RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SUNNYVALE CERTIFYING THE ENVIRONMENTAL IMPACT REPORT, MAKING FINDINGS REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING THE MITIGATION AND MONITORING REPORTING PROGRAM, STATING OVERRIDING CONSIDERATIONS IN THE APPROVAL OF THE AMENDED MOFFETT PARK SPECIFIC PLAN, ADOPTING THE WATER SUPPLY ASSESSMENT, AMENDING THE GENERAL PLAN, ADOPTING AN AMENDED SPECIFIC PLAN FOR THE MOFFETT PARK AREA, AND UPDATING THE GREEN BUILDING TABLE

WHEREAS, Moffett Park is approximately 1,270 acres in the northernmost part of Sunnyvale, generally bound by Moffett Federal Airfield to the west, State Highway 237 to the south, and Caribbean Drive to the north, as depicted in "Exhibit A", attached hereto and incorporated by reference; and

WHEREAS, Moffett Park has been a center of technology and innovation since the first development of the Moffett Industrial Park in the 1960s; and

WHEREAS, the Moffett Park Specific Plan (MPSP) was adopted on April 27, 2004, and subsequently amended in 2006, 2009, 2011, and 2013, for the purpose of maximizing Moffett Park's development potential for corporate headquarters, office, and research/development facilities of high technology companies; and

WHEREAS, on February 6, 2018 (RTC No. 18-0100), the City Council initiated a study of possible amendments to the MPSP and directed staff to conduct community outreach to explore changing the office/industrial development capacity, allowing housing, and increasing opportunities for retail in the MPSP area; and

WHEREAS, on April 9, 2019 (RTC No. 19-037), the City Council approved a project work plan and Guiding Principles for the MPSP update; and

WHEREAS, on May 25, 2021 (RTC No. 21-0546), the City Council voted to select a land use option for further study and environmental review, to include an additional 10 million square feet of office, R&D, and industrial development over existing and approved, plus up to 20,000 housing units (the Project); and

WHEREAS, the adoption of the amended MPSP also requires text amendments to the Land Use and Transportation Plan, as further outlined in "Exhibit B" attached hereto and incorporated by reference;

WHEREAS, on March 24, 2009, the City Council adopted Resolution No. 368-09, the Green Building Tables, which were revised in 2011, 2012, 2014, and most recently 2019 (Resolution No. 938-19); and

WHEREAS, the adoption of the amended MPSP requires an update to the Green Building Tables, as further outlined in "Exhibit C" attached hereto and incorporated by reference; and

WHEREAS, the California Environmental Quality Act (Public Resources Code Sections 21000 *et seq*., ("CEQA") and the Guidelines for Implementation of the California Environmental Quality Act (14 California Code of Regulations, Sections 15000 *et seq*.) (the "CEQA Guidelines") requires local agencies to consider environmental consequences of projects for which they have discretionary authority; and

WHEREAS, a programmatic Draft Environmental Impact Report ("DEIR") and Final Environmental Impact Report ("FEIR", collectively, the "EIR") have been prepared for and by the City of Sunnyvale for the Project pursuant to CEQA and the CEQA Guidelines; and

WHEREAS, the EIR addresses the environmental impacts of the Project, which is further described in Sections 2 of Exhibit D; and

WHEREAS, in conformance with CEQA, the City has issued notices, held public hearings, and taken other actions as described in Section 1.2 of Exhibit D attached hereto; and

WHEREAS, the EIR is incorporated by this reference in this Resolution, and consists of those documents referenced in Section 1.1 of Exhibit D attached hereto; and

WHEREAS, Section 10910 of the Water Code and Section 15155 of the CEQA Guidelines require that a Water Supply Assessment (WSA) be prepared and approved for development projects of a certain size, which includes the MPSP; and

WHEREAS, in April 2023, a Water Supply Assessment was prepared in connection with the proposed update to MPSP which includes an assessment of the available water supply for the City and multiple development projects and growth areas within the City including the MPSP; and

WHEREAS, by motions adopted on June 12, 2023, the Sunnyvale Planning Commission recommended that the City Council certify the EIR, adopt the MPSP, and make related amendments to the City's Zoning Code and General Plan; and

WHEREAS, a public hearing was held by the City Council on July 11, 2023, regarding the Project and the EIR, following notice duly and regularly given as required by law, and all interested persons expressing a desire to comment thereon or object thereto were heard, and the EIR was considered; and

WHEREAS, by this Resolution, the City Council, as the lead agency under CEQA for preparing the EIR and the entity responsible for approving the Project, desires to comply with the requirements of CEQA and the CEQA Guidelines for consideration, certification, and use of the EIR in connection with the approval of the Project.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Sunnyvale as follows:

1. EIR CERTIFICATION. The City Council hereby finds and certifies that the EIR has been completed in compliance with CEQA and the CEQA Guidelines; that the EIR adequately addresses the environmental issues of the Project; that the EIR was presented to the City Council; that the City Council has reviewed and considered the information contained in the EIR prior to approving the Project; and that the EIR reflects the independent judgment and analysis of the City Council.

2. MITIGATION MONITORING AND OVERRIDING CONSIDERATIONS. The City Council hereby identifies the significant effects, adopts the mitigation measures, makes the findings, and adopts a statement of overriding considerations set forth in detail in the attached Exhibit D and the Mitigation Monitoring and Reporting Plan set forth to be implemented for each mitigation measure set forth in detail in the attached Exhibit D, which exhibits are incorporated in this Resolution by this reference. The statements, findings and determinations set forth in Exhibit D attached hereto are based on the above certified EIR and other information available to the City Council, and are made in compliance with Sections 15091, 15092, 15093, and 15096 of the CEQA Guidelines and Sections 21081 and 21081.6 of CEQA.

3. WATER SUPPLY ASSESSMENT. The City Council hereby finds that projected water supplies are sufficient to satisfy the demands of the Project in addition to existing and future uses. The City Council hereby approves the Water Supply Assessment (WSA) in compliance with Section 10910 of the Water Code and Section 15155 of the CEQA Guidelines, and adopts the WSA as a technical addendum to the Environmental Impact Report.

4. GENERAL PLAN AMENDMENTS. Based on the foregoing findings, the City Council finds and determines that the General Plan Amendment constitutes a suitable and logical change in the plan for physical development of the City of Sunnyvale, and it is in the public interest to approve the General Plan Amendments shown and described in detail in the attached Exhibit B, to be effective on September 22, 2023.

5. ADOPTION OF THE AMENDED MOFFETT PARK SPECIFIC PLAN. Based on the foregoing findings, the City Council finds and determines that adoption of the Amended Moffett Park Specific Plan (MPSP) constitutes a suitable and logical change in the plan for the physical development of the City of Sunnyvale, and it is in the public interest to approve the MPSP. The City Council finds that the MPSP is consistent with the City's General Plan, and supports the City's long-term goals for the area. Based upon the MPSP's consistency with the General Plan, and subject to

the implementation of the Mitigation Monitoring and Reporting Program as a condition of approval, the City Council approves and adopts the MPSP including the modifications recommended by staff shown in the Appendix to the MPSP, to be effective on September 22, 2023. Copies of the MPSP are on file in the office of the City Clerk.

6. ADOPTION OF THE AMENDED GREEN BUILDING TABLE. Based on the foregoing findings, the City Council adopts the Green Building Tables (as revised) attached hereto as Exhibit C, to be effective on September 22, 2023.

Adopted by the City Council at a regular meeting held on _____, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:
RECUSAL:

ATTEST: APPROVED:

_____ _____
City Clerk Mayor
(SEAL)

APPROVED AS TO FORM:

_____
City Attorney

FIGURE 1 Moffett Park Specific Plan Area

City of Sunnyvale (2020); County of Santa Clara (2021); ESRI (2020); California Department of Fish and Wildlife (2021)

- Specific Plan Boundary
- City of Sunnyvale Limit
- VTA Light Rail
- Freeway
- Water/Channel

EXHIBIT B

Sunnyvale General Plan
Land Use and Transportation Element Text Changes

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Horizon 2035

The overall focus of the General Plan is to guide the City's physical development and transportation investments in the Sunnyvale planning area (Sunnyvale). The Land Use and Transportation chapter establishes the fundamental framework of how streets and buildings in Sunnyvale will be laid out and how various land uses, developments, and transportation facilities will function together. The Land Use and Transportation Chapter and accompanying policies have been developed to help guide decision making regarding land use and transportation for an approximate 20-year horizon—a time frame that is referred to as Horizon 2035. The framework for this chapter is based on a concept of a Complete Community—an attractive, green, sustainable place that is accessible for all residents.

California Government Code Section 65302 specifically calls for elements of general plans to be combined when major issues cross topics. The Horizon 2035 resulted in policies including fiscally, economically, and environmentally sustainable land use and transportation policies necessary to support goals established in each of the other General Plan chapters.

The Land Use and Transportation Chapter incorporates and integrates policy direction and land use patterns from other City of Sunnyvale planning documents, including:

- Arques Campus Specific Plan
- Downtown Specific Plan
- East Sunnyvale and other Industrial to Residential (ITR) sites
- Lakeside Specific Plan
- Lawrence Station Area Specific Plan
- Moffett Park Specific Plan
- Peery Park Specific Plan
- El Camino Real Specific Plan

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The Character of Change

Over the next 20 years, the city can be expected to change as a result of a number of forces such as population growth, changing demographics, the need for newer buildings and homes, and an ever-changing economy. Other forces such as climate change and citizen demand for a sustainable community will also influence change. Physical changes are guided by new development that almost exclusively occurs through private forces based on market demand. The policies and actions provided in this chapter address areas of Sunnyvale that would be best suited to accommodate transformational change that support the city's evolution into a Complete Community.

Figure 3-1 indicates where change would be encouraged to occur and to what degree it can be expected. The map indicates areas that are meant to be preserved, the new Village Centers, and

industrial areas that are meant to improve and evolve over time but that are not planned for a major character shift. Some of the change portrayed on the map represents areas where a plan has been adopted and transformation is already occurring. For example, the updated El Camino Real Specific Plan, Downtown Specific Plan, and Lawrence Station Area Plan have been adopted recently, along with a new Specific Plan for the Peery Park area. See the individual Specific/Area Plan documents for more detailed information and allowable land uses and design concepts permitted in these areas. Zoning regulations and development standards have been adopted to support these changes.

New areas where noticeable change may occur under new Land Use and Transportation goals and policies include designated parcels on El Camino Real, within the newly identified Village Centers, the Lawrence Station area, the Moffett Park Specific Plan and the Peery Park industrial/office area. Change in these areas would be in addition to what has been planned to date and would only occur over the 20-year term of Horizon 2035, based on market demand for new development.

Future change areas were selected based on the following general criteria:

- Mixed-use development transforming older shopping centers and office areas into new Village Centers to provide close-in services and residential diversity in existing residential areas (to be managed through the preparation of precise plans or site-specific plans).
- Residential, mixed-use and activity centers in the Moffett Park Specific Plan area in order to provide retail, services and residential uses near employment centers and transit.
- Additional mixed-use development located on designated parcels within the El Camino Real Specific Plan.
- Increased industrial and office intensity in the Peery Park business area to be managed by a specific plan.
- Development of a transit village near the Caltrain Lawrence Station with increased housing and business intensity and supporting services in accordance with a station area plan.
- Pockets of more intensive industrial and office development on corridors such as Mathilda Avenue in anticipation of future improved north/south transit, and along Tasman Avenue near the Reamwood light rail station in The Woods business area.

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[Replace table in its entirety]
Figure 3-2: Comparison 2014 to Horizon 2035 + Approved General Plan Amendments (up to July 2023)

	2014 Existing Conditions	Horizon 2035 Buildout + Approved General Plan Amendments (up to July 2023)*
Population	147,055	223,000
Housing Units	57,000	99,374
Industrial/Office/Commercial (million s.f.)	47.3	55.3
Jobs	82,000	149,677
Jobs-to-Housing Units Ratio	1.44	1.51

*Buildout for Moffett Park Specific Plan is 2040.

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GOAL LT-1 COORDINATED REGIONAL AND LOCAL PLANNING PROTECT THE QUALITY OF LIFE, THE NATURAL ENVIRONMENT, AND PROPERTY INVESTMENT, PRESERVE HOME RULE, SECURE FAIR SHARE OF FUNDING, AND PROVIDE LEADERSHIP IN THE REGION.

A fundamental concept to planning for the future of Sunnyvale is that it is not isolated, but rather a part of an integrated region. It is part of the County of Santa Clara as well as the nine-county San Francisco Bay Area, which shares many resources, including natural resources, an air basin, and regional facilities such as major roadways. Development around the area is also affected by regional organizations such as the Association of Bay Area Governments (ABAG), the Metropolitan Transportation Commission (MTC), and the Bay Area Air Quality Management District (BAAQMD).

Although Sunnyvale can plan ahead to address many issues within its boundaries such as how the community will look and where uses will be located, larger issues such as regional transportation, demand for adequate housing, preservation of the bay, air quality, and climate change need to be addressed in a regional context. In the case of traffic, impacts to the transportation system occur regardless of local growth; regional growth accounts for most traffic increases citywide. Sunnyvale's own land use plans only marginally contribute to traffic within the community. Maintaining a regional perspective and participating in and leading regional land use and transportation planning efforts will help Sunnyvale protect the quality of life enjoyed by its residents. Regional participation will also help Sunnyvale achieve its goals for the future and protect the city and the region for future generations.

Prompted by passage of SB 375, Plan Bay Area is the Bay Area's Sustainable Communities Strategy. It is an integrated long-range transportation, land use, and housing plan that supports a growing economy, provides more housing and transportation choices, and reduces transportation-related pollution in the Bay Area. Sunnyvale is committed to implementation of Plan Bay Area. A critical component of Plan Bay Area is the Priority Development Area (PDA) Plan Program, which links regional transit planning to local land use planning to promote sustainable growth. Cities and counties can identify PDAs where they will focus growth in relation to existing or future transit stations. PDAs are eligible for grant funding from ABAG and other agencies. The City of Sunnyvale has identified several PDAs, including the Downtown Specific Plan area, the Lawrence Station area, the Sunnyvale El Camino Real ~~corridor~~Specific Plan area, the Moffett Park Specific Plan area, the East Sunnyvale Industrial to Residential area, and Tasman Crossing.

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Goal LT-1.2a Promote transit-oriented and mixed-use development near transit centers such as Moffett Park Specific Plan, Lawrence Station, Downtown, and El Camino Real and in neighborhood villages.

Goal LT-1.2c Allow increased mixed-use activity centers, residential, office, and commercial~~, and industrial~~ densities along the light rail line in accordance with the Moffett Park Specific Plan.

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Moffett Park Specific Plan

After adopting the previous LUTE (1997), the City realized that there was significant development pressure to be capitalized upon in the city's northern business park—Moffett Park. The City had received a number of requests to develop corporate campuses that exceeded the older, one-story tilt-up-style development standards adopted for that area. In response, in 2004 the City adopted the Moffett Park Specific Plan, which included development standards that made way for a more modern and intensive business park that met the needs of new businesses. Identifying and responding to the special needs of the Moffett Park area has allowed the community to remain competitive in attracting new businesses by having opportunities in place for new office development.

The 2004 amendments to the Moffett Park Specific Plan were successful in creating a modern business park resulting in new employment centers and businesses in the area. In 2018, the City began a new initiative to move the Moffett Park Specific Plan Area vision from a "Class A" business park to an "ecological innovation district." The land use changes related to the new ecological innovation district vision include additional open space, retail uses and very-high density residential development. The City Council adopted the amended plan in 2023.

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Very High Density Residential (36–45 du/ac*)

This designation provides for densities consistent with large-scale apartments or condominiums intended for the Downtown, Moffett Park Specific Plan, Transit Mixed-Use, or on designated parcels within the El Camino Real Specific Plan areas. Very high-density areas are primarily located within specific plan areas.

Land Use Category	Very High Density Residential
Description	Allows large-scale apartments or condominiums in Downtown, Moffett Park Specific Plan Area or within Transit Mixed-Use or the El Camino Real Specific Plan areas.
Density/Intensity	36-45 du/ac*
Typical Zoning Districts	Specific Plan or Area Plan

*Or as defined in the applicable Specific Plan or Area Plan

Mixed-Use Designations

Mixed-use designations promote the integration of residential and commercial/office uses together on the same site. These compact developments facilitate walkability, reduce vehicle trips, and create centers of activity in different neighborhoods.

The City is anticipating a transformation of selected sites to mixed use by 2035, as shown in Figure 3-11. These areas are located near public transit and major thoroughfares. They have been further divided into three categories of mixed-use areas to determine the residential density, type of commercial, and scale of the areas:

- Moffett Park Specific Plan
- Transit Mixed-Use
- El Camino Real Specific Plan (formerly Corridor Mixed-Use)

- Village Mixed-Use

Transit Mixed-Use This category will allow for a wide variety of uses and densities located in close proximity to rail stops or other major forms of mass transit when specific densities and intensities for residential, commercial and office uses are determined by a specific plan or area plan. High-intensity commercial and office uses should be expected. Buildings may be up to eight stories. In the Downtown area, regional commercial is allowed. Densities and intensities in each Transit Mixed-Use area will be implemented with a specific plan or area plan and a toolkit of development standards and design guidelines.

Land Use Category	Transit Mixed-Use
Description	Will allow a mix of residential uses at various densities, high intensity commercial uses, regional commercial uses, and office uses located near rail stops or other mass transit when defined in a Specific Plan or Area Plan.
Density/Intensity	Specific densities and intensities determined by Specific Plan or Area Plan
Typical Zoning Districts	Downtown Specific Plan Blocks 1-23, Lawrence Station Area Plan, Lawrence Station Mixed Use Development, Moffett Park Specific Plan Activity Centers

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Industrial

This designation provides for research and development, manufacturing, office, and heavy industrial uses and is found in the north half of the planning area (Evelyn Avenue and north). Retail uses that serve the industrial area or the entire community (e.g., restaurants, warehouse shopping, home improvement) may be considered appropriate. Places of assembly and other uses with sensitive receptors and uses that may restrict the industrial purpose of the area are limited or prohibited in these areas. Industrial areas generally allow 35% FAR with particular areas designated for more intensive development.

Certain existing industrial areas have been planned to transition to residential uses. Those Industrial-to-Residential (ITR) areas now have a General Plan designation of Medium Density Residential or High Density Residential.

The City also maintains a limited pool of available square footage that may be applied to projects/sites in industrial areas that request higher floor area ratios and provide desired community benefits, including participation in the Green Building Program.

Land Use Category	Industrial
Description	Provides for research and development, manufacturing, office, and heavy industrial uses in the northwestern~~ern~~ portion of the city. Retail

	uses may also be appropriate. Sensitive receptors are limited or prohibited.
Density/Intensity	FAR = 35% with specialized areas of the City designated for more intensive development (see Specialized Areas Map). Greater intensity can be considered by incorporation of sustainable features or by Use Permit.
Typical Zoning Districts	(M-S) Industrial Service (M-3) General Industrial (MP-E1, E2, E3) Moffet Park Employment (MP-O1, O2) Moffett Park Office ~~(M-S) Industrial Service (35% FAR)~~ ~~(M-3) General Industrial (35% FAR) (~~ ~~MP-TOD) Moffett Park Transit-Oriented Development (MP-I)~~ ~~Moffett Park General Industrial~~ ~~(MP-C) Moffett Park Commercial~~

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Mixed-Use Area Plans

Lakeside Specific Plan

This specific plan allows up to 47 dwelling units per acre of residential use and 263 hotel rooms near Lawrence Expressway and US Highway 101. Lakeside is designated Village Mixed-Use; however, it is a unique type of village due to the inclusion of a hotel as the primary commercial use and the limited amount of retail space.

Tasman Crossing

This area is located near Tasman Drive and Fair Oaks Avenue. The plan allows a broad range of densities (14–45 dwelling units per acre) with up to 140,000 square feet of neighborhood-serving commercial. High-density residential is encouraged in the area due to its proximity to light rail; however, densities consistent with the Medium Density Residential designation are also compatible. Part of this area is designated Village Mixed Use.

Downtown Specific Plan

This plan promotes a traditional, full-service, and mixed-use downtown in proximity to major regional transit (Caltrain and bus service). The plan's focus is to provide regional shopping and a mixed-use environment with appropriately located high-density residential in certain locations while preserving the historic elements of Sunnyvale's Downtown. This area is designated Transit Mixed-Use.

Lawrence Station Area Plan

This plan addresses a 231-acre area, or approximately a one-half-mile radius, surrounding the Lawrence Caltrain Station. The plan promotes greater use of this existing transit asset and guides the development of a diverse neighborhood of employment, residential, retail, other support services, and open space.

The densities allowed in the plan area will result in high- and very high-density residential units, higher-intensity office/research and development uses, retail space, and industrial uses.

Moffett Park Specific Plan Area

The plan promotes greater use of this existing transit asset and guides the development of a diverse neighborhood of employment, residential, retail, other support services, and open space. The densities allowed in the plan area will result in very high-density residential units, higher-intensity office/research and development uses, retail space, and industrial uses.

Future Mixed-Use Area Plans

The City will consider Village Center area plans at neighborhood crossroads designated Village Mixed-Use on the General Plan Land Use Map.

