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:	333-385 Moffett Park Drive Project
File Number:	PLNG-2025-0137
Assessor's Parcel Number(s):	110-34-005
Site Address/Location:	333-385 Moffett Park Drive
Applicant/Property Owner:	Ellis Partners

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: October 2025

City of Sunnyvale

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All appendices are incorporated herein by reference.

Section 1.0 Introduction

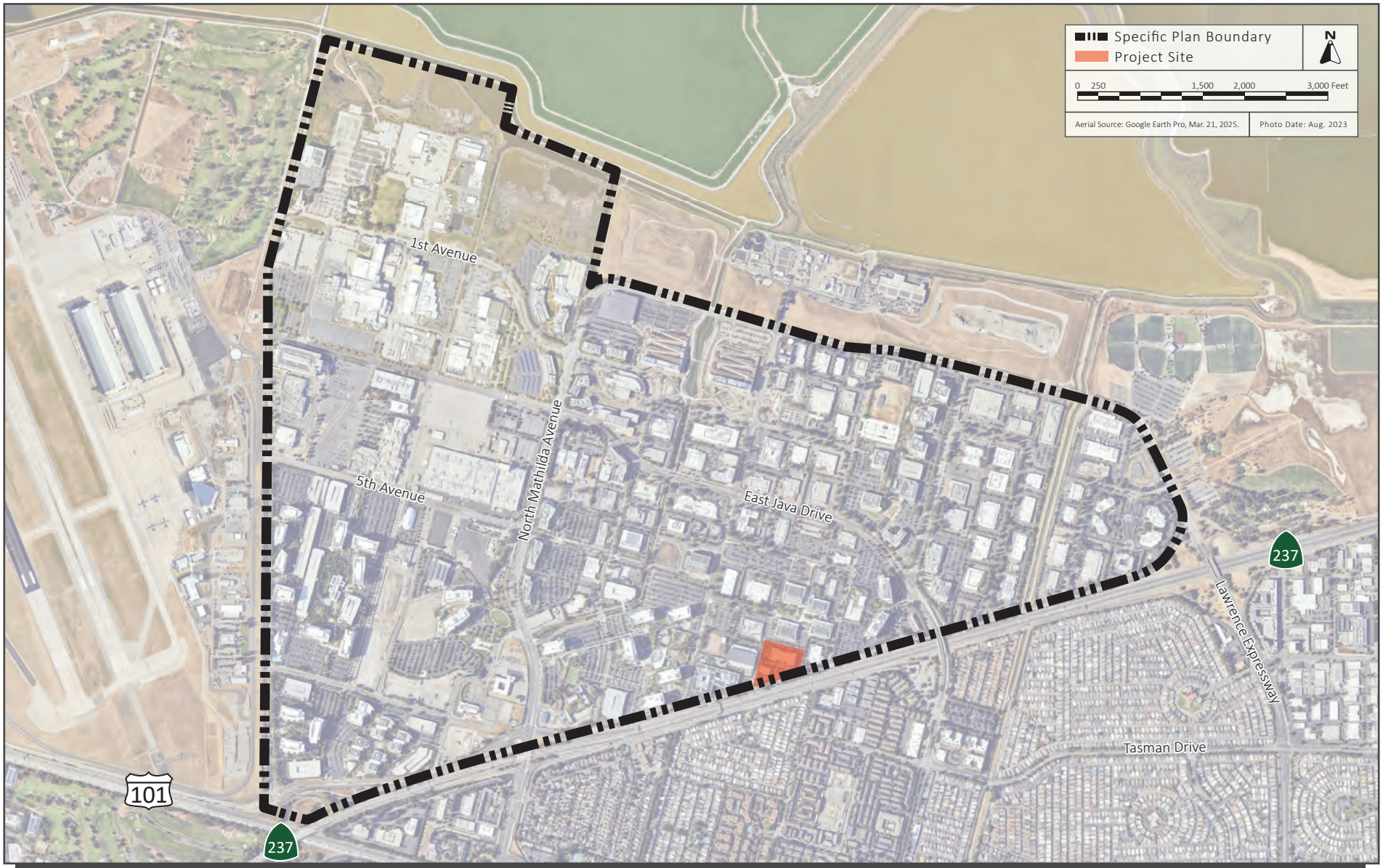
1.1 Moffett Park Specific Plan and Environmental Review

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, and 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.



SPECIFIC PLAN BOUNDARIES | FIGURE 1.1-1

1.2 Streamlined Environmental Review

The FEIR allows for streamlined environmental review 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 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 for, 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.

The FEIR is also available for review on the City's website at the following link: https://www.sunnyvale.ca.gov/business-and-development/planning-and-building/permit-center/specific-plans.

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 five-acre project site is comprised of one parcel (Assessor's Parcel Number [APN] 110-34-005) located at 333, 375, and 385 Moffett Park Drive, to the west of Moffett Park Drive and Innsbruck Drive. The site is bordered by Moffett Park Drive to the south, a private drive (which includes an easement allowing access to the project site) to the west, and light industrial uses to the north, west, and east. Residential uses are located south of the project site, across SR 237 and Persian Drive.

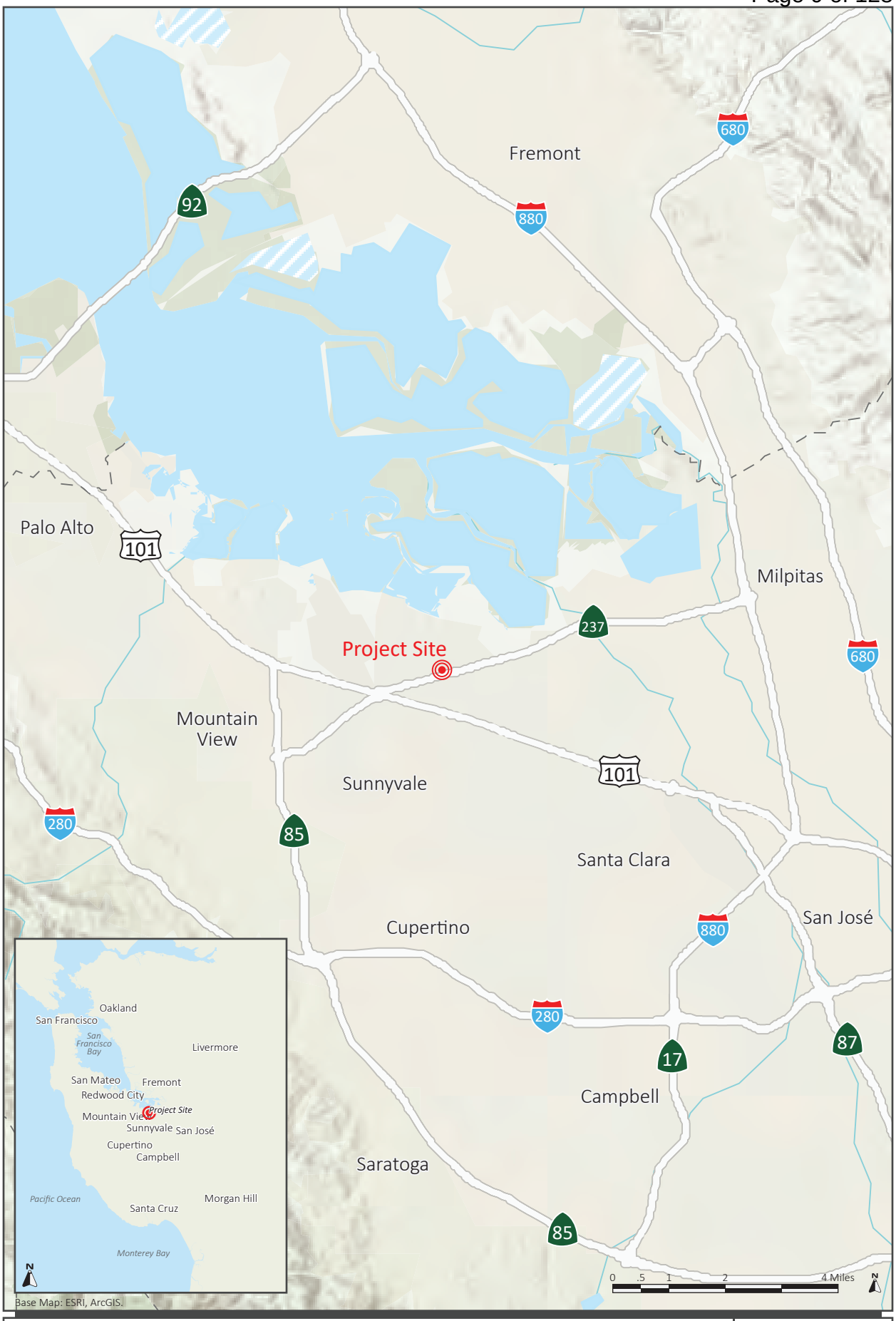
The site is currently developed with a one-story, approximately 10,583 square foot research and development (R&D) building in the southwest corner of the site; a two-story, approximately 79,029 square foot office building in the northern portion of the site; and associated surface parking. Vehicular access to the site is provided from Moffett Park Drive via three driveways and from the private drive via two driveways. The site contains landscaping consisting primarily of trees along the site boundary, building parameters, and parking lot.

A regional and vicinity map are shown on Figure 2.1-1 and Figure 2.1-2, respectively. An aerial photograph with surrounding land uses is shown on Figure 2.1-3.

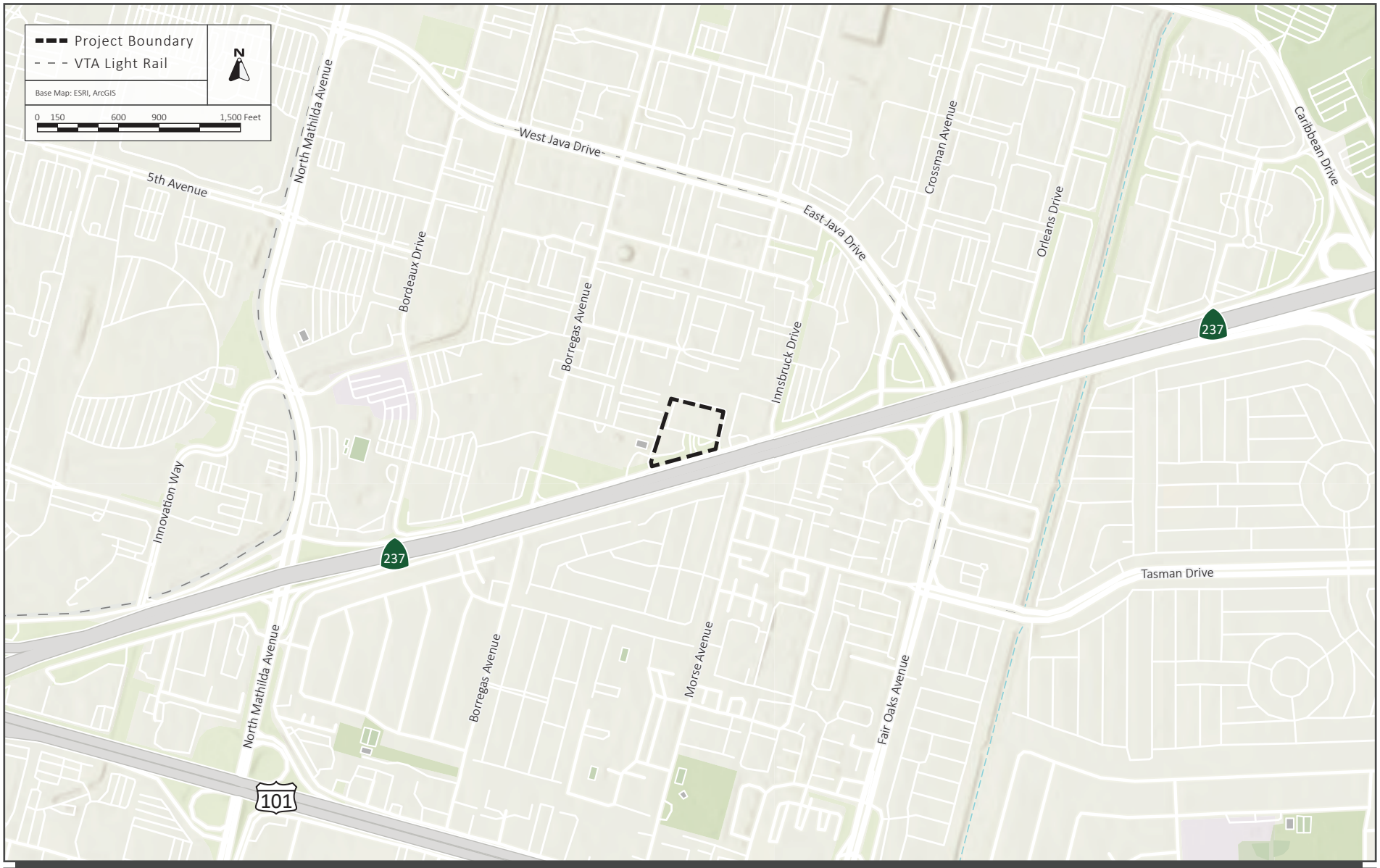
2.2 Specific Plan Zoning Designation and Consistency

