subsurface investigation confirmed the presence of VOCs in soils, soil vapor, and groundwater, as summarized below.

[61] RECs are defined as conditions that present past or current threats of the release of hazardous materials or petroleum hydrocarbons to the site's soil, soil vapor, or groundwater.
[62] California Environmental Protection Agency. "Cortese List Data Resources." Accessed August 1, 24. https://calepa.ca.gov/sitecleanup/corteselist/

Agricultural Pesticides and Metals

The Phase II ESA detected lead, arsenic, and dichlorodiphenyltrichloroethane (DDT) in soil samples at the project site. The samples were below San Francisco Bay Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) for residential uses.

Asbestos-Containing Materials, Lead-Based Paint, and Polychlorinated Biphenyls

Buildings on-site were constructed prior to 1978 and, therefore, are likely to have contain asbestos-containing materials (ACMs), lead-based paints (LBPs), and/or polychlorinated biphenyls (PCBs).

Volatile Organic Compounds

Soil vapor sampling detected perchloroethylene (PCE) and trichloroethylene (TCE) at concentrations above their respective residential ESLs. The PCE contamination is associated with impacted groundwater from up-gradient sources and is not the result of contamination from the project site.[63]

Other VOCs including benzene, 1,4-dichlorobenzene, 1,4-dioxane, hexachlorobutadiene, naphthalene, and ethylene dibromide were detected in soil vapors in exceedance of their respective commercial and residential ESLs.[64] The source of these VOCs is unknown.

PCE and TCE were also detected in groundwater samples; however, these samples were below their applicable residential ESLs. Groundwater sampling also detected acetone, which is commonly used in laboratories and does not pose a human health issue.

Off-Site Sources of Contamination

A database records search was also completed for off-site properties that could affect the project site. Based on a review of the database search results, no nearby sites with active releases or open regulatory cases have been identified that would affect the project site. Refer to Appendix F for additional information.

[63] Cornerstone Earth Group, Inc. *Phase I and II Environmental Site Assessment for 1215 and 1219 Bordeaux Drive.* April 23, 2025. Page 20.
[64] Ibid., page 18.

Other Hazards

Airport

The project site is within the Airport Influence Area (AIA) for the Moffett Federal Airfield.[65] However, as shown on Figures 3.9-2 and 3.9-3 of the FEIR, the project site is outside of the 65 CNEL noise contour and Comprehensive Land Use Plan (CLUP) turning safety zone.[66] Additionally, as shown on Figure 3.9-4 of the FEIR, the project's maximum allowable height is 182 feet above mean sea level (amsl), per Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77).[67]

Wildfire Hazards

The project site is not in or adjacent to a moderate, high, or very high fire hazard severity zone.[68]

4.8.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	No	No	No	No
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?	LTS	No	No	No	No

[65] Windus, Walter B. *Comprehensive Land Use Plan for Moffett Federal Airfield*. December 2018. Figure 5: 2022 Aircraft Noise Contours with AIA.
[66] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 185-186.
[67] Ibid., page 187.
[68] California Department of Forestry and Fire Protection. Fire Hazard Severity Zone Viewer. Accessed January 26, 2026. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0.

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	No	No	No	No
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, will it create a significant hazard to the public or the environment?	LTS	No	No	No	No
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, result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	No	No	No	No
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	LTS	No	No	No	No
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded future development under the Specific Plan would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials by adhering to all federal, state, and local regulations including the Resource Conservation and Recovery Act (RCRA), Toxic Substances Control Act (TSCA), California Code of Federal Regulations (CFR) 49, Title 26 of the CCR, the City's Hazard Mitigation Plan, City Certified Unified Program Agency (CUPA) programs, and SMC requirements to ensure safe storage, management, and disposal of hazardous materials.[69]

The proposed project would use small amounts of commercially available hazardous materials for cleaning and landscaping maintenance that are commonly used for residential developments. These small quantities of commercially available hazardous materials would be used, stored, and dispose of in compliance with existing state, local, and federal regulations and would not pose a risk to adjacent land uses. Consistent with the Specific Plan FEIR, hazardous materials removed from the project site during construction would be properly disposed of (refer to the discussion under checklist question b) below). Therefore, the project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded the implementation of the Specific Plan would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This conclusion was based on several discussions regarding contaminated soil, soil vapor, and groundwater; ACMs, LBPs, and PCBs; and contaminated imported soils.

Contaminated Soil, Soil Vapor, and Groundwater

The FEIR concluded buildout of the Specific Plan would result in a less than significant impact from release of contaminated soil, soil vapor, and groundwater because future development would comply with Specific Plan Hazards and Hazardous Materials Project Requirements 10.3.1-1 through 10.3.1-5 listed below, which require sampling for contaminants, proper handling of hazardous materials contamination, and remediation of contamination under regulatory oversight.[70,] The FEIR analysis assumed sites under regulatory oversight would comply with oversight agency requirements.

[69] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 197.
[70] Ibid., pages 202-203.

Requirement	Description
10.3.1-1	**Environmental Site Assessment.** For any renovation, modification, or redevelopment of a property within Moffett Park that includes subsurface disturbance and requires City review, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society for Testing and Materials (ASTM) Standard Designation E 1527-13 (or the standard that is effective at the time the Phase I ESA is completed) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property has been or is likely to have environmental impacts. The City or its designated environmental professional shall review the Phase I ESA to determine if additional investigation is required based on currently available information, which may supersede the designated property's risk value.
10.3.1-2	**Site Management Plan.** At properties with known or suspected minor environmental impacts that can be addressed safely and effectively during subsurface disturbance activities, a Site Management Plan (SMP) shall be prepared prior to development activities to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction activities. Subsurface sampling shall be compared to then-current DTSC, Water Board, or U.S. EPA screening levels for the proposed land use and background levels to determine if risk is present. The SMP shall also address management of site risks and previously unknown conditions during earthwork activities in areas where impacted soil, soil vapor, and/or groundwater are present or suspected. Recommendations for elements to be included in site-specific Health and Safety Plans (HSPs), to be prepared by individual contractors for their employees' safety based on their work scope, may also be included in the SMP. Worker training requirements and health and safety shall be described in the SMP. The SMP shall be reviewed and approved by a qualified environmental regulatory agency such as California Department of Toxic Substances Control (DTSC), San Francisco Bay Regional Water Quality Control Board (RWQCB), or Santa Clara County Department of Environmental Health (SCCDEH).
10.3.1-3	**Phase II Environmental Site Assessment.** At properties with known or suspected environmental impacts that require additional investigation prior to subsurface disturbance activities, a Phase II ESA shall be prepared and implemented prior to development activities to determine the nature and extent of impacts. The Phase II ESA shall be reviewed and approved by a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH. Consideration should be given to obtaining approval for an investigation plan from the oversight agency prior to completing the Phase II investigation. The scope of work shall include soil, groundwater, and/or soil vapor sampling in areas of potential concern to evaluate if site-specific measures are needed to protect the health and safety of property occupants and construction workers. For example, for projects located on land historically used for agricultural, weed abatement, or related activities, the potential for elevated levels of organochlorinated pesticides shall be addressed. For projects located within proximity to SR 237, the potential for ADL contamination shall be addressed. Field techniques that may be employed under include but are not limited to: • Collecting samples of soil, soil vapor, groundwater, sediment, indoor air, outdoor air, and other media of interest for laboratory analysis;

Requirement	Description
	• Drilling using methods such as direct-push, hollow-stem auger, vibracore, air rotary, and mud rotary; • Trenching, potholing, and excavating; • Constructing temporary or permanent soil vapor or groundwater wells or sampling points; and • Profiling geologic, hydrologic, geophysical, and chemical parameters of the subsurface using invasive and noninvasive tools.
10.3.1-4	**Remediation and/or Management Measures.** At properties with known environmental impacts that must be addressed to make the property compatible with its future use, appropriate remediation and/or management measures must be implemented under the oversight and to the satisfaction of a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH. Contaminants are considered adequately remediated if levels are at or below the current DTSC, Water Board, or U.S. EPA cleanup levels or background levels. Remediation techniques may include but are not limited to excavation, extraction, bioremediation, oxidation, reduction, phytoremediation, and thermal treatment. Management measures may include engineering and administrative controls such as but not limited to impermeable surface caps, vapor intrusion mitigation systems, permeable reactive barriers, land use covenants, and deed restrictions. Field techniques that may be employed under include but are not limited to: • Excavation, extraction, or removal of impacted material for off-site disposal or temporary on-site storage or treatment; • Ex-situ (i.e., above-ground) treatment of impacted material via physical and/or chemical processing; and • In-situ (i.e., below-ground) treatment of impacted material via intrusive physical and/or chemical processing. These field techniques include those currently known and used (e.g., dig-and-haul, landfarming, groundwater and soil vapor extraction and treatment, subsurface injection, etc.) and those that will become state of the art in the future. Prior to the issuance of building permits, the applicant shall demonstrate that hazardous materials do not exist on the site or that the proposed construction and use of the site are approved by the environmental oversight agency with jurisdiction that meets the requirements of Health and Safety Code Section 101480.
10.3.1-5	**Dewatering Management Plan.** For future development projects that require dewatering, a Dewatering Management Plan shall be prepared to determine how the dewatering activities will affect local groundwater quality, especially regarding movement of known or interpolated contaminated groundwater plumes. The Dewatering Management Plan also shall include protocols to evaluate extracted water quality and perform proper disposal of the water. Compliance with permitting requirements shall be described if required by the disposal method. The Dewatering Management Plan shall be prepared by a California Certified Hydrogeologist and approved by a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH.

Consistent with Specific Plan Requirements 10.3.1-1 and 10.3.1-3, Phase I and II ESAs were prepared for the site. As discussed in Section 4.8.1 Environmental Setting, VOCs were detected in soil, soil vapor, and groundwater samples. Consistent with Specific Plan

Requirements 10.3.1-2 and 10.3.1-4, the project would prepare a SMP identifying management options to address known and potential contamination in soil, soil vapor, and groundwater during construction activities. The presence of VOCs in soil vapor could potentially affect future residents of the building, which would be addressed via implementation of a vapor intrusion mitigation plan, as discussed further in Section 4.8.3 Non-CEQA Effects.[71]

Since groundwater at the site ranges from five to 10.5 feet bgs and the project proposes excavation to a maximum depth of seven feet, dewatering may be required during construction. The project would, therefore, prepare a Dewatering Management Plan in compliance with Specific Plan Requirement 10.3.1-5, which would ensure groundwater is tested and disposed of appropriately.

Consistent with the findings in the FEIR, through compliance with Specific Plan requirements 10.3.1-1 through 10.3.1-5, the project would not expose construction workers or the environment to significant hazards. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

Asbestos-Containing Materials, Lead-Based Paint, and Polychlorinated Biphenyls

The FEIR concluded buildout of the Specific Plan involving the demolition of buildings constructed prior to 1978 would result in a less than significant impact from release of ACMs, LBPs, and PCBs by complying with Specific Plan Project Requirements 10.3.1-6 and 10.3.1-7 (which pertain to ACMs and LBP, respectively) and the Municipal Regional Permit (MRP) Provision C.12.f (which pertains to PCBs). The aforementioned requirements and provision require a survey and proper removal of these hazardous materials.[72]

Requirement	Description
10.3.1-6	**Asbestos Survey.** Prior to issuance of demolition permits, an asbestos survey shall be completed on all structures proposed for demolition that are known or suspected to have been constructed prior to 1978 in accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. NESHAP guidelines require the removal of potentially friable asbestos-containing materials (ACMs) prior to building demolition or renovation that may disturb the ACM.
10.3.1-7	**Lead-Based Paint Survey.** Prior to issuance of a demolition permit, a lead-based paint (LBP) survey shall be completed on all structures proposed for demolition that

[71] The vapor intrusion mitigation plan is only required for the proposed building. A vapor barrier need not be installed at the proposed outdoor spaces because the primary pathway of concern for outdoor spaces is direct contact with soil, which would be addressed through the SMP.
[72] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 203-204.

	are known or suspected to have been constructed prior to 1978. If LBP is identified, then federal and state construction worker health and safety regulations shall be followed during renovation or demolition activities. If loose or peeling LBP is identified at the building, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations. Requirements set forth in the CCR Title 8, Section 1532.1 shall be followed during demolition activities, including employee training, employee air monitoring, and dust control. Any debris or soil containing LBP or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

The existing building on-site was constructed in 1973 and, therefore, may contain ACMs, LBPs, and/or PCBs. Accordingly, the project would comply with Specific Plan Requirements 10.3.1-6 and 10.3.1-7 requiring completion of asbestos and lead surveys to determine presence and proper removal, if required, of these materials. As discussed in more detail under checklist question a) in Section 4.9 Hydrology and Water Quality, the project would also comply with MRP Provision C.12.f and the City's adopted PCB screening process to determine presence and proper removal, if required, of PCBs.