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Industrial Area Plans

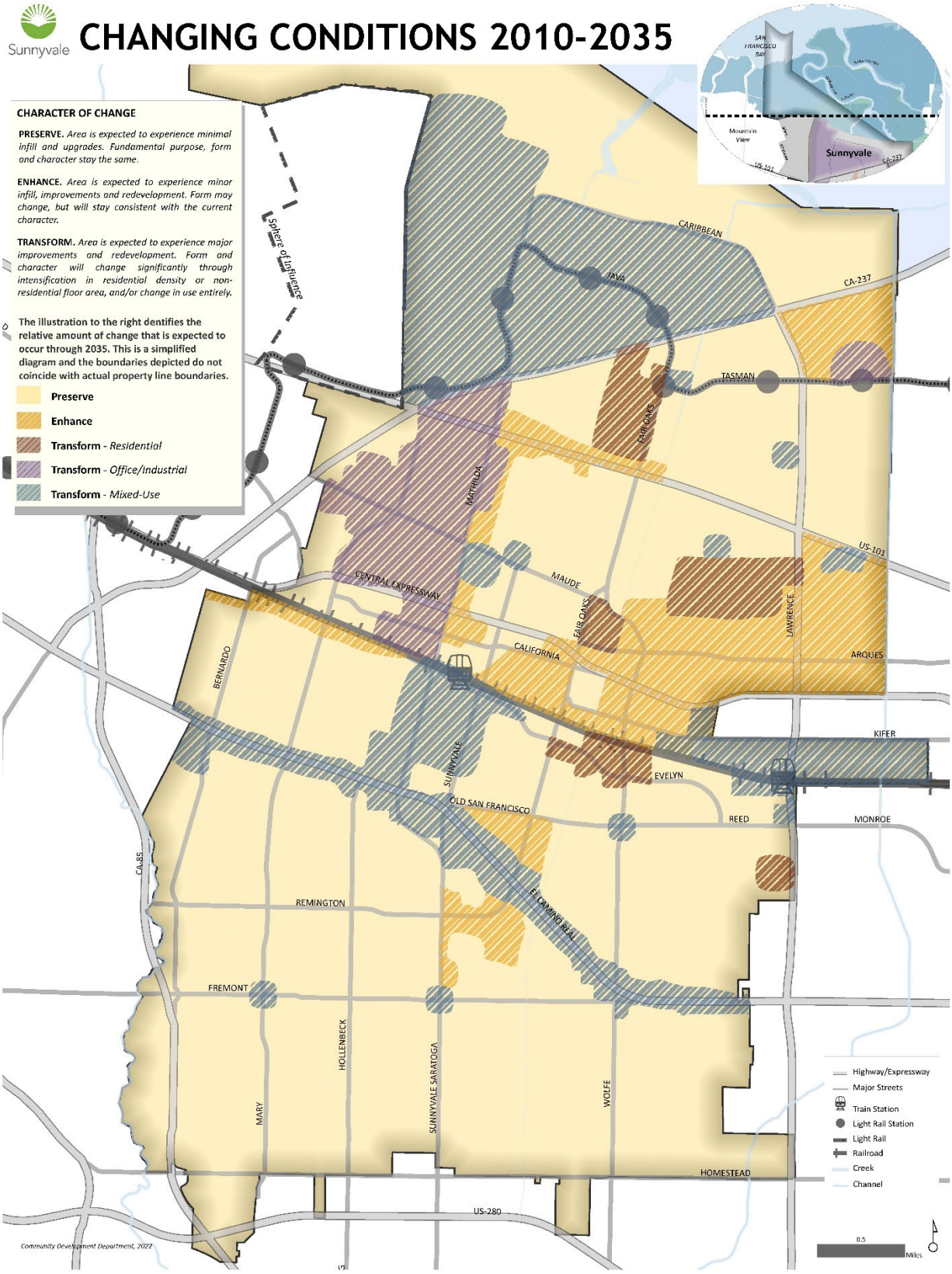
Arques Campus Specific Plan

This specific plan was adopted in 1999 to allow an integrated campus for corporate headquarters with up to 72% FAR and significant site and architectural improvements.

~~Moffett Park Specific Plan~~

~~This specific plan was adopted in 2004 to maximize the development potential for corporate headquarters, offices, and research and development facilities. The plan encourages higher-intensity office uses (up to 70% FAR) along the Tasman light rail line and medium-density floor area ratios (up to 50% FAR) in outlying areas. The allowable FAR depends on the level of green building standards that are met. The specific plan also has provisions for supportive commercial services. A development reserve was established to calculate supply and allocation of additional square footage and higher floor area ratios to projects. Three zoning districts implement the Moffett Park Specific Plan: MP-TOD (Moffett Park Transit-Oriented Development), MP-I (Moffett Park General Industrial), and MP-C (Moffett Park Commercial). FAR limits may be exceeded through participation in the Green Building Program.~~

Page 3-7, Figure 3-1



Updated July 2023

GREEN BUILDING PROGRAM

These requirements apply to projects with a planning application that is "deemed complete" on or after July 1, 2019 (September 22, 2023, for Moffett Park). For projects that do not require a planning application, these requirements apply to building permits submitted on or after July 1, 2019 (September 22, 2023, for Moffett Park).

On May 7, 2019, the City Council revised the green building standards for new construction, additions, and remodels of buildings. The standards were updated on July 11, 2023, to reflect the Moffett Park Specific Plan update. ~~The new requirements are effective for projects with a Planning Application that is 'deemed complete' on or after **July 1, 2019**. For projects that do not require a Planning Application, these requirements apply to building permits submitted on or after **July 1, 2019**.~~

GREEN BUILDING PROGRAM

Following are the steps for complying with the green building program:

- Identify minimum standards: Minimum standards are based on the type of project and scope of work. Refer to the tables on the reverse side of this brochure to determine green building requirements, level of achievement, and verification necessary for various types of projects.
- Submit Building Permit Plans: Building permit plans shall include the applicable green building checklist on a plan sheet. All required/selected points/credits shall be incorporated in the plans.
- Verification of Green Building Measures: The type of verification is described in the tables on the reverse side of this brochure.

  Green Point Rater/LEED AP verification requires the project LEED AP to provide a letter that confirms the project is designed to achieve the minimum points required. A similar letter, based on the actual construction, is required before occupancy/final inspection.

  USGBC Certification verification requires the project's LEED AP to provide a letter prior to permit issuance that confirms the project is designed to achieve the minimum points required and that the project has been registered with the USGBC. A similar letter, based on the actual construction, is required before occupancy/final inspection and shall also confirm if and when project will be submitted to the USGBC.

INCENTIVES

Incentives are offered for projects that exceed the minimum green building standards and are offered to encourage project applicants and developers to provide additional green building features.

Projects that add floor area to an existing site, qualify for the incentive if all buildings at the existing site meet the incentive level through an applicable LEED program (i.e. new construction, core and shell, commercial interiors, existing buildings). The LEED standard for the existing building(s) shall be met prior to occupancy of the new building(s).

MIXED-USE PROJECTS

Build It Green *(BIG) is a non-profit organization whose mission is to promote healthy, energy- and resource-efficient building practices in California. www.builditgreen.org*

The ***U.S. Green Building Council*** *(USGBC), through the LEED program, encourages adoption of sustainable green building and development practices through the creation and implementation of universally understood and accepted tools and performance criteria. www.usgbc.org*

CALGreen *was adopted by the State of California and is the nation's first mandatory green building code which sets the minimum sustainability standards for new residential and non-residential construction.*

Mixed use projects are required to meet the appropriate BIG standard for the residential portion and LEED for the non-residential portion. Alternatively, LEED may be applied to the entire project.

RESIDENTIAL PROJECTS

Type of Project	Minimum Standard	Voluntary Incentives
One Single-Family or Duplex Dwelling		
New Construction	CALGreen Mandatory Measures and GreenPoint Rated Checklist with 90 points minimum and verification by a GreenPoint Rater. *Applicants are **highly encouraged** to include any combination of the following items:* • *All-electric appliances[3] for the entire home (e.g. no gas line connection); or* • *Installation of a "cool roof" or "green roof"; or* • *Install EV chargers[2]; or* • *Greywater, recycled water, and/or rainwater catchment system(s)*	Projects may choose to increase lot coverage by 5% or qualify for staff level design review with a FAR up to 50% or 4,000 sq. ft. (whichever is less) if the project achieves: • 120 points, with Build It Green Certification; **or** • All-electric appliances[3] for the entire home (e.g. no gas line connection).
Addition (including all ADUs)	CALGreen Mandatory Measures as applicable to the scope of work. Reviewed by City staff	
Remodels and Alterations	CALGreen Mandatory Measures as applicable to the scope of work. Reviewed by City staff	--
Multi-Family Residential Development		
New Construction	CALGreen Mandatory Measures and GreenPoint Rated Checklist with 90 points minimum with Build It Green Certification. *Applicants are **highly encouraged** to include any combination of the following items:* • *All-electric appliances[3] in every unit (e.g. no gas line connection for the project); or* • *Installation of a "cool roof" or "green roof"; or* • *Install EV chargers[2]; or* • *Greywater, recycled water, and/or rainwater catchment system(s)*	**Citywide (Excluding Moffett Park)** Projects may choose to increase building height by 5', lot coverage by 5%, or receive a 5% density bonus[1] if the project achieves: 1. 120 points with Build It Green Certification, and 2. All-electric appliances[3] in every unit (e.g. no gas line connection for the project); and 3. Provides/installs one or more of the following items: a. A "cool roof" or "green roof"; or b. Electric Vehicle Chargers[2]; or c. Greywater, recycled water, and/or rainwater catchment system(s).

Additions, Remodels and Alterations	CALGreen Mandatory Measures as applicable to the scope of work. Reviewed by City staff	--

1. Projects that take advantage of the 5% green building density bonus are subject to Sunnyvale's affordable housing requirements for all units provided.
2. Installation of Level 2 electric vehicle chargers are required at a rate of 12.5% of the required parking spaces for the development, with a minimum of one charger required.
3. All-electric appliances include heat pump water heater, heat pump space heaters, induction cooktops, electric clothes dryers, among others.

NON-RESIDENTIAL PROJECTS

Type of Project	Minimum Standard	Voluntary Incentives
New Construction and Initial Tenant Improvements[1]		
≤ 5,000 sq. ft.	CALGreen Mandatory Measures. Reviewed by City staff	--
> 5,000 sq. ft. – 30,000 sq. ft.	CALGreen Mandatory Measures and LEED Gold Level with verification by a LEED AP	**Citywide (Excluding Moffett Park)** Projects can increase FAR by 10% or height by 10' by achieving: • LEED Gold Level with USGBC Certification[2] that achieves at least 75 total points with Design Phase Credits reviewed and approved by USGBC; ***and*** • All-electric[3] (e.g. no gas line connection). ~~• **Moffett Park**~~ ~~Projects can increase FAR by 15% (MP-I) or 20% (MP-TOD) by achieving:~~ ~~LEED Gold Level with USGBC Certification[2] that achieves at least 75 total points with Design Phase Credits reviewed and approved by USGBC; *and*~~ ~~All-electric[3] (e.g. no gas line connection).~~ ~~In addition, projects in Moffett Park can increase FAR by another 10%[4] by achieving:~~ ~~One of the following certifications:~~ ~~LEED Platinum with USGBC certification[2] with Design Phase Credits reviewed and approved by USGBC; or~~ ~~Zero Energy[5] on the project site, certified by International Living Future Institute (ILFI); *and*~~ ~~All-electric[3] (e.g. no gas line connection), *and*~~ • ~~Demonstration of additional features that provide Community Benefit.~~
> 30,000 sq. ft.	CALGreen Mandatory Measures and LEED Gold Level with USGBC Certification, including Design Phase Credits reviewed and approved by USGBC[2]	
Major Alterations (structural, mechanical, plumbing, and electrical alterations)[6]		
All Major Alterations	CALGreen Mandatory Measures and LEED Silver with verification by a LEED AP[7].	--

1. Projects in the Peery Park Specific Plan (PPSP) area are not eligible to receive incentives through the City's Green Building Program because they are eligible to achieve additional FAR for Green Building through the PPSP Community Benefits Program.
2. Although certification may occur after a project is finaled, the project's LEED AP must provide staff with a letter certifying that the building/project has been built to the plan and should be eligible to be certified at the approved LEED level prior to final sign-off of building permit(s).
3. All-electric appliances include heat pump water and space heaters, induction cooktops, electric clothes dryers, among others.
~~4. A Major Moffett Park Special Development Permit (reviewed and approved by City Council) is required for projects requesting the additional 10% FAR.~~
~~5.~~4. Although certification may occur after a project is finaled, the project's mechanical engineer must provide authorization that the design of the project meets all intent to achieve certification for Zero Energy prior to final sign-off of building permit(s).
~~6.~~5. See the Definition Section (last page) to identify which projects would be considered as Major Alterations.
~~7.~~6. Alternate means or methods that meet the intent of the Sunnyvale Green Building Program may be considered at the discretion of the Chief Building Official.

PUBLIC FACILTY[1]

Type of Project	Minimum Standard	Voluntary Incentives
New Construction[2]		
≤ 5,000 sq. ft.	CALGreen Mandatory Measures as applicable to the scope of work. Reviewed by City staff.	--
> 5,000 sq. ft.	CALGreen Mandatory Measures and LEED Gold Level with verification by a LEED AP	--
Major Alterations		
All Major Alterations	CALGreen Mandatory Measures and LEED Silver with verification by a LEED AP	--

1. The City Council may provide direction on any public facility as to the desired green building standards to meet.
2. Provide electric car chargers at a minimum of 3% of the parking spaces.

DEFINITIONS

Cool Roof means a roofing product that has been designed to reflect more sunlight and absorb less heat than a standard roof to help reduce electricity used for air conditioning by lowering roof temperatures.

Design Phase Credits means credits a project can obtain during the Design Application Phase of the LEED application process. The Design Phase Credits are reviewed and approved by USGBC. No actual credits will be awarded as part of this process, but USGBC confirms that the project design is anticipated to be awarded for the design credits at the end of the LEED certification process.

Green Roof means a roof of a building that is partially or completely covered with vegetation and a growing medium, planted over a waterproofing membrane. Green roofs are also commonly known as "living roofs," and includes both roof gardens, rooftop gardens, and landscaped roof.

International Living Future Institute (ILFI) refers to a nonprofit organization that has developed a sustainable building certificate program that promotes the most advanced measurement of sustainability in the built environment, including zero energy and zero carbon buildings. ILFI's certificate program includes different types of certifications: Living Building Certification, Petal Certification, Zero Energy Certification, Zero Carbon Certification. It has been certifying buildings since 2006.

Major Alteration means non-residential alterations where interior finishes are removed and significant upgrades to structural and mechanical, electrical and/or plumbing systems are proposed where areas of such construction are ten thousand gross square feet or more in existing commercial, office and industrial buildings (SMC 19.12.140).

Zero Energy Building means an energy-efficient building where 100% of the building energy needs on a net annual basis supplied by onsite renewable energy, usually without any onsite combustion, demonstrating zero energy performance.

Zero Energy Certification means a performance-based certification program administered and certified by ILFI. This certification requires 100% of the building energy offsets with the onsite renewable energy. The program requires 100% onsite energy generation and no combustion allowed on site, but some exceptions may be given for special circumstances for off-site renewable energy, onsite combustion, and other circumstances, with additional documentations required by ILFI.

The standards were updated on July 11, 2023, to reflect the Moffett Park Specific Plan update. The new requirements are effective for projects with a Planning Application that is 'deemed complete' on or after **July 1, 2019** (**September 22, 2023 for Moffett Park).** For projects that do not require a Planning Application, these requirements apply to building permits submitted on or after **July 1, 2019** (**September 22, 2023 for Moffett Park**).

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The standards were updated on May 16, 2023 to reflect the Moffett Park Specific Plan update. The new requirements are effective for projects with a Planning Application that is 'deemed complete' on or after **July 1, 2019 (May 16, 2023 for Moffett Park)**. For projects that do not require a Planning Application, these requirements apply to building permits submitted on or after **July 1, 2019 (July 15, 2023 for Moffett Park)**.

EXHIBIT D

CEQA Findings of Fact and Statement of Overriding Considerations

Moffett Park Specific Plan (SCH# 2021080338)

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SECTION 1.0 INTRODUCTION

The purpose of these findings is to satisfy the requirements of Sections 15091, 15092, and 15093 of the California Environmental Quality Act (CEQA) Guidelines, associated with approval of the Moffett Park Specific Plan (Specific Plan) project.

The CEQA Statutes (California Public Resources Code [PRC] Sections 21000, et seq.) and Guidelines (California Code of Regulations Sections 15000, et seq.) state that if it has been determined that a project may or will have significant impacts on the environment, then an Environmental Impact Report (EIR) must be prepared. Prior to approval of the project, the EIR must be certified pursuant to CEQA Guidelines Section 15090. When an EIR has been certified that identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale, pursuant to CEQA Guidelines Section 15091(a), for each identified significant impact:

(1) Changes or alterations have been required in, or incorporated into, such project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.
(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.
(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

CEQA Guidelines Section 15092 states that after consideration of an EIR, and in conjunction with making the findings identified above, the lead agency may decide whether or how to approve or carry out the project. A project that would result in a significant environmental impact cannot be approved if feasible mitigation measures or feasible alternatives can avoid or substantially lessen the impact. In the event specific economic, social, or other conditions make infeasible such mitigation measure or project alternatives, individual projects may be approved in spite of one or more significant effects thereof. CEQA Guidelines Section 15093 requires the lead agency to document and substantiate any such determination in a “statement of overriding considerations” as a part of the record.

The requirements of CEQA Guidelines Sections 15091, 15092, and 15093 (as summarized above) are all addressed herein. This document summarizes the findings of fact for the project authorized by those provisions of CEQA and the CEQA Guidelines.

The record of proceedings and project overview are provided below.

1.1 RECORD OF PROCEEDINGS

In accordance with PRC Section 21167.6, subdivision (e), the record of proceedings for the City’s decision on the project includes the following documents, which are incorporated by reference and made part of the record supporting these findings:

- The Notice of Preparation (NOP) for the project and all other public notices issued in conjunction with the project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft EIR for the project and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR;
- The Final EIR for the project, including comments received on the Draft EIR, responses to those comments, and appendices;
- Documents cited or referenced in the Draft EIR and Final EIR;
- An Errata Memo for the Draft EIR and Final EIR was prepared on June 12, 2023;
- A Memo was prepared in response to late letters and comments on the Draft EIR on June 12, 2023;
- The Mitigation Monitoring and Reporting Program (MMRP) for the project;
- All findings and resolutions adopted by the City Council in connection with the project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared in compliance with the requirements of CEQA and with respect to the City Council's action on the project;
- All documents submitted by other public agencies or members of the public in connection with the project, up through the close of the final public hearing;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the project;
- Any documentary or other evidence submitted at such information sessions, public meetings, and public hearings;
- Any and all resolutions adopted by the City regarding the project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings and any documents incorporated by reference, in addition to those cited above;
- Any other written materials relevant to the City Council's compliance with CEQA or its decision on the merits of the project, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the project, or included in the City Council non-privileged retained files for the EIR or project;
- Any other materials required for the record of proceedings by PRC Section 21167.6(e); and The Notice of Determination

The documents constituting the record of proceedings are available for review by responsible agencies and interested members of the public during normal business hours at the City of Sunnyvale offices at 456 West Olive Avenue, Sunnyvale, CA 94086.

1.2 ENVIRONMENTAL REVIEW PROCESS

The City prepared a Notice of Preparation (NOP) for the Specific Plan in accordance with CEQA Guidelines Section 15082. The NOP was submitted to the California Governor's Office of Planning

and Research (OPR) State Clearinghouse and the Santa Clara County Clerk-Recorder's Office, as well as distributed to interested and affected local, state, and federal agencies, interested parties, and organizations, on August 18, 2021. The required 30-day public comment period for the NOP concluded on September 17, 2021. A public scoping meeting was held on August 26, 2021, to solicit public input on the scope and content of the EIR. The NOP and all public comments received on the NOP are included in Appendix A of the Draft EIR.

The Draft EIR includes an analysis of the project's effects on the following environmental resources:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Draft EIR for the project, dated December 19, 2022, was circulated to affected public agencies and interested parties for a 53-day review period from December 19, 2022, through February 10, 2023. Under CEQA, a 45-day review period is required. The public review period for the Draft EIR, therefore, included an additional eight days beyond what is required. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of Draft EIR was published on the City's website (https://www.sunnyvale.ca.gov/home/showpublisheddocument/4011);
- Notification of the availability of the Draft EIR was mailed to project-area residents and other members of the public who had indicated interest in the project;
- The Draft EIR was delivered to the State Clearinghouse on December 19, 2022, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 of the Final EIR for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (https://www.sunnyvale.ca.gov/business-and-development/planning-and-building/ceqa-environmental-notices) and Specific Plan website (https://www.moffettparksp.com/).

In addition, during the public review period for the Draft EIR, the City hosted the following meetings and hearing to provide an overview of the Draft EIR and solicit public comments:

- Specific Plan Open House on January 17, 2023
- Planning Commission Hearing on January 23, 2023
- City Council Meeting on January 31, 2023

During the public review period, the City received 17 written public comment letters and verbal comments at the above public meetings. The comments related to CEQA were addressed by the City in the Final EIR, published on April 13, 2023, and prepared in accordance with CEQA Guidelines Sections 15088 and 15132.

The Final EIR includes comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; the City's responses to those comments; and Draft EIR text revisions. As discussed in the Final EIR, none of the comments provided or text revisions to the Draft EIR constitute new significant information requiring the recirculation of the EIR pursuant to CEQA Guidelines Section 15088.5. The Draft EIR and Final EIR were made available for public review on the City's website: (https://www.sunnyvale.ca.gov/business-and-development/planning-and-building/ceqa-environmental-notices).

Subsequent to the publication of the Final EIR, late comments were received by the City. A Responses to Late Comments memorandum dated June 12, 2023, was prepared that included responses to the late comments. In addition, the City prepared an Errata to the Final EIR dated June 12, 2023, to correct typographical errors, provide additional clarity, and incorporate updates made to the Specific Plan subsequent the circulation of the Final EIR. None of the late comments or text revisions in the Errata constitute new significant information requiring the recirculation of the EIR pursuant to CEQA Guidelines Section 15088.5.