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-O2, which is intended for higher-intensity corporate and professional uses. The MP-O2 district allows for a variety of uses including office, R&D/flex, light industrial, manufacturing, retail, general commercial, restaurants, hospitality, healthcare, and parks and open space.[3] The MP-O2 district allows for a floor-area-ratio (FAR) of up to 2.0 and high-quality transit. The project proposes to comply with all applicable Specific Plan requirements and standards.

[3] City of Sunnyvale. "Code of Ordinances: Chapter 19.29 Moffett Park Specific Plan District." Accessed August 26, 2025. https://ecode360.com/42730203.

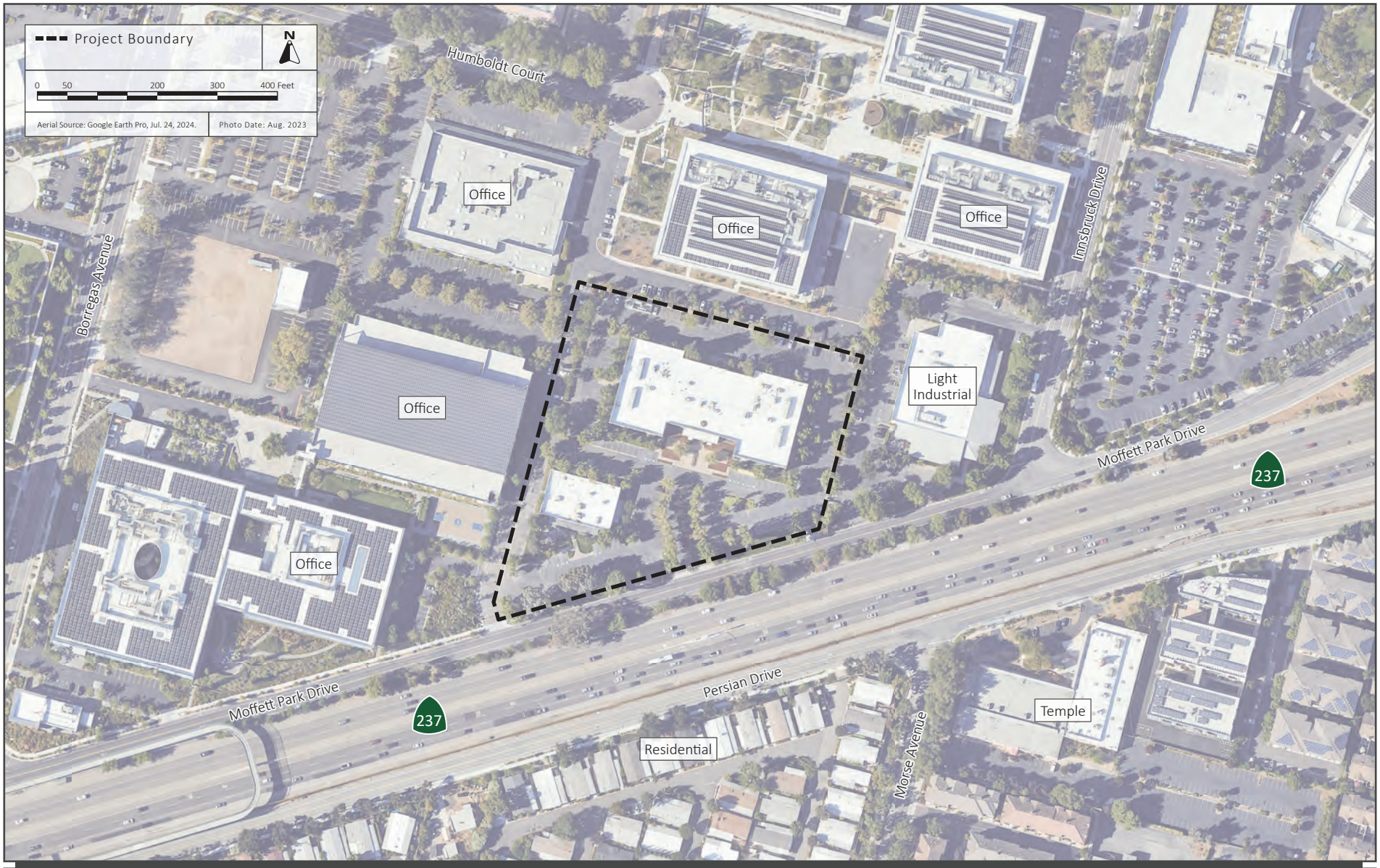


REGIONAL MAP | FIGURE 2.1-1



VICINITY MAP

FIGURE 2.1-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.1-3

2.3 Project-Related Approvals, Agreements, and Permits

The project would require approval from the Sunnyvale Planning Commission. The project is subject to the City's site-specific design review process and would require the following discretionary actions, in addition to ministerial permits for construction activities:

- Development Agreement
- Site Master Plan
- Moffett Park Specific Plan Development Permit

Section 3.0 Project Description

The project proposes to demolish the existing improvements on-site to construct two, three-story buildings totaling 293,996 square feet on top of a shared, three-story podium. The podium would provide three levels of above-grade parking. The buildings would be for office, R&D, medical clinic[4] uses with 10,370 square feet reserved as "creation space," defined in the Specific Plan as "space for production, distribution, repair businesses, art or crafting, clean manufacturing, construction industries, start-up spaces, or spaces for similar uses." No laboratory uses (including medical clinic laboratories) are proposed as part of the project. The project would result in a FAR of 1.35.

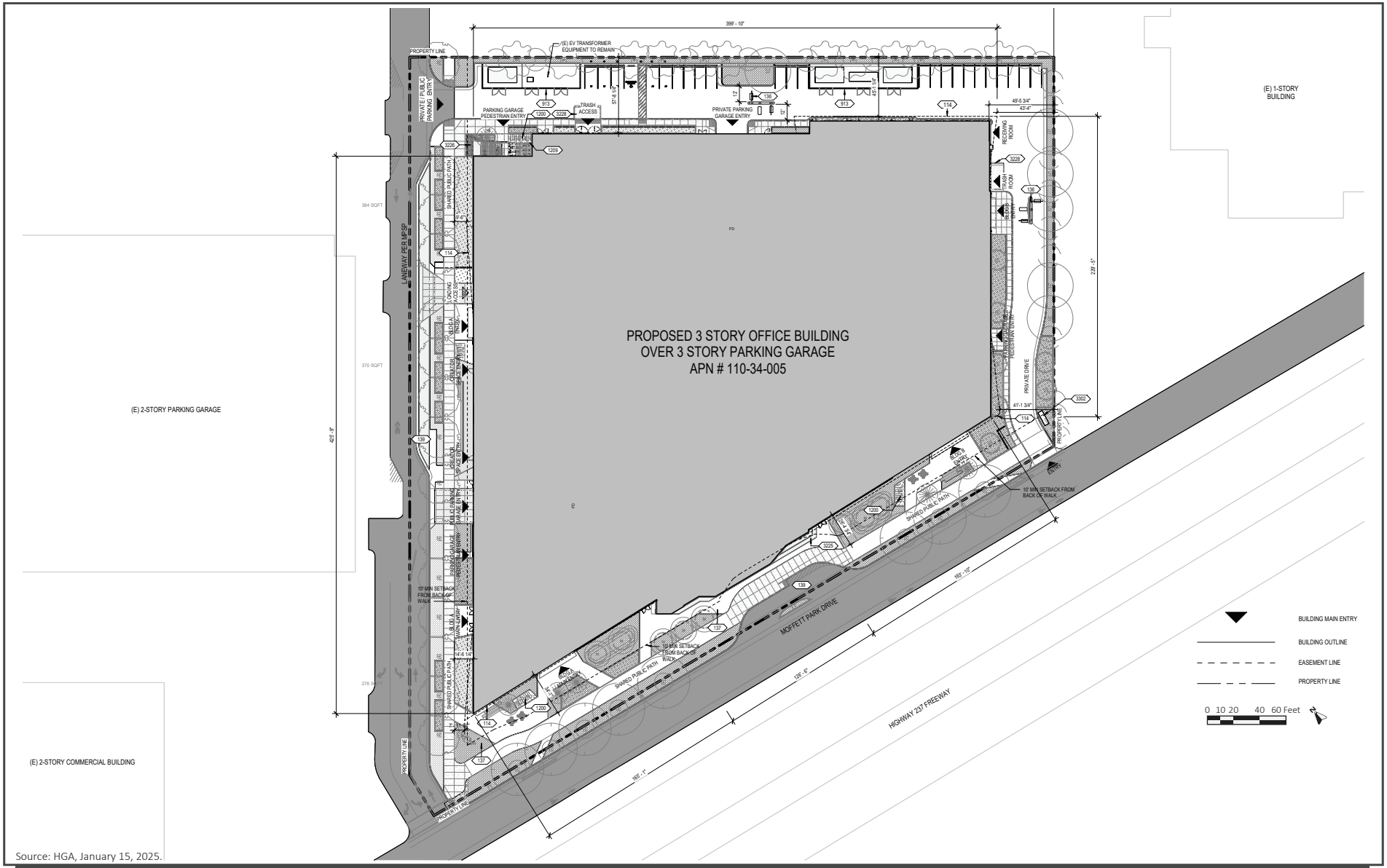
A description of the primary project components (podium and buildings, site access and parking, landscaping and amenity spaces, utility and stormwater improvements, mechanical equipment, green building measures, and construction) is provided below.

3.1 Podium and Buildings

As described above, two buildings would be constructed on top of a shared podium. The podium would provide three levels of above-grade parking and have a maximum height of 32 feet. Each building located above the podium would be three stories tall and have a height of 53 feet to the roof, or 63 feet to the penthouses on either building. Together, the podium and buildings would be six stories tall and have a maximum building height of 85 feet. One building would be located on the west (Building A) and the other would be located on the east (Building B). The buildings would be connected by a podium-level outdoor terrace.

As mentioned above, the buildings would be occupied with office, R&D, and medical clinic uses. The creation space would be located on the ground floor of Building A. The buildings would bracket an approximately 42,296 square foot, outdoor amenity area at the podium level as described in Section 3.1.2 Amenity Space and Landscaping below. A site plan and building elevations are shown on Figures 3.1-1 through 3.1-3.