Through compliance with Specific Plan Requirements 10.3.1-6 and 10.3.1-7, MRP Provision C.12.f, and the City's PCB screening process, the project would not expose construction workers or the environment to significant hazards from ACMs, LBPs, or PCBs. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

Imported Soils

The FEIR concluded buildout of the Specific Plan would result in a less than significant impact from potentially contaminated imported soils because future development projects requiring importation of soil would comply with Specific Plan Project Requirement 10.3.1-8 listed below.[73]

Requirement	Description
10.3.1-8	**Imported Soil Testing.** Prior to issuance of building permits, any development project within Moffett Park that includes the importation of soil shall conduct proper sampling to ensure that the imported soil is free of contamination. Imported materials shall be characterized according to the DTSC's 2001 Information Advisory Clean Imported Fill Material.

As discussed in Section 3.0 Project Description, project construction would include approximately 5,000 cubic yards of fill. All imported soil would be tested in compliance with Specific Plan Requirement 10.3.1-8. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[73] Ibid., page 204.

c. At the time the FEIR was certified, no schools with children under the age of 16 were located in or within 0.25 miles of Moffett Park. If a future school is developed within or adjacent to Moffett Park, future development would comply with existing regulations and Specific Plan Project Requirements identified under checklist question b) to reduce hazardous materials impacts, including those to schools, to a less than significant level.[74]

The closest school to the project site is Bishop Elementary School, located approximately 2.5 miles south at 450 North Sunnyvale Avenue. The proposed project would utilize small quantities of cleaning and maintenance chemicals that are commonly used for residential uses, and would not use or store hazardous materials in sufficient quantities to pose a health risk to nearby schools. Thus, the proposed project would not present a significant risk to nearby schools. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

d. The FEIR concluded that buildout of the Specific Plan involving development of sites included on lists of hazardous materials sites compiled pursuant to Government Code Section 65962 would not create a significant hazard to the public or the environment with the implementation of Specific Plan Project Requirements 10.3.1-1 through 10.3.1-5 identified above under checklist question b).[75]

As discussed in Section 4.8.1 Environmental Setting, the project site is not listed on any sites compiled pursuant to Government Code Section 65962. Therefore, the project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required. Refer to checklist questions a) and b) for discussions on how the project would remediate on-site contamination to a less than significant level.

e. The FEIR disclosed that all of Moffett Park is located within the Moffett Airfield AIA, therefore, all future development is required to be reviewed by the ALUC for compatibility with applicable Moffett Federal Airfield CLUP policies. The FEIR concluded that future development would comply with all applicable CLUP policies (including those pertaining to aircraft noise, the safety of persons on the ground and in aircraft, and the control of objects in navigable airspace) and, therefore, would not result in airport-related safety hazards or excessive noise for people residing or working in the project area.[76]

As discussed in Section 4.8.1 Environmental Setting, the project site is outside of the 65 CNEL noise contour and turning safety zone, and is allowed a maximum height of 182

[74] Ibid.
[75] Ibid., page 205.
[76] Ibid., pages 205-206.

feet amsl per FAR Part 77. As discussed in more detail in Section 4.11 Noise, the project does not conflict with CLUP Noise Compatibility Policies. Since the project site is outside of the CLUP's turning safety zone, the proposed project is not subject to the CLUP's land use restrictions for projects within turning safety zones. Further, because the proposed project proposes a maximum height of 91 feet (and the ground is approximately eight feet amsl), it would comply with FAR Part 77 requirements. Consistent with the FEIR, the proposed project would comply with all applicable CLUP policies. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

f. The FEIR concluded buildout of the Specific Plan would not impair implementation of or physically interfere with City's Local Hazard Mitigation Plan because future development would be reviewed by the City's Department of Public Safety (DPS) to ensure adequate design and infrastructure for fire protection, comply with City Building and Fire Code standards to ensure building design protection features are incorporated, and not modify any major evacuation routes designated in the City's Hazard Mitigation Plan.[77]

Consistent with the FEIR, the proposed project has been reviewed by DPS and DPS has confirmed the proposed design and project infrastructure is adequate for fire protection.[78] The project would comply with City Building and Fire Code standards and would not modify evacuation routes. As such, the project would result in the same impact as disclosed in the FEIR and not impair implementation or physically interfere with the City's Local Hazard Mitigation Plan. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

g. The FEIR concluded that buildout of the Specific Plan would not expose people or structures to significant risk of loss, injury, or death involving wildland fires because Moffett Park is an urbanized area that is not adjacent to a very high fire hazard severity zone.[79]

As discussed in Section 4.8.1 Environmental Setting, the project site is not within or adjacent to a moderate, high, or very high fire hazard severity zone. The proposed project would not expose any people or structures to risk from wildland fires. As such, the project would result in the same impact as disclosed in the FEIR and not expose people or structures to significant risk of loss, injury, or death involving wildland fires. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Section 15162

[77] Ibid., pages 203-204.
[78] Lao, Wendy. Senior Planner, City of Sunnyvale. Personal Communication. March 23, 2026.
[79] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 207.

and 15183 and no further analysis is required.

4.8.3 Non-CEQA Effects

Per BIA v. BAAQMD, effects of the environment on the project are not considered CEQA impacts. However, the City of Sunnyvale has policies (including General Plan Policies SN-12.1, SN-12.5, SN-13.2, and SN-13.3) that address existing hazards and hazardous materials conditions affecting a proposed project.

As discussed in Section 4.8.1 Environmental Setting, there are VOCs (including PCE and TCE) in the soil vapor on-site. The presence of VOCs in soil vapor represents an existing environmental condition affecting the project site rather than an impact caused by the project and, therefore, is addressed as a non-CEQA effect. The following Conditions of Approval, consistent with Specific Plan Requirement 10.3.1-4, would be required of the project to mitigate vapor intrusion with a vapor barrier or sub-slab ventilation system.

Conditions of Approval:

- A Vapor Intrusion Mitigation Plan (VIMP) shall be prepared to prevent exposure of future residents to VOCs in indoor air as a result of vapor intrusion. The VIMP shall require the project applicant to develop a Vapor Management System (VMS) and design the interior spaces with appropriate structural and engineering features to reduce risk of vapor intrusion into the building. At a minimum, the VMS shall include the following:
    - A passive sub-slab ventilation with a spray applied seamless vapor barrier (and with the ability to convert the system from passive to active ventilation),
    - Monitoring to ensure the long-term effectiveness of the remedy, and
    - The implementation of institutional controls.

  The VIMP shall be submitted to a regulatory agency such as the Regional Water Quality Control Board (Water Board), Department of Toxic Substances and Control (DTSC), or Santa Clara County Department of Environmental Health (SCCDEH) for review and approval. Alternative designs may be acceptable if approved in writing by the Water Board, DTSC, or SCCDEH. The applicant shall provide proof of approval from the Water Board, DTSC, or SCCDEH to the City's Planning Division prior to issuance of building permits.
- To document the effectiveness of the VMS, a qualified environmental professional shall conduct post-construction sampling. The results of soil gas sampling, design and installation of the VMS, and post-construction sampling shall be submitted to the Water Board, DTSC, or SCCDEH for review and approval prior to the issuance of occupancy permits. The sampling shall be conducted prior to the issuance of occupancy permits at approximately four weeks after completion of construction, with subsequent testing during the potentially "worst-case" months of

January/February and June/July.[80] The applicant shall provide proof of approval from the Water Board, DTSC, or SCCDEH for the items above to the City's Planning Division prior to release for utility connection, final inspection, issuance of a temporary certificate of occupancy, or issuance of a certificate of occupancy, whichever occurs first.

- A Long-Term Operations, Maintenance, and Monitoring Plan (OMMP) shall also be submitted to the Water Board, DTSC, or SCCDEH for approval that presents the actions that must be taken following construction to maintain and monitor the VMS. The OMMP shall also include a contingency plan in case of VMS failure, and a financial assurance mechanism shall be established to prove that adequate funds are available for long-term maintenance and monitoring of the VMS. The applicant shall provide proof of approval from the Water Board, DTSC, or SCCDEH for the items above to the City's Planning Division prior to release for utility connection, final inspection, issuance of a temporary certificate of occupancy, or issuance of a certificate of occupancy, whichever occurs first.

With implementation of the above Condition of Approval, the project would remediate risks from vapor intrusion on future residents of the proposed project.

[80] The DTSC considers January/February and June/July to be the periods where vapor intrusion poses the greatest risk to developments.

4.9 Hydrology and Water Quality

4.9.1 Environmental Setting

The existing hydrology and water quality setting, including regulatory framework, has not substantially changed since certification of the FEIR.

Water Quality

The nearest waterways to the project site are the Sunnyvale West Channel (approximately 530 feet east of the site) and Sunnyvale East Channel (approximately 4,900 east of the site). The project site is located within the Sunnyvale West Channel and Sunnyvale East Channel watersheds, which, together, drain a watershed of approximately 15 square miles, encompassing most of Sunnyvale, as well as parts of Mountain View, Cupertino, and unincorporated Santa Clara County.

Currently, approximately 79 percent (or 71,744 square feet) of the project site is impervious and approximately 21 percent (or 18,517 square feet) is pervious.[81]

Groundwater

As mentioned in Section 4.6 Geology and Soils, groundwater at the site ranges between five to 10.5 feet bgs. Fluctuations in the groundwater level may occur due to seasonal changes, variations in rainfall and underground drainage patterns, and other factors.

Flooding

According to the FEMA Flood Map, the project site is within Zone X, an area with reduced flood risk due to a levee. Zone X is defined as areas of reduced risk due to levees.[82]

Seiches and Tsunamis

A seiche is the oscillation of water in an enclosed body of water such as a lake or the Bay. The Bay is located over 5,000 feet away from the project site and would not affect the site in the event of a seiche. A tsunami is a sea wave generated by an earthquake, landslide, or other large displacement of water in the ocean. The project site is not located in a tsunami inundation zone.[83]

[81] Stormwater Management Plan Provision C.3 Data Form provided by applicant.
[82] Federal Emergency Management Association. "FEMA's National Flood Hazard Layer (NFHL) Viewer." Accessed January 26, 2026. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.
[83] California Department of Conservation. "Santa Clara County Tsunami Hazard Areas." Accessed January 26, 2026. https://www.conservation.ca.gov/cgs/tsunami/maps/santa-clara.

4.9.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LTS	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	LTS	No	No	No	No
– result in substantial erosion or siltation on- or off-site;	LTS	No	No	No	No
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	LTS	No	No	No	No

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	LTS	No	No	No	No
– impede or redirect flood flows?	LTS	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	No	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would result in a less than significant impact regarding violation of any water quality standards, waste discharge requirements, or surface or ground water quality degradation because compliance with MRP requirements (including MRP Provision C.12.f) and the City's PCB screening process would ensure buildings with the potential to include PCBs are identified and abated, the NPDES General Construction Permit would reduce runoff and pollution in runoff from construction activities, and Specific Plan Project Requirement 10.3.1-5 (which is described in Section 4.8 Hazards and Hazardous Materials) for projects requiring dewatering would ensure proper disposal of contaminated groundwater, and SMC would ensure that future project construction and post-construction runoff would not result in substantial sources of polluted runoff, resulting in less than significant water quality impacts.[84]

[84] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 219.