1.3 PROJECT OVERVIEW

This section provides a description of the project location, brief project description, and list of project objectives.

1.3.1 Project Location

The approximately 1,270-acre Specific Plan area (hereinafter referred to as "Moffett Park") is located in the northernmost portion of the City of Sunnyvale (City). Moffett Park is generally bounded by State Route (SR) 237 to the south, Moffett Federal Airfield and a golf course to the west; San Francisco Bay (Bay), the former/closed Sunnyvale landfill, Sunnyvale Materials Recovery and Transfer (SMaRT) Station®, Donald M. Somers Water Pollution Control Plant (WPCP), WPCP former salt ponds for wastewater treatment, an open-water pond, and Caribbean Drive to the north; and Caribbean Drive, Twin Creeks Sports Complex, and Baylands Park to the east.

1.3.2 Brief Project Description

The proposed project is a comprehensive, City-initiated update of the Specific Plan. The proposed Specific Plan provides a vision and guiding principles, development standards, and design guidelines for future development within Moffett Park. The City's vision for Moffett Park is as follows:

> Moffett Park is an integral part of Sunnyvale, and 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.

The Specific Plan would allow the addition of residential uses and an increase in the allowable office/industrial/R&D, commercial, and institutional uses within Moffett Park. The Specific Plan

would allow for a net increase of 20,000 residential units (where there are no residential units existing today), 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 is currently existing and recently approved. As a result, the buildout of the Specific Plan (which would include existing, recently approved, and proposed uses) 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. Buildout of the Specific Plan is projected to generate approximately 42,000 residents and 95,683 jobs.

1.3.2.1 *Land Use Designations*

The Specific Plan includes eleven land use designations: (1)(2) Office/R&D (two designations); (3)(4)(5) Mixed Employment (three designations); (6) Activity Center; (7) Mixed Use; (8) Residential; (9) Hospitality; (10) Public; and (11) Institutional.

1.3.2.2 *Maximum Building Heights*

The Specific Plan includes maximum building heights allowed for future developments in Moffett Park. The tallest buildings would primarily be allowed in the central and eastern areas of Moffett Park, with maximum building heights ranging from 160 to 275 feet above the ground surface. The maximum building heights in other areas of Moffett Park would be 145 to 150 feet above the ground surface.

1.3.2.3 *Neighborhoods*

The Specific Plan divides Moffett Park into the following six neighborhoods that define future districts: (1) North Java, (2) South Java, (3) Crossman, (4) Chesapeake, (5) West Mathilda, and (6) Discovery. As described in the Specific Plan, each neighborhood is distinct with a unique mix of land uses to create a complete walkable neighborhood oriented around a centralized public open space and activity center and featuring all the services and necessities needed for daily life within a 15-minute walk or bike ride from places of residence or employment. Moffett Park's complete neighborhoods offer workers, residents, and visitors alike with a range of commercial options, recreational opportunities, and transit within a convenient distance of their place of employment or homes.

1.3.2.4 *Transportation Network*

The proposed street network for Moffett Park would consist of existing streets (public and private) and new streets for vehicles and/or people who would walk or bike in Moffett Park. The proposed street network includes four street typologies: anchor streets, crosstown connectors, neighborhood streets, and laneways. The location and alignment of new streets may be adjusted to meet specific requirements of future development projects as they occur subject to City approval and dependent on site and property conditions. All the street typologies would accommodate pedestrians and bicyclists.

[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] Future institutional uses could include facilities such as schools, government facilities, and public/community facilities.

The proposed street network would include pedestrian facilities on every street. Pedestrian facilities include crosswalks, protected crossings, prioritize crossings, sidewalks, lighting, and curbside drop off and loading areas. The proposed bicycle network includes several east-west and north-south connections that are supplemented by additional internal bikeways. Several bicycle enhancements are proposed at key crossings. The enhancements considered as part of the Specific Plan are two crossings at East Channel shown as "D" and "E" on Figure 2.3-4a. Chapter 7 of the Specific Plan includes more details about the mobility network, including bicycle and pedestrian networks, for Moffett Park.

To reduce the overall number of vehicle trips in Moffett Park, there would be a substantial increase in both public and private transit service. Chapter 7.6 of the Specific Plan discusses future transit investments, standards, and guidelines pertaining to the transit network. To optimize transit service in Moffett Park, the Specific Plan identifies the need to reconfigure VTA bus service to better serve increased demand, prioritize light rail on Java Drive and reconfigure pedestrian access to the Java/Borregas light rail station, accommodate an internal circulator, and provide bus layover stations at specified locations.

The Specific Plan's Transportation Demand Management (TDM) strategies aim to reduce Single-Occupancy Vehicle (SOV) travel, minimize daily vehicle trips, and shift trips to transit, biking, walking, scooting, or rideshare. A key element of the Moffett Park TDM strategy is parking management, prioritizing a reduction in the overall parking supply while providing well-managed access for people who choose to drive. Parking maximums, unbundling, and shared parking reduce parking demand, minimize the number of vehicle trips, optimize the use of the existing and future parking supply, and support enhanced urban design and placemaking. The approach for parking is anchored by two key concepts: park once and shared parking. The park once concept is where motorist who drive to Moffett Park would park their car and walk, bike, scoot, or take transit to a variety of destinations. Shared parking facilities would be located proximate to key destinations to optimize the use of parking supply and limit the number of vehicle trips and local congestion.

As part of the Specific Plan, a Transportation Management Authority (TMA) would be formed. The TMA would provide a coordinated framework for designing, administering, operating, and marketing transportation services or programs that reduce SOV trips (such as the internal connector). The TMA would also be responsible for on-going coordination with local transit agencies to maintain frequent service and implement station area improvements. The Specific Plan has a goal of 50 percent SOV at full buildout (Policy TDMP-2.5).

1.3.2.5 *Open Space and Urban Ecology*

The Specific Plan would construct over 200 acres of open space. The Specific Plan defines open space as publicly accessible open spaces, parks, and natural areas which serve the community by providing public access, active transportation, recreational, cultural programs, and ecosystem services. These may include undeveloped natural areas, areas of ecological and ecosystem value, greenbelts and trails, recreation areas, community and neighborhood parks, areas of cultural historic significance, public plazas and squares. They may be publicly owned and managed, or privately owned publicly accessible spaces.

In addition, the Specific Plan would integrate ecology into parks and open spaces within Moffett Park through ecological infrastructure such as green roofs, protected wetlands, urban forests, and well-connected parks into parks and open spaces. The Specific Plan establishes an Ecological Combining District (ECD) in the northwest corner of Moffett Park for the purpose of expanding and enhancing the ecological value of existing and potential wetlands. The ECD makes up approximately 81 acres of the Natural Area open space type.

1.3.2.6 *Policies, Requirements, and Development Standards*

The Specific Plan includes policies and development standards in seven of its 10 chapters: (1) Chapter 4 Land Use, (2) Chapter 5 Development Standards, (3) Chapter 6 Open Space and Urban Ecology, (4) Chapter 7 Mobility, (5) Chapter 8 Transportation Demand Management and Parking, and (6) Chapter 9 Infrastructure and Utilities. Chapter 10 Implementation includes project requirements, implementation actions, capital improvements, and monitoring programs.

1.3.2.7 *Discretionary Approvals*

City actions to adopt the Specific Plan would include the following: Certify the Final EIR; Amend the General Plan and adopt the Specific Plan; Adopt required findings for the adoption of the Specific Plan, including required findings under CEQA Guidelines Sections 15090, 15091, and 15093; Amend the SMC; and Adopt a Mitigation Monitoring and Reporting Program.

1.3.3 Project Objectives

Pursuant to CEQA Guidelines Section 15124(a), the City's objectives for the Specific Plan are as follows:

1. **Maintain Moffett Park as an integral part of Sunnyvale.** Moffett Park remains a natural extension of the City's built landscape, providing residents, workers, and visitors an integrated and cohesive connection between the San Francisco Bay and the wider neighborhoods of Sunnyvale. Through enhanced multimodal mobility connections, including transit, pedestrian, and bicycle improvements, and accessible parks and open space that support underserved neighborhoods in northern Sunnyvale, Moffett Park connects and serves all Sunnyvale residents with new amenities and destinations. Maximize new employment and housing growth to support the fiscal health of Sunnyvale through increased property, hotel, and sales tax revenues.
2. **Establish Moffett Park as a model community through its commitment to comprehensively addressing resilience, climate protection, and equity in all activities.** Moffett Park is a safeguard for the community in the face of climate change, as well as a model for equitable and sustainable development at the building, block, and neighborhood scale. New residential and neighborhood commercial uses support a sustainable land use mix in Moffett Park, improving the regional jobs-housing balance, lowering travel distances, and improving access to daily goods and services. Measures are designed to reduce greenhouse gas emissions from water and energy use and minimize air and water pollution. The City prioritizes walking, biking and public transit and requires aggressive single-occupancy vehicle trip reduction for all new developments. The City promotes the social and physical needs of all visitors, workers, and future residents.

3. **Evolve Moffett Park into a vibrant and inclusive community where all people can thrive.** Moffett Park establishes a network of active and unique neighborhoods that serve a broad range of users and cohesively integrate with the rest of Sunnyvale. Moffett Park transitions from an office and industrial area into an adaptable environment that accommodates residential, neighborhood-serving commercial, and recreational activities. Through the Specific Plan, the City establishes target numbers to guide the transition of Moffett Park into a series of complete neighborhoods. Each neighborhood has targets for neighborhood-serving commercial square footage, housing, employment square footage, and parks and open space. New park and open space types promote recreation, active transportation, and social gathering. The City targets twenty percent of the future housing in Moffett Park to be reserved for lower-income households, providing much needed housing for a diverse workforce at all income levels.
4. **Maintain and strengthen Moffett Park as a diverse economic engine that supports economic prosperity for all.** Moffett Park continues to be a hub of economic activity and technological innovation, supporting a diverse economic base to ensure the long-term fiscal health of the area and the City. This includes a mix of large, established high-tech companies, smaller spaces for start-ups, and a range of retail, services, hotels, and entertainment. The City supports a wide range of businesses, including small, local companies as well as large, multinational firms through the continued growth of Moffett Park. Policies to support the retention of existing local businesses through community benefits, and to encourage essential services, such as a grocery store help maintain economic diversity. The City promotes the training and continued education of workers, residents, and students to support economic prosperity for all.
5. **Create a connected, accessible district that prioritizes the movement of people over vehicles to reduce climate pollution and to support a healthy community.** Moffett Park uses multimodal strategies and district-wide policy to redesign the district around people rather than vehicles. Streets are designed to promote a safe and comfortable mobility network for all individuals, regardless of which mobility option they use. All streets within the Moffett Park are "Complete Streets," balancing space for bicycles, pedestrians, transit vehicles, and other mobility options. New bicycle and pedestrian connections into and out of Moffett Park are essential to improving circulation and overall connectivity. Moffett Park supports existing operations of public transit and facilitates opportunities for expansion and new connections like the Moffett Park Circulator. An emphasis on walking, biking, and transit use shifts travel away from single-occupant vehicles and lowers greenhouse gases.
6. **Cultivate dynamic and connected public spaces that accommodate the physical and social needs of all users.** Moffett Park cultivates a network of welcoming, connected, and accessible parks and open spaces that support recreation, social gathering, health, and urban ecology. Moffett Park provides a high level of service with ample parks and open space through the development of new Natural Areas-Ecological Patches, Greenbelt-Ecological Corridors, Community Parks, Neighborhood Parks, and Mini Parks and Plazas. The interconnected spaces maintain and expand connections to the San Francisco Bay, while enhancing ecological value and resilience. The variety of open space types ensure recreational and social opportunities support different activities, age groups, and uses throughout the day and evenings.
7. **Create a healthy, resilient, and biodiverse environment.** The open space and urban ecology plan for Moffett Park creates an interconnected system of habitat areas that are supported by surrounding green features integrated into streetscapes and new development.

Habitat patches are distributed across Moffett Park and connected by corridors along the channels and streets. Continuous canopy cover along streets facilitates wildlife movement across Moffett Park while providing vital shade over multi-modal routes, reducing stormwater runoff, enhancing the character of Moffett Park, and adding to the overall resilience of the area. Additionally, new developments enhance ecosystems and support biodiversity through bird safe design, an Ecological Overlay Zone and transfer of development rights policy, and increased building setbacks along the East, West, and Lockheed Martin Channels. Infrastructure improvements and both active and passive strategies at the site and building level provide opportunities to manage stormwater and future challenges associated with climate change and sea level rise.

8. **Integrate innovative and emerging technologies in the district to support community-wide goals.** Moffett Park continues to leverage its position as an innovative hub to establish itself as a regional center for thought leadership and emerging technologies. The City accelerates Smart City design and district-scale infrastructure systems, fostering collaboration among regional agencies, community, and property owners to develop innovative, multi-benefit solutions to complex challenges facing the San Francisco Bay Area.

SECTION 2.0 FINDINGS REQUIRED UNDER CEQA

The Draft EIR identified a number of no impacts and less than significant impacts associated with the project that do not require mitigation. The Draft EIR also identified a number of significant environmental effects (or impacts) that may be caused in whole or in part by the project. Some of these significant effects can be fully avoided or substantially lessened through the implementation of Specific Plan policies and requirements. Other effects cannot be, and thus are significant and unavoidable. For reasons set forth in Section 3.0 Statement of Overriding Considerations, the City has determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the project.

The findings of the City with respect to the project's significant effects and mitigation measures are set forth in the Final EIR and these Findings of Fact. For the full analysis of each environmental impact, refer to the Draft EIR and the Final EIR. The following provides a summary description of each significant impact, describes the applicable Specific Plan policies and requirements identified in the Final EIR and adopted by the City, and states the findings of the City regarding the significance of each impact after imposition of the adopted Specific Plan policies and requirements. A full explanation of these environmental findings and conclusions can be found in the Final EIR and associated record (described herein), both of which are incorporated by reference. The City hereby ratifies, adopts, and incorporates the analysis and explanation in the record into these findings, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

2.1 FINDINGS REGARDING EIR RECIRCULATION

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR when "significant new information" is added to the EIR after the lead agency gives public notice of the availability of the Draft EIR but before certification. "Information" may include project changes, changes to the environmental setting, or additional data or other information. The CEQA Guidelines do not consider new information to be significant unless the lead agency changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect or a feasible way to mitigate the impact that the agency or project proponent has declined to implement. CEQA Guidelines Section 15088.5 states "significant new information" requiring recirculation may include:

(1) A new significant environmental impact that had not previously been disclosed in the draft EIR would result from the project or from a new mitigation measure;
(2) A substantial increase in the severity of an environmental impact that had already been identified unless mitigation measures would be adopted to reduce the impact to a level of insignificance;
(3) A feasible project alternative or mitigation measure would considerably lessen the significant environmental impacts of the project, but the proponents will not adopt it; or
(4) The draft EIR was so inadequate and conclusory that meaningful public review and comment were precluded.

Recirculation is not required if new information added to the EIR just clarifies or makes minor modifications to an otherwise adequate EIR.

The City made changes to the Draft EIR after it was released, which are described in Section 5.0 Draft EIR Text Revisions of the Fina EIR. Minor clarifications were made to Specific Plan Requirements 10.3.5-1, 10.3.5-2, 10.3.5-11, 10.3.1-2, 10.3.1-3, and 10.3.1-4, and a new Specific Plan Requirement 10.3.1-8 was added. These changes are reflected below. No new or substantially more severe significant impacts would result from the clarifications. There are no new feasible alternatives, policies, requirements, or mitigation measures that are considerably different from those considered in the EIR that the City has declined to adopt.

2.2 FINDINGS REGARDING NO IMPACTS AND LESS THAN SIGNIFICANT IMPACTS

Section 15091 of the CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as having "no impact" or a "less than significant" impact. The impacts where the project would result in either no impact or a less than significant impact, and which require no mitigation, are identified below and grouped into impacts that do not rely on Specific Plan policies or requirements and those that do. Please refer to the Draft EIR for more detail.

2.2.1 No Specific Plan Policies and Requirements Relied Upon

The impacts in which the project would result in no impacts or less than significant impacts and do not rely on Specific Plan policies or requirements are listed below.

Aesthetics

- **Impact AES-1:** The project would not have a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**
- **Impact AES-2:** The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **(No Impact)**
- **Impact AES-3:** The project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**
- **Impact AES-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant aesthetics impact. **(Less than Significant Cumulative Impact)**

Agriculture and Forestry Resources

- **Impact AG-1:** The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. **(No Impact)**
- **Impact AG-2:** The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **(No Impact)**
- **Impact AG-3:** The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

- **Impact AG-4:** The project would not result in a loss of forest land or conversion of forest land to non-forest use. **(No Impact)**
- **Impact AG-5:** The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. **(No Impact)**
- **Impact AG-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact. **(No Cumulative Impact)**

Biological Resources

- **Impact BIO-5:** The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **(Less than Significant Impact)**

Geology and Soils

- **Impact GEO-1:** The project would not 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides. **(Less than Significant Impact)**
- **Impact GEO-2:** The project would not result in substantial soil erosion or the loss of topsoil. **(Less than Significant Impact)**
- **Impact GEO-3:** The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**
- **Impact GEO-4:** The project would not be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property. **(Less than Significant Impact)**
- **Impact GEO-5:** The project would not 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. **(Less than Significant Impact)**

Hazards and Hazardous Materials

- **Impact HAZ-1:** The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**
- **Impact HAZ-5:** The project would be located within an airport land use plan and would not result in a safety hazard or excessive noise for people residing or working in the project area. **(Less than Significant Impact)**
- **Impact HAZ-6:** The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

- **Impact HAZ-7:** The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. **(No Impact)**

Hydrology and Water Quality

- **Impact HYD-4:** The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(Less than Significant Impact)**
- **Impact HYD-5:** The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**
- **Impact HYD-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact. **(Less than Significant Cumulative Impact)**

Land Use

- **Impact LU-1:** The project would not physically divide an established community. **(Less than Significant Impact)**
- **Impact LU-2:** The project 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. **(Less than Significant Impact)**
- **Impact LU-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact. **(Less than Significant Cumulative Impact)**

Mineral Resources

- **Impact MIN-1:** The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. **(No Impact)**
- **Impact MIN-2:** The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. **(No Impact)**
- **Impact MIN-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

Population and Housing

- **Impact POP-1:** The project would not 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). **(Less than Significant Impact)**
- **Impact POP-2:** The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**
- **Impact POP-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant population and housing impact. **(Less than Significant Cumulative Impact)**

Public Services

- **Impact PS-1:** The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. **(Less than Significant Impact)**
- **Impact PS-2:** The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. **(Less than Significant Impact)**
- **Impact PS-3:** The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. **(Less than Significant Impact)**
- **Impact PS-5:** The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. **(Less than Significant Impact)**
- **Impact PS-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant public services impact. **(Less than Significant Cumulative Impact)**

Transportation

- **Impact TRN-2:** The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact)**
- **Impact TRN-3:** The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**
- **Impact TRN-4:** The project would not result in inadequate emergency access. **(Less than Significant Impact)**

Tribal Cultural Resources

- **Impact TCR-2:** The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is 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. **(Less than Significant Impact)**

Utilities and Service Systems

- **Impact UTL-1:** The project would not 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. **(Less than Significant Impact)**

- **Impact UTL-3:** The project would not 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. **(Less than Significant Impact)**
- **Impact UTL-4:** The project would not 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. **(Less than Significant Impact)**
- **Impact UTL-5:** The project would not be noncompliant with federal, state, or local management and reductio statutes and regulations related to solid waste. **(Less than Significant Impact)**

Wildfire

- **Impact WF-1:** The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. **(No Impact)**
- **Impact WF-2:** The project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **(No Impact)**
- **Impact WF-3:** The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. **(No Impact)**
- **Impact WF-4:** The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **(No Impact)**
- **Impact WF-C:** The project would not result in a cumulatively considerable contribution to a cumulatively significant wildfire impact. **(No Cumulative Impact)**

2.2.2 Specific Plan Policies and Requirements Relied Upon

Aesthetics

Impact AES-4: The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(Less than Significant Impact)**

Specific Plan Standards: Chapter 5:

(1) Applicability. All new construction, building additions, and/or building alterations shall adhere to the following Bird Safe Design standards.

(2) Façade treatment. No more than 10 percent of the surface area of a building's total exterior façade shall have untreated glazing between the ground and 60 feet above ground. Bird-friendly glazing treatments can include the use of opaque glass, the covering of clear glass surface with patterns, the use of paned glass with fenestration patterns, and the use of external screens over non-reflective glass. All façade glazing shall have reflectivity ratings no greater than 30 percent.

(3) Skyways, walkways, or glass walls. New construction and building additions shall avoid building glass skyways or walkways, freestanding glass walls, and transparent building corners. If such features are incorporated, all glazing on those features shall be treated as described under 4a, Glazing design.

(4) Façade treatment. No more than 10 percent of the surface area of a building's total exterior façade between the ground and 60 feet above ground or within 15 feet above a green roof shall have untreated glazing. Bird-friendly glazing treatments can include the use of opaque glass, the covering of clear glass surface with patterns, the use of paned glass with fenestration patterns, and the use of external screens over non-reflective glass. All façade glazing shall have reflectivity ratings no greater than 30%.

a. Glazing treatment. Bird-friendly glazing treatments shall include elements with a minimum horizontal width of one quarter of an inch and minimum vertical height of one eighth of an inch with a maximum vertical spacing of four inches and maximum horizontal spacing of two inches.

(5) Interior occupancy sensors. Occupancy sensors or other switch control devices in non-residential development shall be installed on non-emergency interior lights. These lights should be programmed to shut off during non-work hours and between 10:00 pm and sunrise. Using smaller zones in internal lighting layouts will increase the effectiveness of occupancy sensors.