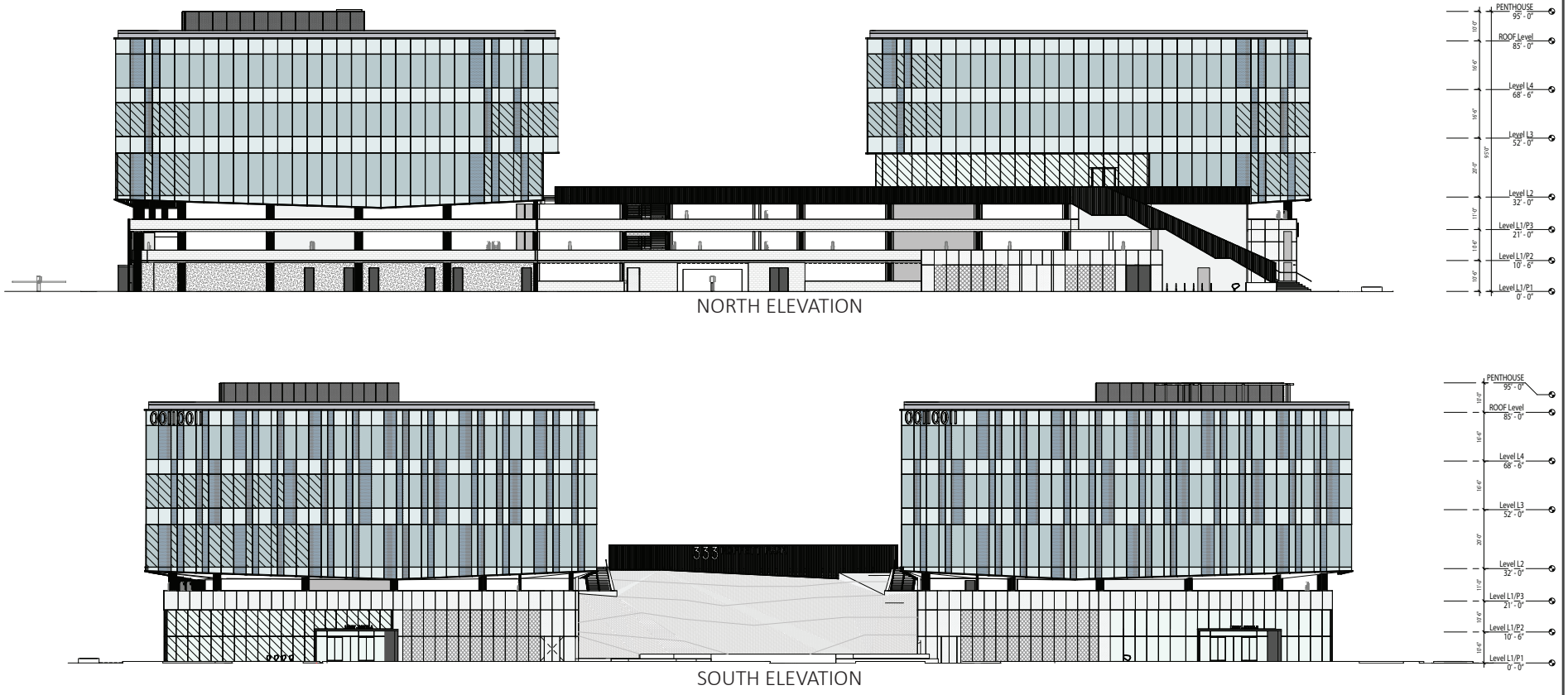
[4] Per the Sunnyvale Municipal Code (SMC), a medical clinic is allowed in the MP-O2 zoning district through a miscellaneous plan permit. Per the SMC, "'medical clinic' is a medical office with ancillary uses, such as laboratories, pharmacies, medical retail or education" and "'medical office'" means offices of doctors, dentists, chiropractors, physical therapists, athletic trainers, acupuncturists, optometrists and other similar health related occupations, where patients visit on a daily basis." The project does not propose to include laboratory uses within the medical clinic and would be limited to pharmacies, retail, or education uses.



Source: HGA, January 15, 2025.

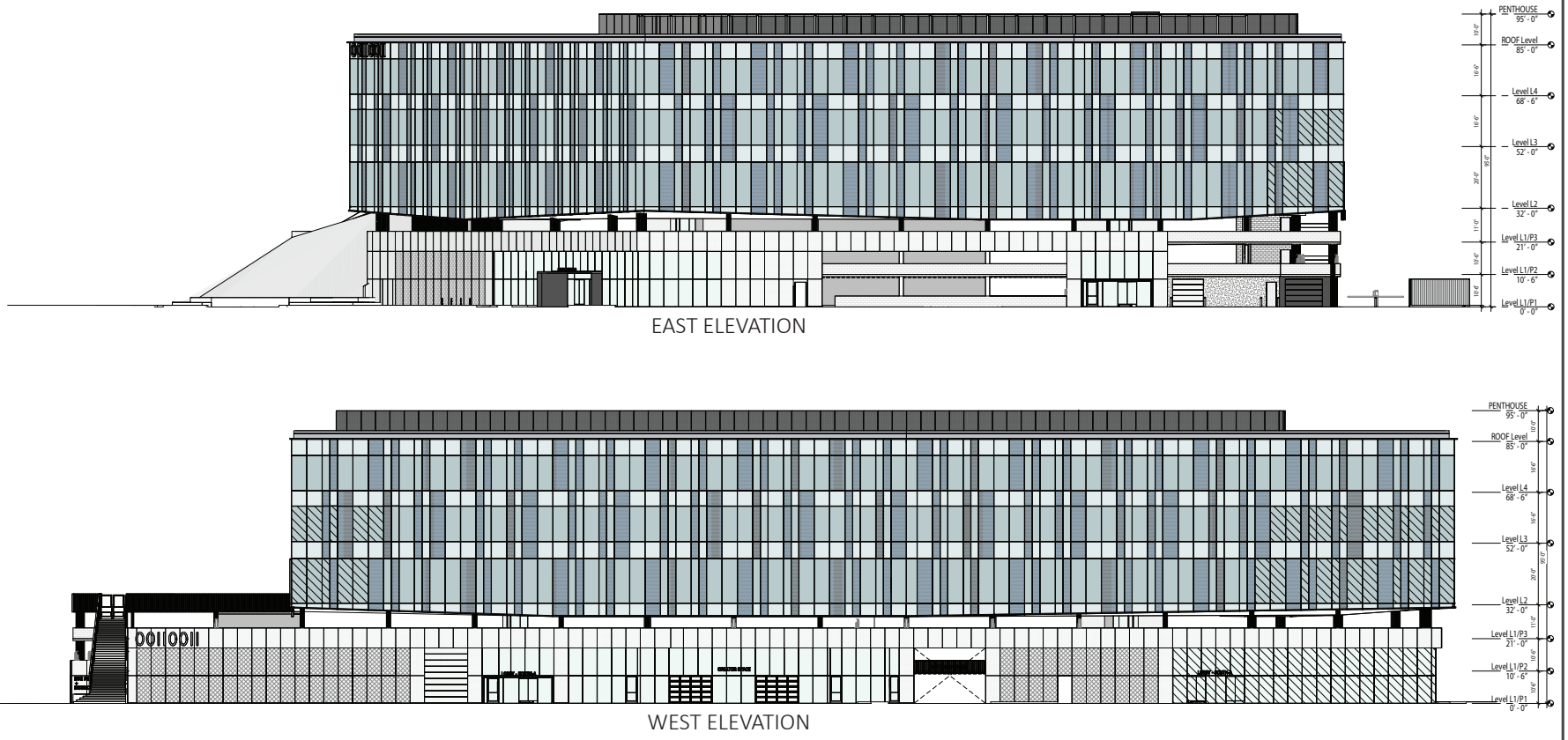
SITE PLAN

FIGURE 3.1-1



Source: HGA, January 15, 2025.

BUILDING ELEVATIONS (NORTH AND SOUTH) | FIGURE 3.1-2



EAST ELEVATION

WEST ELEVATION

Source: HGA, January 15, 2025.

BUILDING ELEVATIONS (EAST AND WEST) | FIGURE 3.1-3

3.2 Amenity Space and Landscaping

The above-referenced podium-level outdoor amenity area would include an approximately 24,270 square foot outdoor fitness space and 18,400 square foot amenity terrace. The terrace would include an outdoor kitchen, dining table, several benches and seats, gaming table, amphitheater with seating, and landscaping. Additionally, the amenity area would include an approximately 6,500 square foot pollinator garden. The pollinator garden would be visible from Moffett Park Drive, separated from the amenity space by a slatted wood fence.

The project would include three privately owned and publicly accessible (POPA) spaces totaling approximately 12,119 square feet. The POPAs would be located along Moffett Park Drive and the private drive on the west side of the project site. The POPAs are intended to support the bicycle, pedestrian, and public transit goals of the Specific Plan, and would include amenities such as bike service areas, pedestrian paving, benches, and boulder seating. The project would include a plaza with public art at the southwest corner of the project site, where Moffett Park Drive and the private drive intersect.

The project site contains 151 trees, 63 of which are City-protected trees.[5] The project applicant would remove 128 trees (including 52 protected trees) and plant 87 new trees, resulting in a total of 110 trees on site with a net loss of 41 trees. New landscaping and trees would be planted around the perimeter of the site.

3.3 Site Access and Parking

Vehicular access to the project site would be provided via three 24-foot driveways. The first driveway would be located in the southeast corner of the site, accessible via Moffett Park Drive, and would lead into a private drive. The second driveway would be located along the west side of the podium, accessible via the private drive, and would provide garage access. The third driveway would be located in the northwest corner of the site, accessible via the private access easement, and would lead into the private drive.

The proposed project would include a total of 800 parking spaces. There would be 218 parking spaces on the ground floor and 582 parking spaces on levels one through three of the podium. The project would provide 565 electric vehicle (EV) spaces and 66 carpool/vanpool spaces.

[5] The City of Sunnyvale's Municipal Code Section 19.94.050 includes the City's Tree Preservation Ordinance, which requires tree removal permits, and planting of replacement trees at the discretion of the Director of Community Development for any removal of protected trees. SMC Section 19.94.050 defines a protected tree as any tree of significant size. A significant size single-trunk tree is any tree measuring 38 inches or more in circumference when measured at four and one-half feet above the ground surface, or any tree more than 12 inches in diameter.

The project would also include 190 bicycle parking spaces, 152 of which would be Class I (long-term) bicycle parking spaces and 38 of which would be Class II (short-term) parking spaces. The Class I bicycle storage room would be provided in the southwestern corner of the garage under Building A and the Class II spaces would be provided in the northeastern corner of the garage under Building B. Two shower/locker rooms would be provided, one in the garage under Building A and one in the garage under Building B, with a total of 120 lockers and 14 showers for cyclists.

The project would provide a shared pedestrian and cyclist path along Moffett Park Drive and a sidewalk detached from the shared street for vehicles and cyclists along the laneway. The path would also provide access into the ground level POPAs, which include internal pedestrian pathways.

3.4 Utility and Stormwater Improvements

The project would include lateral connections to an existing 12-inch water main in Moffett Park Drive to provide domestic water service and fire water service. In addition, the project would connect irrigation lines to an existing eight-inch recycled water main in Moffett Park Drive. The project would also connect to two existing sanitary sewer manholes in Moffett Park Drive. The project would install two new six-inch sewer laterals that would tie into separate, existing 10-inch sewer mains, one flowing east and the other flowing west in Moffett Park Drive. The project would install two public fire hydrants on Moffett Park Drive and two public hydrants along the laneway.

The project would include drainage and biotreatment areas throughout the site, i.e., in the amenity park space area, around the perimeter of the site, and along sidewalks. Stormwater runoff from the site would be treated in bioretention areas on the ground level and flow through planters on the roof before being directed to the City's stormwater system. The project would also include 15,151 square feet of off-site stormwater.