Buildings that are constructed or remodeled between January 1, 1950, and December 31, 1980, are subject to the City's PCB Screening Assessment. The City's PCB Screening Assessment was adopted to comply with MRP Provision C.12.f, as explained in the FEIR. Since the building on-site was constructed in 1973, the building may contain PCBs and is subject to the City's PCB Screening Assessment. The project would obtain an NPDES General Construction Permit (which would include preparing a SWPPP) and implement the following stormwater control BMPs during construction:

- Install inlet protection at open inlets to prevent sediment from entering the storm drainage system
- Provide concrete washout
- Provide silt fence or straw rolls around the perimeter of site slopes
- Monitor erosion and sediment control measures prior to, during, and after storm events
- Keep all paved areas clear of earth material and debris during the rainy season (October 15 through April 15)

As discussed in Section 4.6 Geology and Soils, the project would comply with Specific Plan Requirement 10.3.1-5 requiring a Dewatering Management Plan if groundwater is encountered during excavation.

To reduce water quality impacts post-construction, the project would comply with the MRP (including Provision C.3) and SMC Section 12.60.155 regarding low impact development (LID) site design. The project would implement the following LID features during operations:

- Directing runoff onto vegetated areas
- Treating stormwater runoff with bioretention planters

The project would comply with the same regulations identified in the FEIR and would result in the same less than significant impact to water quality as disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not substantially decrease of groundwater supply or interference with groundwater recharge because future developments' compliance with Specific Plan Hazards and Hazardous Materials Project Requirement 10.3.1-5 (described in Section 4.8 Hazards and Hazardous Materials) would reduce the impacts of future development on groundwater supplies from dewatering activities or direct pumping by implementing a Dewatering Management Plan to safely remove groundwater, Valley Water's Well Ordinance 90-1 would ensure potential groundwater wells on a future project site are properly destroyed so they do not impact

groundwater supplies, and NPDES General Construction Permit and MRP would ensure future projects implement LID site design measures to minimize the discharge of pollutants into waterways.[85]

As discussed under checklist question a) above, the project requires dewatering and would comply with Specific Plan Hazards and Hazardous Materials Project Requirement 10.3.1-5. There are no wells on-site, therefore, compliance with Valley Water's Well Ordinance 90-1 is not appliable to the project.

With construction of the project, pervious surfaces would increase by 3,260 square feet (from 18,517 to 21,777).[86] As discussed under checklist question a) above, the project would be subject to the requirements under Provision C.3 of the MRP and implement LID-based stormwater treatment controls, which, coupled with the project's increase in pervious surfaces, would increase the potential for groundwater recharge. For these reasons, implementation of the project would not substantially decrease groundwater supplies or interfere with groundwater recharge and not result in new or substantially more severe significant impacts. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. The FEIR concluded buildout of the Specific Plan would not substantially alter the existing drainage pattern of the site or the area in a manner that would cause significant erosion, siltation, flooding, polluted runoff, or changes to flood flows because the buildout of the Specific Plan (including planned park and open space areas and future development compliance with Specific Plan Development Standard 5.2.3, Standard 2, which requires development to comply with paving area maximums in Table 6 of the Specific Plan) would increase pervious surfaces, would not modify the existing primary drainage system, and future development projects would comply with the MRP, City's PCB screening process, Construction General Permit, and SMC requirements to reduce water quality, siltation, and soil erosion impacts.[87]

As discussed under checklist question b) above, implementation of the project would result in an increase of pervious surfaces. The project would comply with the MRP, City's PCB screening process, Construction General Permit, and SMC by implementing construction-phase BMPs as well as post-construction site design measures, source control measures, and stormwater treatment measures, which would increase the potential for groundwater recharge, reduce the amount of surface runoff leaving the site, and improve the water quality of the runoff. In addition, there are no waterways on-site and the project does not include modifications to any waterways. For these reasons, the project would not result in new or substantially more severe significant impacts than

[85] Ibid., page 220.
[86] Stormwater Management Plan Provision C.3 Data Form provided by applicant.
[87] Ibid., pages 221-222.

disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR concluded buildout of the Specific Plan would not risk release of pollutants due to inundation in flood hazard, tsunami, or seiche zones due to compliance by future development with the RCRA, TSCA, CFR 49, CCR Title 26, CUPA programs, City's Hazard Mitigation Plan, and SMC requirements for proper storage and handling of hazardous materials.[88]

As discussed in Section 4.9.1 Environmental Setting, the project site is in Zone X (a zone with reduced risk due to a levee), not located in a tsunami inundation zone, and would not be affected by a seiche. In addition, the proposed residential use would not use, store, or generate substantial quantities of hazardous materials. Therefore, the project would result in the same impact as disclosed in the FEIR and the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

e. The FEIR concluded buildout of the Specific Plan would not conflict with or obstruct implementation of a water quality control plant or sustainable groundwater management plan because a) there are no Valley Water Groundwater Management Plan for the Santa Clara Llagas Subbasins recharge facilities, pump plants, or drinking water treatment plants in the Specific Plan area and b) future development would be consistent with the Basin Plan by complying with existing water quality control regulations (i.e., the MRP, City adopted PCB screening process, NPDES Construction General Permit, and SMC regulations).[89]

As discussed under checklist questions a) through c) above, the project would comply with the MRP, City's PCB screening process, NPDES General Construction Permit, and SMC requirements pertaining to water quality and stormwater control BMPs. Therefore, the project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[88] Ibid., page 222.
[89] Ibid., page 223.

4.10 Land Use and Planning

4.10.1 Environmental Setting

The existing land use and planning setting, including regulatory framework, has not substantially changed since certification of the FEIR, with the exception of the City's 2023 to 2031 Housing Element being certified in March 2024.

As described in Section 2.0 Project Information, the project site is located within the Moffett Park Specific Plan in the City's General Plan. The site is zoned as MP-R, which is intended for very high-density residential uses.[90] The MP-R district has a minimum residential density requirement of 70 du/ac and maximum development potential in the MP-R district is limited through various form-based standards (e.g., setbacks, lot coverage, height limits, and publicly accessible open spaces and mobility connection requirements).

As shown on Figure 2.1-3, the project site is currently developed with one office building and associated surface parking. The site is bordered by Bordeaux Drive to the east, 5th Avenue to the south, and office uses to the north and west.

4.10.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Physically divide an established community?	LTS	No	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	No	No	No	No

Note: LTS = less than significant.

[90] City of Sunnyvale. "Code of Ordinances: Chapter 19.29 Moffett Park Specific Plan District." Accessed January 7, 2026. https://ecode360.com/42730203.

a. The FEIR concluded buildout of the Specific Plan would not physically divide a community because Moffett Park is separated from adjacent communities by roadways, the Specific Plan would not introduce divisive infrastructure (such as a highway or railway), and the Specific Plan would result in a new street network that would improve connectivity between Moffett Park and adjacent communities.[91]

The project proposes residential development that is generally consistent with the Specific Plan. The project would not construct any new barriers or roadways that would physically divide the community. The project would develop a portion of the planned Bordeaux Neighborhood Park via construction of a POPA featuring a dog park, picnic deck, landscaped paths, and seating areas. The project would improve connectivity by including these pedestrian-oriented facilities and on-site bicycle parking and a secure bike room to support cyclists, and being located near transit systems to support transit use. Consistent with the findings of the Specific Plan FEIR, implementation of the project would not physically divide an established community. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect because a) future development would comply with FAA notification requirements and CLUP policies to prevent aviation-related hazards and b) the Specific Plan is consistent with General Plan Policies LT-1.2 and LT-1.3 for providing mixed-use development in proximity to transit and incorporating open space, and LT-3.23 by proposing a multi-modal transportation network that would facilitate and improve connectivity within Moffett Park and to adjacent areas.[92]

As discussed in more detail in Section 4.8 Hazards and Hazardous Materials, the project is located outside of the AIA's 65 CNEL noise contour and CLUP turning safety zones, and is consistent with FAR Part 77 height requirements.

The proposed land use is consistent with the General Plan and Specific Plan land use designations and assumptions for the site. The project would be consistent with General Plan Policies LT-1.2, LT-1.3, and LT-3.23 because it would contribute to the development of the planned Bordeaux Neighborhood Park, include amenities to support pedestrians and cyclists (as noted under checklist question a) above), and introduce residential uses within proximity to transit.

[91] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 228-229.
[92] Ibid., page 229.

As discussed in detail in Section 4.3 Biological Resources, the project's proposed POPA would develop a portion of the planned Bordeaux Neighborhood Park. The buildout of the Bordeaux Neighborhood Park must comply with the Specific Plan standards and guidelines for Habitat Patches and Neighborhood Parks. The project would comply with the landscape design requirements as discussed under checklist question b) in Section 4.3 Biological Resources. As explained in 4.3 Biological Resources, the project would be consistent with its responsible portion of the Habitat Patch and Neighborhood Park standards and guidelines. When redevelopment of the nearby sites within the boundaries of the planned Bordeaux Neighborhood Park occur, they would comply with their responsible portion. Therefore, consistency with all of the Habitat Patch and Neighborhood Park standards and guidelines would be achieved in the future, through build out of individual development projects that would contribute to the construction of the Bordeaux Neighborhood Park.

Further, the proposed residential use is consistent with the permitted uses in the MP-R zoning district. The project proposes a density of 134 du/ac and a building height of 91 feet, both of which are consistent with the MP-R district standards requiring a minimum density of 70 du/ac and allowing a maximum height of 160 feet. The proposed 25,700 square feet of open space is consistent with the MP-R district requirement of 50 square feet of open space per unit (which would be a minimum of 13,250 square feet for the project). Based on Table 6 of the Specific Plan, development within the MP-R district is allowed a maximum of 15 percent paved areas, minimum 20 percent landscaped area, and a maximum of 70 percent building mass coverage. According to the project plans, the project would have a total of one percent paved area, 33 percent landscaped area, and 57 percent building mass coverage, consistent with the requirements for the MP-R district.

As disclosed in Section 3.9, the project includes several waivers pertaining to certain development standards, including dimensions for the area dedicated to the Bordeaux Neighborhood Park and partially enclosed interior courtyards, the 20 percent green roof requirement, residential storage requirements, ground floor setbacks, provision of Type A off-street loading zone, the number of major façade breaks, and provisions of bicycle lockers for residents. These waivers relate to site planning, building design, and amenity requirements rather than the project's fundamental land use, density, height, or overall consistency with the General Plan and Specific Plan. The waivers are requested pursuant to State Density Bonus Law, which allows qualifying projects to obtain waivers or reductions from development standards when necessary to physically accommodate the project's density bonus and associated incentives or concessions. Accordingly, although the project would not fully conform to these individual standards, the requested waivers would be permitted by State Density Bonus Law and would not constitute a significant conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed throughout this document (including Sections 4.2 Air Quality, 4.4 Cultural Resources, 4.5 Energy, and 4.6 Geology and Soils), the project is consistent with applicable Specific Plan requirements and policies adopted for the purpose of avoiding or mitigating environmental effects. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

4.11 Noise

4.11.1 Environmental Setting

The existing noise setting, including regulatory framework, has not substantially changed since certification of the FEIR.

Per Figure 3.13-2 of the FEIR, the noise level at the project site varies between 55 to 65 dBA L_{dn}.[93,94] Based on General Plan Policy SN-8.5 pertaining to noise and land use compatibility, this is considered normally acceptable for an office use.

4.11.2 Impact Discussion

Would the project result in:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	LTS	No	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS	No	No	No	No

Note: LTS = less than significant.

[93] L_{dn} is the average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 PM and 7:00 AM.
[94] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 244.

a. Buildout of the Specific Plan would generate noise during construction (i.e., from construction equipment) and operation (i.e., through changes in land use, traffic noise, and mechanical equipment).