(6) Exceptions to the bird safe design requirements. The City may waive or reduce bird safe design requirements based on analysis by a qualified ornithologist with bird safety expertise which indicates that proposed construction will not pose a collision hazard to birds.

Specific Plan Guidelines: Chapter 5:

(1) Flight paths. New construction shall avoid the funneling of flight paths along buildings or trees towards a building façade.

(2) Reduced glazing. New construction and building additions should reduce glass at tops of buildings, especially when incorporating a green roof into the design.

(3) Avoiding visual traps. Visual traps such as areas of glass through which trees, landscape areas, water features, or the sky are visible from the exterior, should be avoided unless a bird safety treatment is used.

(4) Collision monitoring. Building owners and tenants are encouraged to monitor locations of bird collisions (e.g., based on dead or injured birds or imprints of feathers on windows) and implement retrofit measures, such as application of bird-friendly patterns to existing windows or use of internal blinds, where collisions occur.

(5) Interior lighting. Building design and operation shall reduce the amount of light that escapes through windows during the night.

(6) Window coverings. Building owners and tenants are encouraged to install window coverings above the ground floor to reduce the amount of light escape from the building at night.

(7) Workstation lighting. Businesses are encouraged to turn off lighting at employee workstations and draw office window coverings at the end of the day.

(8) Migration periods. Building managers should place particular focus on limiting nighttime light escape during bird migration periods (February 15 through May 31, and August 15 through November 30).
(9) Maintenance. Businesses are encouraged to schedule maintenance during the day or to conclude before 10:00 p.m.

Specific Plan Policies: OSE-3.4: Integrate dark sky policies into site lighting and street light plans.

Findings: The City Council finds that the Specific Plan Standards and Guidelines in Chapters 5 of the Specific Plan and Specific Plan Policy OS-3.4 are feasible and that they would reduce potential impacts associated with light and glare from future development projects to a less than significant level. These standards, guidelines, and policies are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Future development projects in Moffett Park would comply with the Specific Plan standards and guidelines listed above to prevent light and glare impacts by avoiding large expanses of glass, reflective or transparent glass, and uplighting. In addition, consistent with Specific Plan Policy OSE-3.4, future projects would integrate dark sky policies complying with the exterior lighting standards described in Section 6.6.9 of the Specific Plan 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. Therefore, impacts related to new sources of light and glare are less than significant.

Air Quality

Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.3-3: Generator Emissions. All diesel standby emergency generators powered by diesel fuel shall meet US 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 US EPA Tier 4 standards for particulate matter emissions.

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 is 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.

Findings: The City Council finds that Specific Plan Requirements 10.3.3-3 and 10.3.3-4 are feasible and that they would reduce potential air quality community health risk impacts during construction and operation of future development projects to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Implementation of Specific Plan Project Requirement 10.3.3-4 would reduce construction TAC and $PM_{2.5}$ emissions by at least 85 percent below existing emission rates by requiring the use of efficient and cleaner construction equipment, renewable/alternative fuel, and low-VOC coatings, resulting in construction health

risk impacts below BAAQMD thresholds of significance. Modeling completed for the project confirmed that operational health risk impacts from project traffic to off-site receptors was below the BAAQMD thresholds of significance. In addition, compliance with Specific Plan Requirements 10.3.3-3 and 10.3.3-4 would ensure future backup diesel generators would have engines that meet or exceed Tier 4 standards for particulate matter emissions and result in health risk impacts below the BAAQMD thresholds of significance. Therefore, operational health risk impacts are less than significant.

Impact AIR-4: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **(Less than Significant Impact)**

Specific Plan Requirement 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).

Findings: The City Council finds that Specific Plan Requirement 10.3.3-5 is feasible and that it would reduce odor impacts generated by future uses to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Future developments (e.g., industrial/R&D uses) that generate substantial odors implementing the above Specific Plan Project Requirement 10.3.3-5 would reduce substantial odor impacts on sensitive receptors to a less than significant level by implementing odor control measures and taking corrective actions when complaints are received. Therefore, the operation of future development under the Specific Plan would not result in significant odor emissions.

Biological Resources

Impact BIO-1: The project would not 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 CDFW or USFWS. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.5-1: Special Status Plants. At the time development is proposed, focused special status plant surveys shall be completed by a qualified biologist (defined as a person with a minimum of a four-year degree in wildlife sciences, biology, environmental sciences, or equivalent experience in the biological sciences) for alkali milk-vetch and Congdon's tarplant in the grasslands and vernally mesic areas (e.g., areas with a moderate supply of moisture) of Moffett Park's northwestern corner. These surveys shall be completed prior to ground disturbance and shall be timed to occur during the appropriate blooming season for each species. Surveys conducted in or around April, June, and September would be sufficient to confirm their presence or absence; the timing and number of surveys shall be adjusted based on environmental conditions that may affect blooming in a particular year. The surveys shall follow protocols outlined in the "California Native Plant Society Botanical Survey Guidelines" and the California Department of Fish and Wildlife's (CDFW's) "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." If the alkali milk-vetch and Congdon's tarplant are determined absent, no additional measures are required.

If the alkali milk vetch and/or Congdon's tarplant are present, to the maximum extent practicable, the project shall be designed to avoid populations of special status plants. If the project cannot be redesigned to avoid impacts to the identified species, and these impacts are found to be significant as defined by CEQA, then compensation measures shall include development of an on-site restoration plan for these species. The determination of the significance of impacts shall be based on, but not limited to, criteria such as the nature of the habitat impacts (i.e., temporary versus permanent impacts), extent of the species' range, relative abundance of regional populations of the species in its range, and the number of plant populations in Moffett Park. Areas to be preserved on-site as open space are expected to be able to fully accommodate any compensation measures for these species. If compensation measures cannot be fully accommodated on-site, then off-site compensatory mitigation (in the immediate vicinity of the identified populations(s), where feasible) would need to be considered. At a minimum, the restoration plan shall contain the following elements:

- Location of restoration areas,
- Propagation and planting techniques to be employed for the restoration effort,
- Timetable for implementation,
- Monitoring plan and performance criteria,
- Adaptive management techniques, and
- A site maintenance plan.

A report would be prepared summarizing the results of the surveys and submitted to the City, along with the restoration plan (if required). The restoration plan shall be reviewed and approved by the City for approval prior to the start of project

construction. The objective of the restoration plan would be to replace the special status plants and habitat lost during project buildout at proportional basis to the impact. This would incorporate both the spatial and relative density of the impacted plant and its habitat. Success of the restoration effort would be based on a five-year monitoring program.

10.3.5-2: Burrowing Owl Survey. Preconstruction surveys shall be completed by a qualified biologist in areas where burrowing owl habitat occurs such as ruderal lots (not including impervious surfaces). Each preconstruction survey shall consist of two surveys: an initial survey no more than 14 days in advance of the on-set of ground-disturbing activity and a follow-up survey occurring within 24 hours prior to the start of construction. These surveys shall be conducted in accordance with the methods described in the Staff Report on Burrowing Owl Mitigation or the most recent California Department of Fish and Wildlife (CDFW) guidelines at the time development is proposed. The surveys shall cover all areas of suitable burrowing owl habitat within the construction zones.

- If preconstruction surveys are undertaken during the non-breeding season (September 1 through January 31), any burrows occupied by resident owls in areas planned for construction shall be protected by a construction-free buffer with a radius of 150 to 250 feet around each active burrow, with the required buffer distance to be determined in each case by a qualified biologist with at least two years of experience surveying for burrowing owls. Passive relocation of resident owls is not recommended by the CDFW where it can be avoided. If passive relocation is unavoidable, resident owls may be passively relocated according to a relocation plan prepared by a qualified biologist.

- If preconstruction surveys are undertaken during the breeding season (February 1 through August 31) and active nest burrows are located within or near construction zones, a construction-free buffer of 250 feet shall be established around all active owl nests. The buffer areas shall be enclosed with temporary fencing, and construction equipment and workers shall not be allowed to enter the enclosed setback areas. Buffers shall remain in place for the duration of the breeding season. Should construction work be halted or paused for more than one-week, new preconstruction surveys shall be prepared meeting the same requirements. After the breeding season (i.e., once all young have left the nest), passive relocation of any remaining owls may take place but only under the conditions described below.

  If breeding owls are detected, suitable compensation shall be provided. Compensation could include collaborating with existing protected areas for the burrowing owls along the San Francisco Bay or collaborating and interacting with the Santa Clara Valley Habitat Plan (Habitat Plan) burrowing owl program. Although the City of Sunnyvale is not within the Habitat Plan area, it is within the extended area for preserving habitat to assist with conservation of burrowing owls for the Habitat Plan; the applicant should

collaborate with the Santa Clara Valley Habitat Agency to define a suitable and acceptable compensation strategy. This most likely would result in the applicant funding a defined conservation need for the Habitat Plan. Providing protection in the form of deed restrictions or establishing a conservation easement in the northwestern "natural" area would also help to provide suitable compensation for breeding owls observed within the developed portion of Moffett Park.

A report shall be submitted to the City summarizing the results of the survey, any buffer zones, and measures implemented to prevent impacts to nesting burrowing owls and their habitat.

10.3.5-3: Bumble Bees Survey. At the time development is proposed in the potentially suitable habitat in the natural lands on the northern side of the Lockheed Martin property, four separate surveys shall be completed by a qualified biologist when the ambient temperatures are greater than 60 degrees Fahrenheit, wind speeds are ideally less than eight miles per hour (mph), and skies are clear enough to see your shadow. Bumble bees typically have an active season, or flight period in warmer months. The flight periods of the two different bumble bees which have potential to occur in Moffett Park are: (1) the Crotch bumble bee's flight period is typically late February through late October, peeking in early April with a second pulse in July; and 2) the western bumble bee's flight period is typically early April to early November, with workers peaking in early August and males peaking in late September; the queens' flight period is early February through late November, peaking in late June and late September. The survey period should be from March through September and should aim for a survey in April, July, August, and September at the least; surveys will depend on local temperatures to identify the specific active season for any given area.

The surveys shall be completed between 12:00 PM and 4:00 PM but may be completed earlier if the weather conditions are good. The surveys shall be completed by walking transects spaced up to approximately 100 feet apart within the affected habitat. Transect widths shall be reduced if needed, so there is complete visual coverage of potential nest, overwintering, and forage sites. These bumblebees are typically found in potential nesting, overwintering, and forge habitat within brush piles, in un-mowed or overgrown areas, hollow logs, abandoned rodent burrows, but can also nest above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees, as well as milkweeds, daisies, lupines, burclovers, phacelias, and salvias. To the degree any of this habitat exists onsite, focused surveys shall occur within suitable habitat. If possible, bumble bee species shall be determined, the location of potential or known Crotch bumble bees and western bumble bees shall be recorded via a handheld GPS unit, and a representative picture shall be taken. No bumble bees shall be handled to determine species.

If protected bumble bees are observed on the project site, they shall be avoided via buffer zones (the size of which would be determined at the time surveys are

prepared). If protected bumble bees are observed on the site or adjacent to the site and they cannot be fully avoided, construction shall occur during a period of time that minimizes the effect of dust on their lifecycles (which would be determined at the time surveys are prepared). If protected bumble bees are observed on the site, compensation may be necessary; any habitat compensation should protect suitable habitat proportional to the impact.

Following completion of the surveys, a report shall be prepared that documents the methods and summarizes the results of the survey which would identify any buffer zones, and measures to prevent impacts to protected bumble bees. The report shall be submitted to the City prior to issuance of grading permits.

10.3.5-4: Steelhead. Plans shall contain the following elements:

- All work adjacent to waterways which may support steelhead shall use adequate silt fencing and Stormwater Pollution Prevention Plan (SWPPP) measures to ensure debris (i.e., soil) does not enter the waterway.
- All work over waterways (e.g., bridge work) shall use netting to ensure items such as tools and pollutants do not fall into the waterway.
- All work in or around waterways shall ensure an appropriate spill kit is onsite to avoid polluting the waterway.

10.3.5-5: Western Pond Turtle. Pre-construction surveys shall be completed by a qualified biologist within 250 feet of a waterway if development is proposed in or within 250 feet of a waterway within/no sooner than 48 hours of construction to ensure that western pond turtles are absent from the construction area. If western pond turtles are present, the turtle shall be able to leave on its own, or a biologist possessing all necessary permits shall relocate them.

A report shall be prepared summarizing the results of the pre-construction survey which outlines recommended next steps, including the following measures to prevent impacts to the western pond turtle. The report shall be submitted to the City prior to the issuance of grading permits.

Immediately following the pre-construction surveys, the construction zone shall be cleared, and silt fencing shall be erected and maintained around construction zones to prevent western pond turtles from moving into these areas.

A biological monitor shall be present onsite during particular construction activities, including initial silt fence installation along water features, to ensure western pond turtles are not harmed, injured, or killed during project buildout.

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

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.

10.3.5-7: Salt-marsh Harvest Mouse Survey. A habitat survey shall be completed by a qualified biologist 30 days prior to work within 250 feet of the emergent wetland habitat located in the northeastern corner of Moffett Park to confirm current habitats. If pickleweed or salt grass habitats are within the work area, these areas shall be avoided, and a report shall be submitted to the City summarizing the results of the habitat survey which would identify any buffer zones and expected monitoring efforts to prevent impacts to the salt-marsh harvest mouse and their habitat.

A qualified biologist shall monitor work occurring within 50 feet of habitat identified as suitable for the salt-marsh harvest mouse. This monitor shall stop work should a salt-marsh harvest mouse be detected in the work area until the individual moves out of the construction area and into suitable habitat on its own.

Should monitoring be required, a report shall be submitted to the City summarizing the results of the monitoring, including any observation of the salt-marsh harvest mouse.

10.3.5-8: San Francisco Dusky-Footed Woodrat Survey. A qualified biologist shall conduct a preconstruction survey for San Francisco dusky-footed woodrat nests no more than 30 days and no less than 14 days prior to the onset of construction activities. This survey timing allows for the scheduling of and deconstruction of any

woodrat nests which need relocating. The survey shall encompass all construction zones and surrounding lands within 50 feet. If no woodrat nests are present, no additional measures are required.

Identified nests shall be avoided, where possible. If avoidance is not possible, the nest(s) shall be manually deconstructed by a qualified biologist when helpless young are not present, typically during the non-breeding season (October 1 through January 31). The nest shall be reconstructed in a nearby suitable area.

If it is determined during the preconstruction survey that young may be present, a suitable buffer, delineated with flagging, depending on the timing within the breeding season (ranging from 15 to 50 feet) shall be established around the nest by a qualified biologist and maintained during construction until the young are independent and have successfully moved from the nest on their own.

A report shall be submitted to the City summarizing the results of the survey and identifies any buffer zones and measures implemented to prevent impacts to San Francisco dusky-footed woodrats.

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.

Findings: The City Council finds that implementation of Specific Plan Requirements 10.3.5-1 through 10.3.5-9 is feasible and would reduce the impacts to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Requirements 10.3.5-1 through 10.3.5-9, future development would reduce potential impacts to special status species including the alkali milk-vetch and Congdon's tarplant, burrowing owls, bumblebees, steelhead, western pond turtle, roosting bats, salt-marsh harvest mouse, dusky-footed woodrat, and migratory birds and raptors by ensuring habitat or species avoidance through appropriately timed habitat surveys to determine absence/presence, pre-construction surveys to determine absence/presence, implementation of avoidance/preventative measures, passive removal efforts, on-site monitoring by qualified biologists, and/or establishment of no-construction buffer zones during construction. Therefore, this impact would be reduced to a less than significant level.

Impact BIO-2: The project would not 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. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.5-10: During the environmental review process for future developments proposed within 250 feet of riparian areas, a qualified biologist shall determine if the project would impact riparian habitat and the project shall be designed to avoid impacts. If impacts cannot be avoided, the project shall mitigate for impacts to riparian habitat by a measure of at least 1:1. This can consist of on-site or off-site planting mitigation or fees paid to a suitable mitigation bank. For on- or off-site mitigation plantings, a restoration plan, including success criteria, must be written, which would include a minimum monitoring period of five years. Regulatory permits may be required for impacts to riparian habitat from the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB).

Specific Plan Standards: Chapter 6:

(1) Building Placement. No private development shall be located with the ECD. Buildings service the ECD such as public restrooms, restoration maintenance buildings, interpretive centers, or stormwater pumps shall be located to minimize impact on sensitive habitat areas.
(2) Impervious Area. No new impervious surface shall be constructed closer to the delineated wetlands than existing impervious surfaces, and no net increase impervious surface shall occur within the ECD.
(3) Landscape Design and Lighting within the ECD. Landscape design shall be per Section 6.6.6 Landscape Design in the Specific Plan. Landscape areas adjacent

within the ECD shall be designed to provide high-quality habitat and shall be comprised of 100 percent native species per Appendix B of the Specific Plan and per qualified restoration ecologist. Landscape design shall be designed by a qualified restoration ecologist to ensure that the design is consistent with best practices for ecological habitat restoration including the planting plan (plant palettes, structure, and species distribution) and other work necessary for successful native habitat restoration. Landscape lighting shall not be installed with the Ecological Enhancement Area.

(4) Landscape Design and Lighting within 150 feet of the ECD Boundary. Landscape design shall be per Section 6.6.6 Landscape Design in the Specific Plan. Landscape areas adjacent to the ECD shall be designed to provide high-quality habitat and shall be comprised of 100 percent native species per Appendix B of the Specific Plan. Landscape design shall be reviewed by a qualified ecologist to ensure that the design is consistent with best practices for urban ecology including the planting plan (plant palettes, structure, and species distribution) and the lighting plan. Landscape lighting shall be per Section 6.6.9 Exterior Lighting of the Specific Plan.

(5) Raptor Perches. Raptor perch deterrents should be placed at the edges of new building roofs or other structures (e.g., light poles or electrical towers) within the ECD and within a 150 feet buffer from the ECD.

Findings: The City Council finds that Specific Plan Requirement 10.3.5-10 and the standards outlined in Chapter 6 of the Specific Plan are feasible and that they would reduce potential impacts to riparian habitat and sensitive natural communities to a less than significant level. The requirement and standards are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With the implementation of Specific Plan Requirement 10.3.5-10 and Specific Plan design standards laid out in Chapter 6 of the Specific Plan, future development in Moffett Park would result in minimal impacts to riparian habitat and natural communities by incorporating restoration plans at a minimum 1:1 ratio and complying with the protective ECD building placement, impervious area, and landscaping and lighting standards. Therefore, impacts to riparian habitats or natural communities are less than significant.

Impact BIO-3: The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.5-10: see above under Impact BIO-2.

10.3.5-11: During the environmental review process for future developments containing a wetland or potential wetland on the project site, a formal aquatic resources delineation shall be completed and submitted to the USACE for verification of the presence and extent of jurisdictional waters within Moffett Park. Information about the riparian habitat shall be collected during the site visit for this work as well to evaluate potential impacts to riparian habitat on a project-specific level.

Future development must comply with all state and federal laws and regulations related to disturbance to jurisdictional waters. If it is determined that wetlands within Moffett Park under the USACE's and/or RWQCB's jurisdiction, future project developers would be required to obtain a Section 404 Clean Water Act permit from the USACE, Section 401 water quality certification from the RWQCB, and/or Section 1602 Streambed Alteration Agreement from the CDFW or demonstrate that such permits are not necessary prior to initiating any construction-related activities within jurisdictional waters. Future project developers shall satisfy all agency requirements to mitigate aquatic impacts. These may include avoidance of aquatic resources, measures to minimize impacts, or compensation (e.g., habitat enhancement) for impacts at a minimum of 1:1. Mitigation for the permanent loss of waters of the US and/or state shall be required by either purchasing appropriate mitigation credits from an approved mitigation bank (currently mitigation banks do not exist for this location, but should one become available this would become an option) or via permittee responsible mitigation for which the applicant would need to provide a project-specific Wetland/Riparian Mitigation and Monitoring Plan (MMP) prepared by a qualified wetland restoration ecologist. The MMP would form the basis of the applicants permit package to the USACE, CDFW, and/or RWQCB and shall also be submitted to the City of Sunnyvale for review and approval. At a minimum this plan shall include:

- A description of the impacted water;
- A map depicting the location of the mitigation site(s) and a description of existing site conditions;
- A detailed description of the mitigation design that includes: (i) the location of the created wetlands; (ii) proposed construction schedule; (iii) a planting/vegetation plan; (iv) specific monitoring metrics, and objective performance and success criteria, such as delineation of created area as jurisdictional waters using USACE published methods; and (v) contingency measures if the created wetlands do not achieve the specified success criteria; and
- Short-term and long-term management and monitoring methods.

Findings: The City Council finds the implementation of Specific Plan Requirements 10.3.5-10 and 10.3.5-11 feasible and that they would reduce potential impacts to state or federally protected wetlands to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or

incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Project Requirements 10.3.5-10 and 10.3.5-11, future development projects would reduce potential impacts to state or federally protected wetlands through avoidance of wetlands in project design, or otherwise mitigating impacts to riparian habitats at a minimum 1:1 ratio. If mitigation is required, a project-specific MMP is required to ensure its success. Therefore, impacts to state or federally protected wetlands are less than significant.

Impact BIO-4: The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. **(Less than Significant Impact)**

Specific Plan Standards: Chapter 5 as identified under Impact AES-4 above.

Specific Plan Guidelines: Chapter 5 as identified under Impact AES-4 above.

Specific Plan Policy: OSE-3.4 as identified under Impact AES-4 above.

Findings: The City Council finds that the Specific Plan Standards and Guidelines in Chapters 5 of the Specific Plan and Specific Plan Policy OSE-3.4 are feasible and that they would reduce potential impacts to the movement of resident and migratory birds through Moffett Park to a less than significant level. These standards, guidelines, and policy are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Future development projects in Moffett Park would comply with Specific Plan Standards and Guidelines in Chapters 5 of the Specific Plan to prevent light and glare impacts by avoiding large expanses of glass, reflective or transparent glass, and uplighting. In addition, consistent with Specific Plan Policy OSE-3.4, future projects would integrate dark sky policies complying with the exterior lighting standards described in Section 6.6.9 of the Specific Plan 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. These standards, guidelines, and policies would minimize potential harmful effects of light and glare on migratory bird species, such as building collision, direction confusion, or exhaustion. Therefore, impacts related to the movement of resident and migratory birds through Moffett Park are less than significant.