3.5 Mechanical Equipment

Heating, ventilation, and air conditioning (HVAC) equipment, including condenser units, and approximately 34,500 square feet of solar photovoltaic (PV) arrays (i.e., a solar access roof area as defined by Title 24) would be located on the roofs of Buildings A and B. A fire pump room would be located on the ground floor of the parking garage and would contain one 150-horsepower (hp) fire pump. A transformer/generator enclosure would be located in the northeastern corner of the project site on the ground floor and would contain a 500-kilowatt (kW) generator to serve as emergency backup. The 500-kW generator would be consistent with U.S. EPA Tier 4 standards.

3.6 Green Building Measures

The project applicant proposes to meet the California Building Standards Code (CALGreen) Mandatory Measures and GreenPoint Rated Checklist and achieve at least 90 points and a Build It Green Certification. The project applicant would incorporate green building measures including, but not limited to, the following:

- **Renewable Energy**: The project would install approximately 34,500 square feet of solar access roof area on the roofs of Buildings A and B.
- **Electric Vehicle (EV) Charging:** The project would include 565 EV and EV-ready parking spaces.
- **Resource Efficient Landscaping:** The project would plant drought tolerant and native species for landscaping.
- **Green Roof:** The project would provide approximately 18,600 square feet of vegetation on the roof of the podium.

3.7 Transportation Demand Management Measures

The project applicant proposes to include the following Transportation Demand Management (TDM) measures:

- On-site Transportation Coordinator
- Annual monitoring and reporting program
- Enrollment in the Moffett Park TMA
- TDM marketing materials for employees
- Unbundled parking
- Priority parking for carpools and vanpools
- Bicycle parking and shower and changing facilities
- Bicycle repair station
- Pre-tax transit/vanpool benefits

For details about the proposed TDM measures, refer to Appendix A.

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 26 months in two phases. The podium and Building A would be constructed during phase one, and Building B would be constructed during phase two. Excavation and removal of approximately 15,000 cubic yards of soil would be necessary to accommodate the proposed building foundations,

footings, and utilities. Construction would require excavation at a maximum depth of 10 feet below the ground surface (bgs) at the elevator pits and seven feet bgs elsewhere throughout the site.

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 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:

3.1	Aesthetics	3.10	Land Use and Planning
3.2	Air Quality	3.11	Noise
3.3	Biological Resources	3.12	Population and Housing
3.4	Cultural Resources	3.13	Public Services
3.5	Energy	3.14	Recreation
3.6	Geology and Soils	3.15	Transportation
3.7	Greenhouse Gas Emissions	3.16	Tribal Cultural Resources
3.8	Hazards and Hazardous Materials	3.17	Utilities and Service Systems
3.9	Hydrology and Water Quality		

The discussion for each environmental resource area listed above 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 no 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.

As noted in the Section 3.0 Project Description, no laboratory uses (including medical clinic laboratories) are proposed as part of the project. Therefore, laboratory uses are not analyzed in this Environmental Checklist document. If proposed in the future, either as part of the medical clinic or R&D uses, subsequent review for laboratory uses would be 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.

The project site is accessed through a driveway via Moffett Park Drive. The ingress and egress routes of the driveway are separated by a planter strip. The larger office building, with the addresses of 375 and 385 Moffett Park Drive, is a rectangular one-story flat-roofed building. The building is beige, with grey accent at the frontage, containing windows all around. The buildings on the project site are surrounded by a ring of surface parking. The 333 Moffett Park Drive building is a smaller, square building with the same architectural style.

Photos of the existing buildings and parking lot are shown on Photos 1 through 4. Photos of surrounding uses are shown on Photos 5 through 8.

Photo 1: View of 333 Moffett Park Drive building frontage from southwest corner of project site, facing north.

Photo 2: View of back of 333 Moffett Park Drive building from center of parking lot, facing southeast.

PHOTOS 1 & 2

Photo 3: View of 375-385 Moffett Park Drive building frontage from center of parking lot, facing north.

Photo 4: View of back of 375-385 Moffett Park Drive building from northern end of project site, facing south.

PHOTOS 3 & 4

Photo 5: View of existing parking lot and Moffett Park Drive ingress/egress driveways, facing south.

Photo 6: View of Moffett Park Drive and State Route 237 from the project site, facing south.

PHOTOS 5 & 6

Photo 7: View of adjacent office building from the northeast corner of the project site, facing north.

Photo 8: View of adjacent parking garage from private drive, facing northwest.

PHOTOS 7 & 8

4.1.2 Impact Discussion

	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?
Except as provided in Public Resources Code Section 21099, would the project:					
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?[6] 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, whereas future development projects located in the northwestern and eastern portions of Moffett Park (outside of a TPA) would be required to comply with Specific Plan Policy OSE-3.4 and Specific Plan Section 6.6.9 standards pertaining to exterior lighting.

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

The project site is located within a TPA[7] and, 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 Sections 15162 and 15183. No further analysis is required.

[7] Metropolitan Transportation Commission/Associated of Bay Area Governments. "Transit Priority Areas (2021)." Accessed July 25, 2024. https://opendata.mtc.ca.gov/datasets/MTC::transit-priority-areas-2021-1/explore?location=37.406385%2C-122.016106%2C15.00

4.2 Air Quality

This section is based, in part, on a TDM Plan completed by W-Trans in June 2024, and an Air Quality and Health Risk Assessment completed for the project by Illingworth & Rodkin, Inc., in August 2024. 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.

The closest sensitive receptors to the project site are the worker receptors in the office buildings surrounding the project site, and the single-family residences approximately 300 feet to the south opposite U.S. 101.

4.2.2 Impact Discussion

	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?
Would the project:					
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 generally 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.[8]

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.

[8] 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. • 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

Requirement	Description
	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: – 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. – Use electric equipment such as aerial lifts, air compressors, cement mortar mixers, concrete/industrial saws, cranes, and welders. – 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. – Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment. – 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

Requirement	Description
	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.

Because the project includes demolition activities, the project does not meet all the screening criteria outlined by the Air District for less than significant construction criteria air pollutant emissions. In compliance with Specific Plan Requirement 10.3.3-2, the project's construction criteria air pollutant emissions were modeled and the results are summarized in Table 4.2-1 below (refer to Appendix B for details about the modeling).

Table 4.2-1: Construction Period Emissions

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Per Year (tons)				
2025	0.24	2.19	0.07	0.06
2027 + 2027*	1.89	3.03	0.08	0.07
Average Daily Construction Emissions Per Year (pounds/day)				
2025 (197 construction workdays)	2.45	22.20	0.70	0.63
2026 + 2027* (301 construction workdays)	12.59	20.12	0.52	0.48
Air District thresholds (pounds per day)	54	54	82	54
Exceed Threshold?	No	No	No	No

* Only two months in 2027.

Source: Illingworth & Rodkin, Inc. *333-385 Moffett Park Drive Construction Emissions and Health Risk Assessment.* August 23, 2024.

As shown in Table 4.2-1 above, construction activities would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$ and 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 the 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.[9]

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.

The proposed project is consistent with the Specific Plan's land use assumptions/allowed uses for the project site and is, therefore, accounted for in the FEIR analysis. Consistent with Specific Plan Requirement 10.3.3-3, the proposed 500-kW generator would meet U.S. EPA Tier 4 standards.

The Specific Plan established minimum TDM requirements for both residential and non-residential projects. Non-residential projects over 5,000 square feet are required to provide TDM program elements at a minimum, with additional measures included if the

[9] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 73-78.

minimum elements do not meet the 50 percent single-occupancy vehicle (SOV) goal. Consistent with Specific Plan Standard 8.2.4.c, a TDM plan was prepared for the proposed project. As mentioned in Section 3.0 Project Description, the plan includes the following minimum required and project-specific TDM measures:

- On-site Transportation Coordinator (minimum required)
- Annual monitoring and reporting program (minimum required)
- Enrollment in the Moffett Park TMA (minimum required)
- TDM marketing materials for employees (project-specific)
- Unbundled parking (minimum required)
- Priority parking for carpools and vanpools (minimum required)
- Bicycle parking and shower and changing facilities (minimum required)
- Bicycle repair station (project-specific)
- Pre-tax transit/vanpool benefits (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.[10]

The proposed project is consistent with the Specific Plan and included 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.

[10] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 77-78.

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 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.[11]

As discussed in Section 2.0 Project , the proposed project would include EV infrastructure, solar panels, drought tolerant landscaping, and a green roof. The project would meet the CALGreen Mandatory Measures and GreenPoint Rated Checklist and achieve at least 90 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 a) and concluded to not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. 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 receptors would be required to implement Specific Plan Project Requirement 10.3.3-4 below to reduce construction TACs and particulate matter ($PM_{2.5}$) emissions during construction below Air District thresholds of significance.[12]

[11] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 66-68.
[12] Ibid., pages 79-81.

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 appropriate 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 Project 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 (HI) for non-cancer health risks. The modeled maximum annual DPM and $PM_{2.5}$ concentrations were identified at nearby sensitive receptors to find the maximally exposed individual (MEI). The MEI was identified as a single-family residence south of the construction site opposite U.S. 101. Project risk impacts to the MEI are summarized in Table 4.2-2 below. Refer to Appendix B for details about the health risk modeling.

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

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ (ug/m^3)	Hazard Index
Project Construction (Years 0-2)			
Uncontrolled	30.20	0.15	0.02
With controls*	2.21	0.07	<0.02
Project Operation (Years 2-30)			
Generator	0.55	-	<0.01
Total Maximum Project Impact (Years 0-30)			
Uncontrolled	30.75	0.15	0.02
With controls*	2.76	0.07	<0.01
Air District Single-Source Threshold	>10.0	>0.3	>1.0
Exceed Threshold?	No	No	No

* Controls refer to measures to control dust and exhaust during construction (i.e., Specific Plan Requirement 10.3.3-1).

Source: Illingworth & Rodkin, Inc. *333-385 Moffett Park Drive Construction Emissions and Health Risk Assessment.* August 23, 2024. Page 21.

As shown in Table 4.2-2, project construction would exceed Air District thresholds for cancer risk if dust and exhaust controls are not implemented. With implementation of Specific Plan Requirement 10.3.3-1, the cancer risk would be reduced to below the Air District threshold by minimizing dust and exhaust during construction.

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. Three stationary sources of TACs were identified with the potential to affect the project MEI. Cumulative impacts are summarized in Table 4.2-3 below. Refer to Appendix B for details about the cumulative screening and health risk calculations.

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

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ (ug/m^3)	Hazard Index
Project Impacts			
Uncontrolled	30.75	0.15	0.02
With controls*	2.76	0.07	<0.01
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold?	No	No	No
Cumulative Impacts			
SR 237	2.07	0.11	<0.01
Google LLC, MEI at 620 feet	0.32	<0.01	-
220 Humboldt Court, MEI at 790 feet	0.73	<0.01	-
Google, MEI at 1,000 feet	0.34	-	-
Cumulative Totals			
Uncontrolled	34.21	<0.28	<0.03
With controls*	6.22	<0.20	<0.02
Air District Cumulative Sources Threshold	*>100*	*>0.8*	*>10.0*
Exceed Threshold?	No	No	No

* Controls refer to measures to control dust and exhaust during construction, and use of construction equipment with Tier 4 Final engines plus electric cranes as controls (i.e., Specific Plan Requirements 10.3.3-1 and 10.3.3-4).

Source: Illingworth & Rodkin, Inc. *333-385 Moffett Park Drive Construction Emissions and Health Risk Assessment.* August 23, 2024. Page 24.