Construction Noise Impacts

The FEIR concluded buildout of the Specific Plan would have less than significant construction noise impacts because future development would comply with SMC Section 16.08.30 pertaining to permissible construction hours and use of environmentally disruptive equipment (e.g., air compressors without mufflers or continuously running motors or generators) and implement Specific Plan Requirement 10.3.4-1, listed below, requiring noise control strategies and construction BMPs.[95]

Requirement	Description
10.3.4-1	**Construction Noise Measures.** Future development projects shall implement site-specific noise attenuation measures during construction to reduce the generation of construction noise and vibration. These measures shall be included in a Noise Control Plan that shall be submitted for review and approval by the City prior to issuance of demolition, grading, and/or building permits. Measures specific in the Noise Control Plan and implemented during construction shall include 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., jackhammers, 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. • 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 similar measures. • Noise and vibration reducing pile-driving techniques shall be implemented during construction and shall be monitored to ensure no damage to nearby structures occurs (i.e., vibrations above PPVs of 0.25 in/sec at nearby structures). These techniques shall include: a. Installing intake and exhaust mufflers on pile-driving equipment. b. Vibrating piles into place when feasible, and installing shrouds around the pile-driving hammer where feasible. c. Implementing "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.

[95] Ibid., pages 245-248.

Requirement	Description
	d. Using cushion blocks to dampen impact noise, if feasible based on soil conditions. e. At least 48 hours prior to pile-driving activities, notifying building owners and occupants within 600 feet of the project area of the dates, hours, and expected duration of such activities. • Prohibit unnecessary idling of internal combustion engines. • Construction staging areas shall be established at locations that create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. Material stockpiles, as well as maintenance/equipment staging and parking areas, shall be located as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • Where feasible, temporary power service from local utility companies shall be used instead of portable generators. • Locate cranes as far from adjoining noise-sensitive receptors as possible. • During final grading, substitute graders for bulldozers, where feasible. Wheeled heavy equipment are quieter than track equipment and should be used where feasible. • Maintain smooth vehicle pathways for trucks and equipment accessing the site, and avoid local residential neighborhoods as much as possible. • During interior construction, the exterior windows facing noise-sensitive receptors should be closed. • During interior construction, locate noise-generating equipment within the building to break the line-of-sight to the adjoining receptors. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities (including pile driving, removal of existing structures; site grading and excavation; installation of utilities; construction of building foundations, cores, and shells; paving; and landscaping). The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The project is generally consistent with the Specific Plan and does not include atypical construction activities not considered in the FEIR analysis. Consistent with the FEIR, the proposed project would comply with SMC Section 16.08.30 and prepare a Noise Control Plan and implement the noise control strategies pursuant to Specific Plan Requirement 10.3.4-1. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Operational Noise Impacts

The FEIR analyzed operational noise impacts resulting from land uses, traffic noise, and mechanical equipment. The following discussion addresses these same areas, with an additional open space discussion.

Land Use

The FEIR concluded the Specific Plan would have a less than significant impact with regard to land use because future development would comply with General Plan Policies (including SN-8.4, SN-8.5, SN-8.6, SN-8.9, SN-9.1, and SN-9.3) and SMC Section 19.42.030 to reduce operational noise impacts to a less than significant by requiring new development to meet the City's noise standards established to avoid operational noise impacts on existing land uses.[96]

Consistent with the FEIR, the proposed project would comply with the aforementioned General Plan Policies. The City (rather than specific development projects) is responsible for complying with General Plan Policies SN-9.1 and -9.3. The project would comply with General Plan Policies SN-8.4 by complying with state noise guidelines and SMC noise regulations, as follows.

Per the State's Noise Guideline for Land Use Planning and General Plan Policy SN-8.5, noise levels of 55 to 60 dBA L_{dn} are considered normally acceptable and levels of 60 to 65 dBA L_{dn} are considered conditionally acceptable for residential uses. "Normally acceptable" means conventional residential use is allowed in this noise environment without any special insulation requirements. "Conditionally acceptable" means residential use may be permitted in this noise environment, provided that project-specific design features are incorporated to reduce noise exposure to acceptable levels. As discussed in Section 4.11.1 Environmental Setting, the existing noise level at the project site varies between 55 to 65 dBA L_{dn}. Accordingly, the proposed residential use falls within the normally and conditionally acceptable range.

As discussed further in Section 4.11.3 Non-CEQA Effects, Specific Plan Requirement 10.3.4-10 requires an acoustical design review to determine the need for project-specific design features (e.g., sound-rated windows and doors, mechanical ventilation allowing windows to remain closed, and site/building design that shields common outdoor areas from noise sources). Implementation of project-specific design features would also ensure compatibility with the noise environment and compliance with General Plan Policies SN-8.5, SN-8.6, and SN-8.9 by designing the proposed buildings in a way that insulates people from noise (e.g., in compliance with the state's interior noise standard of 45 dBA L_{dn} or less).

[96] Ibid., pages 248-249.

Additionally, SMC Section 19.42.030(b)(1) requires that noise levels do not exceed 60 dBA during nighttime or 70 dBA during daytime hours on the property line of adjacent non-residential uses. The proposed project would not introduce substantial operational noise sources beyond mechanical equipment (i.e., HVAC and emergency fire pump) and typical residential activity. As discussed under Mechanical Equipment below, the HVAC and fire pump would be reviewed during final design pursuant to Specific Plan Requirement 10.3.4-2, and any necessary noise controls would be incorporated to ensure compliance with applicable City noise limits at the property line.

In addition, the project does not propose amplified outdoor sound, late-night commercial activity, or other atypical operational noise sources that would be expected to generate noise in excess of the City's standards at adjacent non-residential property lines. As discussed further under Open Space below, the project's proposed open space areas would not generate noise in excess of the City's standards.

Therefore, the project would not result in significant operational noise impacts, nor would it meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Open Space

As discussed above, SMC Section 19.42.030(b)(1) requires that operational noise levels not exceed 60 dBA L_{eq} during nighttime hours or 70 dBA L_{eq} during daytime hours at the property line of adjacent non-residential uses. The passive open space features on-site including picnic deck, landscaped paths, and seating areas would not generate substantial operational noise. For example, it does not include amplified sound or organized event programming. The primary open space feature that could generate noise is the proposed dog park within the proposed POPA.

Dog parks can generate localized noise resulting from dog barks and people talking and yelling. Based on prior noise assessments completed for dog parks, small dog parks (three to six dogs and three to six people) typically result in hourly average noise levels of 55 to 58 dBA L_{eq} at 100 feet from the center of activity.[97] The proposed dog park would be small in size and its center of activity would be approximately 50 feet from the closest property line, located north of the project site. Accounting for the decrease in distance from 100 feet to 50 feet, noise levels would increase by approximately six dBA, resulting in an estimated range of 61 to 64 dBA L_{eq} at the nearest property line.[98]

Based on the above discussion, operation of the project's open space amenities would comply with the City's property line limits in SMC Section 19.42.030(b)(1). Therefore, the

[97] Sources: 1) Illingworth & Rodkin, Inc. *Lakewood Park Project Noise and Vibration Assessment.* May 23, 2025. 2) Illingworth & Rodkin, Inc. *Red Hill Community Park Environmental Noise Assessment.* July 6, 2005.
[98] Bruce, Heather. Senior Consultant, Illingworth & Rodkin, Inc. Personal Communication. April 3, 2026.

project would not result in significant operational noise impacts, nor would it meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Traffic

The FEIR concluded that, while buildout of the Specific Plan would result in a significant increase in Specific Plan traffic generated noise of more than three dBA L_{dn} at two roadway segments (Bordeaux Drive from North Mathilda Avenue to Java Drive and Geneva Drive north of East Java Drive), there are no existing noise-sensitive receptors located along those roadway segments that would be affected.[99]

The proposed development is consistent with the land use and density assumptions in the Specific Plan, and its traffic is accounted for in the FEIR analysis. Therefore, the project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Mechanical Equipment

The FEIR concluded that future development would not result in mechanical equipment noise exceeding City property line noise standards by implementing Specific Plan Noise and Vibration Project Requirement 10.3.4-2 below, which requires review of proposed mechanical equipment systems and implementation of controls, as necessary.[100]

Requirement	Description
10.3.4-2	**Operational Noise.** Prior to the issuance of building permits, a qualified acoustical consultant shall be retained to review mechanical equipment systems during final design of future projects. The consultant shall review selected equipment and determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements (including SMC Section 19.42.030 requires that operational noise not exceed 75 dBA along the property line, and that the noise levels not exceed 60 dBA during daytime hours or 50 dBA during nighttime hours at any point on adjacent residential properties). Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Additionally, enclosures and interior wall treatments shall be considered to reduce noise exposure within the on-site units. Alternate measures may include locating equipment in less noise-sensitive areas, where feasible. The specific equipment shall be included on the approved building permit plan set.

[99] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 249-256.
[100] Ibid., page 257.

The proposed project would not introduce substantial operational noise sources beyond standard mechanical equipment, i.e., HVAC and an emergency fire pump. As proposed, the equipment would be in less noise-sensitive areas (i.e., on the roof) or enclosed to minimize noise (i.e., in a designated fire pump room on the ground floor). All equipment would be subject to the City's applicable operational noise limits in SMC Section 19.42.030 and Specific Plan Requirement 10.3.4-2, which requires review by a qualified acoustical consultant during final design and incorporation of any necessary noise controls to ensure compliance at the property line and at adjacent sensitive receptors. Fire pump testing and operation would also be required to comply with applicable City noise limits. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would result in less than significant vibration impacts because future development projects would comply with Caltrans vibration standards/limits identified for the purpose of avoiding impacts to adjacent buildings from construction vibration and prohibiting the use of heavy vibration-generating construction equipment within 25 feet of residences and hotels/motels, and would implement Specific Plan Requirements 10.3.4-3 through 10.3.4-7 below to reduce construction-related vibration by prohibiting the use of heavy vibration-generating construction equipment near residences and hotels/motels, requiring vibration reducing techniques during construction, and implementing a Construction Vibration Monitoring, Treatment, and Reporting Plan (as appropriate).[101]

Requirement	Description
10.3.4-3	**Heavy Vibration-Generating Construction Equipment.** Prohibit the use of heavy vibration-generating construction equipment within 25 feet of residences and hotels/motels. Use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 25 feet of residences and hotels/motels adjoining the site.
10.3.4-4	**Dropping Heavy Equipment.** Avoid dropping heavy equipment within 25 feet of residences and hotels/motels. Use alternative methods for breaking up existing pavement, such as a pavement grinder, instead of dropping heavy objects within 25 feet of residences and hotels/motels adjoining the site.
10.3.4-5	**Pile-Driving Techniques.** Noise and vibration reducing pile-driving techniques shall be employed during construction and monitored to ensure no damage to nearby structures occurs (i.e., vibrations above PPVs of 0.25 in/sec at nearby structures). 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. • Implementing "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.

[101] Ibid., pages 257-261.

Requirement	Description
	• Using cushion blocks to dampen impact noise, if feasible based on soil conditions. • At least 48 hours prior to pile-driving activities, notifying building owners and occupants within 600 feet of the project area of the dates, hours, and expected duration of such activities.
10.3.4-6	**Heavy Equipment Communications.** The contractor shall alert heavy equipment operators to the proximity of the adjacent structures so they can exercise extra care.
10.3.4-7	**Construction Vibration Monitoring, Treatment, and Reporting Plan.** For projects requiring impact or vibratory pile driving, a Construction Vibration Monitoring, Treatment, and Reporting Plan shall be implemented to document conditions prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. The construction vibration monitoring plan shall include, but not be limited to, the following measures: • Document conditions that all structures located within 100 feet of pile driving activities and at historic structures located within 275 feet of pile driving activities prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. Specifically: • Vibration limits shall be applied to vibration-sensitive structures located within 100 feet of any high impact construction activities, such as pile driving, and 275 feet of historic buildings. • Performance of a photo survey, elevation survey, and crack monitoring survey for each structure of normal construction within 100 feet of any high impact construction activities and each historic structure within 275 feet of pile driving activities. Surveys shall be performed prior to any construction activity, in regular intervals during construction, and after project completion, and shall include internal and external crack monitoring in structures, settlement, and distress, and shall document the condition of foundations, walls and other structural elements in the interior and exterior of said structures. • Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits. • At a minimum, vibration monitoring shall be conducted during all pile driving activities. • If vibration levels approach limits, suspend construction, and implement contingency measures to either lower vibration levels or secure the affected structures. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site. • Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make

Requirement	Description
	appropriate repairs or compensation where damage has occurred as a result of construction activities.