Impact BIO-6: The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(Less than Significant Impact)**

Specific Plan Requirement: 10.3.5-2 as identified under Impact BIO-1 above.

Findings: The City Council finds that Specific Plan Requirement 10.3.5-2 is feasible and that it would reduce impacts related to potential conflict with a local habitat conservation plan to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Although Moffett Park is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, the Habitat Plan mitigates for burrowing owls outside of the Habitat Plan area because they have an extended boundary that allows for conservation outside of the main Habitat Plan boundary specifically for burrowing owls. With implementation of Specific Plan Project Requirement 10.3.5-2, future development projects would be required to collaborate with the Habitat Plan in the event burrowing owls are detected on a development site. Such collaboration could include compensation for burrowing owl habitat preservation. Therefore, impacts related to plan conflicts are less than significant.

Impact BIO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. **(Less than Significant Cumulative Impact)**

Specific Plan Requirements: 10.3.5-1 through 10.3.5-9 detailed under Impact BIO-1, 10.3.5-10 detailed under Impact BIO-2, 10.3.5-11 detailed under Impact BIO-4.

Specific Plan Standards and Guidelines: Chapter 6 under Impact BIO-2, Chapter 5 under Impact BIO-4/AES-4

Specific Plan Policy: OSE-3.4 detailed under Impact AES-4

Findings: The City Council finds that Specific Plan Requirements 10.3.5-1 through 10.3.5-11, Specific Plan standards and guidelines in Chapters 5 and 6 of the Specific Plan, and Specific Plan Policy OSE-3.4 would reduce potential cumulative impacts to biological resources to less than significant levels. These requirements, standards, guidelines, and policy are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations

have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Implementation of Specific Plan Requirements 10.3.5-1 through 10.3.5-9 would ensure future development projects reduce potential impacts to sensitive natural communities, habitats, and special status plant and animal species to less than significant levels, and ensure compliance with the Habitat Plan. Implementation of Specific Plan Requirements 10.3.5-10, 10.3.5-11, and Specific Plan standards and guidelines in Chapter 6 would ensure future development projects reduce potential impacts to riparian habitat and natural communities and state or federal wetlands. Implementation of Specific Plan standards and guidelines in Chapter 5 and Policy OSE-3.5 would ensure future development projects reduce potential impacts to migratory wildlife to less than significant levels. Refer to the findings and rationale described under Impacts BIO-1 through BIO-4 and Impact BIO-6 above for more detailed descriptions of the rationale of how the individual requirements would reduce respective impacts. For these reasons, impacts related to cumulative biological resources impacts are less than significant.

Cultural and Tribal Cultural Resources

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.2-1: Historic Resource Evaluation. A Historic Resource Evaluation shall be required for future development that would impact properties that may meet the CEQA definition of historic resources, including resources 45 years of age or older and not currently listed/identified.

- At a minimum, the supplemental review effort shall include preparation of a site-specific historic resources report that involves a records search at the Northwest Information Center (NWIC), a review of the Sunnyvale Heritage Resources Inventory, and where there is no evaluation within the last five years (using the Department of Parks and Recreation 523A and B forms), evaluation by a qualified historian or architectural historian to determine if the property meets the CEQA definition of a historic resource.
- If the supplemental review effort does not identify any site or structure that meets the definition of a historic resource that could be affected by construction activities, then no further study or protection is necessary prior to project implementation.

10.3.2-2: Standards for the Treatment of Historic Properties. New construction within historic districts or adjacent to a historic resource, rehabilitation of a historic resource, replacement of an existing historic resource, addition to a historic resource, or a renovation of a historic resource shall conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties, California Historic Building Code, and other applicable regulations.

Findings: The City Council finds that Specific Plan Requirements 10.3.2-1 and 10.3.2-2 feasible and that they would reduce potential impacts to historical resources to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: While the project does not propose the removal of any historic resources, implementation of the Specific Plan would allow for new development and redevelopment over a period of approximately 20 years that could directly or indirectly affect historic resources, including those that have yet to be identified and evaluated. Once future development projects are proposed, compliance with Specific Plan Requirements 10.3.2-1 and 10.3.2-2 listed above would ensure historic resources are identified and treated in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, California Historic Building Code, and other applicable regulations. Therefore, impacts to historical resources are less than significant.

Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is 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). **(Less than Significant Impact)**

Impact TCR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. **(Less than Significant Cumulative Impact)**

Requirement: 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.

- At a minimum, the supplemental review effort shall include preparation of a site-specific historic resources report that involves a records search at the Northwest Information Center (NWIC), a review of the Sunnyvale Heritage Resources Inventory, and where there is no evaluation within the last five years (using the

Department of Parks and Recreation 523A and B forms), evaluation by a qualified historian or architectural historian to determine if the property meets the CEQA definition of a historic resource.

- If the supplemental review effort does not identify any site or structure that meets the definition of a historic resource that could be affected by construction activities, then no further study or protection is necessary prior to project implementation.

10.3.2-4: 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.

Findings: The City Council finds Specific Plan Requirements 10.3.2-3 through 10.3.2-5 feasible and that they would reduce potential impacts to archaeological and tribal cultural resources to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With the implementation of Specific Plan Requirements 10.3.2-3 through 10.3.2-5, future development in Moffett Park would result in minimal impacts to archaeological and tribal cultural resources by requiring monitoring for potential unknown resources, halting construction if a resource is encountered, and implementing appropriate treatment to reduce impacts to the resource to a less than significant level. Therefore, impacts to archaeological and tribal cultural resources are less than significant. Cumulative projects are subject to the same or similar Specific Plan Requirements and existing regulations (including AB 52 and General Policy CC-55) to protect tribal cultural resources.

Impact CUL-3: The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.2-5 detailed under Impact CUL-2 above.

Findings: The City Council finds Specific Plan Requirement 10.3.2-5 feasible and that it would reduce potential impacts to buried human remains to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Future development implementing Specific Plan Requirement 10.3.2-5 would protect human remains if discovered by halting construction if a resource is encountered and requiring appropriate treatment to reduce impacts to a less than significant level. Therefore, impacts to human remains are less than significant.

Impact CUL-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant cultural resources impact. **(Less than Significant Cumulative Impact)**

Specific Plan Requirements: 10.3.2-1 and 10.3.2-2 detailed under Impact CUL-1, 10.3.2-3 through 10.3.2-5 detailed under Impact CUL-2.

Findings: The City Council finds Specific Plan Requirements 10.3.2-1 through 10.3.2-5 feasible and that they would reduce potential cumulative impacts to cultural resources to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: All cumulative developments, including cumulative projects adjacent to Moffett Park, are subject to the development review process to assess site specific cultural resources impacts and required to implement similar avoidance measures as the above Specific Plan requirements to protect cultural resources. Therefore, cumulative impacts to cultural resources are less than significant.

Energy

Impact EN-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **(Less than Significant Impact)**

Impact EN-3: The project would not result in a substantial increase in demand upon energy resources in relation to projected supplies. **(Less than Significant Impact)**

Specific Plan Policies: 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.

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.

TDMP-2.1: Establish a Moffett Park Transportation Management Association (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.

Findings: The City Council finds Specific Plan Policies DS-4.1, DS-4.8, DS-5.5, IU.5-1 through IU-5.4, and TDMP-2.1 through 2.5 feasible and that they would ensure that the project does not result in wasteful or inefficient energy consumption or a substantial increase in demand upon projected energy supplies. These policies are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Implementation of Specific Plan Policies DS-4.1, DS-4.8, DS-5.5, and IU.5-1 through IU-5.4 would ensure future development projects in Moffett Park meet or exceed state mandated Title 24 energy efficiency, CALGreen, and Sunnyvale Green Building. Additionally, implementation of Specific Plan Policies TDMP-2.1 through TDMP-2.5 would reduce gasoline consumption by providing multi-modal transportation options and alternatives to SOV trips, which would reduce energy consumption. Future development would also comply with the City's Reach Code, which prohibits natural gas use for most land uses. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources are less than significant.

Impact EN-2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

Specific Plan Policies: DS-4.1, DS-4.8, DS-5.4, and IU-5.1 through IU-5.5 described under Impact EN-1 above.

Findings: The City Council finds Specific Plan Policies DS-4.1, DS-4.8, DS-5.5, and IU.5-1 through IU-5.4 feasible and that they would reduce impacts associated with potential energy plan conflicts to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Implementation of Specific Plan policies DS-4.1, DS-4.8, DS-5.5, and IU.5-1 through IU-5.4 would ensure future development projects in Moffett Park meet or exceed state mandated Title 24 energy efficiency, CALGreen, and Sunnyvale Green Building energy requirements. In addition, future projects are required to comply with the City's Reach Code requirements and the project is consistent with the City's Climate Action Playbook. Therefore, the project would not conflict with state or local plans for renewable energy or energy efficiency.

Impact EN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant energy impact. **(Less than Significant Cumulative Impact)**

Specific Plan Policies: DS-4.1, DS-4.8, DS-5.4, IU-5.1 through IU-5.5, and TDMP-2.1 through TDMP-2.5 described under Impact EN-1/Impact EN-3 above.

Findings: The City Council finds the above Specific Plan Policies feasible and that they would reduce cumulative energy impacts to a less than significant level. These policies are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Energy is a cumulative resource. If a project is determined to have a significant energy impact, it is concluded that the impact is also a cumulative impact. Per the rationale for Impact EN-1 through Impact EN-3, the project would not result in a significant (or cumulatively significant) energy impact.

Geology and Soils

Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact)**

Specific Plan Requirements: 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.

Findings: The City Council finds Specific Plan Requirement 10.3.2-6 feasible and that it would reduce potential impacts to unique paleontological resources to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Requirement 10.3.2-6, future development projects would not result in significant impacts to unknown paleontological resources by monitoring construction work at depths of eight feet or greater (which is where

paleontological resources could be present) and properly protecting, recovering, and documenting resources (if found).

Impact GEO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact)**

Specific Plan Requirements: 10.3.2-6 described under Impact GEO-6 above.

Findings: The City Council finds Specific Plan Requirement 10.3.2-6 feasible and that it would reduce potential impacts to unique paleontological resources to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Cumulative projects are all required to comply with existing regulations, including CEQA, California Building Code, National Pollution Discharge Elimination System permits, Sunnyvale Municipal Code, to reduce geology and soil impacts to a less than significant level. In addition, cumulative projects are subject to the same or similar requirement as Specific Plan Requirement 10.3.2-6 to protect paleontological resources (see rationale under Impact GEO-6 above). For these reasons, the project would not result in a significant cumulative geology and soils impact.

Hazardous and Hazardous Materials

Impact HAZ-2: The project would not 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. **(Less than Significant Impact)**

Impact HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant Impact)**

Impact HAZ-4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; however, it would not create a significant hazard to the public or the environment. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.1-1: Environmental Site Assessment. For any renovation, modification, or redevelopment of a property within Moffett Park that includes subsurface disturbance and requires City review, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society for Testing and Materials (ASTM) Standard Designation E 1527-13 (or the standard that is effective at the time the Phase I ESA is completed) to identify Recognized Environmental Conditions, evaluate the property history, and

establish if the property has been or is likely to have environmental impacts. The City or its designated environmental professional shall review the Phase I ESA to determine if additional investigation is required based on currently available information, which may supersede the designated property's risk value.

10.3.1-2: Site Management Plan. At properties with known or suspected minor environmental impacts that can be addressed safely and effectively during subsurface disturbance activities, a Site Management Plan (SMP) shall be prepared prior to development activities to establish management practices for handling contaminated soil, soil vapor, groundwater, or other materials during construction activities. Subsurface sampling shall be compared to then-current DTSC, Water Board, or U.S. EPA screening levels for the proposed land use and background levels to determine if risk is present. The SMP shall also address management of site risks and previously unknown conditions during earthwork activities in areas where impacted soil, soil vapor, and/or groundwater are present or suspected. Recommendations for elements to be included in site-specific Health and Safety Plans (HSPs), to be prepared by individual contractors for their employees' safety based on their work scope, may also be included in the SMP. Worker training requirements and health and safety shall be described in the SMP. The SMP shall be reviewed and approved by a qualified environmental regulatory agency such as California Department of Toxic Substances Control (DTSC), San Francisco Bay Regional Water Quality Control Board (RWQCB), or Santa Clara County Department of Environmental Health (SCCDEH*).*

10.3.1-3: Phase II Environmental Site Assessment. At properties with known or suspected environmental impacts that require additional investigation prior to subsurface disturbance activities, a Phase II ESA shall be prepared and implemented prior to development activities to determine the nature and extent of impacts. The Phase II ESA shall be reviewed and approved by a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH. Consideration should be given to obtaining approval for an investigation plan from the oversight agency prior to completing the Phase II investigation. The scope of work shall include soil, groundwater, and/or soil vapor sampling in areas of potential concern to evaluate if site-specific measures are needed to protect the health and safety of property occupants and construction workers. For example, for projects located on land historically used for agricultural, weed abatement, or related activities, the potential for elevated levels of organochlorinated pesticides shall be addressed. For projects located within proximity to SR 237, the potential for ADL contamination shall be addressed. Field techniques that may be employed under include but are not limited to:

- Collecting samples of soil, soil vapor, groundwater, sediment, indoor air, outdoor air, and other media of interest for laboratory analysis;
- Drilling using methods such as direct-push, hollow-stem auger, vibracore, air rotary, and mud rotary;
- Trenching, potholing, and excavating;

- Constructing temporary or permanent soil vapor or groundwater wells or sampling points; and
- Profiling geologic, hydrologic, geophysical, and chemical parameters of the subsurface using invasive and noninvasive tools.

10.3.1-4: Remediation and/or Management Measures. At properties with known environmental impacts that must be addressed to make the property compatible with its future use, appropriate remediation and/or management measures must be implemented under the oversight and to the satisfaction of a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH. Contaminants are considered adequately remediated if levels are at or below the current DTSC, Water Board, or U.S. EPA cleanup levels or background levels. Remediation techniques may include but are not limited to excavation, extraction, bioremediation, oxidation, reduction, phytoremediation, and thermal treatment. Management measures may include engineering and administrative controls such as but not limited to impermeable surface caps, vapor intrusion mitigation systems, permeable reactive barriers, land use covenants, and deed restrictions. Field techniques that may be employed under include but are not limited to:

- Excavation, extraction, or removal of impacted material for off-site disposal or temporary on-site storage or treatment;
- Ex-situ (i.e., above-ground) treatment of impacted material via physical and/or chemical processing; and
- In-situ (i.e., below-ground) treatment of impacted material via intrusive physical and/or chemical processing.

These field techniques include those currently known and used (e.g., dig-and-haul, landfarming, groundwater and soil vapor extraction and treatment, subsurface injection, etc.) and those that will become state of the art in the future. Prior to the issuance of building permits, the applicant shall demonstrate that hazardous materials do not exist on the site or that the proposed construction and use of the site are approved by the environmental oversight agency with jurisdiction that meets the requirements of Health and Safety Code Section 101480.

10.3.1-5: Dewatering Management Plan. For future development projects that require dewatering, a Dewatering Management Plan shall be prepared to determine how the dewatering activities will affect local groundwater quality, especially regarding movement of known or interpolated contaminated groundwater plumes. The Dewatering Management Plan also shall include protocols to evaluate extracted water quality and perform proper disposal of the water. Compliance with permitting requirements shall be described if required by the disposal method. The Dewatering Management Plan shall be prepared by a California Certified Hydrogeologist and approved by a qualified environmental regulatory agency such as DTSC, RWQCB, or SCCDEH.

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

10.3.1-7: Lead-Based Paint Survey. Prior to issuance of a demolition permit, a lead-based paint (LBP) survey shall be completed on all structures proposed for demolition that are known or suspected to have been constructed prior to 1978. If LBP is identified, then federal and state construction worker health and safety regulations shall be followed during renovation or demolition activities. If loose or peeling LBP is identified at the building, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations. Requirements set forth in the CCR Title 8, Section 1532.1 shall be followed during demolition activities, including employee training, employee air monitoring, and dust control. Any debris or soil containing LBP or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

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

Findings: The City Council finds Specific Plan Requirements 10.3.1-1 through 10.3.1-8 feasible and that they would reduce potential impacts related to contaminated groundwater, soil, soil vapor, asbestos-containing materials, lead-based paints, and polychlorinated biphenyls to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: There are three sites within Moffett Park on the Cortese List. With implementation of Specific Plan Requirements 10.3.1-1 through 10.3.1-5, future development projects in Moffett Park (including those three sites on the Cortese List) would reduce impacts from any existing on-site soil, soil vapor, and/or groundwater contamination (including if they are in proximity to a future school) by requiring sampling for contaminants, proper handling of hazardous materials contamination, and remediation of contamination under regulatory oversight. Additionally, implementation of Specific Plan Requirements 10.3.1-6 and 10.3.1-7 would reduce impacts associated with the release of asbestos-containing materials, lead-based paint, and polychlorinated biphenyls from demolition of buildings (including if they are in proximity to a future school) by requiring surveys and proper removal of potential contaminants. Further, future development projects (including if they are in proximity

to a future school) requiring imported soils would implement Specific Plan Requirement 10.3.1-8, which would require proper sampling of imported soils to ensure the soils are free of contamination. Therefore, impacts are less than significant.

Impact HAZ-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact. **(Less than Significant Cumulative Impact)**

Specific Plan Requirements: 10.3.1-1 through 10.3.1-8 detailed under Impact HAZ-1 above.

Findings: The City Council finds Specific Plan Requirements 10.3.1-1 through 10.3.1-8 feasible and that they would reduce potential cumulative hazardous materials impacts to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Moffett Park and surrounding areas have similar history of former agricultural use and potential contamination due to the use of hazardous materials by commercial and industrial uses. Existing regulations are in place to reduce hazardous materials impacts to acceptable levels, preventing cumulative impacts. Future development projects within and outside Moffett Park are subject to existing regulations that ensure the safe storage, management, and disposal of hazardous materials. Future development projects are also subject to the City's development review process, which requires site-specific evaluation of impacts under CEQA. Development in adjacent jurisdictions, such as the City of Mountain View, are subject to a similar development review process. Projects resulting in hazardous materials impacts would be mitigated to a less than significant level through compliance with existing regulations and implementation of project-specific measures (such as Specific Plan Project Requirements 10.3.1-1 through 10.3.1-8). For these reasons, the cumulative hazardous materials impact would be less than significant.

Hydrology and Water Quality

Impact HYD-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

Impact HYD-2: The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

Impact HYD-5: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

Specific Plan Requirement: 10.3.1-5 detailed under Impact HAZ-2 above.

Findings: The City Council finds Specific Plan Requirement 10.3.1-5 feasible and it would reduce water quality impacts to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Future development is required to comply with existing regulations including the MRP (Provision C.12.f and C.3), City's adopted PCB screening process, statewide NPDES Construction General Permit that ensure less than significant water quality impacts during construction and operation. In the event contaminated groundwater is encountered during future construction activities, compliance with Specific Plan Project Requirement 10.3.1-5 ensures proper management and disposal. The project would not otherwise interfere with sustainable groundwater management.

Impact HYD-3: The project would not 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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 impede or redirect flood flows. **(Less than Significant Impact)**

Specific Plan Standards: Chapter 5.2.3, Standard 2: Development shall comply with paving area maximums in Table 6 (in the Specific Plan). Maximum area is based on net parcel areas excluding publicly accessible open spaces and complete street easements and dedications. Paving area includes any paved or hardscaped area used for vehicular circulation and parking of vehicles.

Findings: The City Council finds Specific Plan Standard 2 in Chapter 5.2.3 of the Specific Plan feasible and that it would reduce potential impacts related to flooding and drainage pattern alteration to a less than significant level. This standard is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Standard 2 in Chapter 5.2.3, future development projects would comply with maximum established paving area requirements and would ensure impacts related to flooding and drainage pattern are reduced. Based on Table 6 in the Specific Plan, future residential developments would be allowed to have a maximum of 15 percent paved areas/impervious surfaces, commercial developments would have a maximum of 10 percent paved areas, and non-residential development along the perimeter of Moffett Park would have a maximum of 25 percent paved areas. The proposed 215 to 240 acres of park and open space areas would increase the overall amount of landscaping and pervious surfaces in Moffett Park. This decrease in impervious surfaces would result in a corresponding increase in percolation of runoff and would not result in flooding or stormwater runoff greater than existing conditions and the impact is less than significant.

Noise and Vibration

Impact NOI-1: The project would not result in 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. **(Less than Significant Impact)**

Specific Plan Requirements: 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 specified in the Noise Control Plan and implemented during construction shall include the following noise control strategies:

- Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Impact tools (e.g., jackhammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools.
- Stationary noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other similar measures.
- Noise and vibration reducing pile-driving techniques shall be implemented during construction and shall be monitored to ensure no damage to nearby structures occurs (i.e., vibrations above PPVs of 0.25 in/sec at nearby structures). These techniques shall include:
  - 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.[3]
- 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

[3] Cushion blocks are blocks of material that are used with impact hammer pile drivers. They consist of blocks of material placed atop a piling during installation to minimize noise generated when driving the pile. Materials typically used for cushion blocks include wood, nylon, and micarta.

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.

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.