As shown in Table 4.2-3, project construction would exceed Air District single-source thresholds for cancer risk if 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 two 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 phases 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 construction cancer risk levels would be reduced below Air District single-source or cumulative 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 to the Air District single-source or cumulative source significance thresholds for cancer risk, annual $PM_{2.5}$, or hazard index.[13]

Since the proposed project 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, i.e., emergency generators, because future development would comply with Specific Plan Requirements 10.3.3-3, which would ensure 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.

[13] Ibid., pages 81-82.

The project includes one emergency generator that would be located in its own enclosure in the northeast corner of the project site. The generator would provide up to 500-kW powered by a 670 hp diesel-powered engine. The generator 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. Consistent with Specific Plan Project Requirement 10.3.3-4, the project's operational health risk impacts from the proposed generator were assessed due to the project's proximity to sensitive receptors. As shown in Table 4.2-1, the generator would not exceed Air District 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.

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.[14] 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 R&D uses which, as discussed in the FEIR, have the potential

[14] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 82-85.

to generate substantial operational odors. Consistent with Specific Plan Requirement 10.3.3-5, the project applicant would develop an odor control plan that contains maintenance procedures for adequate ventilation and odor-proofing, as well as an action plan to quickly and efficiently address any odor complaints. The tenant of the proposed creation space is unknown at this time; if it is a user that would generate odors, it would also comply with Specific Plan Requirement 10.3.3-5. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Sections 15162 and 15183. No further analysis is required.

4.3 Biological Resources

This section is based, in part, on an Arborist Report prepared by the project by HortScience | Bartlett Consulting in June 2024. The report is attached as Appendix C.

4.3.1 Environmental Setting

The existing biological resources setting, including regulatory framework, has not substantially changed since certification of the FEIR. However, since the certification of the FEIR, on October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under the California Endangered Species Act and designated the species as a candidate species. A decision by the California Department of Fish and Wildlife (CDFW) on whether to list this species is expected in 2026.

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 (1,600 feet northwest) and Sunnyvale East Channel (2,800 feet northeast).

Table 4.3-1: Trees on the Project Site

Species (Common Name)	Number of Protected Trees	Total Number of Trees
European white birch	0	21
Camphor	0	4
Silver dollar gum	3	3
Raywood ash	9	11
Evergreen ash	5	5
Crape myrtle	0	1
Sweetgum	29	71
Olive	1	2
Canary Island pine	1	3
Aleppo pine	1	1
Chinese pistache	1	5
London plane	2	4
Fremont cottonwood	0	2
Lombary poplar	2	2
Purpleleaf plum	0	7
Coast redwood	9	9
Total	**63**	**151**

4.3.2 Impact Discussion

	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?
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	LTS	No	No	No	No
a) 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
b) 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
c) 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

	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?
Would the project:					
d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	No	No	No	No
e) 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, bumble bees, steelhead, western pond turtle, roosting bats, salt-marsh harvest mouse, San Francisco Dusky-Footed woodrat, and migratory nesting birds and raptors).[15]

Due to the project site's existing, developed condition (i.e., lack of on-site ruderal and riparian habitats) and location in the southern, developed portion of Moffet Park, the project is not subject to Specific Plan Requirements 10.3.5-1, 10.3.5-2, 10.3.5-3, 10.3.5-4, 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

[15] 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. A report shall be submitted to the City summarizing 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 contains two buildings, 151 trees, and vegetation that could provide foraging and nesting opportunities for a variety of bird species. The proposed project would remove 128 trees, including 52 protected trees. As discussed in the FEIR, given the lack of sensitive habitat on the project site, impacts to roosting bats and migratory nesting birds and raptors would be less than significant.

Consistent with the FEIR, the project would comply with Specific Plan Requirements 10.3.5-6 and 10.3.5-9 requiring preconstruction surveys for roosting bat assessments, and migratory bird and raptor. For these reasons, 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 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).[16,17]

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, Sunnyvale Municipal Code (SMC) Chapter 19.81 Streamside Development Review, and Water Resources Protection Ordinance, as applicable.

The project site is developed and does not contain sensitive habitat, nor is it located within 250 feet of riparian areas or within (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 and the project would not have an impact on sensitive habitat (including 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 General Permit to reduce runoff and pollution in runoff from construction activities (which

[16] 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.
[17] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 118-119.

includes preparation of a NOI and Stormwater Pollution Prevention Plan [SWPPP], and implementation of stormwater control BMPs).[18]

The project is developed and does not contain any wetlands, nor is it within 250 feet of a riparian area. For these reasons, Specific Plan Requirements 10.3.5-10 and 10.3.5-11 are not applicable to the project site and the project would not have an impact on 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 10.3.5-2 through 10.3.5-8 mentioned under checklist question a) above would reduce impacts to the movement of special status species (i.e., Crotch 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, and 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 Backlight-Uplight-Glare rating system, automatic shutoffs for unnecessary lighting from 10 PM to sunrise, and other requirements.[19]

As discussed in the discussion under checklist question a) above, the project would not impact the Crotch 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. Therefore, Specific Plan Requirements 10.3.5-2 through 10.3.5-8 are not applicable. Further, the project would comply with Specific Plan Policy OSE-3.4 and Specific Plan Section 6.6.9 standards by installing lights that are backlit or uplit and have automatic dimmers and shutoffs in order. 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.

[18] Ibid., pages 119-121.
[19] Ibid., pages 121-123.

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.[20]

The project is not adjacent to waterways. As such, the project would comply with SMC Section 19.94 pertaining to tree removal and protection. As discussed in Section 2.0 Project , the project would remove 128 trees (including 52 protected trees) of the 151 existing trees. The project would obtain tree removal permits and plant 87 replacement trees on-site (primarily around the perimeter of the proposed buildings) consistent with SMC Section 19.94. 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.[21] For this reason, the FEIR concluded the Specific Plan would not conflict with the Habitat Plan and result in a less than significant impact.[22]

As discussed under checklist question a), the project site does not contain ruderal habitat and would not impact burrowing owls. For this reason, Specific Plan Requirement 10.3.5-2 is not applicable to the project. The project would not be inconsistent with the Habitat Plan or any other habitat conservation 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.

[20] Ibid., page 123.
[21] Ibid., pages 123-124.
[22] Ibid.

4.4 Cultural Resources

The following discussion is based, in part, on an Archaeological Sensitivity Assessment prepared for the project by Archaeological/Historical Consultants in August 2024. This report 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.

Historic Resources

The types of cultural resources that meet the definition of historical resources under CEQA generally consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. The project site was historically a meadow, then used as agricultural land from the 1920s through 1980s. The existing buildings were constructed in 1985. The existing buildings are 40 years old. They are not listed in the City's Heritage Resources Inventory (HRI) as properties with architectural or historic significance, nor are they eligible for the National Register of Historic Properties (NRHP) or listed in the Office of Historic Preservation's (OHP's) Built Environmental Resources Directory (BERD).[23]

Archaeological Resources

Native American Sensitivity

The project site is located on a Holocene-era alluvial fan deposit within one mile of a tidal marsh. However, the nearest source of fresh water (e.g., Campbell Creek) is over two miles away. There are two known archaeological sites within a quarter mile of the project site. The project site has a moderate sensitivity for buried Native American archaeological deposits.

Historic-Period Sensitivity

The project site was used for agricultural purposes throughout its history and is unlikely to contain buried archaeological deposits. Additionally, the site was not developed with structures until the current buildings were constructed in the mid-1980s. Thus, the project site has a low sensitivity for buried historic-era cultural resources and for historic-era archaeological deposits.

[23] City of Sunnyvale. "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.

4.4.2 Impact Discussion

	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?
Would the project:					
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).[24] 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.

As discussed in Section 4.4.1 Environmental Setting, the existing buildings on-site are less than 45 years of age (and therefore not subject to evaluation per Specific Plan Requirement 10.3.5-10) and are not listed in the City's HRI. The project site is also not adjacent to a historic resource or historic district. As such, the project does not need to comply with Specific Plan Requirements 10.3.2-1 and 10.3.2-2 and the project would have no impact on historic resources. Therefore, the project would not meet any of the

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

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.[25] The Specific Plan Requirements are listed below.

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 Archaeological Sensitivity Assessment was prepared for the project. As discussed in Section 4.4.1 Environmental Setting, the proposed project is located in an area of moderate sensitivity for Native American archaeological resources and an area of low sensitivity for historic-era archaeological resources. Consistent with Specific Plan Requirement 10.3.2-3, the site-specific Archaeological Sensitivity Assessment identifies the following measure due to the site's sensitivity, which shall be implemented by the project as condition of approval:

[25] Ibid., page135.

Condition of Approval:

- Cultural Resources Awareness Training. Prior to issuance of any grading permit, the project applicant shall be responsible for conducting a Cultural Awareness training for construction personnel. The training shall be facilitated by a qualified archaeologist in collaboration with a Native American representative registered with the Native American Heritage Commission for the City of Sunnyvale and that is traditionally and culturally affiliated with the geographic area as described in Public Resources Code Section 21080.3. Documentation verifying that Cultural Awareness Training has been conducted shall be submitted to the City prior to issuance of any grading permit.

Implementation of the above condition of approval ensures construction crews receive cultural resources training to allow them to better recognize any cultural resources they may encounter. Further, 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.[26]

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.

[26] 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. However, 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). 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 and one R&D building that use energy in the form of electricity and natural gas to operate the buildings, and gasoline as fuel for vehicles traveling to and from the site.

4.5.2 Impact Discussion

	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?
Would the project:					
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.[27]

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.[28]

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.

[27] Ibid., page 144.
[28] 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 project is consistent with the Specific Plan and is, therefore, 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 proposes to install higher efficiency appliances, lighting, and HVAC systems to reduce energy consumption; solar panels; a green roof; vegetation and landscaping; and EV charging infrastructure. In addition, the project would voluntarily be 100 percent electric.

For these reasons, the proposed project would be consistent with the findings of the FEIR and would not result in wasteful, inefficient, or unnecessary energy consumption during operation. 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.[29]

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, installing solar panels, being 100 percent electric, and complying with the City's construction and demolition waste diversion program. For

[29] Ibid., page 145.

these reasons, the proposed project would be consistent with the findings of the FEIR and would not conflict with a state or local 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.

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.[30]

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 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 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.[31]

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

[30] Ibid., page 146.
[31] Ibid., page 147.

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.[32]

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.

[32] Ibid.

4.6 Geology and Soils

The following discussion is based, in part, on a Geotechnical Investigation prepared for the project by Rockridge Geotechnical in October 2023. A copy of the Geotechnical Investigation is attached as Appendix D.

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 soils on-site consist of medium stiff to very stiff clay and silty clay with layers of medium dense to very dense sand and silty sand.[33] The soils on-site are highly expansive.[34] Expansive soils can change due to seasonal fluctuations in moisture content.

Groundwater

Groundwater at the site ranges between six and 11 feet bgs.[35] 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.[36] 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	6.1 miles southwest
Hayward	7.4 northeast
San Andreas	9.9 southwest
Calaveras	11.8 east

[33] Rockridge Geotechnical. *Geotechnical Investigation Proposed Office Development 385 Moffett Park Drive*. October 9, 2023. Page 3.
[34] Ibid.
[35] Ibid., page 4.
[36] Ibid., page 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.[37] Based on site investigation, several layers of potentially liquefiable material were encountered between depths of five and 18 feet bgs.[38] 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 very low.[39]

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 liquefiable soils on-site are not continuous, the potential for lateral spreading is very low.[40]

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.[41] 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.

[37] California Department of Conservation. "CGS Seismic Hazards Program: Liquefaction Zones." Accessed August 1, 2024. https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=37.534114%2C-122.226939%2C13.33.
[38] Rockridge Geotechnical. *Geotechnical Investigation Proposed Office Development 385 Moffett Park Drive*. October 9, 2023. Page 9.
[39] Ibid.
[40] Ibid.
[41] California Department of Conservation. "CGS Seismic Hazards Program: Landslide Zones." Accessed August 1, 2024. https://maps-cnra-cadoc.opendata.arcgis.com/maps/08d18656a0194881a7e0f95fde19f08c/explore?location=37.395669%2C-121.928605%2C11.00.