The project is adjacent to structurally sound and designed buildings (i.e., not historical buildings or buildings documented to be structurally weakened) and, therefore, would need to keep vibration levels at or below the 0.5 in/sec PPV Caltrans limit to avoid vibration impacts. Project construction activities would consist of conventional drilling, use of jackhammers, rock drills, and other high-power or vibratory tools that may generate vibration in the immediate vicinity. As identified in the FEIR, jackhammers typically generate vibration levels of approximately 0.035 in/sec PPV at a distance of 25 feet, and drilling typically generates vibration levels of 0.09 in/sec PPV at 25 feet, both of which are below the 0.5 in/sec PPV threshold.[102] Pile driving is the construction activity with the greatest potential to generate vibration levels that could approach or exceed the 0.5 in/sec PPV threshold. Because the proposed project does not propose pile driving during construction, it would not need to comply with Specific Plan Requirements 10.3.4-5 and 10.3.4-7, and its construction vibration levels would be expected to remain below the 0.5 in/sec PPV threshold.

Consistent with the FEIR, the proposed project would comply with Specific Plan Project Requirements 10.3.4-3, 10.3.4-4, and 10.3.4-6 during construction. Therefore, the project would not result in new or substantially more severe significant impact than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. The FEIR concluded buildout of the Specific Plan would not expose people residing or working in the project area to excessive noise levels from Moffett Federal Airfield through compliance with CLUP Noise Compatibility Policies N-1, N-2, N-3, and N-6 and Specific Plan Noise and Vibration Project Requirement 10.3.4-8, listed below, which requires a noise analysis for projects exposed to aircraft noise levels ranging from 65 to 75 dBA CNEL and incorporation of any necessary noise insulation features to meet noise standards.[103]

Requirement	Description
10.3.4-8	**CLUP Noise Levels.** Future developments under the Specific Plan exposed to conditionally acceptable and generally unacceptable aircraft noise levels, as defined by the Moffett Federal Airfield CLUP, shall complete a detailed noise analysis that includes the required noise reduction measures and noise insulation features included in the design to ensure compatibility with the CLUP noise standards.

[102] Ibid., pages 258-259.
[103] Ibid., page 261.

CLUP Noise Compatibility Policies N-1, N-2, N-3, and N-6 require land use projects to be compared against the CLUP's aircraft noise contours to determine consistency with the CLUP. While the project site is within the AIA for the Moffett Federal Airfield, it is outside of its 65 CNEL noise contour. The proposed residential use is considered generally acceptable per the ALUC Noise Compatibility Policies shown in Table 3.13-2 in the FEIR.[104] "Generally acceptable" means the land use is ordinarily compatible with the aircraft noise environment and may be developed without special noise studies or measures beyond standard codes, unless project-specific circumstances require otherwise. Because the project site is outside the 65 CNEL contour, the residential use is considered compatible with aircraft noise exposure at the site and is not subject to Specific Plan Requirement 10.3.4-8. Therefore, the project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

4.11.3 Non-CEQA Effects

Per BIA v. BAAQMD, effects of the environment on the project are not considered CEQA impacts. However, the City of Sunnyvale has policies (including General Plan Policies SN-8.1, SN-8.3, SN-8.5, SN-8.7, SN-8.8, and SN-10.4) that address existing noise conditions affecting a proposed project.

The FEIR concluded buildout of the Specific Plan could result in an exceedance of normally acceptable exterior noise levels at future residential, school, and hotel/motel outdoor areas, and/or an exceedance of CALGreen interior noise standards in residential or non-residential projects. In addition, buildout of the Specific Plan could result in vibration impacts to buildings proposed within 35 feet of light rail lines.[105] The FEIR concluded that future projects would comply with the Specific Plan Noise and Vibration Project Requirements 10.3.4-9 through 10.3.4-11 requiring residential, hotel/motel, and school projects to be designed in a way that locates noise-sensitive outdoor uses away from significant sources of noise; project-specific acoustical analysis to reduce interior noise levels; and project-specific vibration analyses for projects proximate to VTA light rail lines reduce effects of the noise and vibration environment on future development projects to acceptable levels.

The following Specific Plan Requirements are applicable to the proposed project.

Requirement	Description
10.3.4-9	**Noise Sensitive Outdoor Uses.** Residential, hotel/motel, and school projects shall be designed in such a way to locate noise-sensitive outdoor use areas away from major roadways or other significant sources of noise.

[104] Ibid., page 236.
[105] Ibid., pages 264-265.

Requirement	Description
	• Projects shall shield noise-sensitive outdoor use spaces with buildings or noise barriers to reduce exterior noise levels. • The final detailed design of the heights and limits of proposed noise barriers shall be completed at the time that the final site and grading plans are submitted.
10.3.4-10	**Acoustical Analysis.** A project-specific acoustical analysis shall be prepared, in compliance with State Building Codes and City noise standards, to ensure that the design incorporates controls to reduce interior noise levels to 45 dBA Ldn or lower within the residential units and to 50 dBA Leq(1-hr) or lower within non-residential interiors. Additionally for residential units located adjacent to the VTA light-rail tracks, maximum instantaneous noise levels shall be at or below 50 dBA Lmax within bedrooms and at or below 55 dBA Lmax within all other residential rooms. The project applicant shall conform with any special building construction techniques requested by the City's Building Department, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking. If future projects do not meet the 45 dBA Ldn (for residential interiors) or 50 dBA Leq(1-hr) (for non-residential interiors) standards, other site-specific measures, such as increasing setbacks of the buildings from the adjacent roadways, using shielding by other buildings or noise barriers to reduce noise levels, implementing additional sound treatments to the building design shall be considered to reduce interior noise levels to meet the State and City standards.

Specific Plan Requirement 10.3.4-9 would apply to the proposed residential project to ensure that noise-sensitive outdoor areas are appropriately sited. In addition, pursuant to Specific Plan Requirement 10.3.4-10, the project applicant would prepare an acoustical analysis to demonstrate compliance with CBC requirements and City noise standards. The analysis would identify and incorporate necessary design features (e.g., sound-rated windows and doors, enhanced wall assemblies, acoustical caulking, and/or alternative site planning measures) to ensure that interior noise levels do not exceed 45 dBA L_{dn} within residential units. If the acoustical analysis determines that exterior noise levels could result in interior exceedances, additional site-specific measures (e.g., increased setbacks, building orientation, shielding, or noise barriers) would be implemented as needed.

The State's Noise Guidelines for Land Use Planning identify neighborhood parks and playgrounds as normally acceptable up to 70 dBA L_{dn} and conditionally acceptable up to 80 dBA L_{dn}. Because the project site is exposed to approximately 55 to 65 dBA L_{dn}, the project's on-site open space areas would fall within the normally acceptable range for neighborhood parks and playgrounds. Although dog parks can generate localized noise from park users and dogs, the proposed dog park would be part of the planned neighborhood park in an area already designated for such recreational use. Accordingly, the project's park and open space areas would be compatible with the existing exterior noise environment.

In addition, pursuant to SMC Section 19.42.030(a)(2), operational noise in the project's primary usable open space areas, including the entry plaza and other common/open space areas integrated into the site design, would not exceed 55 dBA during nighttime hours or 65 dBA during daytime hours. Based on the FEIR noise contours, the site is exposed to approximately 55 to 65 dBA L_{dn}, and the entry plaza is internal to the project and partially shielded by the proposed building mass from surrounding roadway noise. The project also would not include substantial on-site operational noise sources adjacent to the plaza. Accordingly, the project's usable open space areas would be expected to comply with the City's applicable exterior noise standards, and the project would not exceed applicable interior noise standards. Therefore, the project would not exceed interior noise standards and would be consistent with the FEIR.

4.12 Population and Housing

4.12.1 Environmental Setting

The existing population and housing setting, including regulatory framework, has not substantially changed since certification of the FEIR, with the exception of the City's 2023 to 2031 Housing Element being certified in March 2024. With the adoption of the Housing Element, the buildout of the General Plan (which includes the Specific Plan) would result in 102,122 dwelling units and 239,785 residents in the City by 2040.[106]

As of January 2025, the population of Sunnyvale was estimated to be 159,673 with an average of 2.59 persons per household and approximately 64,268 housing units.[107]

There are no existing residences on the project site.

4.12.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	No	No	No	No

Note: LTS = less than significant.

[106] Ibid., page 271.
[107] California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State 2020-2024." Accessed February 13, 2026. https://dof.ca.gov/Forecasting/Demographics/Estimates/.

a. The FEIR concluded buildout of the Specific Plan would not induce substantial unplanned population growth because it would be consistent with growth projected in the North Santa Clara County. Further, buildout of the Specific Plan would be consistent with Plan Bay Area 2050 goals and General Plan Policies by planning mixed-use residential development in proximity to transit; maximizing opportunities for higher-density housing; providing affordable housing options; creating employment opportunities; conserving natural resources; contributing additional parks, open space, and recreation areas; and increasing connectivity by improving transportation infrastructure.[108]

The proposed land use and density is consistent with the Specific Plan and, therefore, consistent with the growth analyzed in the FEIR. The project would result in the same impact as disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not displace substantial numbers of existing people or housing because Moffett Park did not contain residential units.[109]

As there are no existing residences on-site, implementation of the proposed project would not displace substantial numbers of existing people or housing and would result in the same impact as disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[108] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 270-272.
[109] Ibid., page 272.

4.13 Public Services

4.13.1 Environmental Setting

The existing public services setting, including regulatory framework, has not substantially changed since certification of the FEIR, with the exception of approval of the Lakewood Branch Library and Learning Center (Lakewood Library) Project Initial Study. The library has been constructed and is expected to open in summer 2026.[110]

Fire and police protection services for the project site are provided by the Sunnyvale DPS. DPS is staffed by Public Safety Officers who are cross-trained as police offers, firefighters, and emergency medical technicians. DPS is divided into three Bureaus: Bureau of Fire Services, Bureau of Police Services, and Bureau of Special Operations. The nearest fire station is Station #5, located at 1210 Bordeaux Drive, less than 400 feet south of the project site. The Police Services program is based out of the Sunnyvale DPS headquarters at 700 All America Way, located approximately three miles south of the project site.

The project site is located within the Sunnyvale School District (SSD) and Fremont Union High School District (FUHSD) boundaries.[111] The closest schools to the project site are Bishop Elementary School, located approximately 2.5 miles south at 450 North Sunnyvale Avenue; Lakewood Elementary School, located three miles southeast at 750 Lakechime Drive; and Columbia Middle School, located approximately three miles south at 739 Morse Avenue.

The closest park to the project site is Baylands Park, located two miles northeast at 999 East Caribbean Drive.

The Sunnyvale Public Library (Main Library) is located at 665 West Olive Avenue, 3.1 miles south of the project site. The Lakewood Library is located at 750 Lakechime Drive, 2.9 miles southeast of the project site.

[110] City of Sunnyvale. "Lakewood Branch Library and Learning Center." Accessed February 13, 2026. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/infrastructure-projects/lakewood-branch-library.
[111] County of Santa Clara. "Property Information - Assessor's Parcel Number (APN): 110-25-017." Accessed February 13, 2026. https://asr.santaclaracounty.gov/online-services/property-search/real-property.

