

CITY OF SUNNYVALE

SUNNYVALE CAP INITIAL STUDY/NEGATIVE DECLARATION

ADMINISTRATIVE DRAFT INITIAL STUDY/NEGATIVE DECLARATION

Prepared for:

City of Sunnyvale
Community Development
456 West Olive Avenue
PO Box 3707
Sunnyvale, CA 94088-3707

Prepared by:



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ENVIRONMENTAL CHECKLIST FORM

1. Project title:

City of Sunnyvale Climate Action Plan

2. Lead agency name and address:

City of Sunnyvale
Community Development
456 West Olive Avenue
PO Box 3707
Sunnyvale, CA 94088-3707

3. Contact person and phone number:

Gerri Caruso, Principal Planner

(408) 730-7591

4. Project location:

Sunnyvale is located within approximately 22.8 square miles in northwest Santa Clara County, in the greater San Francisco Bay Area (see **Figure 1**). The area is commonly referred to as the South Bay and is also known as the Silicon Valley, as this region is home to many of the world's largest technology corporations. The city is almost entirely surrounded by the cities of Santa Clara, Cupertino, Los Altos, and Mountain View and the San Francisco Bay, generally between Calabazas Creek on the east and Stevens Creek on the west. Sunnyvale is between two major earthquake faults, the San Andreas fault approximately 14 miles to the west and the Hayward fault approximately 18 miles to the east.

5. Project sponsor's name and address:

City of Sunnyvale
Community Development
456 West Olive Avenue
PO Box 3707
Sunnyvale, CA 94088-3707

6. General Plan designation:

Not applicable; project is citywide

7. Zoning:

Not applicable; project is citywide

8. Description of Project:

Introduction

The proposed project consists of the adoption and implementation of the City of Sunnyvale Climate Action Plan (CAP). This Initial Study (IS) provides programmatic-level analysis of the proposed CAP. The CAP does not include any development proposals and would not directly result in physical environmental effects due to the construction and operation of facilities. Future projects subject to CEQA review would be required to demonstrate consistency with the goals and actions of the proposed CAP for project-level greenhouse gas (GHG) impacts to be deemed less than significant.

Project Characteristics

The City of Sunnyvale has prepared the CAP to address GHG emissions consistent with the target reductions of Assembly Bill (AB) 32 and the AB 32 Scoping Plan. The CAP would streamline future environmental review of projects in Sunnyvale by utilizing CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions, which, in part, states:

Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in...a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. (CEQA Guidelines Section 15183.5[a])

The CAP would also meet the Bay Area Air Quality Management District's (BAAQMD) expectation for a Qualified GHG Reduction Strategy. The CAP identifies how the City would achieve the State-recommended GHG emissions reduction target of 15% below 2008 levels by the year 2020 (equivalent to 1990 emissions). The CAP provides goals and associated measures, also referred to as reduction measures, in the sectors of energy use, transportation, land use, water, solid waste, and off-road equipment. The target areas and goals of the CAP include the following:

- OS – Open Space and Urban Forestry
- EC – Decrease Energy Consumption
- EP – Provide a Sustainable Energy Portfolio
- WC – Decrease Water Consumption
- LW – Reduce Landfilled Waste
- OR – Off-Road Equipment
- CA – Increase Awareness of Sustainability Issues
- LUP – Improve Mobility through Land Use Planning
- CTO – Expand Sustainable Circulation and Transportation Options
- OVT – Optimize Vehicular Travel