Findings: The City Council finds Specific Plan Requirement 10.3.4-1 and 10.3.4-2 feasible and that they would reduce potential impacts related to temporary and permanent increases in ambient noise and vibration levels to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Requirement 10.3.4-1, future development projects in Moffett Park would reduce construction-related noise impacts to a less than significant level by limiting the days and hours allowed for construction activity and requiring the implementation of construction noise control and attenuation measures. Additionally, with implementation of Specific Plan Requirement 10.3.4-2, future developments including mechanical equipment would be required to undergo mechanical equipment design review to ensure mechanical equipment would not exceed City standards for noise and vibration limits. Therefore, construction and operational noise impacts are less than significant.

Impact NOI-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact)**

Specific Plan Requirements: 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[4]
- At least 48 hours prior to pile-driving activities, notifying building owners and occupants within 600 feet of the project area of the dates, hours, and expected duration of such activities

10.3.4-6: Heavy Equipment Communications. The contractor shall alert heavy equipment operators to the proximity of the adjacent structures so they can exercise extra care.

10.3.4-7: Construction Vibration Monitoring, Treatment, and Reporting Plan. For projects requiring impact or vibratory pile driving, a Construction Vibration Monitoring, Treatment, and Reporting Plan shall be implemented to document conditions prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. The construction vibration monitoring plan shall include, but not be limited to, the following measures:

- Document conditions at all structures located within 100 feet of pile driving activities and at historic structures located within 275 feet of pile driving

[4] Cushion blocks are blocks of material that are used with impact hammer pile drivers. They consist of blocks of material placed atop a piling during installation to minimize noise generated when driving the pile. Materials typically used for cushion blocks include wood, nylon, and micarta.

activities prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. Specifically:

  - Vibration limits shall be applied to vibration-sensitive structures located within 100 feet of any high impact construction activities, such as pile driving, and 275 feet of historic buildings.
  - Performance of a photo survey, elevation survey, and crack monitoring survey for each structure of normal construction within 100 feet of any high impact construction activities and each historic structure within 275 feet of pile driving activities. Surveys shall be performed prior to any construction activity, in regular intervals during construction, and after project completion, and shall include internal and external crack monitoring in structures, settlement, and distress, and shall document the condition of foundations, walls and other structural elements in the interior and exterior of said structures.

- Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits.
- At a minimum, vibration monitoring shall be conducted during all pile driving activities.
- If vibration levels approach limits, suspend construction, and implement contingency measures to either lower vibration levels or secure the affected structures.
- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.
- Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

Findings: The City Council finds Specific Plan Requirements 10.3.4-3 through 10.3.4-7 feasible and that they would reduce potential impacts related to construction-related vibration to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Requirements 10.3.4-3 through 10.3.4-7, future development projects in Moffett Park would not result in significant construction-

related vibration impacts by prohibiting use of heavy vibration-generating construction equipment within 25 feet of residences and hotels/motels and requiring noise and vibration reducing pile-driving techniques during construction, completing pre- and post-construction monitoring, and making appropriate repairs or compensation for damage. Therefore, groundborne vibration impacts are less than significant.

Impact NOI-3: The project would be located within the vicinity of an airport land use plan; however, the project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

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

Findings: The City Council finds Specific Plan Requirement 10.3.4-8 feasible and that it would reduce potential impacts related to airport-related noise to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: With implementation of Specific Plan Requirement 10.3.4-8, future development projects in Moffett Park would comply with the CLUP by completing a noise analysis and implementing identified noise reduction and insulation measures in project designs. Therefore, impacts of potential excessive noise levels to people residing or working in Moffett Park in the vicinity of Moffett Federal Airfield are less than significant.

Impact NOI-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant noise impact. **(Less than Significant Impact)**

Specific Plan Requirements: 10.3.4-1 and 10.3.4-2 detailed above in Impact NOI-1, 10.3.4-3 through 10.3.4-7 detailed above in Impact NOI-2, and 10.3.4-8 detailed above in Impact NOI-3.

Findings: The City Council finds Specific Plan Requirements 10.3.4-1 through 10.3.4-8 feasible and that they would reduce potential cumulative noise and vibration impacts to a less than significant level. These requirements are adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the

project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Cumulative projects are subject to CEQA and would be required to implement similar noise and vibration reduction measures as the identified Specific Plan requirements, and be required to comply with the Moffett Federal Airfield CLUP. As described in greater detail in the rationales for Impact NOI-1 through NOI-3 above, implementation of Specific Plan Requirements 10.3.4-1 through 10.3.4-8 would reduce potential impacts to existing ambient noise levels, generation of excessive groundborne vibration or noise, and people residing or working in the project area to less than significant levels. Therefore, impacts related to cumulative noise and vibration are less than significant.

Public Services and Recreation

Impact PS-4: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. **(Less than Significant Impact)**

Impact REC-2: The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

Specific Plan Policies: OSE-2.1: Provide a minimum of one tot lot for ages two to five within each residential neighborhood or one per 7,000 residents.

OSE-2.2: Provide a minimum of one inclusive, all-abilities and ages play space within each residential neighborhood or one per 7,000 residents.

OSE-2.4: Provide a minimum of four dog parks or dog walking areas located within 10-minute walk of residential buildings or one per 10,500 residents.

OSE-2.5: Provide a minimum of one multi-use/flexible field area, 50 by 100 yards minimum or equivalent to a high school soccer field as defined by the US Youth Soccer Association.

OSE-2.6: Provide a minimum of three open field/flexible recreation areas, 35 by 65 yards minimum or equivalent to a U10 soccer field as defined by the US Youth Soccer Association. Fields may be synthetic or natural turf with grading and drainage to allow for regular use for informal/drop-in, youth sports, and community events.

OSE-2.7: When and where possible, increase the quantity of multi-use flex fields to include more opportunities for informal and youth athletics.

OSE-2.8: Co-locate a community or neighborhood park with potential school site(s).

Findings: The City Council finds Specific Plan Policies OSE-2.2 and OSE-2.5 through OSE-2.8 feasible and that they would reduce potential impacts to park and recreational facilities to a less than significant level. These policies have been adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: While the Specific Plan buildout would result in new residents and increase the demand on park and recreational facilities in the City, compliance with Specific Plan Policies OSE-2.2 and OSE-2.5 through OSE-2.8 above would ensure the development of park and recreational facilities in Moffett Park adequately serve future residents in Moffett Park and throughout the City. The physical impacts of constructing the park and open space would be reduced to less than significant levels through compliance with existing regulations including General Plan and Specific Plan requirements and policies identified for air quality, biological resources, cultural resources, energy, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources impacts. Therefore, impacts to existing park and recreational facilities and construction of new facilities are less than significant.

Impact REC-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **(Less than Significant Impact)**

Specific Plan Policies: OSE-2.1 through OSE-2.2 and OSE-2.4 through OSE-2.8 detailed under Impact PS-4/Impact REC-2 above.

Findings: The City Council finds Specific Plan Policies OSE-2.1, OSE-2.2, and OSE-2.4 through OSE-2.8 feasible and that they would reduce potential impacts to park and recreational facilities to a less than significant level. These policies have been adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: While the Specific Plan buildout would result in new residents and increase the demand on park and recreational facilities in the City, compliance with Specific Plan Policies OSE-2.2 and OSE-2.5 through OSE-2.8 above requires future developments to provide recreational amenities, which would ensure the development of park and recreational facilities in Moffett Park adequately serve future residents in Moffett Park and throughout the City. Therefore, the Specific Plan would not result in

substantial deterioration to existing park and recreational facilities and the impacts to these facilities are less than significant.

Impact REC-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant recreation impact. **(Less than Significant Impact)**

Specific Plan Policies: OSE-2.1 through OSE-2.2 and OSE-2.4 through OSE-2.8 detailed under Impact PS-4/Impact REC-2 above.

Findings: The City Council finds Specific Plan Policies OSE-2.1, OSE-2.2, and OSE-2.4 through OSE-2.8 feasible and that they would reduce potential cumulative recreation impacts to a less than significant level. These policies have been adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: While the cumulative projects would result in new residents and increase the demand on park and recreational facilities in the City, compliance with the City's Municipal Code requirements for parkland dedication and in-lieu fees as well as Specific Plan Policies OSE-2.2 and OSE-2.5 through OSE-2.8 above would ensure adequate park and recreational facilities to serve the City's residences. In addition, cumulative projects that include new park and recreational facilities are subject to the City's development review process and existing regulations that would require the implementation of the same or similar Specific Plan policies identified to reduce construction-related air quality, biological resources, cultural resources, energy, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources impacts to a less than significant level. Therefore, the cumulative projects (including the Specific Plan) would not result in significant cumulative impacts to park and recreational facilities.

Transportation

Impact TRN-1: The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

Impact TRN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. **(Less than Significant Cumulative Impact)**

Specific Plan Policies: 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.

TDMP-1.6: Promote and support flexible approaches to parking supply and management by coordinating parking infrastructure and prioritizing shared facilities.

Findings: The City Council finds the Specific Plan Policies listed above feasible and that they would reduce potential impacts to transit, roadway, bicycle, and pedestrian facilities to a less than significant level. These policies have been adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: Implementation of Specific Plan Policies listed above would promote the use of multi-modal transportation by increasing transit availability, convenience, and capacity; enhancing the existing bicycle network with bridges at key crossings, bikeways, protected bicycle lanes, and phased signals; and enhancing the existing pedestrian network wide and/or raised crosswalks, pedestrian amenities along multi-use paths, and phased signals. Therefore, the project is consistent with programs, plans, ordinances, and policies addressing transit, roadways, bicycle facilities, and pedestrian facilities and the impact is less than significant and less than significant cumulatively. All other cumulative impacts were discussed to be less significant because the project-level less than significant VMT results also represent cumulative conditions and the City's development review process for cumulative projects ensures no hazards would result from design, incompatible uses, or emergency access.

Utilities and Service Systems

Impact UTL-2: The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

Specific Plan Policies: IU-3.2: Prioritize water conservation and the use of recycled water for all outdoor, non-drinkable uses, including in streets, 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 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.

Findings: The City Council finds that Specific Plan Policies IU-3.2, IU-3.3, and IU-3.5 are feasible and that they would reduce potential impacts to water supplies to a less than significant level. This requirement is adopted by the City Council as part of its adoption of the Specific Plan. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale: The Water Supply Assessment (WSA) prepared for the project concluded that, while the Specific Plan would result in an increase in water demand within the City of Sunnyvale, the City's water supply contract with the SFPUC and Valley Water would meet the City's projected water demand and the project's water demands under normal years. As described in the WSA, the City's available potable and non-potable water supplies are expected to be sufficient to meet demands of existing uses and future uses under normal conditions. Under dry and multiple-dry years, the City would likely need to impose water conservation measures, through execution of water contingency shortage plans, to reduce demand. Implementation of Specific Plan policies IU-3.2, IU-3.3, and IU-3.5 detailed above would further reduce the demand and impact from future development in Moffett Park. Therefore, potential impacts to water supply are less than significant.

2.3 FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE IMPACTS

Air Quality

Impact AIR-1: The project would conflict with or obstruct implementation of the applicable air quality plan. **(Significant and Unavoidable Impact)**

Specific Plan Requirements: 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 DPM, $PM_{2.5}$, 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 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 Bay Area Air Quality Management District (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 EIR. 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 NOx emissions. Exhaust emission (NOx 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 NOx 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 NOx emissions that meet the NOx 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 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.

10.3.3-3: Generator Emissions. All diesel standby emergency generators powered by diesel fuel shall meet US 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 US EPA Tier 4 standards for particulate matter emissions.

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 is 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.

Specific Plan Policies: TDMP-2.1: Establish a Moffett Park Transportation Management Association (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.

Specific Plan Standards: Standard 8.2.4.c: New development is to meet the following peak hour trip reduction rates through efforts defined in a submitted Transportation Demand Plan (TDM) and through participation in programs of the MPSP 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%

Findings: The City Council finds that there are no feasible mitigation measures beyond what is required by the Specific Plan requirements, policies, and standard identified above that would reduce the impact to a less than significant level. Therefore, this impact is significant and unavoidable.

Rationale: The BAAQMD CEQA Air Quality Guidelines set forth criteria for determining consistency with the 2017 Clean Air Plan (CAP). 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. BAAQMD has different thresholds of significance for protecting public health when evaluating land use plans versus projects. The BAAQMD Air Quality Guidelines do not have thresholds related to direct and indirect regional criteria pollutant emissions resulting from plan implementation; rather, they only require emissions computations for project-level analysis. An assessment of the Specific Plan and future Specific Plan development under both the BAAQMD plan- and project-level thresholds was completed in the Draft EIR. As discussed below, the Specific Plan is consistent with the 2017 CAP in all aspects except for exceeding the BAAQMD project-level, operational criteria air pollutant thresholds.

(1) The goals of the 2017 CAP are: protecting public health and protecting the climate. The project's consistency with the 2017 CAP goal of protecting the climate is discussed separately. Public health is protected by progress towards

attaining air quality standards for criteria air pollutants (during construction and operation) and eliminating health risk.

Attaining Air Quality Standards for Criteria Air Pollutants

Specific Plan Requirements 10.3.3-1 and 10.3.3-2 require future construction projects implement best management practices to reduce fugitive dust, complete project-specific modeling, and implement measures to reduce emissions below the BAAQMD thresholds of significance. Thus, construction period emissions would be reduced to less than significant levels.

Operational emissions would be generated primarily from vehicles driven by future residents, employees, customers, and vendors. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) also contribute to the project's operational emissions. The buildout of the Specific Plan would exceed BAAQMD's project-level significance thresholds for ROG, PM_{10}, and $PM_{2.5}$.

The significant operational ROG emissions are attributed to the use of architectural coatings (i.e., paint) for the additional buildings resulting from implementation of the Specific Plan. Specific Plan Requirement 10.3.3-2 requires the use of low VOC coatings in future construction. While it is feasible and enforceable for the City to require super compliant VOC coatings be applied initially, the City cannot ensure that future occupants or tenants use super compliant VOC coatings during reapplication for the lifetime of the development project. In addition, there is no feasible mitigation measure to ensure consumer products (such as inks, coatings, and adhesive) used by future residents and tenants would be low in VOCs.

The significant levels of operational PM_{10} and $PM_{2.5}$ primarily result from the increase in traffic and associated tailpipe exhaust emissions. Specific Plan Policies TDPM-2.1 through TDMP-2.5 would reduce mobile emissions to the extent feasible and Specific Plan Requirement 10.3.3-3 would reduce emissions associated with diesel generators. During project-level review of future development projects, development projects would be evaluated for consistency with Specific Plan Project Requirement 10.3.3-3, Specific Plan Policies TDMP-2.1 through TDMP-2.4, Specific Plan Standard 8.2.4.c, and all feasible and applicable measures to reduce operational criteria air pollutants would be required as part of the project or as conditions of approval. The Specific Plan could substantially reduce emissions of regional air pollutants over the long-term through implementation of the above identified policies, however, the policies and measures would not be capable of reducing the impact to a less than significant level given the magnitude of the impact (the project would be about 19 times the threshold for ROG, about eight times the threshold for PM_{10}, and about three times the threshold for $PM_{2.5}$). Therefore, the buildout of the Specific Plan

would result in significant and unavoidable operational criteria pollutant emissions.

Eliminating Health Risk

Implementation of Specific Plan Project Requirement 10.3.3-4 would reduce construction TAC and $PM_{2.5}$ emissions by at least 85 percent below existing emission rates by requiring the use of efficient and cleaner construction equipment, renewable/alternative fuel, and low-VOC coatings, resulting in construction health risk impacts below BAAQMD thresholds of significance. Modeling completed for the project confirmed that operational health risk impacts from project traffic to off-site receptors was below the BAAQMD thresholds of significance. In addition, compliance with Specific Plan Requirements 10.3.3-3 and 10.3.3-4 would ensure future backup diesel generators would have engines that meet or exceed Tier 4 standards for particulate matter emissions and result in health risk impacts below the BAAQMD thresholds of significance. Therefore, operational health risk impacts are less than significant.\

(2)(3) Table 3.3-2 in the Draft EIR includes appliable 2017 CAP control measures and a discussion of how the proposed Specific Plan would be consistent with the CAP control measures to reduce automobile trips, conserve energy, and conserve water. Future development under the Specific Plan would comply with existing regulations and Specific Plan policies that support and are consistent with applicable 2017 CAP control measures. As such, the Specific Plan does not interfere with implementation of the 2017 CAP control measures.

In addition, Table 3.3-3 in the Draft EIR provides population and traffic conditions for existing land uses, the buildout of the adopted Specific Plan, and the buildout of the proposed Specific Plan. Compared to existing conditions, the proposed Specific Plan would increase traffic by 162,312 daily trips that result in an additional 2.19 million daily VMT. Additionally, the proposed Specific Plan would result in an increase of 60,471 new jobs and the addition of 42,000 new residents in Moffett Park. Because there is no population in Moffett Park under existing conditions, this analysis used the per capita VMT to address changes in traffic with respect to population. This changes from 35.15 miles per capita to 24.92 miles per capita, which is computed as a 29 percent decrease. While the proposed Specific Plan would increase traffic trips, the rate of increase in traffic measured as the rate of trips or VMT would be less than the increase in service population.

Impact AIR-2: The project would 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. **(Significant and Unavoidable Impact)**

Specific Plan Requirements: 10.3.3-1 through 10.3.3-3 identified under Impact AIR-1 (detailed above).

Specific Plan Policies: TDMP-2.1 through TDMP-2.5 identified under Impact AIR-1 (detailed above).

Findings: The City Council finds that there are no feasible mitigation measures beyond what is required by the Specific Plan requirements and policies identified above that would reduce the project's significant operational criteria air pollutant emissions to below the BAAQMD thresholds of significance. Therefore, the impact is significant and unavoidable.

Rationale: As discussed in detail under Impact AIR-1, Specific Plan Requirements 10.3.3-1 and 10.3.3-2 require future construction projects implement best management practices to reduce fugitive dust, complete project-specific modeling, and implement measures to reduce emissions below the BAAQMD thresholds of significance. Thus, construction period emissions would be reduced to less than significant levels.

Operational emissions would be generated primarily from vehicles driven by future residents, employees, customers, and vendors. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) also contribute to the project's operational emissions. The buildout of the Specific Plan would exceed BAAQMD's project-level significance thresholds for ROG, PM_{10}, and $PM_{2.5}$.

The significant operational ROG emissions are attributed to the use of architectural coatings (i.e., paint) for the additional buildings resulting from implementation of the Specific Plan. Specific Plan Requirement 10.3.3-2 requires the use of low VOC coatings in future construction. While it is feasible and enforceable for the City to require super compliant VOC coatings be applied initially, the City cannot ensure that future occupants or tenants use super compliant VOC coatings during reapplication for the lifetime of the development project. In addition, there is no feasible mitigation measure to ensure consumer products (such as inks, coatings, and adhesive) used by future residents and tenants would be low in VOCs.

The significant levels of operational PM_{10} and $PM_{2.5}$ primarily result from the increase in traffic and associated tailpipe exhaust emissions. Specific Plan Policies TDPM-2.1 through TDMP-2.5 would reduce mobile emissions to the extent feasible and Specific Plan Requirement 10.3.3-3 would reduce emissions associated with diesel generators. During project-level review of future development projects, development projects would be evaluated for consistency with Specific Plan Project Requirement 10.3.3-3 and Specific Plan Policies TDMP-2.1 through TDMP-2.4 and all feasible and applicable measures to reduce operational criteria air pollutants would be required as part of the project or as conditions of approval. The Specific Plan could substantially reduce emissions of regional air pollutants over the long-term through implementation of the above identified policies, however, the policies and measures would not be capable of reducing the impact to a less than significant level

given the magnitude of the impact (the project would be about 19 times the threshold for ROG, about eight times the threshold for PM_{10}, and about three times the threshold for $PM_{2.5}$). Therefore, the buildout of the Specific Plan would result in significant and unavoidable operational criteria pollutant emissions.

Impact AIR-C: The project would result in a cumulatively considerable contribution to a significant cumulative air quality impact. **(Significant and Unavoidable Cumulative Impact)**

Specific Plan Requirements: 10.3.3-1 through 10.3.3-5 identified under Impact AIR-1, Impact AIR-3, and Impact AIR-4 (detailed above).

Specific Plan Policies: TDMP-2.1 through TDMP-2.5 identified under Impact AIR-1 (detailed above).

Findings: The City Council finds that there are no feasible mitigation measures beyond the required Specific Plan requirements and policies that would reduce the identified significant cumulative air quality impacts to a less than significant level. Therefore, this impact is significant and unavoidable.

Rationale: By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to result in the region being in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In other words, if a project results in a significant air quality impact, it would also result in a significant cumulative air quality impact. As discussed in the rationale for Impact AIR-1, Impact AIR-2, the project results in significant and unavoidable air quality impacts in regard to significant operational criteria air pollutant emissions. As discussed in the rationale for Impact AIR-3 and Impact AIR-4, the project would result in less than significant (and therefore, less than significant cumulative) air quality impacts related to community health risk and odors.

Greenhouse Gas Emissions

Impact GHG-1: The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Significant and Unavoidable Impact)**

Specific Plan Requirements: 10.3.3-1 and 10.3.3-2 detailed above under Impact AIR-1.

8.3.3-4: Future development projects shall comply with EV system requirements in the most recently adopted version of CALGreen Tier 2 requirements at the time a building permit application is filed.

10.4-20: Develop solid waste minimization programs that include increased rates of recycling, composting of food, and reuse of construction materials.

10.6: Update Specific Plan policies and implementing measures on a regular basis (e.g., every five years) to measure progress and incorporate new measures to progress toward achieving carbon neutrality. Future updates to the Specific Plan would

address the goals of new local and state plans (e.g., state's upcoming scoping plan) to achieve GHG emissions reductions as well as new methods to more accurately model GHG emissions and implement innovative measures or project designs.

Specific Plan Policies: TDMP-2.1 through TDMP-2.5 detailed under Impact AIR-1 above.