4.6.2 Impact Discussion

	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?
Would the project:					
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
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

	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?
Would the project:					
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.[42]

In conformance with the CBC and consistent with the FEIR, a site-specific Geotechnical Investigation was prepared for the site (which is included in Appendix D) 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 issues for the site included relatively high groundwater and presence of highly expansive near-surface soil. Accordingly, the Geotechnical

[42] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 156.

Investigation recommendations for the project include dewatering for excavations deeper than five feet bgs; waterproofing elevator pit walls and foundations that would extend below the groundwater table; and minimizing the effects of expansive soil by moisture-conditioning the soil, providing non-expansive fill or lime-treated soil below interior and exterior slabs behind retaining walls, and supporting foundations below the zone of severe moisture change or providing a stiff, shallow foundation that can limit deformation.[43] In addition, 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 D.

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.[44]

The project site would be excavated to a maximum of 10 feet bgs for the elevator pits and seven feet bgs elsewhere on-site. 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 Sections 15162 and 15183. No further analysis is required.

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.[45]

[43] Rockridge Geotechnical. *Geotechnical Investigation Proposed Office Development 385 Moffett Park Drive*. October 9, 2023.
[44] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 157.
[45] Ibid., pages 157-158.

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. 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.[46]

As discussed under checklist question a), the soils on-site are highly expansive. The effects of expansion potential of near-surface soil can be minimized by moisture-conditioning the soils below slabs, providing non-expansive soil below slabs, and by either providing supporting foundations below the area of severe moisture change or providing a stiff, shallow foundation (as recommended in the Geotechnical Investigation, Appendix D). The project would be built in conformance with the recommendations of the Geotechnical Investigation and would comply with the CBC. The project, therefore, 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.

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.[47] 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.[48]

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 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

[46] Ibid., page 161.
[47] Ibid.
[48] Ibid.

eight feet or greater. The FEIR concluded buildout of the Specific Plan would result in a 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).[49]

Requirement	Description
10.3.2-6	**Fossil Review.** Future development projects involving excavation at depths of eight feet or greater, shall retain a qualified paleontologist to inspect cuts more than eight feet deep for fossils at all times during original grading. In the event paleontological resources are discovered, all work within 25 feet of the find shall be halted and a Principal Paleontologist (M.S. or PhD in paleontology or geology familiar with paleontological procedures and techniques) shall evaluate the find and prepare a Paleontological Resource Mitigation (PRM) plan. As part of the PRM plan, discovered fossil(s), along with copies of all pertinent field notes, photos, and maps, shall be deposited in a scientific institution with paleontological collections. A final report documenting any found resources, their recovery, and disposition shall be prepared and filed with the local repository and the City.

The project would excavate at depths below eight feet and, consistent with the FEIR, comply with Specific Plan Requirement 10.3.2-6 to reduce impacts to paleontological resources to a less than significant level. The project, therefore, would result in the same 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.

[49] Ibid., page 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. However, 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 and R&D uses 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

	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?
Would the project:					
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.[50]

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.

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.

[50] Ibid., page 172-175.

Requirement	Description
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.[51]

The project is consistent with the Specific Plan and would comply with Specific Plan Greenhouse Gas Emission Project Requirement 8.3.3-4. Because Specific Plan Greenhouse Gas Emission Project Requirements 10.4-20 and 10.6 and Specific Plan Policies TDMP 2.1 through 2.5 are to be implemented by the City (rather than a private development project), implementation of those requirements are not applicable to the project. The project would, however, comply with the City's Reach Code and CALGreen Tier 2 requirements and voluntarily be 100 percent electric, 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.

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.[52]

[51] Ibid., page 175.
[52] Ibid.

The proposed project would not result in a significant, project-level operational GHG emissions impact because it: 1) would be 100 percent electric and does not propose the use of natural gas; 2) is consistent with the land use and density for the site in Specific Plan and, therefore, would be 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 (as discussed in Section 2.0 Project). 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.[53]

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 Game Plan for the same reasons as documented in the FEIR of installing higher efficiency appliances, lighting, and HVAC systems; solar panels; and a green roof. 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. For these reasons, 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.

[53] Ibid., page 176.

4.8 Hazards and Hazardous Materials

The following discussion is based, in part, on a Phase I Environmental Site Assessment (ESA) prepared for the project by Roux Associates, Inc. in August 2022. A copy of the Phase I ESA is attached as Appendix E.

4.8.1 Environmental Setting

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

History 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 1897, the project site was occupied with a residential dwelling in the southwestern corner. By 1939, the dwelling was demolished and replaced by a group of buildings on the eastern portion of the site. The site was used for agriculture/farming beginning in 1939. The group of buildings was demolished by 1968. By the late 1970s, the majority of land in the vicinity of the project site had been developed. By 1994, the site was developed with the existing office and R&D buildings.

On-Site Sources of Contamination

A database records search and site reconnaissance were completed in order to identify recognized environmental conditions (RECs), controlled RECs, and/or historical recognized RECs. 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, groundwater, or surface water. Based on the site's historic agricultural use, there is potential for pesticides to be found in shallow soils. While the project site has been previously listed on databases, it is not currently listed on any. Further, the project site is not listed on any sites compiled pursuant to Government Code Section 65962.[54] Refer to Appendix E for additional information (including the results) of the database records search.

Off-Site Sources of Contamination

A database records search was also completed for several nearby off-site properties that could affect the project site. Based on a review of the database search results, no nearby sites would have an effect on the project site given the listing details, remediation, and/or case status (e.g., oversight agency requiring no further action) (refer to Appendix E for additional detail).

[54] California Environmental Protection Agency. "Cortese List Data Resources." Accessed August 1, 2024. https://calepa.ca.gov/sitecleanup/corteselist/

Other Hazards

Airport

The project site is within the AIA for the Moffett Federal Airfield.[55] 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 CLUP turning safety zone.[56] 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).[57]

Wildfire Hazards

The project site is not in or adjacent to a moderate, high, or very high fire hazard severity zone.[58]

4.8.2 Impact Discussion

	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?
Would the project:					
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

[55] Windus, Walter B. *Comprehensive Land Use Plan for Moffett Federal Airfield*. December 2018. Figure 5: 2022 Aircraft Noise Contours with AIA.
[56] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 185-186.
[57] Ibid., page 187.
[58] Cal Fire. Fire Hazard Severity Zone Viewer. Accessed March 26, 2025. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0.

	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?
Would the project:					
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 (TSCR), 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.[59]

The proposed project would use small amounts of commercially available hazardous materials for cleaning and landscaping maintenance. 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). 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 groundwater, soil, and soil vapor; asbestos-containing materials, lead-based paints, and polychlorinated biphenyls; and contaminated imported soils.

Contaminated Groundwater, Soil, and Soil Vapor

The FEIR concluded buildout of the Specific Plan would result in a less than significant impact from release of contaminated groundwater, soil, and soil vapor 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.[60, 61] The FEIR analysis assumed sites under regulatory oversight would comply with oversight agency requirements.

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

[59] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 197.
[60] Ibid., page 202-203.
[61] The FEIR acknowledges that, if project sites proposed for development have met the Specific Plan requirements through previous environmental work, additional work may not be required unless previously unknown conditions are encountered.

Requirement	Description
	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; • 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

Requirement	Description
	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 Requirement 10.3.1-1, a Phase I ESA was prepared for the site. As discussed in Section 4.8.1 Environmental Setting, there is a potential for pesticides to be found in shallow soils on-site. Thus, consistent with Specific Plan Requirement 10.3.1-3, the project shall prepare a Phase II ESA prior to the start of any construction activities. If the Phase II ESA reveals contamination on-site, the project applicant would comply with Specific Plan Requirement 10.3.1-4 ensuring proper remediation of contaminated soils, soil vapor, or groundwater.

Consistent with Specific Plan Requirement 10.3.1-2, the project shall prepare a SMP identifying management options to reduce impacts to a less than significant level if contaminated soil and/or groundwater are encountered during construction activities. Further, as discussed in Section 4.6 Geology and Soils, since groundwater at the site ranges from six to 11 feet bgs and the project proposes excavation to a maximum depth of 10 feet bgs, dewatering would likely be required during construction. As such, the

project would prepare a dewatering management plan in compliance with Specific Plan Requirement 10.3.1-5.

Through compliance with all applicable Specific Plan Requirements above, 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 asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (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.[62]

The existing buildings on-site were constructed in 1985 and, therefore, do not contain ACMs or LBPs. For this reason, the above Specific Plan Requirements are not applicable to the project. As discussed in more detail under checklist question a) in Section 3.10 Hydrology and Water Quality, given the construction date of the buildings (i.e., post 1980), PCBs are not present on-site and compliance with MRP Provision C.12.f is not applicable to the project. For these reasons, the project would not result in new or substantially more severe significant impacts 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.

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.[63]

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

[62] Ibid., page 203-204.
[63] Ibid., page 204.

Requirement	Description
	materials shall be characterized according to the DTSC's 2001 Information Advisory Clean Imported Fill Material.

As discussed in Section 2.0 Project , the project would import approximately 15,000 cubic yards of soil on-site. 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.

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.[64]

The closest school to the project site is Bishop Elementary School, located approximately 2.5 miles south at 450 North Sunnyvale Avenue.[65] Similar to other existing residential uses in the area, the proposed project would utilize small quantities of cleaning and maintenance chemicals 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).[66]

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.

[64] Ibid.
[65] Google Maps. "333 Moffett Park Drive to Bishop Elementary School." Accessed August 2, 2024. https://maps.app.goo.gl/CmsSVGzX4KnYWrqs9.
[66] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 205.

e. The FEIR disclosed that all of Moffett Park is located within the Moffett Airfield Airport Influence Area (AIA), therefore, all future development is required to be reviewed by the ALUC for compatibility with applicable Moffett Federal Airfield Comprehensive Land Use Plan (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.[67]

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 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 85 feet, 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.[68]

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. 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 Moffet Park is an urbanized area that is not adjacent to a very high fire hazard severity

[67] Ibid., pages 205-206.
[68] Ibid., pages 203-204.

zone.[69]

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. 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.

[69] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 207.

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 1,600 feet northwest) and Sunnyvale East Channel (approximately 2,800 feet northeast). 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 77 percent (or 168,189 square feet) of the project site is impervious and 23 percent (or 49,180 square feet) is pervious.

Groundwater

As mentioned in Section 4.6 Geology and Soils, groundwater at the site ranges between six and 11 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.[70]

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.[71]

[70] Federal Emergency Management Association. "FEMA's National Flood Hazard Layer (NFHL) Viewer." Accessed August 2, 2024. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.
[71] California Department of Conservation. "Santa Clara County Tsunami Hazard Areas." Accessed August 2, 2024. https://www.conservation.ca.gov/cgs/tsunami/maps/santa-clara.

4.9.2 Impact Discussion

	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?
Would the project:					
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

	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?
Would the project:					
- 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.[72]

[72] 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 buildings on-site were constructed in 1984, the buildings on-site do not contain PCBs and are not subject to the City's PCB Screening Assessment (nor MRP Provision C.12.f). The project would obtain an NPDES General Construction Permit (which would include preparing a SWPPP) and implement the following stormwater control BMPs during construction:

- Installing inlet protection at open inlets to prevent sediment from entering the storm drainage system
- Providing concrete washout
- Providing silt fence or straw rolls around the perimeter of site slopes
- Monitoring erosion and sediment control measures prior to, during, and after storm events
- Keeping 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 requires dewatering during construction and would comply with Specific Plan Requirement 10.3.1-5.