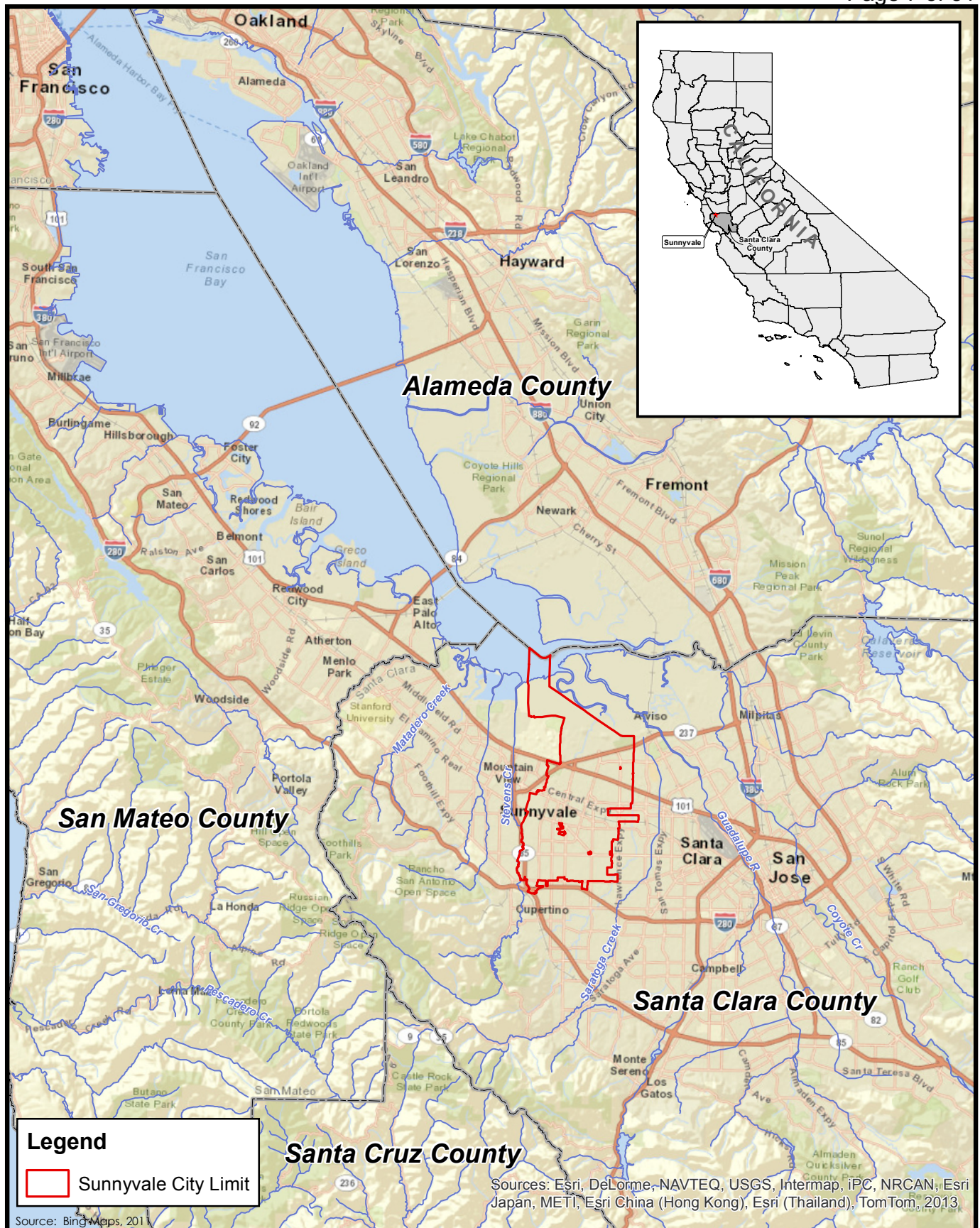


Figure 1
Project Vicinity
PMC

The framework of the CAP consists of (1) an inventory of GHG emissions that identifies and quantifies existing emissions and projected future emissions; (2) reduction targets to reduce GHG emissions incrementally by 2020 and 2035; and (3) the goals, reduction measures, and actions that have been devised to reduce existing emissions to meet the reduction targets. The City's CAP and its reduction targets are consistent with AB 32 and the California Air Resources Board (CARB) recommendations to ensure that California emissions are reduced.

For the purpose of defining "existing" GHG emission levels, the City chose the emissions in the year 2008 as a benchmark to inventory carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄) generated from activities within Sunnyvale. The emissions sources calculated in the baseline GHG inventory include commercial, residential, and industrial electricity and natural gas use, on-road transportation, solid waste disposal, energy use and direct process emissions related to water and wastewater, and off-road equipment use for construction and lawn and garden activities. GHG emissions from these activities were calculated from activity data such as kilowatt hours of electricity, therms of natural gas, tons of waste disposed, and vehicle miles traveled (VMT) from trips with an origin or destination in Sunnyvale. In 2008, the community emitted approximately 1,270,170 metric tons of carbon dioxide equivalents (MTCO₂e) (see **Table 1**).