Findings: The City Council finds that there are no feasible mitigation measures beyond the Specific Plan requirements and policies above that would reduce the impact to a less than significant level. Therefore, this impact is significant and unavoidable.

Rationale: GHG emissions would result from the future construction and operation of uses in Moffett Park. Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions. BAAQMD encourages the incorporate of best management practices to reduce GHG emissions during construction where feasible and applicable, including using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet, using local building materials of at least 10 percent, and recycling or reusing at least 65 percent of construction waste or demolition materials. Future development under the Specific Plan would comply with Specific Plan Project Requirement 10.3.3-1 and 10.3.3-2 detailed under Impact AIR-1 to restrict idling of construction equipment and utilize energy-efficient equipment, as well as comply with CALGreen and the City's construction and demolition waste diversion regulations to recycle or reuse at least 65 percent of the development projects' nonhazardous waste. For these reasons, future projects would result in less than significant construction GHG emissions.

Per BAAQMD, a plan is considered to have a less than significant GHG emission if it is consistent with a qualified GHG reduction strategy (the City does not currently have one) or meets the state's GHG reduction goals that include carbon neutrality by 2045. There is no current pathway for the project or state to achieve carbon neutrality. The implementation of the Specific Plan, however, would decrease the amount of GHG emissions per capita compared to existing uses. This means that the Specific Plan would result in a more efficient use of land and resources compared to existing conditions. Implementation of Specific Plan Project Requirements 8.3.3-4, 10.4-20, and 10.6 would reduce operational GHG emissions from future proposed development projects by providing electric vehicle parking, minimizing solid waste, and updating Specific Plan policies on a regular basis to incorporate new measures to progress towards achieving carbon neutrality.

In addition, future development projects would be consistent with the City's Reach Code which would prohibit the construction of new natural gas infrastructure with exceptions for certain uses (e.g., commercial dryers in large hotels and emergency operation centers). In accordance with the Reach Code, all future multi-family and non-residential buildings would be required to install solar panels with the exception for some non-residential and high-rise residential buildings that could use solar thermal systems as an alternative. Future projects would also include EV charging stations or have EV outlets or conduits (i.e., EV infrastructure), in conformance with the Reach Code and CALGreen Tier 2 requirements (as described in Specific Plan

Project Requirement 8.3.3-4 above). Specific Plan Policies TDMP 2.1 through 2.5 require future development to implement a TDM plan to reduce vehicle trips (which, in turn, reduces mobile GHG emissions).

Achieving carbon neutrality will rely on multiple factors including future state regulations (including the upcoming scoping plan) and technologies, and changes to human behavior. For this reason, Specific Plan Project Requirement 10.6 above is adaptive and requires periodic updates to the Specific Plan policies as needed to capture new criteria, standards, and technologies would assist towards achieving carbon neutrality.

Moreover, since achieving carbon neutrality would require state regulations and solutions that are not yet known or available, it is conservatively concluded that the buildout of the Specific Plan will result in a significant and unavoidable GHG impact.

Impact GHG-2: The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Significant and Unavoidable Impact)**

Specific Plan Requirements: 10.3.3-1 through 10.3.3-4 detailed under Impact AIR-1 above, and 8.3.3-4, 10.4-20, and 10.6 detailed under Impact GHG-1 above.

Specific Plan Policies: TDMP-2.1 through TDMP-2.5 detailed under Impact AIR-1 above.

Findings: The City Council finds that there are no feasible mitigation measures beyond the Specific Plan requirements and policies identified under Impact GHG-1 that would reduce the project's conflict with AB 1279 or the 2017 Clean Air Plan to a less than significant level. Therefore, this impact is significant and unavoidable.

Rationale: The project is consistent with applicable GHG regulations including Plan Bay Area 2050, CALGreen, Title 24 Building Code, and Climate Action Playbook. The project is not, however, consistent with AB 1279 or the 2017 Clean Air Plan. AB 1279 codifies the statewide goal of carbon neutrality by 2045. As discussed in the rationale for Impact GHG-1, there is no current pathway for the project or state to achieve carbon neutrality and that the Specific Plan includes currently feasible requirements and policies to reduce GHG emissions. Specific Plan Requirement 10.6 is an adaptive policy that requires the Specific Plan be updated regularly to include new measures to progress towards carbon neutrality. The project's inconsistency with the 2017 Clean Air Plan and rationale for the impact is discussed under Impact AIR-1, which concludes that the project incorporates feasible requirements to reduce operational criteria air pollutant emissions but the levels still exceed the BAAQMD project-level thresholds of significance. For these reasons and rationales, this impact is significant and unavoidable.

Impact GHG-C: The project would result in a cumulatively considerable contribution to a significant cumulative GHG emissions impact. **(Significant and Unavoidable Cumulative Impact)**

Specific Plan Requirements: 10.3.3-1 through 10.3.3-4 detailed under Impact AIR-1 above, and 8.3.3-4, 10.4-20, and 10.6 detailed under Impact GHG-1 above.

Specific Plan Policies: TDMP-2.1 through TDMP-2.5 detailed under Impact AIR-1 above.

Findings: The City Council finds that there are no feasible mitigation measures beyond the Specific Plan Requirements and Policies identified above that would reduce the significant cumulative GHG impact to a less than significant level. Therefore, this impact is significant and unavoidable.

Rationale: GHG emissions have a broader, global impact; therefore, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable. As discussed under Impact GHG-1 and Impact GHG-2 (including the rationale portions), the Specific Plan would result in significant GHG impacts given certain future non-residential uses (e.g., commercial dryers in large hotels and emergency operation centers) may use natural gas appliances and plumbing and there is no feasible pathway for the Specific Plan on its own to achieve carbon neutrality by 2045 and the project's inconsistency with the 2017 Clean Air Plan given its significant operational criteria air pollutant emissions. Therefore, the project would have a cumulatively considerable contribution to a significant cumulative GHG emissions impact.

Utilities and Service Systems

Impact UTL-C: The project would result in a cumulatively considerable contribution to a significant cumulative utilities and service systems impact due to the future expansion of the WPCP to treat sewage from cumulative projects. **(Significant and Unavoidable Cumulative Impact)**

Findings: The project would result in a significant cumulative impact due to the need to expand the existing WPCP, the construction of which could result in significant and unavoidable environmental impacts. The City Council finds that there are no feasible mitigation measures that would reduce the identified significant impact to a level below significant. Subsequent environmental review for the expansion of the WPCP that the City will be preparing in the near future will identify impacts and mitigation to reduce those impacts. Therefore, at this time, this impact is significant and unavoidable.

Rationale: The Draft EIR determined cumulative impacts to water supply and demand, water system and fire flow, sanitary sewer system, stormwater system, and solid waste to be less than significant. However, cumulative impacts to wastewater treatment were found to be significant and unavoidable because cumulative wastewater generation (including that of the Specific Plan) would exceed the capacity of the WPCP and require the expansion of the WPCP which the construction of the expansion could result in significant and unavoidable environmental impacts.

The City is aware an update to the WPCP Master Plan is needed to plan for adequate wastewater treatment for recently approved projects (e.g., Lawrence Station Area

Plan and the Downtown Specific Plan Amendments and specific development projects) and other future growth in the City (including Moffett Park). Subsequent environmental review for the WPCP Master Plan update will be completed by the City. The specific design and improvements needed are unknown at this time, therefore, it is speculative to evaluate the environmental impacts of these undetermined improvements. For this reason, the environmental impact from the construction of new or expanded wastewater treatment facilities to provide adequate cumulative wastewater treatment is conservatively disclosed as significant and unavoidable.

The Specific Plan would have a significant contribution (2.6 mgd) to the overall cumulative increase in wastewater generated (3.73 mgd) above the WPCP's planned capacity; therefore, the project's contribution to the cumulative wastewater treatment impact is considerable.

2.4 FINDINGS REGARDING ALTERNATIVES

The Draft EIR included several project alternatives. The City hereby concludes that the Draft EIR sets forth a reasonable range of alternatives to the proposed project so as to foster informed public participation and informed decision making. The City finds that the alternatives identified and described in the Final EIR were considered and further finds that two of them (Location Alternative and No Residential Alternative) to be infeasible for the specific economic, social, or other considerations set forth below pursuant to CEQA Section 21081.

In addition to the project, the following alternatives were evaluated in the Draft EIR, and are more fully described in Section 7 of the Draft EIR.

2.4.1 No Project/No New Development Alternative

The No Project/No New Development Alternative assumes Moffett Park would remain as it is today – developed with the existing 305,304 square feet of commercial uses, 18,102,203 square feet of office/industrial/R&D uses, and 126,122 square feet of institutional uses. This alternative does not, however, preclude the development of these sites that is consistent with the adopted Specific Plan (which is discussed in Section 2.4.2 below).

Findings: The City Council finds that the No Project/No New Development Alternative would reduce all significant impacts of the project. However, the Alternative would not meet the project objectives. Therefore, the City Council rejects the No Project/No New Development Alternative as undesirable because it fails the project's underlying purpose and does not meet any of the project objectives.

Rationale: Because the No Project/No New Development Alternative would not result in changes to existing conditions, this alternative would avoid all of the environmental impacts of the project. In regard to the project objectives, the No Project/No New Development Alternative would:

- Not meet Objective 1 as it would not add housing or include pedestrian and bicycle improvements to enhance multimodal mobility connections and improve access to transit.
- Not meet Objective 2 since it would not include housing, which would help meet housing needs and facilitate the beneficial effects of high-density mixed-use development (such as lower VMT and air pollutant emissions). Nor would this alternative include multimodal improvements or aggressive SOV reduction requirements. that would also reduce VMT and GHG emissions.
- Not meet Objective 3 as this alternative would not add new park and open space areas to promote recreation or affordable housing.
- Partially meet Objective 4 since there is an existing mix of businesses, though this alternative does not strengthen the diversity or facilitate essential services such as grocery stores within Moffett Park.
- Not meet Objective 5 since it would not include multi-modal improvements.
- Not meet Objective 6 given this alternative would not include new parks or open spaces.
- Not meet Objective 7 since most existing uses were developed prior to the City's adoption of its bird safe design and existing development would not be required to comply with the Specific Plan's enhanced bird safe design guidelines, ECD, or increased setback requirements along waterway channels.
- Partially meets Objective 8 given some of the existing businesses are technology companies though this alternative does not facilitate district-scale infrastructure.

2.4.2 No Project/Adopted Specific Plan Buildout Alternative

The No Project/Adopted Specific Plan Alternative assumes Moffett Park would be built out consistent with the adopted Specific Plan. Under the No Project/Adopted Specific Plan Buildout Alternative, 305,304 square feet of commercial uses (which already exists), 24,100,000 square feet of office/industrial/R&D uses, and 126,122 square feet of institutional uses (which already exists) could be developed in Moffett Park. Compared to existing conditions, the No Project/Adopted Specific Plan Buildout Alternative would result in a net increase of about 6.0 million square feet of new office/industrial/R&D uses. Compared to the proposed project, the No Project/Adopted Specific Plan Buildout Alternative would have:

- 20,000 fewer residential units (i.e., no residential units),
- 935,303 less square feet of commercial space,
- 7,900,000 less square feet of office/industrial/R&D space, and
- 326,000 less square feet of institutional space.

Findings: The City Council finds that the No Project/Adopted Specific Plan Buildout Alternative would result in lesser aesthetics, air quality, energy, GHG, hazards and hazardous materials, noise, population and housing, public services, recreation, and utilities and services systems impacts. This alternative would avoid the Specific Plan's significant and unavoidable utilities and services impact as the City's

wastewater treatment system has capacity for this alternative. The No Project/New Development Alternative would result in the same or similar impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, and transportation.

The No Project/Adopted Specific Plan Alternative would partially meet Objectives 4, 7 and 8, and would not meet the other five objectives (Objectives 1, 2, 3, 5, or 6).

The City Council rejects the No Project/Adopted Specific Plan Buildout Alternative as undesirable because it fails the underlining purpose and does not substantially meet the project's objectives.

Rationale: Because the No Project/Adopted Specific Plan Alternative would result in less development than the proposed Specific Plan, this alternative would result in less overall light and glare, energy use, construction and operational criteria air pollutant emissions, GHG emissions, construction and project-generated traffic noise, demand on public services, and demand on utilities and service systems. In addition, this alternative does not include any housing and includes less non-residential development (e.g., less office/R&D/industrial development). For these reasons, this alternative results in lesser aesthetics, energy, GHG, noise, population and housing, public services, recreation, and utilities and service systems impacts. This alternative would not result in a cumulatively considerable contribution to the need to expand the WPCP. The Specific Plan would, however, result in better energy efficiency overall since most of Moffett Park would be redeveloped with new buildings that would be more energy efficient given compliance with the latest standards, compared to this alternative where most of the existing buildings would remain (most of which were constructed under older, less stringent energy standards).

Although the No Project/Adopted Specific Plan Buildout Alternative would result in less overall GHG emissions, similar to the proposed project, this alternative would not attain BAAQMD's threshold to reach carbon neutrality by 2045 and, therefore, would result in a significant and unavoidable GHG impact. Similarly, this alternative would result in less overall operational criteria pollutant emissions compared to the proposed Specific Plan, however, these emissions would exceed BAAQMD thresholds, which would result in a significant and unavoidable impact.

New development under the No Project/Adopted Specific Plan Buildout Alternative would result in the same impacts to biological resources, cultural resources (including TCRs), geology and soils, as the proposed Specific Plan given that these resources are part of the existing environmental conditions. Significant impacts would be reduced to a less than significant level. The redevelopment of land for six million square feet of new office/industrial/R&D would be of a smaller scale than the redevelopment of most of Moffett Park under the proposed Specific Plan. As such, while the impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials would be less than significant under this alternative and the proposed Specific Plan, the magnitude of the impact could be greater under the proposed Specific Plan as more land would be affected under the project than under this alternative.

The No Project/Adopted Specific Plan Buildout Alternative would result in similar less than significant hazards and hazardous materials, hydrology and water quality, land use, and transportation impacts as the proposed Specific Plan as new development under either would: a) implement policies that require the cleanup of contaminated sites b) comply with water quality regulations and not impact groundwater supplies/recharge, c) not physically divide an established community and comply with a land use plan/policy/regulation adopted to avoid or mitigate an environmental effect, and d) not result in a significant VMT impact. Because this alternative would result in less redevelopment, it is possible that some of the contaminated sites in Moffett Park may not be redeveloped under this alternative and, therefore, may not be remediated. The Specific Plan would result in beneficial impacts to hydrology and water quality compared to this alternative by increasing the overall amount of pervious surfaces compared to existing conditions and including multi-modal transportation improvements that would not be completed under the No Project/Adopted Specific Plan Buildout Alternative.

In regard to the project objectives, the No Project/Adopted Specific Plan Buildout Alternative would:

- Not meet Objective 1 as it would not add housing or include pedestrian and bicycle improvements to enhance multimodal mobility connections and improve access to transit.
- Not meet Objective 2 since it would not include housing, which would help meet housing needs and facilitate the beneficial effects of high-density mixed-use development (such as lower VMT and air pollutant emissions). Nor would this alternative include multimodal improvements or aggressive SOV reduction requirements that would also reduce VMT and GHG emissions.
- Not meet Objective 3 as this alternative would not add new park and open space areas to promote recreation or affordable housing.
- Partially meet Objective 4 since existing and six million net new office/industrial/R&D uses represent mix of businesses, though this alternative does not strengthen the diversity or facilitate essential services such as grocery stores within Moffett Park.
- Not meet Objective 5 since it would not include multi-modal improvements.
- Not meet Objective 6 given this alternative would not include new parks or open spaces.
- Partially meet Objective 7 since most existing uses were developed prior to the City’s adoption of its bird safe design guidelines, and the 6.0 million square feet of net new office/industrial/R&D uses would be required to comply with the City’s bird safe design guidelines. The development under this alternative, however, would not be required to comply with the Specific Plan’s enhanced bird safe design guidelines, Ecological Overlay Zone, or increased setback requirements along waterway channels.

- Partially meets Objective 8 given some of the existing and future businesses would be technology companies, though this alternative does not facilitate district-scale infrastructure.

2.4.3 25 Percent Reduced Development Alternative

The 25 Percent Reduced Development Alternative assumes an approximate 25 percent reduction in the amount of development proposed by the Specific Plan. The purpose of this alternative is to substantially reduce the project-level, significant operational criteria air pollutant emissions resulting from the buildout of the Specific Plan. The BAAQMD CEQA Air Quality Guidelines includes screening levels for projects that are assumed to result in less than significant operational criteria air pollutant emissions. For example, the project-level screening threshold for a high-rise residential development is 510 dwelling units. For an office building, the project-level screening threshold is 346,000 square feet. An alternative that would meet the screening thresholds and would result in less than significant project-level operational criteria air pollutant impacts would not meet the basic objectives of the project, therefore, the City did not consider one further. Rather, the City is evaluating this 25 Percent Reduced Development Alternative that would substantially lessen the project's significant operational criteria air pollutant emissions. Under the Reduced Size Alternative, up to 15,000 residential units, 874,000 square feet of commercial uses, 24.0 million square feet of office/industrial/R&D, and 244,500 square feet of institutional uses could be developed in Moffett Park. Besides the reduction in development assumed, all other aspects of the Specific Plan (e.g., enhanced bird safe design, SOV requirement, etc.) are assumed.

Findings: The City Council finds the 25 Percent Reduced Development Alternative would result in lesser aesthetics, air quality, energy, GHG, noise, population and housing, public services, recreation, and utilities and services systems impacts than the proposed Specific Plan. The Reduced Size Alternative would result in the same or similar impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, and transportation as the proposed Specific Plan. While this alternative would meet all of the project objectives, it would not meet Objectives 1 and 6 to the same extent as the proposed Specific Plan because it would not include as much housing (including affordable housing) and open space.

The City Council rejects the 25 Percent Reduced Development Alternative as undesirable because it will not achieve the City's goals to provide housing, recreation and public services nor will it achieve the City's goals to reduce GHG emissions and lessen air pollutants.

Rationale: Because the 25 Percent Reduced Development Alternative would result in less development than the proposed Specific Plan, this alternative would result in less overall light and glare, construction and project-generated traffic noise, demand on public services and recreational facilities, and demand on utilities and service systems. This alternative would result in a 25 percent reduction in operational criteria pollutant emissions, operational energy usage, and GHG emissions than the proposed Specific Plan. In addition, this alternative would result in less housing and, therefore, would result in a lower increase in population and its associated demand on public

services and recreational facilities. For these reasons, this alternative results in lesser aesthetics, air quality, energy, GHG, noise, population and housing, public services, recreation, and utilities and service systems impacts.

The Specific Plan would, however, result in better energy efficiency overall since there would be more developments in Moffett Park with new buildings that would be more energy efficient given compliance with the latest standards, compared to this alternative. Additionally, although the 25 Percent Reduced Development Alternative would result in a 25 percent reduction in overall GHG emissions, operational criteria air pollutant emissions, and sewage generation, similar to the proposed Specific Plan, this alternative would not attain BAAQMD's threshold to reach carbon neutrality by 2045, would exceed BAAQMD's project-level operational criteria air pollutant thresholds, and contribute to the need for the capacity of the WPCP to be expanded which could result in significant impacts.

New development under the 25 Percent Reduced Development Alternative would result in the same or similar impacts to biological resources, cultural resources (including TCRs), geology and soils, hazards and hazardous materials, hydrology and water quality, land use, and transportation as the proposed Specific Plan given that these resources are part of the existing environmental conditions and a similar amount of total area would be redeveloped under this alternative. With this alternative, however, the amount of open space would range from 159 to 172 acres compared to 212 to 230 acres under the Specific Plan. Therefore, since implementation of the Specific Plan would result in less impervious surfaces, the Specific Plan would result in less hydrology and water quality impacts than this alternative.

In regard to the project objectives, the 25 Percent Reduced Development Alternative would:

- Meet Objective 1 as it would add housing and jobs, and also include pedestrian and bicycle improvements to enhance multimodal mobility connections and improve access to transit. This alternative, however, would not maximize the amount of housing and employment uses in Moffett Park to the same extent as the proposed Specific Plan.
- Meet Objective 2 as this alternative would add housing, which would help meet housing needs and facilitate the beneficial effects of high-density mixed-use development (such as lower VMT and air pollutant emissions). This alternative would also include the same multi-modal improvements and SOV requirement as the proposed Specific Plan.
- Meet Objective 3 as this alternative would include the same amount of new park and open space areas and 20 percent of the housing would be affordable for lower-income households.
- Meet Objective 4 since it would facilitate a mix of businesses (including essential services such as grocery stores) to support economic diversity.
- Meet Objective 5 since it would include the same multimodal improvements as the proposed Specific Plan.

- Meet Objective 6 given this alternative would include open spaces to provide recreational opportunities. This alternative, however, would not provide open space to the same extent as the Specific Plan.
- Meet Objective 7 because new development would be required to comply with the Specific Plan's enhanced bird safe design guidelines, Ecological Overlay Zone, or increased setback requirements along waterway channels.
- Meet Objective 8 given some of the existing and future businesses added to Moffett Park would be technology companies, and this alternative would facilitate district-scale infrastructure.

2.4.4 Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. Based on the above discussion, the environmentally superior alternative to the proposed Specific Plan is the No Project/No New Development Alternative because all of the project's significant environmental impacts would be avoided by leaving the site in its current condition. However, Section 15126(e)(2) states that "if the environmentally superior alternative is the No Project/No New Development Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Among the alternatives that assume some development in Moffett Park, the environmentally superior alternative is the No Project/No New Development Alternative because it would avoid all of the project's environmental impacts. CEQA Guidelines Section 15126.6(e)(2) states that "if the environmentally superior alternative is the No Project Alternative, the EIR shall identify an environmentally superior alternative among the other alternatives." In addition to the No Project/No New Development Alternative and the No Project/Adopted Specific Plan Buildout Alternative, the 25 Percent Reduced Development Alternative would be the environmentally superior alternative to the project.