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 (which is 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.[73]

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, the pervious surfaces on site would increase by less than one percent (i.e., 429 square feet) compared to existing conditions. 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 (small) 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.[74]

As discussed under checklist question b) above, implementation of the project would result in an increase of pervious surfaces. Based on Table 6 of the Specific Plan, non-residential development along the perimeter of Moffett Park would have a maximum of 25 percent paved area. According to the project plans, the project would have a total of 14 percent paved area, consistent with Specific Plan Development Standard 5.2.3, Standard 2. With the increase in impervious surfaces on-site compared to existing conditions, the existing storm drain system would continue to accommodate flows from the project site. In addition, there are no waterways on-site and the project does not include modifications to any waterways. Further, the project would comply with the MRP,

[73] Ibid., page 220.
[74] Ibid., pages 221-222.

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. For these reasons, 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.

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.[75]

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 office uses would not use, store, or generate substantial quantities of hazardous materials. Any substantial hazardous materials used by the proposed R&D use, medical clinic, or creation space shall be contained and stored properly pursuant to existing regulations (including the ones identified above). For this reason, 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, Construction General Permit, and SMC regulations).[76]

As discussed previously under checklist questions a) through c), there are no PCBs on-site and the project would comply with the MRP, 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.

[75] Ibid., page 222.
[76] 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 , the project site is located within the Moffett Park Specific Plan in the City's General Plan. The site is zoned as MP-O2, which is intended for higher-intensity corporate and professional uses. The MP-O2 district allows for a variety of uses including office, R&D/flex, light industrial, manufacturing, retail, general commercial, restaurants, hospitality, healthcare, and parks and open space. The MP-O2 district allows for a FAR of up to 2.0, the highest intensity of office uses in proximity to the MP-AC, MP-R, and MP-MU districts, and high-quality transit.

As shown on Figure 2.1-3, the project site is currently developed with one office building, one R&D building, and associated surface parking. The site is bordered by Moffett Park Drive to the south, a private drive to the west, and light industrial uses to the north, west, and east. Residential uses are located south of the project site, south of SR 237 and Persian Drive.

4.10.2 Impact Discussion

	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?
Would the project:					
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

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.[77]

The project proposes development consistent with the Specific Plan. The project would not construct any new barriers or roadways that would physically divide the community. The project would improve connectivity by constructing a multi-use path that would support bicycle, pedestrian, and public transit use. For these reasons, 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.[78]

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 uses are consistent with the General Plan and Specific Plan land use designations for the site. The project's density and FAR of 1.35 are consistent with what was assumed for the project site in the Specific Plan. The project would be consistent with General Plan Policies LT-1.2, LT-1.3, and LT-3.23 because it would introduce office and R&D uses within proximity to transit and include 12,119 square feet of POPAs that would support bicycle, pedestrian, and public transit use.

In addition, the proposed office and R&D uses are consistent with the allowable uses in the MP-O2 zoning district. In addition, innovation and/or creation spaces are required for new office, R&D, and industrial development within the Specific Plan area. Section 19.29.090 of the SMC requires that innovation space be equal to a minimum of 7.5 percent of all net new office and R&D uses, or five percent for creation space. Per the SMC, space can be provided as innovation, creation, or a combination of both. The

[77] Ibid., pages 228-229.
[78] Ibid., page 229.

project applicant proposes to provide only creation space. The project's provision of 10,370 square feet of creation space would be consistent with the requirement to include five percent of net new space as creation space.[79]

The proposed medical clinic use is also consistent with the allowable uses in the MP-O2 zoning district. Per the SMC, a medical clinic is allowed in the MP-O2 zoning district through a miscellaneous plan permit. Per the SMC, "'medical clinic' is a medical office with ancillary uses, such as laboratories, pharmacies, medical retail or education" and "'medical office'" means offices of doctors, dentists, chiropractors, physical therapists, athletic trainers, acupuncturists, optometrists and other similar health related occupations, where patients visit on a daily basis."[80] The project does not propose to include laboratory uses within the medical clinic and would be limited to pharmacies, retail, or education uses. If laboratory use is proposed in the future, subsequent review would be required.

As discussed throughout this document (including Sections 4.2 Air Quality, 4.4 Cultural Resources, and 4.8 Hazards and Hazardous Materials), 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.

[79] Project = 293,996 square feet. Existing uses = 89,612 square feet. Net increase = project – existing = 204,384 square feet. Creation space required = 204,384 square feet x 0.05 = 10,219 square feet.
[80] City of Sunnyvale. "Code of Ordinances: Sections 19.12.140 and 19.12.160." Accessed September 3, 2025. https://ecode360.com/42730203. https://ecode360.com/42729520.

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 65 to 70 dBA L_{dn}.[81,82] 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

	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?
Would the project result in:					
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

[81] 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.
[82] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 244.

	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?
Would the project result in:					
Note: LTS = less than significant					

a. Buildout of the Specific Plan would generate noise during construction (i.e., from construction equipment) and operation (i.e., through change 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.[83]

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 peak particle velocities [PPVs] of 0.25 in/sec at nearby structures). These techniques shall include: – Installing intake and exhaust mufflers on pile-driving equipment.

[83] Ibid., pages 245-248.

Requirement	Description
	– 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. – 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. • 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 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.

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.[84]

Consistent with the FEIR, the proposed project would comply with the aforementioned General Plan Policies. As discussed in Section 4.11.1 Environmental Setting, the existing noise level at the project site varies between 65 to 70 dBA L_{dn}. The project would comply with General Plan Policy SN-8.4 by complying with state noise guidelines and SMC noise regulations, as follows. The project would comply with General Plan Policies SN-8.5 and SN-8.6 because noise levels of 65 to 70 dBA L_{dn} are considered normally acceptable for office uses per the State's Noise Guidelines for Land Use Planning, and because buildout of the Specific Plan would not result in an increase of more than three dBA L_{dn} in the project vicinity.[85] The project would comply with General Plan Policy 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 50 dBA $L_{eq(1\text{-}hr)}$ or less). The City (rather than specific development projects) is responsible for complying with General Plan Policies SN-9.1 and -9.3.

SMC Section 19.42.030(a) sets residential noise limits, which would not apply to the proposed project. SMC Section 19.42.030(b) requires that noise levels do not exceed 60 dBA during nighttime or 70 dBA during daytime hours on the property line of adjacent nonresidential uses. The project does not include substantial operating noise sources except for standard mechanical equipment, which (as discussed below) would be controlled to meet property line noise standards, and an emergency backup generator that would be tested for short periods of time and used only in an emergency, therefore, the project would comply with SMC Section 19.42.030(b). The project, therefore, 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.

[84] Ibid., pages 248-249.
[85] Ibid., pages 249-254, 257.

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.[86]

The proposed development is consistent with 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 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.[87]

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.

As discussed in Section 3.1.5 Mechanical Equipment, HVAC would be located on the roofs of proposed Buildings A and B. A fire pump room would be located on the ground floor of the parking garage and would contain one 150 HP fire pump. A transformer/ generator enclosure, containing a 500-kW emergency backup generator, would be located in the northeastern corner of the project site on the ground floor. As proposed, the equipment would be in less noise-sensitive areas (i.e., on rooftops and in parking garages) and/or enclosed to minimize noise. The project would comply with Specific Plan

[86] Ibid., pages 249-256.
[87] Ibid., page 257.

Requirement 10.3.4-2 to ensure the proposed mechanical equipment would implement any necessary noise controls to meet City property line noise standards. 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).[88]

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. • 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.

[88] Ibid., pages 257-261.

Requirement	Description
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: o 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. o 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 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 those buildings at or below the 0.5 in/sec PPV Caltrans limit to avoid vibration impacts. The project does not propose pile driving during construction and would not need to comply with Specific Plan Requirements 10.3.4-5 and 10.3.4-7. 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 int 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, 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.[89]

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. As such, the proposed project is considered generally acceptable per the ALUC Noise Compatibility Policies shown in Table 3.13-2 in the FEIR.[90] The project 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 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 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 nonresidential projects. In addition, buildout of the Specific Plan could result in vibration impacts to buildings proposed within 35 feet of light rail lines.[91] 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

[89]Ibid., page 261.
[90] Ibid., page 236.
[91] Ibid., pages 264-265.

rail lines reduce effects of the noise and vibration environment on future development projects to acceptable levels.

Requirement	Description
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 L_{dn} or lower within the residential units and to 50 dBA $L_{eq(1\text{-}hr)}$ or lower within nonresidential interiors. Additionally for residential units located adjacent to the VTA light-rail tracks, maximum instantaneous noise levels shall be at or below 50 dBA L_{max} within bedrooms and at or below 55 dBA L_{max} 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 L_{dn} (for residential interiors) or 50 dBA $L_{eq(1\text{-}hr)}$ (for nonresidential 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 Policies 10.3.4-9 and 10.3.4-11 are not applicable to the proposed project because it does not include residential, hotel/motel, or school uses, nor is it located within 20 feet of a VTA light rail line. Consistent with Specific Plan Requirement 10.3.4-10, the project would prepare an acoustical analysis prior to issuance of building permits and implement any necessary design controls to ensure interior noise levels are at 50 dBA $L_{eq(1\text{-}hr)}$ or lower. 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.[92]

As of January 2024, the population of Sunnyvale was estimated to be 157,566 with an average of 2.5 persons per household, with approximately 63,608 housing units.[93]

There are no existing residences on the project site.

4.12.2 Impact Discussion

	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?
Would the project:					
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					

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

[92] Ibid., page 271.

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

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 and contributing additional parks/open space/recreation areas, and increasing connectivity by improving transportation infrastructure.[94]

The project would not construct residences. The proposed development 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.[95]

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.

[94] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Pages 270-272.
[95] 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 Project Initial Study. The project is currently under construction and anticipated to be completed by the end of 2025.[96]

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, approximately 0.4 miles north 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.[97] The closest schools to the project site are Columbia Middle School, located approximately 2.4 miles south at 739 Morse Avenue; Bishop Elementary School, located approximately three miles south at 450 North Sunnyvale Avenue; and Lakewood Elementary School, located three miles southeast at 750 Lakechime Drive.

The closest park to the project site is Baylands Park, located 1.2 miles northeast at 999 East Caribbean Drive. The Sunnyvale Public Library is located at 665 West Olive Avenue, 3.2 miles south of the project site.

[96] City of Sunnyvale. "Lakewood Branch Library and Learning Center." Accessed March 25, 2025. https://www.sunnyvale.ca.gov/business-and-development/projects-in-sunnyvale/infrastructure-projects/lakewood-branch-library.
[97] County of Santa Clara. "Property Information - Assessor's Parcel Number (APN): 110-34-005." Accessed March 25, 2025. https://www.sccassessor.org/index.php/all-situs-search?SFrom=all&SType=all&STab=address&addValue=333%20moffett%20park%20drive&guid=d1ba3a83-fc2c-4afa-8660-cada8701aa1c.

4.13.2 Impact Discussion

	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?
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:					
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. Future development under the Specific Plan would pay an in-lieu public facilities fee that could be used for any necessary upgrades and associated services, 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.[98]

[98] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 283.