4.13.2 Impact Discussion

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Fire Protection?	LTS	No	No	No	No
b) Police Protection?	LTS	No	No	No	No
c) Schools?	LTS	No	No	No	No
d) Parks?	LTS	No	No	No	No
e) Other Public Facilities?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities because the construction of new or expanded fire facilities (when/if needed) would undergo separate environmental review and implement measures to reduce construction-related impacts to a less than significant level. In addition, DPS continually evaluates its service levels and works with the City Council during the annual budget process to balance resources and ensure fire services are adequate. The FEIR concluded that future development under the Specific Plan would be reviewed by DPS to ensure adequate design and infrastructure for fire protection and comply with Building and Fire Code standards to reduce impacts to fire protection facilities and services to a less than significant level.[112]

Consistent with the findings in the FEIR, the project would be built in accordance with Building and Fire Code standards. The proposed site plan was reviewed by DPS and found to include adequate design and infrastructure for fire protection.[113] The project, therefore, would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities because the construction of new or expanded police facilities

[112] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 283.
[113] Lao, Wendy. Senior Planner, City of Sunnyvale. Personal Communication. March 23, 2026.

(when/if needed) would undergo separate environmental review and implement measures to reduce construction-related impacts to a less than significant level. In addition, DPS continually evaluates its service levels and works with the City Council during the annual budget process to balance resources and ensure police services are adequate.[114]

The project, therefore, would not require the construction of new police protection facilities to maintain adequate service. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. As described in the FEIR, buildout of the Specific Plan would generate students above the existing capacities at local public schools. It is possible new or expanded school facilities would be required. If/when new or expanded school facilities are proposed, they would undergo separate environmental review and implement measures to reduce construction-related impacts to a less than significant level. The FEIR concluded that future development would pay school impact fees to reduce impacts associated with increased demands on school facilities to a less than significant level.[115]

The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. The project would generate approximately 686 residents.[116] As discussed in Section 4.13.1 Environmental Setting, the project site is located within the SSD and FUHSD boundaries. Students generated by the project are anticipated to attend Bishop or Lakewood Elementary School, Columbia Middle School, and Fremont High School based upon current school and district boundaries. Based on the student generation rates of 0.07 from SSD[117] and 0.125 from FUHSD[118], the project would generate approximately 18 elementary, 18 middle, and 33 high school students.[119] Both school districts have impact fees for new residential and non-residential projects constructed within their boundaries.[120] The proposed project would pay applicable school impact fees. The project would result in the same impact as disclosed in the FEIR

[114] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 284.
[115] Ibid., pages 284-286.
[116] Based on a rate of 2.59 persons per household for the City of Sunnyvale (265 dwelling units x 2.59 persons per household = 686 people). Source: California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State 2020-2024." Accessed February 13, 2026. https://dof.ca.gov/Forecasting/Demographics/Estimates/.
[117] Burns, Brandt. Director of Facilities and Operations, Sunnyvale School District. Personal Communication. June 9, 2022.
[118] Fremont Union High School District. *2024 Developer Fee Justification Study*. April 2024. Page 6.
[119] 265 units x 0.07 elementary/middle school students/unit = 18 elementary/middle school students. 265 units x 0.12495 high school students/unit = 33 high school students.
[120] Sources: (1) Sunnyvale School District. "Developer Fee Compliance." Accessed February 13, 2026. https://www.sesd.org/Page/662. (2) Fremont Union High School District. "Business Services." Accessed February 13, 2026. https://www.fuhsd.org/departments/business-services.

and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR concluded buildout of the Specific Plan would not result in substantial adverse physical impacts associated with the provision of parks facilities because implementation of the Specific Plan would include adequate open space to serve the increased demand from future residents via compliance with SMC Chapter 19.74 (which requires residential developments to provide five acres of parkland/open space per 1,000 residents and payment of in-lieu fees or land dedications for multi-family rental housing projects) and Specific Plan Policies OSE-2.1 through -2.8 (which requires provision of open space and recreational facilities associated with residential projects).[121]

Policy	Description
OSE-2.1	Provide a minimum of one tot lot for ages two to five within each residential neighborhood or one per 7,000 residents.
OSE-2.2	Provide a minimum of one inclusive, all-abilities and ages play space within each residential neighborhood or one per 7,000 residents.
OSE-2.3	Provide a minimum of 1 destination, all-abilities and ages play space within the plan area.
OSE-2.4	Provide a minimum of four dog parks or dog walking areas located within 10-minute walk of residential buildings or one per 10,500 residents.
OSE-2.5	Provide a minimum of one multi-use/flexible field area, 50 by 100 yards minimum or equivalent to a high school soccer field as defined by the U.S. Youth Soccer Association.
OSE-2.6	Provide a minimum of three open field/flexible recreation areas, 35 by 65 yards minimum or equivalent to a U10 soccer field as defined by the U.S. Youth Soccer Association. Fields may be synthetic or natural turf with grading and drainage to allow for regular use for informal/drop-in, youth sports, and community events.
OSE-2.7	When and where possible, increase the quantity of multi-use flex fields to include more opportunities for informal and youth athletics.
OSE-2.8	Co-locate a community or neighborhood park with potential school site(s).

Per SMC Chapter 19.74, the City requires a minimum of five acres of parkland/open space per 1,000 residents. Based on the projected increase of approximately 42,000 residents under the Specific Plan, approximately 210 acres of new parkland would be required to maintain this service ratio. The Specific Plan accounts for this demand by planning for the provision of approximately 212 to 230 acres of open space, which would be realized through a coordinated effort between the City, property owners, and developers, utilizing land dedication or easement dedication by non-residential and residential developments, transfer of development rights, ecological setback standards,

[121] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 257.

the purchase of land using park dedication fee, and maintenance of publicly accessible parks and open spaces by property owners.[122,123]

The project includes multi-family residential development and is, therefore, subject to SMC Chapter 19.74 and the Specific Plan policies listed above. The project would comply with SMC Chapter 19.74 by paying applicable in-lieu fees. As described in Section 3.0 Project Description, the project would provide approximately 25,700 square feet of private and common open space including landscaping and seating areas. In addition, pursuant to Chapter 6 in the Specific Plan, the project would develop its portion of the planned Bordeaux Neighborhood Park via construction of a POPA featuring a dog park, picnic deck, landscaped paths, and seating areas. The project's 0.3-acre POPA would contribute to the overall parkland supply assumed under the Specific Plan and analyzed in the FEIR.

The project would comply with Specific Plan Policy OSE-2.4 through its inclusion of a dog park. While the project would not directly include a tot lot, play space, multi-use/flexible field area, open field/flexible recreation area, or school site pursuant to Specific Plan Policies OSE-2.1 through -2.3 and -2.5 through -2.8 it would support these policies via its payment of in-lieu fees, which would contribute towards the development of larger active recreational facilities. Also, as discussed in detail in Section 4.3 Biological Resources, although the project by itself would not be consistent with all of the Habitat Patch and Neighborhood Park standards and guidelines, as they pertain to full buildout of the park (which is beyond the scope of the proposed project), it would comply with and contribute its portion.

Overall, the proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. The project would result in the same impact as disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183 and no further analysis is required.

e. The FEIR concluded buildout of the Specific Plan would not result in substantial adverse physical impacts associated with the provision of new or expanded libraries because any future library facilities in Moffett Park would be in compliance with existing regulations and applicable policies (including the Specific Plan policies identified in Sections 3.3 Air Quality, 3.4 Biological Resources, 3.5 Cultural Resources, 3.6 Energy, 3.7 Geology and Soils, 3.8 Greenhouse Gas Emissions, 3.9 Hazards and Hazardous Materials, 3.10 Hydrology and Water Quality, 3.13 Noise, and 3.18 Tribal Cultural Resources of the FEIR) to reduce environmental impacts from its construction to a less than significant level.[124] The City has a service ratio goal of one square foot per capita of building spaces for libraries. At the time the FEIR was adopted, the City was providing 0.39 square feet of

[122] Ibid., page 21.
[123] Ibid., page 287.
[124] Ibid., Page 288.

library space per capita (based on a population of 155,567 and operation of the Main Library).

Under existing conditions, the City is providing 0.38 square feet per capita (based on a current population of 159,673 and operation of the Main Library). Subsequent to the certification of the FEIR, the City has constructed Lakewood Library, which will open later this year and increase the service ratio to 0.506 square feet per capita. The proposed project would generate 686 residents that would create an incremental demand for library services by resulting in a 0.503 square feet per capita service ratio. The project, therefore, would not substantially affect the City's library service ratio compared to existing conditions without the project and Lakewood Library.

As described in the FEIR, it was assumed that by the time the Specific Plan was built out (year 2040), the City would have also implemented the Civic Center Modernization Project Master Plan. The plan was approved in September 2018 and consists of three phases. The first phase, completed in 2023, was to replace City Hall and construct a new Emergency Operations Center.[125] The second phase focuses on replacing the existing 60,800 square foot Main Library with up to a 120,000 square foot library.[126] Phase 3 would relocate the DPS building from the corner of El Camino Real/Pastoria to the corner of Charles/Olive. The completion for the remaining phases of the approved Civic Center Modernization Project Master Plan is expected to be completed by 2040, which would further increase the citywide total library square footage.

Based on the above discussion, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[125] City of Sunnyvale. "Civic Center Phase One." Accessed December 19, 2025. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/infrastructure-projects/civic-center/civic-center-phase-one.
[126] City of Sunnyvale. "Civic Center Phase Two." Accessed December 19, 2025. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/infrastructure-projects/civic-center/civic-center-phase-two.

4.14 Recreation

4.14.1 Environmental Setting

The existing recreation setting, including regulatory framework, has not substantially changed since certification of the FEIR.

As mentioned in Section 4.13 Public Services, the closest park to the project site is Baylands Park, located 1.9 miles northeast at 999 East Caribbean Drive. Another nearby recreational facility is the Bay Trail, located 0.5 miles north of the project site.

4.14.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	LTS	No	No	No	No
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would not result in substantial physical deterioration of existing recreational facilities because future multi-family developments would comply with the SMC Chapter 19.74 and Specific Plan Policies OSE-2.1 through -2.8.[127]

As described in Section 3.0 Project Description, the project includes residential open space and a POPA, which would minimize the use of nearby recreational facilities by

[127] Ibid., page 297.

project residents. Further, as discussed under checklist question d) in Section 4.13 Public Services, the project's 0.3-acre POPA would contribute to the overall parkland supply assumed under the Specific Plan and analyzed in the FEIR. In addition, the project's required compliance with SMC Chapter 19.74 would ensure that it provides its fair share of parkland and/or pays in-lieu fees to meet the City's ratio of five acres of parkland/open space per 1,000 residents. The project's in-lieu fees could be used to fund the acquisition and development of park and open space consistent with Specific Plan Policies OSE-2.1 through OSE-2.3 and OSE-2.5 through OSE-2.8. The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded physical impacts of constructing the park and open space included in the Specific Plan would be reduced to less than significant levels through compliance with existing regulations including General Plan and Specific Plan policies pertaining to air quality, biological resources, cultural resources, energy, geology and soils, GHGs, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources.[128]

The project's proposed 25,700 square feet of private and common open space on-site and approximately 0.3-acre POPA would minimize the project's demand on nearby recreational facilities (e.g., Baylands Park located 1.9 miles northeast). In addition, the POPA would contribute towards the amount of open space available to the public in the Specific Plan area. The environmental impacts associated with these amenity spaces are analyzed throughout this document. Through compliance with existing regulations, these amenities would not result in significant construction impacts. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[128] Ibid.

4.15 Transportation

This section is based, in part, on a TDM Plan completed by Hexagon Transportation Consultants, Inc. in November 2025. The report is attached as Appendix A.

4.15.1 Environmental Setting

The existing transportation setting, including regulatory framework, has not substantially changed since certification of the FEIR.

Transit Facilities

The project vicinity is served by four Santa Clara Valley Transportation Authority (VTA) bus routes and one Altamont Corridor Express (ACE) shuttle. These services and distance from the project site are summarized in Table 4.15-1 below.