TABLE 1
2008 COMMUNITY-WIDE BASELINE EMISSIONS BY SECTOR

2008 Baseline Greenhouse Gas Emissions	MTCO ₂ e	Percentage of Total
Residential	198,140	16%
Commercial/Industrial	502,210	39%
Transportation	442,610	35%
Community Waste	76,970	6%
Landfill Gas	3,600	< 1%
Water	6,870	1%
Off-Road	37,830	3%
Caltrain	1,940	< 1%
Total	1,270,170	100%

According to the City's "business-as-usual" (BAU) greenhouse gas forecast, community-wide emissions would grow by approximately 18% by the year 2020 to 1,494,980 MTCO₂e and by 43% by 2035 to 1,810,160 MTCO₂e. **Table 2** shows Sunnyvale's projected GHG emissions by sector.

TABLE 2
SUNNYVALE BUSINESS-AS-USUAL GHG EMISSIONS FORECAST (MTCO₂E)

Sector	Source	2008 Baseline	2010 Estimate	2020 Forecast	2035 Forecast
Residential	Electricity	84,850	86,160	93,020	104,350
	Natural Gas	113,290	115,040	124,200	139,320
Commercial/Industrial	Electricity	387,700	399,380	463,240	578,680
	Natural Gas	114,510	117,950	136,820	170,910
Transportation	VMT	442,610	457,680	533,070	646,150
Landfilled Waste	Commercial	51,570	53,120	61,620	76,970
	Residential	25,400	25,790	27,850	31,240
Landfill Gas	Landfill Gas	3,600	3,460	2,830	2,100
Water	Gallons	6,870	7,000	7,730	8,960
Off-Road	Construction	34,930	35,620	39,310	45,580
	Lawn & Garden	2,900	2,940	3,180	3,560
Caltrain	Trips	1,940	1,970	2,110	2,340
Total		1,270,170	1,306,110	1,494,980	1,810,160
Percentage Change Since Baseline			3%	18%	43%

* The 2010 and 2020 business-as-usual growth forecasts are linear interpolations of the growth between 2008 and 2035 under the adopted General Plan growth scenario.

Other GHG emission reductions are expected to occur prior to implementation of the CAP, in compliance with several state-level programs such as the Renewable Portfolio Standard (RPS), updates to Title 24 Energy Efficiency Standards, California Solar Initiative Rebates, and the implementation of the Clean Car Fuel Standard, the implementation of which would slow down the projected increases in GHG emissions. Similarly, a project to electrify Caltrain is expected to be implemented, which would further reduce GHG emissions. **Table 3** provides estimates of the GHG emissions reductions that would occur with implementation of the existing state and regional reduction programs and efforts.

TABLE 3
IMPACT SUMMARY OF STATE AND REGIONAL REDUCTION EFFORTS (MTCO₂E)

	2008	2010	2020	2035
BAU Forecast	1,270,170	1,306,110	1,494,980	1,810,160
BAU Forecast Growth Percentage		3%	18%	43%
Pavley I – Clean Car Fuel Standard	–	0	-81,150	-159,460
Renewables Portfolio Standard	–	-19,700	-90,800	-173,690
CALGreen & 2008 Title 24 Standards	–	0	-31,210	-105,400

	2008	2010	2020	2035
Caltrain Electrification (Regional)	–	0	-1,900	-2,100
Total State/Regional Reductions	–	-19,700	-205,060	-440,650
Adjusted BAU Forecast	1,270,170	1,286,410	1,289,920	1,369,510
ABAU Forecast Growth Percentage (from baseline)	0%	1%	2%	8%

The CAP includes a quantitative analysis of the GHG reduction benefit that would occur with implementation of each goal to serve as a Qualified GHG Reduction Strategy in accordance with the CEQA Guidelines and BAAQMD guidance. Reduction measures in the CAP include a diverse mix of regulatory and incentive-based programs. The reduction measures aim to reduce GHG emissions from each source to avoid reliance on any one strategy or sector to achieve the target. As shown in **Table 4**, implementation of the measures and actions contained in the proposed CAP is projected to result in emissions reductions of 438,050 MTCO₂e by 2020 and 659,910 MTCO₂e by 2035. This represents reductions of 34% and 52% from baseline (2008) levels, respectively, which is more than double the GHG reductions necessary to meet AB 32 targets. Without implementation of proposed CAP Policy EP-1, which supports participation in a Community Choice Aggregation (CCA) to increase renewable energy use in the City, the CAP would result in emissions reductions of 204,650 MTCO₂e by 2020 and 321,490 MTCO₂e by 2035, which would still meet the applicable AB 32 targets.