SECTION 3.0 STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Section 21081 of the PRC and Section 15093 of the CEQA Guidelines, the City adopts and makes the following statement of overriding considerations regarding the remaining significant unavoidable impacts of the project, as discussed above, and the anticipated economic, social, and other benefits of the project.

Based on the record of proceedings, the City finds and determines that (1) the majority of the significant impacts of the project will be reduced to less than significant levels by implementation of the mitigation measures recommended in these findings; (2) the City's approval of the project as proposed will result in certain significant adverse environmental effects that cannot be avoided or reduced to a less than significant level even with the incorporation of all feasible mitigation measures into the project; and (3) there are no other feasible mitigation measures or feasible project alternatives that will further mitigate, avoid, or reduce to a less than significant level the remaining significant environmental effects.

In light of the environmental, social, economic, and other considerations identified in the findings for the project, the objectives of the project, and the considerations set forth below related to this project, the City chooses to approve the project because, in its view, the economic, social, technological, and other benefits resulting from the project substantially outweigh the project's significant and unavoidable adverse environmental effects.

The following statements identify the reasons why, in the City's judgment and based on substantial evidence, the benefits of the project outweigh the significant and unavoidable effects. The substantial evidence supporting the enumerated benefits of the project can be found in the preceding findings, which are herein incorporated by reference; in the project itself; and in the record of proceedings as defined above. Each of the overriding considerations set forth below constitutes a separate and independent ground for finding that the benefits of the project outweigh its significant adverse environmental effects and is an overriding consideration warranting approval.

The City finds that the project, its land use plan and policies, will have the following economic, social, technological, and environmental benefits, which constitute overriding considerations:

- Moffett Park was originally developed in the 1960s as a suburban office park where employees commuted to and from work in personal automobiles. The adoption of the original Moffett Park Specific Plan continued to prioritize office development. The update to the Moffett Park Specific Plan, is a high priority for the City as the vision for the plan area has moved from a Class "A" office park designed around automobile transportation, with no housing and limited amenities, to a well-connected ecological innovation district with a diverse mix of uses. Changing economic and societal conditions, including the state's critical housing shortage and accelerating climate change, compel the City to re-envision the future of the plan area as a vibrant, pedestrian and bike-friendly urban neighborhood that combines housing, jobs, recreation, ecological areas, and open space in close proximity to high-quality public transit. In order to ensure the economic feasibility of this goal, while ensuring that development will serve the needs of all Sunnyvale residents, the amended Moffett Park Specific authorizes the City Council to approve, through development agreements, additional office density in the plan area in return for community benefits such as affordable housing,

publicly accessible open space and other need public infrastructure. These community benefits, as well as the overall housing, economic, social, and cultural benefits of creating a lively, inclusive, and successful eco-innovation district in the north area of the City, offset the significant and unavoidable environmental effects of the Project.

- The project incorporates all feasible mitigation measures to reduce potential environmental impacts to the greatest extent feasible. No feasible mitigation measures or alternatives have been identified that would mitigate the significant and unavoidable adverse effects of the Project and still meet the Project objectives.
- The project concentrates growth in existing urbanized areas as infill development and thereby results in fewer impacts from the construction of new infrastructure. The provision of infill office, commercial and residential development is needed by the City and is anticipated under the Land Use and Transportation Element.
- The project will help to achieve the City's Climate Action Playbook 2.0 emission reduction goals by concentrating mixed-use development along a transit corridor and enhancing infrastructure that is supportive of multimodal transportation. These strategies increase opportunities for shared mobility, fast and reliable transit use, less reliance on single-occupancy vehicle trips, and reduced vehicle miles traveled (VMT) per person. Lower VMT leads to less greenhouse gas emissions, energy efficiency, and improved air quality and public health.
- The project will promote greater use of public transit by placing new office and residential buildings within 0.5 mile of the Valley Transportation Authority bus and light rail stations in the Moffett Park area, thereby reducing local and regional Vehicles Miles Traveled (VMT), which translates into air quality and greenhouse gas emissions benefits and increases in resources and energy efficiency, as recognized by California Department of Transportation (Caltrans), Santa Clara Valley Transportation Authority (VTA), Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG).
- The project's land use plan, which includes a mix of residential, employment and commercial uses, will promote non-automobile travel, reducing local and regional Vehicles Miles Traveled (VMT), which translates into air quality and greenhouse gas emissions benefits and increases in resources and energy efficiency, as recognized by California Department of Transportation (Caltrans), Santa Clara Valley Transportation Authority (VTA), Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG).
- The project helps to implement the City's Complete Streets policy and Active Transportation Plan (ATP) by improving accessibility, mobility and safety for people who work in, live in and visit the plan area. The emphasis on complete streets and non-automotive mobility improvements, such as the "Diagonal", will improve the quality of life for the employment population and future residents of the plan area. Moreover, these measures would help move the City towards its goal to become a complete sustainable community that is less dependent on automobiles.
- The City and the surrounding Silicon Valley region are currently experiencing a severe housing shortage. The project's residential density will create much-needed housing and increase the variety of housing options available in the City of Sunnyvale, including a substantial number of affordable units, in a walkable, transit-oriented, amenity-rich neighborhood.
- The project's density and housing goals significantly assist the City in meeting its RHNA of 11,966 residential units for the 2022-2030 Housing Element Update as well as for future City RHNA allocations. As the City is currently developed in a suburban model with

predominantly single-family homes, the MPSP provides a unique development pattern that will provide denser housing options.

- The project promotes a variety of affordable and market-rate housing options including denser housing opportunities that will result in smaller units such as studios, single-room occupancy and microunits that are available to serve residents at all income levels.
- The project includes new architectural and site design guidelines to ensure high-quality design, walkable block sizes and sets a new standard for quality design for future development.
- The project includes design requirements such as building step and setbacks, open space, tree canopy and landscaping requirements that will enhance the community's quality of life, increase pervious area, reduce the "heat island effect" and contribute to the ecological vision of the project.
- The project includes open space design requirements to support urban ecology and resilience and to create "eco-patches" that include native habitat diversity ranging from coastal wetlands to oak woodlands.
- The project creates a supportive environment for small and local businesses by placing residential units within walking distance of existing and future neighborhood serving commercial uses and activity centers. This land use organization provides an opportunity for small business to serve the workforce and residents of the area and creates walkable neighborhood.
- The project increases local government revenues through additional business taxes, property taxes, impact fees for transportation improvements and affordable housing, and community benefits payments.
- In addition to paying the existing required Transportation Impact Fee (TIF), development projects are also required to pay the new MPSP TIF, which is a fair-share contribution towards relieving traffic congestions and improving transit travel times.
- The project creates short-term construction jobs that will provide income to City residents.

The above statements of overriding considerations are consistent with, and substantially advance, the following goals and policies of the City's General Plan:

GOAL LT-1: COORDINATED REGIONAL AND LOCAL PLANNING - Protect the quality of life, the natural environment, and property investment, preserve home rule, secure fair share of funding, and provide leadership in the region.

- **Policy LT-1.7** Emphasize efforts to reduce regional vehicle miles traveled by supporting active modes of transportation including walking, biking, and public transit.

- **Policy LT-1.10** Participate in federal, state, and regional programs and processes in order to protect the natural and human environment in Sunnyvale and the region.
- **Policy LT-1.11** Prepare for risks and hazards related to climate change prior to their occurrence.

GOAL LT-2: ENVIRONMENTALLY SUSTAINABLE LAND USE AND TRANSPORTATION PLANNING AND DEVELOPMENT - Support the sustainable vision by incorporating sustainable features into land use and transportation decisions and practices.

- **Policy LT-2.1** Enhance the public's health and welfare by promoting the city's environmental and economic health through sustainable practices for the design, construction, maintenance, operation, and deconstruction of buildings, including measures in the Climate Action Plan.
- **Policy LT-2.2** Reduce greenhouse gas emissions that affect climate and the environment though land use and transportation planning and development.
- **Policy LT-2.3** Accelerate the planting of large canopy trees to increase tree coverage in Sunnyvale in order to add to the scenic beauty and walkability of the community; provide environmental benefits such as air quality improvements, wildlife habitat, and reduction of heat islands; and enhance the health, safety, and welfare of residents.
- **Policy LT-2.6** Address sea level rise, increased rainfall, and other impacts of climate change when reviewing new development near creeks, and consider the projected flood levels over the economic lifespan of the project.
- **Policy LT-2.7** Provide Sunnyvale residents and businesses with opportunities to develop private, renewable energy facilities.

GOAL LT-3: AN EFFECTIVE MULTIMODAL TRANSPORTATION SYSTEM - Offer the community a variety of transportation modes for local travel that are also integrated with the regional transportation system and land use pattern. Favor accommodation of alternative modes to the automobile as a means to enhance efficient transit use, bicycling, and walking and corresponding benefits to the environment, person-throughput, and qualitative improvements to the transportation system environment.

- **Policy LT-3.1** Use land use planning, including mixed and higher-intensity uses, to support alternatives to the single-occupant automobile such as walking and bicycling and to attract and support high investment transit such as light rail, buses, and commuter rail.
- **Policy LT-3.2** Refine land use patterns and the transportation network so they work together to protect sensitive uses and provide convenient transportation options throughout the planning area.
- **Policy LT-3.4** Require large employers to develop and maintain transportation demand management programs to reduce the number of vehicle trips generated by their employees.
- **Policy LT-3.5** Follow California Environmental Quality Act requirements, Congestion Management Program requirements, and additional City requirements when analyzing the transportation impacts of proposed projects and assessing the need for offsetting transportation system improvements or limiting transportation demand.
- **Policy LT-3.6** Promote modes of travel and actions that provide safe access to city streets and reduce single-occupant vehicle trips and trip lengths locally and regionally. The order of consideration of transportation users shall be: (1) Pedestrians, (2) Non-automotive (bikes, three-wheeled bikes, scooters, etc.), (3) Mass transit vehicles, (4) Delivery vehicles, and (5) Single-occupant automobiles.
- **Policy LT-3.7** Provide parking and lane priority to environmentally friendly motorized vehicles (e.g. carpools, low emission, zero emission).
- **Policy LT-3.8** Prioritize safe accommodation for all transportation users over non-transport uses. As City streets are public spaces dedicated to the movement of vehicles, bicycles, and pedestrians, facilities that meet minimum appropriate safety standards for transport uses shall be considered before non-transport uses are considered.

- **Policy LT-3.9** As parking is the temporary storage of transportation vehicles, do not consider parking a transport use of public streets.
- **Policy LT-3.10** Prioritize street space allocated for transportation uses over parking when determining the appropriate future use of street space.
- **Policy LT-3.11** As they become available, use multimodal measures of effectiveness to assess the transportation system in order to minimize the adverse effect of congestion. Continue to use level of service (LOS) to describe congestion levels. Use vehicle miles traveled (VMT) analysis to describe potential environmental effects and impacts to the regional transportation system.
- **Policy LT-3.12** Maintain a funding mechanism where new and existing land uses equitably participate in transportation system improvements.
- **Policy LT-3.13** Move progressively toward eliminating direct and hidden subsidies of motor vehicle parking and driving, making the true costs of parking and driving visible to motorists.
- **Policy LT-3.14** Require roadway and signal improvements for development projects to improve multimodal transportation system efficiency.
- **Policy LT-3.15** Prioritize transportation subsidies and project financing over time to the most environmentally friendly modes and services. Support bicycling through planning, engineering, education, encouragement, and enforcement.
- **Policy LT-3.17** Set speed limits at the lowest practicable levels consistent with state law.
- **Policy LT-3.18** Facilitate safe and orderly traffic flow and promote school pedestrian and bicycle safety.
- **Policy LT-3.19** Utilize intelligent transportation systems and other technological applications to improve travel efficiency and safety.
- **Policy LT-3.20** Optimize the city's multimodal traffic signal system and respond quickly to signal breakdowns.
- **Policy LT-3.21** Implement best practices, innovative facilities, and technology to enhance complete streets.
- **Policy LT-3.22** Provide safe access to city streets for all modes of transportation. Safety considerations of all transport modes shall take priority over capacity considerations of any one transport mode.
- **Policy LT-3.23** Ensure that the movement of cars, trucks and transit vehicles, bicycles, and pedestrians of all ages and abilities does not divide the community. City streets are public spaces and an integral part of the community fabric.
- **Policy LT-3.24** Ensure effective and safe traffic flows for all modes of transport through physical and operational transportation improvements.
- **Policy LT-3.25** Maintain a functional classification of the street system that identifies local roadways, Congestion Management Program roadways and intersections, and intersections of regional significance.
- **Policy LT-3.26** Support the proliferation of multiuse trails within Sunnyvale and their connection to regional trails in order to provide enhanced access to open space, promote alternative transportation options, and increase recreational opportunities while balancing those needs with the preservation of natural habitat, public safety, and quality of life in residential neighborhoods.
- **Policy LT-3.27** Require appropriate roadway design practice for private development consistent with City standards and the intended use of the roadway.

- **Policy LT-3.28** Support statewide, regional, and subregional efforts that provide for a safe, effective transportation system that serves all travel modes consistent with established service standards.
- **Policy LT-3.30** Support regional and cross-regional transportation improvements and corridors while minimizing impacts to community form and intracity travel.

GOAL LT-4 AN ATTRACTIVE COMMUNITY FOR RESIDENTS AND BUSINESSES - In combination with the City's Community Design Sub-Element, ensure that all areas of the city are attractive and that the city's image is enhanced by following policies and principles of good urban design while valued elements of the community fabric are preserved.

- **Policy LT-4.1** Preserve and enhance an attractive community, with a positive image, a sense of place, landscaping, and a human scale.
- **Policy LT-4.2** Encourage nodes of interest and activity, public open spaces, well-planned development, mixed-use projects, signature commercial uses, and buildings and other desirable uses, locations, and physical attractions.
- **Policy LT-4.3** Enforce design review guidelines and zoning standards that ensure the mass and scale of new structures are compatible with adjacent structures, and also recognize the City's vision of the future for transition areas such as neighborhood Village Centers and El Camino Real nodes.
- **Policy LT-4.4** Avoid monotony and maintain visual interest in newly developing neighborhoods, and promote appropriate architectural diversity and variety. Encourage appropriate variations in lot sizes, setbacks, orientation of homes, and other site features.

GOAL LT-6 PROTECTED, MAINTAINED, AND ENHANCED RESIDENTIAL NEIGHBORHOODS - Ensure that all residential areas of the city are maintained and that neighborhoods are protected and enhanced through urban design which strengthens and retains residential character.

- **Policy LT-6.2** Limit the intrusion of incompatible uses and inappropriate development in and near residential neighborhoods but allow transition areas at the edges of neighborhoods.
- **Policy LT-6.4** Allow compatible and supporting uses such as group homes, places of assembly, community centers, recreational centers, and child-care centers in residential neighborhoods (including single-family neighborhoods) subject to review and consideration of operations, traffic, parking, and architecture.

GOAL LT-7 DIVERSE HOUSING OPPORTUNITIES - Ensure the availability of ownership and rental housing options with a variety of dwelling types, sizes, and densities that contribute positively to the surrounding area and the health of the community.

- **Policy LT-7.2** Determine the appropriate residential density for a site by evaluating the site planning opportunities and proximity of services (such as transportation, open space, jobs, and supporting commercial and public uses).
- **Policy LT-7.5** Consider the impacts of all land use decisions on housing affordability and on the housing needs of special needs groups within Sunnyvale.

GOAL LT-8 OPTIONS FOR HEALTHY LIVING - Create a city development pattern and improve the city's infrastructure in order to maximize healthy choices for all ages, including physical activity, use of the outdoors, and access to fresh food.

- **Policy LT-8.4** Promote compact, mixed-use, and transit-oriented development in appropriate neighborhoods to provide opportunities for walking and biking as an alternative to auto trips.
- **Policy LT-8.5** Promote walking and bicycling through street design.

GOAL LT-9 ADEQUATE AND BALANCED RECREATION FACILITIES - The City strives to provide and maintain adequate and balanced open space and recreation facilities for the benefit of maintaining a healthy community based on community needs and the ability of the city to finance, construct, maintain, and operate these facilities now and in the future. (*Previously Open Space and Recreation Goal 2.2A*)

- **Policy LT-9.1** Ensure that the planned availability of open space in both the city and the region is adequate.
- **Policy LT-9.18** Improve accessibility to parks and open space by removing barriers.
- **Policy LT-9.19** Protect creeks and wetlands as important parts of the community's natural environment and open space and for their contribution to flood control.

GOAL LT-10 REGIONAL APPROACH TO PROVIDING AND PRESERVING OPEN SPACE - The City embraces a regional approach to providing and preserving open space and providing open space and recreational services, facilities and amenities for the broader community. (*Previously Open Space and Recreation Goal 2.2C*)

- **Policy LT-10.2** Support public and private efforts in and around Sunnyvale to acquire, develop and maintain open space and recreation facilities and services for public use.
- **Policy LT-10.3** Encourage School Districts to make available school sites in and around Sunnyvale for community open space and recreation programs.
- **Policy LT-10.5** Engage in regional efforts to enhance and protect land uses near streams and to respond to sea level rise and climate change.

GOAL LT-11 SUPPORTIVE ECONOMIC DEVELOPMENT ENVIRONMENT - Facilitate an economic development environment that supports a wide variety of businesses and promotes a strong economy within existing environmental, social, fiscal, and land use constraints.

- **Policy LT-11.1** Provide existing businesses with opportunities to grow in Sunnyvale and provide opportunities to expand into new technologies.
- **Policy LT-11.2** Support a full spectrum of conveniently located commercial, mixed-use, public, and quasi-public uses that add to the positive image of the community.
- **Policy LT-11.3** Promote business opportunities and business retention in Sunnyvale.
- **Policy LT-11.4** Participate in regional efforts to respond to transportation and housing problems caused by economic growth in order to improve the quality of life and create a better environment for businesses to flourish.

GOAL LT-12 A BALANCED ECONOMIC BASE - Develop a balanced economic base that can resist downturns of any one industry and provides revenue for City services.

- **Policy LT-12.1** Encourage green technology industries.
- **Policy LT-12.4** Attract and retain a diversity of commercial enterprises and industrial uses to sustain and bolster the local economy and provide a range of job opportunities.
- **Policy LT-12.5** Encourage land uses that generate revenue while preserving a balance with other community needs, such as housing.

- **Policy LT-12.7** Maintain an adequate supply of land zoned for office, industrial, and retail development to meet projected needs.
- **Policy LT-12.8** Provide quality neighborhood, community, and regional retail centers/uses to meet the needs of residents.
- **Policy LT-12.9** Consider the importance of tax generation (retail, hotel, auto, and business-to-business uses) to support the fiscal health of the community and to fund municipal services.

GOAL LT-13 PROTECTED, MAINTAINED, AND ENHANCED COMMERCIAL AREAS, SHOPPING CENTERS, AND BUSINESS DISTRICTS - Achieve attractive commercial centers and business districts and buildings that are maintained and allow a full spectrum of businesses that operate unencumbered.

- **Policy LT-13.1** Identify valuable physical characteristics and business aspects and protect the uniqueness and integrity of all business areas and districts.
- **Policy LT-13.2** Improve the visual appearance of business areas and districts by applying high standards of architectural design, landscaping, and sign standards for new development and the reuse or remodeling of existing buildings.
- **Policy LT-13.3** Use density and design principles, such as physical transitions, between different land uses and to buffer between sensitive uses and less compatible uses.
- **Policy LT-13.5** Support convenient neighborhood-serving commercial centers that provide services that reduce automobile dependency and contribute positively to neighborhood character.
- **Policy LT-13.8** Require high design standards for office, industrial, and research and development (R&D) buildings in all business districts.
- **Policy LT-13.9** Maintain areas of Class B and C buildings to support all types of businesses and provide a complete community.

GOAL LT-14 SPECIAL AND UNIQUE LAND USES TO CREATE A DIVERSE AND COMPLETE COMMUNITY - Provide land use and design guidance so that special and unique areas and land uses can fulfill their distinctive purposes and provide a diverse and complete community fabric.

- **Policy LT-14.1** Provide existing businesses with opportunities to grow in Sunnyvale and provide opportunities to expand into new technologies.
- **Policy LT-14.3** Use special area plans to guide land use and development in areas that support alternative travel modes, Village Centers, economic development, and a better jobs/housing ratio.
- **Policy LT-14.4** Use specialized zoning districts and other zoning tools to address issues in the community and update as needed to keep up with evolving values and new challenges in the community.
- **Policy LT-14.7** Balance the need for additional residential uses with industrial uses needed for a healthy economy.
- **Policy LT-14.8** Ensure that development projects provide appropriate improvements or resources to meet the city's future infrastructure and facility needs and provide development incentives that result in community benefits and enhance the quality of life for residents and workers.

- **Policy LT-14.11** Maintain and promote conveniently located public and quasi-public uses and services that enhance neighborhood cohesiveness and provide social and recreational opportunities.
- **Policy LT-14.14** Allow community-serving places of assembly in commercial zoning districts if the provision of a full range of conveniently located retail and retail services is not compromised.

GOAL HE-1: ADEQUATE HOUSING – Assist in the provision of adequate housing to meet the diverse needs of Sunnyvale's households of all income levels. (Housing and Community Revitalization Goal A / Adopted In 2009)

GOAL HE-4: ADEQUATE HOUSING SITES – Provide adequate sites for the development of new housing through appropriate land use and zoning to address the diverse needs of Sunnyvale's residents and workforce (Housing and Community Revitalization Goal D / Adopted In 2009)

GOAL HE-6: SUSTAINABLE NEIGHBORHOODS – Maintain sustainable neighborhoods with quality housing, infrastructure and open space that fosters neighborhood character and the health of residents. (Housing and Community Revitalization Goal F / Adopted in 2009)