Table 4.15-1: Transit Routes

Transit Agency Route	Distance to Stop from Project Site	Days of Operation	Time of Operation	Frequency
VTA Orange Line Light Rail	1,500 feet	Monday to Friday Saturday to Sunday	5:00 AM to 12:15 AM 5:45 AM to 12:15 AM	15 to 20 min
VTA Local Bus Route 56	1,130 feet	Monday to Friday Saturday Sunday	5:15 AM to 11:00 PM 7:20 AM to 9:25 PM 7:25 AM to 8:25 PM	30 to 60 min
VTA Express Bus Route 121	1,130 feet	Monday to Friday	4:25 AM to 9:00 AM 2:50 PM to 7:00 PM	1 to 2 hours 60 to 90 min
VTA Rapid Bus Route 523	1,500 feet	Monday to Friday Saturday Sunday	6:15 AM to 10:30 PM 7:10 AM to 8:40 PM 7:40 AM to 7:40 PM	20 to 30 min 30 min 30 min
ACE Red Shuttle	1,130 feet	Monday to Friday	6:00 AM to 10:00 AM 1:45 PM to 5:40 PM	50 to 90 min 50 to 70 min

Source: Hexagon Transportation Consultants, Inc. *1215 Bordeaux Drive Residential Transportation Demand Management Plan*. November 7, 2025.

Roadway Network

Regional access to Moffett Park is provided via U.S. 101, SR 85, and SR 237, as described in the FEIR. The project site can be accessed from SR 237 via an interchange at Moffett Park Drive and North Mathilda Avenue.

Local access to the project site is provided via Moffett Park Drive, North Mathilda Avenue, West Java Drive, 5th Avenue, and Bordeaux Drive. Moffett Park Drive is an east-west, two-

to four-lane roadway that begins at Manila Avenue in the west and extends east until Baylands Park. North Mathilda Avenue is a north-south, six-lane roadway that begins at West Caribbean Drive in the north and transitions into Sunnyvale Saratoga Road to southern City limits. West Java Drive is an east-west, two- to four-lane roadway that begins at East Java Drive and ends at North Mathilda Avenue. 5th Avenue is an east-west, two-lane roadway that extends from Bordeaux Drive in the east to Enterprise Way in the west. Bordeaux Drive is a north-south, two-lane roadway that begins at West Java Drive in the north and ends at Moffett Park Drive to the south. Direct access to the project site is provided via 5th Avenue and Bordeaux Drive.

Bicycle Facilities

There are Class I, II, IIB, III, and IV facilities in the vicinity of the project site. Class I facilities are defined as shared-use paths, Class II facilities are on-street bicycle lanes, Class IIB facilities are buffered bicycle lanes, Class III facilities are bicycle routes, and Class IV facilities are separated bikeways. The types, locations, and lengths of existing bicycle facilities in the immediate vicinity of the project site are summarized in Table 4.15-2 below.

Table 4.15-2: Bicycle Facilities

Facility	Class	Length (miles)	Begin Point	End Point
West Channel	I	0.72	Bordeaux Drive	West Caribbean Drive
Bordeaux Drive	II	0.60	West Java Drive	Moffett Park Drive
D Street	II	0.43	5th Avenue	11th Avenue
5th Avenue	II	0.44	D Street	Enterprise Way
Java Drive	IIB	0.88	North Mathilda Avenue	Crossman Avenue
North Mathilda Avenue	III	0.65	Innovation Way	1st Avenue / Bordeaux Avenue (intersection)
5th Avenue	IV	0.25	North Mathilda Avenue	West Channel

Pedestrian Facilities

The project site is served by sidewalks and crosswalks within the project vicinity. Pedestrian signal heads and push buttons are present at the nearby signalized intersections and high-visibility crosswalks are present at the nearby unsignalized intersections, as well as some midblock locations on 5th Avenue and Bordeaux Drive. Continuous pedestrian facilities are present between the site and surrounding land uses.

4.15.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	LTS	No	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	LTS	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	LTS	No	No	No	No
d) Result in inadequate emergency access?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would not conflict with a program, plan, ordinance, or policy addressing the circulation system because it would implement Specific Plan Policies M-3.1 through M-3.5, M-4.1, and M-4.2 that would improve public transit by improving convenience, connectivity, and capacity; improve the roadway network by building a complete streets network that prioritizes pedestrians and bicycles; require new development implement TDM plans; and improve bicycle and pedestrian facilities by incorporating design standards and guidelines that promote bicyclist and pedestrian safety and connectivity.[129]

Through its proposed improvements to multimodality, the Specific Plan was determined to be consistent with Plan Bay Area 2050, the City's General Plan, City Council Policy 1.2.8, City Transportation Analysis Guidelines, Congestion Management Plan (CMP) Guidelines. In addition, the FEIR assumed future projects would comply with the

[129] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 309-321.

following policies to support multimodality (i.e., public transit, bikeability, and walkability):

Policy	Description
LU-4.2	Prioritize walking and biking by breaking up large blocks into a finer-grained network and through complete streets improvements.
M-1.3	Plan for and provide a transportation system that is flexible and appropriately accommodates all modes of traffic.
M-2.1	Prioritize implementing improved bicycle and pedestrian access within the complete streets typology as illustrated on the Street Typology and Modal Networks maps.
M-2.2	Designate street space for people who walk and bike.
M-2.3	Prioritize mobility and safety for non-motorized modes when considering intersection capacity increases.
M-2.4	Keep the street network dense with short blocks to support connections for people who walk and bike.
M-2.5	Minimize pedestrian crossing distances and maximize pedestrian connections.
M-3.1	Work with the Santa Clara Valley Transportation Authority (VTA) to maintain high frequency, high-capacity transit services.
M-3.2	Prioritize public transit networks within the complete streets typology as illustrated on the attached Street Typology and Modal Networks maps.
M-3.3	Work towards obtaining and providing right-of-way for public transit and priority lanes.
M-3.4	Make public transit a convenient and reliable option for daily trip making.
M-3.5	Prioritize investments that reduce first/last-mile barriers to transit stops.
M-4.1	Prioritize and implement transportation investments and strategies that reduce vehicle miles traveled (VMT) per capita and per employee.
M-4.2	Strategically and opportunistically increase person capacity at the district gateways.
OSE-1.1	Establish a network of greenbelt, parks, and trails that are an integral part of the active non-vehicular transportation network and promote safe pedestrian and bicycle use throughout the district.
OSE-1.3	Provide open spaces that are well distributed and located adjacent to transit, and activity and community centers.
OSE-1.5	Locate open spaces to provide a universally accessible route from all residential buildings to a neighborhood-serving park within a half-mile or 10-minute average walking distance.
TDMP-1.3	Promote biking by establishing standards for bicycle parking facilities and infrastructure.
TDM-1.6	Promote and support flexible approaches to parking supply and management by coordinating parking infrastructure and prioritizing shared facilities.

Transit Facilities

As discussed in Section 4.15.1 Environmental Setting, the project site is within one mile of several VTA routes and one ACE shuttle. The project would not conflict with existing or

planned transit network facilities and therefore, would not conflict with Specific Plan Policy M-3.2. The project supports Specific Plan Policy M-3.4 because it proposes high-density residential uses proximate to transit, which would facilitate project residents and visitors commuting to the site via transit. The project would implement a TDM plan, consistent with Specific Plan Standard 8.2.4.c, and, therefore, be consistent with Specific Plan Policy M-4.1 of implementing strategies to reduce VMT per capita. The City (i.e., not private development such as the proposed project) is responsible for implementing the other Specific Plan policies pertaining to transit (i.e., M-3.1, M-3.3, and M-3.5). As such, the proposed project would be consistent with the impacts identified in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

Pedestrian and Bicycle Facilities

As discussed in Section 4.15.1 Environmental Setting, the project site is served by sidewalks and crosswalks within the project vicinity and along the site frontage. The proposed project would comply with Specific Plan Policies LU-4.2, M-1.3, M-2.1 through M-2.5, M-4.1, and TDMP-1.3 by providing landscaped walking paths for pedestrians in the POPA and providing bike parking for residents. The project would retain the existing bike lanes on 5th Avenue and northbound Bordeaux Avenue and would alter the existing southbound bike lane on Bordeaux Drive. Implementation of the proposed project would not interfere with the existing or planned bicycle facilities in the Specific Plan area. As such, the proposed project would be consistent with the impacts identified in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR estimated that residential and office VMT associated with buildout of the Specific Plan would be below 15 percent of the countywide averages, and concluded that future development would be reviewed on a project-by-project basis to ensure consistency with local and state VMT policies, resulting in a less than significant impact.[130]

The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. The project, therefore, would result in the same VMT impact as disclosed in the FEIR. Since local and state VMT policies have not changed since the certification of the FEIR, no additional VMT analysis is required. In addition, as discussed in Section 4.2 Air Quality, implementation of the proposed TDM measures would result in trip reductions consistent with Specific Plan Standard 8.2.4.c. The proposed project would not result in new or substantially more severe significant impacts than disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[130] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 321-322.

c. The FEIR concluded buildout of the Specific Plan would not result in increased hazards due to geometric design features or incompatible uses because the Specific Plan transportation network improvements would be designed according to City standards and no incompatible uses (e.g., farm equipment) would be included.[131]

Consistent with the FEIR, the proposed project would be designed to meet City standards (e.g., adequate driveway widths, sight line, and emergency vehicle access) to prevent circulation hazards, and does not propose any incompatible uses. The project would also reconstruct the sidewalk along 5th Avenue. The project does not include other improvements or changes to the transportation network. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR concluded buildout of the Specific Plan would result in adequate emergency access because future development would increase mobility and access and be designed to meet City Building and Fire code standards.[132]

Consistent with the findings in the FEIR, the proposed project would be designed to meet City Building and Fire code standards, including those for adequate access and design for emergency vehicles. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[131] Ibid., page 323.
[132] Ibid

4.16 Tribal Cultural Resources

The following discussion is based, in part, on an ASA prepared for the project by Archaeological/Historical Consultants, Inc. in February 2026. This report is confidential and is on file with the Sunnyvale Community Development Department.

4.16.1 Environmental Setting

The existing tribal cultural resources (TCR) setting, including regulatory framework, has not substantially changed since certification of the FEIR.

There are six known archaeological resources within Moffett Park.[133] As discussed in Section 4.4 Cultural Resources, the site-specific ASA determined that the project site has a low sensitivity for buried Native American archaeological deposits due to its distance from freshwater sources and lack of recorded resources on-site or within one quarter mile of the site.

4.16.2 Impact Discussion

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	LTS	No	No	No	No

[133] Ibid., page 327.

b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would not result in impacts to a TCR listed or eligible for listing in the CRHR or City's HRI because no TCRs are located within Moffett Park. The FEIR concluded future development would comply with existing regulations (i.e., General Plan Policy CC-5.5) and Specific Plan Project Requirements 10.3.2-3 through 10.3.2-5 (refer to Section 4.4 Cultural Resources) to protect TCRs[134]

As discussed in Section 4.4 Cultural Resources, the project site does not contain known TCRs and has a low sensitivity for buried TCRs. Consistent with the FEIR, the proposed project would comply with Specific Plan Requirements 10.3.2-4 and 10.3.2-5 in the event archaeological resources (such as TCRs) are discovered on-site. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded buildout of the Specific Plan would not result in impacts to a TCR considered significant by Public Resources Code Section 5024.1 because no TCRs are identified within Moffett Park. The FEIR concluded future development would comply with existing regulations and Specific Plan policies to protect TCRs.[135]

As discussed in Section 4.4 Cultural Resources and under checklist question a) above, the project site does not contain known TCRs and has a low sensitivity for buried TCRs, and the project would comply with Specific Plan Requirements 10.3.2-4 and 10.3.2-5 in the

[134] Ibid., page 327-328.
[135] Ibid., page 327-328.

event archaeological resources (such as TCRs) are discovered on-site. The project would result in the same impact as disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183.

4.17 Utilities and Service Systems

The following discussion is based, in part, on a Sanitary Sewer Analysis prepared by BKF Engineers on September 12, 2025. The report is attached as Appendix H.

4.17.1 Environmental Setting

The existing utilities and service systems setting, including regulatory framework, has not substantially changed since certification of the FEIR. Since the certification of the FEIR, the WPCP processing capacity was updated to 19.5 million gallons per day (mgd), which was mentioned and analyzed in the FEIR under cumulative conditions.