Consistent with the findings in the FEIR, the project would pay the in-lieu public facilities fee and 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. 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 (when/if needed) would undergo separate environmental review and implement measures to reduce construction-related impacts to a less than significant level. Future development under the Specific Plan would pay an in-lieu public facilities fee that could be used for any necessary upgrades to reduce impacts to police protection facilities and services to a less than significant level.[99]

Consistent with the findings of the FEIR, the project would pay the in-lieu public facilities fee. 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. Future development would pay school impact fees to reduce impacts associated with increased demands on school facilities to a less than significant level.[100]

The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. The project does not include housing that would result in new residents and students. Therefore, the project would not increase demands on existing school facilities. As discussed in Section 4.13.1 Environmental Setting, the project site is located within the SSD and FUHSD boundaries. Both school districts have impact fees for new residential and non-residential projects constructed within their boundaries.[101,102] The proposed project would pay applicable school impact fees. The project would result in the same impact as disclosed in the FEIR and would not meet any

[99] Ibid., page 284.
[100] Ibid., page 284-286.
[101] Sunnyvale School District. "Developer Fee Compliance." Accessed March 26, 2025. https://www.sesd.org/Page/662.
[102] Fremont Union High School District. "Business Services." Accessed March 26, 2025. https://www.fuhsd.org/departments/business-services.

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, Specific Plan Policies OSE-2.1 through -2.8, and payment of in-lieu fees as needed by future multi-family development.[103]

The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. The project does not include multi-family residential development and, therefore, is not subject to SMC Chapter 19.74 and the Specific Plan policies listed above are not applicable. 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 of planned Library Modernization project and with the payment of in-lieu public services fees by future development that could be used for necessary upgrades to libraries. The FEIR also concluded if new library facilities were constructed in Moffett Park, they would result in less than significant impacts through compliance with existing regulations.[104]

The proposed project is consistent with the development and growth assumed in the Specific Plan and analyzed in the FEIR. Consistent with the conclusions of the FEIR, the project would pay the in-lieu public facilities fee. 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.

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

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 1.2 miles northeast at 999 East Caribbean Drive. Another nearby recreational facility is the Twin Creeks Sports Complex, located one mile northeast at 969 East Caribbean Drive.

4.14.2 Impact Discussion

	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) Would the project 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) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	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 (which requires 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).[105]

[105] Ibid., page 297.

As described in Section 3.0 Project Description, the project includes an outdoor fitness space and amenity terrace and POPAs, which would offset the use of nearby recreational facilities by project employees. The proposed project does not include multi-family residential uses and, therefore, is not subject to SMC Chapter 19.74 and is not required to comply with Specific Plan Policies OSE-2.1 through -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.[106]

As discussed under checklist question a), the project includes an outdoor fitness space and amenity terrace, as well as 12,119 square feet of POPAs (which would contribute towards the amount of open space in the Specific Plan. These amenity spaces would offset the use of nearby, existing facilities. 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.

[106] Ibid.

4.15 Transportation

The following discussion is based, in part, on a TDM Plan prepared for the project by W-Trans in June 2024. A copy of the TDM Plan 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	Service		
		Days of Operation	**Time of Operation**	**Frequency**
VTA Orange Line Light Rail	0.5 mile	Monday to Friday Saturday to Sunday	5:00 AM to 12:45 AM 6:00 AM to 12:45 AM	1 to 30 min 30 min
VTA Route 56	0.5 mile	Monday to Friday Saturday Sunday	5:30 AM to 10:40 PM 7:20 AM to 9:25 PM 7:25 AM to 8:25 PM	30 to 60 min
VTA Route 121 Express	0.5 mile	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 Route 523 Rapid Bus	0.7 mile	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	0.5 mile	Monday to Friday	6:00 AM to 10:00 AM 3:15 PM to 6:40 PM	50 to 90 min 50 to 70 min

Source: W-Trans. *Transportation Demand Management Plan for 333 Moffett Park Drive*. June 12, 2024. Page 4.

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 U.S. 101 via an interchange at Moffett Park Drive.

Local access to the project site is provided via Moffett Park Drive, Borregas Avenue, and Innsbruck 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. Moffett Park Drive provides direct access to the project site via a driveway. Borregas Avenue is a north-south street west of the project site. Borregas Drive begins at Moffett Park Drive in the south and extends north until it transitions into Carl Drive. Innsbruck Drive is a north-south street east of the project site. Innsbruck Drive begins at Moffett Park Drive in the south and extends north until it transitions into Gibraltar Drive.

Bicycle Facilities

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

Table 4.15-2: Bicycle Facilities

Facility	Class	Length (miles)	Begin Point	End Point
Moffett Park Drive	I	0.4	Innovation Way	Bordeaux Drive
Caribbean Drive (westbound)	I	0.4	Mathilda Avenue	Borregas Avenue
Caribbean Drive (eastbound)	II	0.4	Mathilda Avenue	Borregas Avenue
Caribbean Drive	II	1.0	Borregas Avenue	Moffett Park Drive
Innovation Way	II	0.2	Mathilda Avenue	Bordeaux Drive
Moffett Park Drive	II	0.4	Enterprise Way	Innovation Way
Moffett Park Drive	II	1.5	Bordeaux Drive	Caribbean Drive
Mathilda Avenue	II	3.2	Caribbean Drive	Iowa Avenue
1st Avenue / Bordeaux Drive	II	1.3	East Street	Moffett Park Drive
Borregas Avenue	II	2.5	Caribbean Drive	Maude Avenue
Fair Oaks Avenue / Java Drive / Crossman Avenue	II	1.2	Caribbean Drive	Weddell Drive
Tasman Drive	II	0.3	Morse Avenue	Fair Oaks Avenue
Persian Drive	II	1.0	Ross Drive	Fair Oaks Way
Morse Avenue / Weddell Drive	II	1.1	Persian Drive	Fair Oaks Avenue

Source: W-Trans. *Transportation Demand Management Plan for 333 Moffett Park Drive.* June 12, 2024. Pages 4-5.

Pedestrian Facilities

The project site is served by sidewalks and crosswalks within the project vicinity, such as along Borregas Avenue and Innsbruck Drive. There is no sidewalk along the frontage of the project site or along the south side of Moffett Park Drive between Bordeaux Drive and Chesapeake Terrace near Caribbean Drive.

4.15.2 Impact Discussion

	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?
Would the project:					
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.[107]

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

[107] Ibid., 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. As discussed in Section 2.0 Project , the project

would provide pre-tax transit benefits. The proposed project would comply with Specific Plan policies M-1.3, M-3.2, M-3.4, and M-4.1 pertaining to transit because employees and visitors of the proposed buildings could conveniently commute to the site via transit. The City (i.e., not private development such as the proposed project) is responsible for implementing Specific Plan policies M-3.1, M-3.3, M-3.5, and M-4.1. 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, but does not contain a sidewalk 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 improving access and connectivity for pedestrians and cyclists; providing a multi-use path along the project frontage which would be accessed by existing facilities in the vicinity; and providing bike parking, showers, and lockers. Also, implementation of the proposed project would not interfere with the implementation of planned Class I, II, IIB, or IV facilities in the vicinity.[108] 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.[109]

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.

[108] Class IIB facilities are defined as buffered bicycle lanes and Class IV facilities are defined as separated bikeways. The City's Active Transportation Plan Update includes 13 planned bicycle facilities (varying from Classes I, II, IIB, and IV) within the vicinity of the project site. Source: W-Trans. *Transportation Demand Management Plan for 333 Moffett Park Drive.* June 12, 2024. Pages 4-5.
[109] Ibid., 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.[110]

Consistent with the FEIR, the proposed project would be designed to meet City standards to prevent circulation hazards, and does not propose any incompatible uses. 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.[111]

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.

[110] Ibid., page 323.
[111] Ibid.

4.16 Tribal Cultural Resources

The following discussion is based, in part, on an Archaeological Sensitivity Assessment prepared for the project by Archaeological/Historical Consultants in August 2024. This report is confidential and is on file with the Sunnyvale Community Development Department.

4.16.1 Environmental Setting

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

As discussed in Section 4.4 Cultural Resources, there are two known archaeological sites within a quarter mile of the project site and the project site has a moderate sensitivity for buried Native American archaeological deposits.

4.16.2 Impact Discussion

	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?
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	LTS	No	No	No	No

	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) 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 tribal cultural resource (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., AB 52 as applicable) and Specific Plan Project Requirements 10.3.2-3 through 10.3.2-5 (refer to Section 4.4 Cultural Resources) to protect TCRs.[112]

There are no known TCRs on-site. As discussed in Section 4.4 Cultural Resources, an Archaeological Sensitivity Assessment was prepared for the project, and a Condition of Approval would be implemented to ensure construction crews receive cultural resources training. Further, consistent with the FEIR, the proposed project would comply with Specific Plan Requirements 10.2.3-4 and 10.2.3-5 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

[112] Ibid., page 327-328.

with existing regulations and Specific Plan policies to protect TCRs.[113]

As discussed in Section 4.4 Cultural Resources and under checklist question a) above, there are no known TCRs on-site and the project would implement a Condition of Approval to ensure construction crews receive cultural resources training, and would comply with Specific Plan Requirements 10.2.3-4 and 10.2.3-5 in the 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.

[113] Ibid.

4.17 Utilities and Service Systems

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 an existing 12-inch water main, an eight-inch recycled water main, two sanitary sewer manholes, and two 10-inch sewer mains in Moffett Park Drive that serve the site.

4.17.2 Impact Discussion

	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?
Would the project:					
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
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

	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?
Would the project:					
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 the improvement projects 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 decrease impervious 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.[114]

As described in more detail in Section 2.0 Project , the proposed project includes lateral connections to existing water and sewer mains in Moffett Park Drive. The project would also connect to two existing sanitary sewer manholes in Moffett Park Drive. The proposed development is 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. As discussed in Section 4.9 Hydrology and Water Quality, the project would

[114] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 343-350.

decrease impervious surfaces on-site, which would result in a decrease in runoff compared to existing conditions. The project also voluntarily proposes to be 100 percent electric and would not use natural gas. 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.[115] 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.

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 outdoor uses. 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.[116]

[115] Ibid., page 351.
[116] Ibid., page 352.

Given the WPCP's treatment capacity of 19.5 mgd, current flows to the WPCP (12.9 mgd ADWF)[117], and the project's estimated sewage generation (0.02 mgd ADWF)[118], 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.[119]

The proposed project is consistent with the development assumptions and analysis in the FEIR. Specialty 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.[120]

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.

[117] Ibid.
[118] Illingworth & Rodkin, Inc. *333-385 Moffett Park Drive Construction Emissions and Health Risk Assessment.* August 23, 2024.
[119] City of Sunnyvale. *Moffett Park Specific Plan Integrated Final EIR*. SCH# 2021080338. July 2023. Page 352.
[120] 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:

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Section 6.0 Lead Agency and Consultants

6.1 Lead Agency

City of Sunnyvale
Community Development Department
- Trudi Ryan, Director
- Shaunn Mendrin, Planning Officer
- Julia Klein, Principal Planner
- Margaret Netto, Senior Planner

6.2 Consultants

David J. Powers & Associates, Inc.
Environmental Consultants
- Kristy Weis, Principal Project Manager
- Maria Kisyova, Project Manager
- Ryan Osako, Graphic Artist

Archaeological/Historical Consultants
Historical & Cultural Consultants
- Daniel Shoup, Principal Archaeologist
- Molly Fierer-Donaldson, Senior Archaeologist

HortScience | Bartlett Consulting
Arborist
- Brenda Wong, Consulting Arborist and Urban Forester

Illingworth & Rodkin, Inc.
Air Quality & Acoustics Consultants
- James Reyff, Principal
- Casey Divine, Consultant
- Jordyn Bauer, Consultant
- Zachary Palm, Consultant

Rockridge Geotechnical
Geotechnical Consultants
- Craig S. Shields, Principal Engineer

Roux Associates, Inc.
Environmental Engineering Consultants
- Angela Liang Cutting, Principal Engineer
- Shivani Ananth, Staff Engineer

W-Trans
Transportation & Engineering Consultants
- Mark Spencer, Senior Principal
- Brian Canepa, Principal

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
Bay	San Francisco Bay
Bay Area	San Francisco Bay Area
BERD	Built Environmental Resources Directory
bgs	below the ground surface
BMP	best management practices
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
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
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