There are existing 12-inch water, 12-inch sanitary sewer, 24-inch storm drain, and eight-inch recycled water lines in Bordeaux Drive that serve the site. Solid waste collected from the project site is transported to the SMaRT Station®. The SMaRT Station® receives municipal solid waste, recyclables, and yard trimmings. The SMaRT Station® diverts approximately 41 percent of the materials delivered from being landfilled. Diverted materials primarily include compostable organics, concrete, dirt, carpet, mattresses, and yard trimmings. The remaining waste is disposed of at Kirby Canyon Landfill in south San José.

4.17.2 Impact Discussion

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LTS	No	No	No	No

Would the project:	Specific Plan FEIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	No	No	No	No
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	No	No	No	No
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS	No	No	No	No
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS	No	No	No	No

Note: LTS = less than significant.

a. The FEIR concluded buildout of the Specific Plan would require new or expanded water and sewer infrastructure. Future development would pay water and sewer connection impact fees to fund improvement projects (i.e., capital improvement projects, or CIPs) and separate environmental review (which would identify measures to reduce construction-related impacts to a less than significant level) would be completed at the time the improvements are designed. The FEIR also concluded buildout of the Specific Plan would not worsen existing deficiencies in the storm drain system because buildout of the Specific Plan would increase pervious surfaces in Moffett Park, thereby decreasing runoff and flows to the storm drain system. Further, the FEIR concluded buildout of the Specific Plan would not result in significant construction-related impacts from the relocation or construction of new or expanded electric power, natural gas, or

telecommunication facilities because improvements to those facilities (if/when proposed) would undergo separate environmental review and comply with existing regulations to reduce construction-related impacts to a less than significant level.[136]

As described in Section 3.0 Project Description, the proposed project would construct lateral connections to the existing 12-inch water main and 12-inch sewer main in Moffett Park Drive. The project would also construct a new lateral connection to the existing 24-inch storm drain main line in 5th Avenue. The City has confirmed that the capacity of the local water[137] and sewer lines[138] are adequate and can serve the project. The project would include the installation of two new fire hydrants, including one on 5th Avenue and one on Bordeaux Drive adjacent to the project frontages. As discussed in Section 4.9 Hydrology and Water Quality, the project would increase pervious surfaces on-site, which would decrease runoff compared to existing conditions. As a result, the existing, local storm drain lines would continue to be able to accommodate flows from the project site.

The proposed development is generally consistent with the Specific Plan and the analysis in the FEIR. For this reason, no new improvements or CIPs beyond those identified in the FEIR would be required. Consistent with the FEIR, the project would pay water and sewer connection fees which would fund necessary CIPs and ensure adequate water and sewer infrastructure at buildout of the Specific Plan. Further, the project voluntarily proposes to be 100 percent electric and would not use natural gas. The project would connect to existing electrical and telecommunications infrastructure and not require the construction of new or expanded infrastructure for these utilities. Therefore, the project would result in the same impacts as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

b. The FEIR concluded that, while buildout of the Specific Plan would result in an increased water demand, the City's water supply would meet the projected water demand of both the City and the Specific Plan under normal years.[139] Under dry and multiple-dry years, the City would likely need to impose water conservation measures, through execution of existing water contingency shortage plans, to reduce demand. In addition, the FEIR determined future development projects would comply with SMC requirements, General Plan Policies, and the following Specific Plan policies pertaining to water conservation.

[136] Ibid., page 343-350.
[137] Evans, Eric. Senior Environmental Engineer, Environmental Services Department, City of Sunnyvale. Personal Communication. April 29, 2026.
[138] BKF Engineers. *1215 Bordeaux Drive Sanitary Sewer Analysis.* September 12, 2025. Page 2.
[139] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 351.

Policy	Description
IU-3.2	Prioritize water conservation and the use of recycled water for all outdoor, non-drinkable uses, including in street, open spaces, and landscaped areas.
IU-3.3	Encourage sustainable development practices for development projects to reduce the demands on the water supply and sanitary sewer systems, including use of recycled water indoors, installation of localized blackwater systems, regenerative and high efficiency landscape practices that reduce water and energy use, development of private district utility systems, and increased building efficiency to beyond City standards.
IU-3.5	Require new development to provide recycled water infrastructure in new streets, connect to the recycled water system, and use recycled water for outdoor water use at a minimum.

The project is consistent with the development assumptions and analysis in the FEIR. The project would comply with SMC Chapter 19.37 that includes water-efficient landscape design, planting, and irrigation requirements; General Plan Policies related to water conservation; and Specific Plan Policies IU-3.2, -3.3, and -3.5 by planting native landscaping, installing recycled water irrigation piping, and using recycled water for landscaping. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

c. The FEIR concluded that buildout of the Specific Plan would not exceed the treatment capacity at the WPCP, resulting in a less than significant impact.[140]

Given the WPCP's treatment capacity of 19.5 mgd, current flows to the WPCP (12.9 mgd ADWF)[141], and the project's estimated sewage generation (0.04 mgd ADWF)[142], there is sufficient capacity at the WPCP to serve the project. The project would not result in new or substantially more severe significant impacts than disclosed in the FEIR. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

d. The FEIR concluded the Specific Plan would not generate solid waste in excess of state or local standards because future development would comply with existing waste reduction regulations and be served by local landfills (e.g., Kirby Canyon Landfill) with sufficient capacity; therefore, impacts would be less than significant.[143]

[140] Ibid., page 352.
[141] City of Sunnyvale. *Water Pollution Control Plant Annual NPDES Report*. February 1, 2025. Page 10.
[142] Based on a sanitary sewer generation rate of 150 gpd/du. 265 du x 150 gpd/du = 39,750 gpd / 1,000,000 = 0.03975 mgd. Source: BKF Engineers. *1215 Bordeaux Drive Sanitary Sewer Analysis*. September 12, 2025.
[143] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 352.

The proposed project is consistent with the development assumptions and analysis in the FEIR. Specialty, the city's service provider, would provide recycling, organics, and solid waste collection services to the site. The project would also comply with the CALGreen and City construction and demolition waste diversion requirements by diverting 65 percent of nonhazardous waste from landfills. Therefore, the project would result in the same impact as disclosed in the FEIR and would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

e. The FEIR concluded that the Specific Plan would comply with existing statutes and regulations governing solid waste including AB 341, SB 1383, CALGreen construction waste and debris diversion, and General Plan Policy EM-14.3 by requiring recycling consistent with federal, state, and local requirements.[144]

The proposed project would comply with the existing regulations listed above by providing recycling and organic waste collection and disposal services and diverting 65 percent of nonhazardous waste from landfills. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

[144] Ibid., page 353.

Section 5.0 References

The analysis in this Compliance Checklist is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

BKF Engineers. *1215 Bordeaux Drive Sanitary Sewer Analysis.* September 12, 2025.

California Department of Forestry and Fire Protection. Fire Hazard Severity Zone Viewer. Accessed January 26, 2026. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0.

California Department of Conservation. "CGS Seismic Hazards Program: Liquefaction Zones." Accessed January 26, 2026. https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=37.534114%2C-122.226939%2C13.33

---. "Santa Clara County Tsunami Hazard Areas." Accessed January 26, 2026. https://www.conservation.ca.gov/cgs/tsunami/maps/santa-clara.

California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State 2020-2024." Accessed February 13, 2026. https://dof.ca.gov/Forecasting/Demographics/Estimates/.

California Environmental Protection Agency. "Cortese List Data Resources." Accessed August 1, 24. https://calepa.ca.gov/sitecleanup/corteselist/

City of Sunnyvale. "Code of Ordinances: Chapter 19.29 Moffett Park Specific Plan District." Accessed January 7, 2026. https://ecode360.com/42730203.

---. "Heritage Resources Inventory Update." Accessed August 22, 2024. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/long-range-planning-initiatives/heritage-resources-inventory-update.

---. "Lakewood Branch Library and Learning Center." Accessed February 13, 2026. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/infrastructure-projects/lakewood-branch-library.

---. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023.

---. *Water Pollution Control Plant Annual NPDES Report*. February 1, 2025.

County of Santa Clara. "Property Information - Assessor's Parcel Number (APN): 110-25 017." Accessed February 13, 2026. https://asr.santaclaracounty.gov/online-services/property-search/real-property.

Federal Emergency Management Association. "FEMA's National Flood Hazard Layer (NFHL) Viewer." Accessed January 26, 2026. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd

Fremont Union High School District. *2024 Developer Fee Justification Study*. April 2024.

---. "Business Services." Accessed February 13, 2026. https://www.fuhsd.org/departments/business-services.

Hexagon Transportation Consultants, Inc. *1215 Bordeaux Drive Residential Transportation Demand Management Plan*. November 7, 2025.

Illingworth & Rodkin, Inc. Lakewood Park Project Noise and Vibration Assessment. May 23, 2025.

---. *Red Hill Community Park Environmental Noise Assessment*. July 6, 2005.

Metropolitan Transportation Commission/Association of Bay Area Governments. "Transit Priority Areas (2021)." Accessed January 26, 2026. https://opendata.mtc.ca.gov/datasets/MTC::transit-priority-areas-2021-1/explore?location=37.410718%2C-122.023664%2C16.10.

Rockridge Geotechnical. *Geotechnical Investigation for Proposed Development at 1215 Bordeaux Drive*. April 2025. Page 8.

Sunnyvale School District. "Developer Fee Compliance." Accessed February 13, 2026. https://www.sesd.org/Page/662.

Windus, Walter B. *Comprehensive Land Use Plan for Moffett Federal Airfield*. December 2018. Figure 5: 2022 Aircraft Noise Contours with AIA.

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Section 6.0 Lead Agency and Consultants

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Section 7.0 Acronyms and Abbreviations

AB	Assembly Bill
ACM	Asbestos-Containing Material
ADWF	Average Dry Weather Flow
amsl	above mean sea level
Air District	Bay Area Air District
APN	Assessor's Parcel Number
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxics Control Measure
BAAQMD	Bay Area Air Quality Management District, or Bay Area Air District
Bay	San Francisco Bay
Bay Area	San Francisco Bay Area
BERD	Built Environmental Resources Directory
bgs	below the ground surface
BMP	best management practices
BUG	Backlight-Uplight-Glare
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CIWQS	California Integrated Water Quality System
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level

CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	Diesel Particulate Matter
DPS	Department of Public Safety
DTSC	Department of Toxic Substances Control
ECD	Ecological Combining District
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ESL	environmental screening level
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	floor-area-ratio
FAR Part 77	Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace
FEIR	Final Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
Habitat Plan	Santa Clara Valley Habitat Plan
HI	Hazard Index
HP	horsepower
HRA	health risk assessment
HRI	Heritage Resources Inventory
HSP	Health and Safety Plan
HVAC	heating, ventilation, and air conditioning
IFEIR	Integrated Final Environmental Impact Report
kW	kilowatt
LBP	lead-based paint
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
LID	low impact development

L_{max}	Maximum A-weighted noise level during a measurement period
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individual
mph	miles per hour
MRP	Municipal Regional Stormwater NPDES Permit
MSL	mean sea level
NAHC	Native American Heritage Commission
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OHP	Office of Historic Preservation
PRM	Paleontological Resource Mitigation
PCB	Polychlorinated Biphenyls
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
POPA	privately owned and publicly accessible
PPV	peak particle velocity
PV	photovoltaic
R&D	Research and Development
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCCDEH	Santa Clara County Department of Environmental Health
SCH	State Clearinghouse
SMaRT	Sunnyvale Materials Recovery and Transfer
SMC	Sunnyvale Municipal Code
SMP	Site Management Plan

Specific Plan	Moffett Park Specific Plan
SR	State Route
SRA	State Responsibility Area
SVCE	Silicon Valley Clean Energy
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCR	tribal cultural resource
Title 24	Title 24, Part 6 of the California Code of Regulations
TMA	Transportation Management Association
TPA	Transit Priority Area
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VIMP	Vapor Intrusion Mitigation Plan
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
VTA	Santa Clara Valley Transportation Authority
Williamson Act	California Land Conservation Act
WPCP	Wastewater Pollution Control Plant