Total reductions with both the CAP measures and the state and regional reduction programs would be 643,110 MTCO₂e by 2020 and 1,100,560 MTCO₂e by 2035. Combined with the state and local programs, GHG emissions would be reduced by 51% by 2020 and by 87% by 2035.

TABLE 4
2020 GHG REDUCTIONS BY GOAL

Sector		2020 GHG Reductions (MTCO ₂ e/yr)	2035 GHG Reductions (MTCO ₂ e/yr)
Open Space and Urban Forestry		-310	-780
Decrease Energy Consumption		-70,680	-104,610
Provide a Sustainable Energy Portfolio	Renewable Energy Portfolio (EP-1)	-233,400	-338,420
	Local Renewable Energy (EP-2)	-20,980	-24,670
Decrease Water Consumption		-980	-1,520
Reduce Landfilled Waste		-53,960	-96,190
Reduce Off-Road Equipment Emissions		-7,430	-13,820
Increase and Retain Awareness of Sustainability Issues		N/A	N/A
Improve Mobility through Land Use Planning		-19,880	-21,410
Expand Sustainable Circulation and Transportation Options		-16,660	-32,380
Optimize Vehicular Travel		-13,770	-26,110
Total Reductions		-438,050	-659,910

9. Surrounding land uses and setting:

The Climate Action Plan would be implemented citywide.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The proposed project would not require action by any other agencies.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION (to be completed by the lead agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed name

Title

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-d) Less Than Significant Impact

The CAP is a policy-level document; it does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the aesthetic quality of the environment or adversely affect visual resources. The CAP promotes mixed land uses that enable reductions in GHGs, but this would not result in specific changes to land use designations or zoning, as the City's current General Plan and Zoning Code also provide for mixed land uses. As a policy document, the CAP would have no direct impact on visual resources, but future activities could change community aesthetics. However, any future development projects that would implement CAP measures and actions would be subject to applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the CAP. Sunnyvale's zoning regulations, standard development conditions, and design guidelines address site and building design and Sunnyvale Municipal Code Chapter 19.56 lays out regulations for alternative energy systems, including wind and solar, that set height, setback, and location restrictions for alternative energy structures that could be development under implementation of the CAP. Therefore, the CAP would not result in any substantial visual impacts on the physical environment, and this impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-e) No Impact

The city is built out and contains no important farmland, land zoned for agricultural use, or land subject to a Williamson Act contract. Similarly, the city does not contain any forestland or timberland or any land zoned for such uses. The CAP does not include policies, development proposals, or requests to rezone land or that would result in the conversion of agricultural or forestland to another use. Therefore, the proposed project would have no impact on agriculture or forest resources.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-d) Less Than Significant Impact

The city is located within the Bay Area Air Quality Management District (BAAQMD), which has prepared an Ozone Attainment Plan and Clean Air Plan to address the basin's nonattainment with the national 1-hour ozone standard and the California ambient air quality standards (CAAQS). The emissions inventories contained in these plans are based on projected population growth and vehicle miles traveled (VMT) for the region. Projects that result in an increase in population or employment growth beyond that identified in regional or community plans could result in increases in VMT and subsequently increase mobile source emissions, which could conflict with the BAAQMD's air quality planning efforts.

The proposed CAP does not include any site-specific designs or proposals or grant any entitlements for development and does not propose to change existing land use designations or zoning beyond the current Sunnyvale General Plan. Future projects intended to implement the goals and actions of the CAP would not include any new housing or employment centers and would not result in population or employment growth beyond that identified in regional or community plans. It is unknown to what extent future improvements would need to be constructed, if at all, but this analysis assumes that some infrastructure (such as purple pipes for the delivery of recycled water) or improvements like the addition of bus shelters, bicycle racks, sidewalks, etc., could be proposed in the future as a means to implement the goals of the CAP. Expansion of the city's purple pipe system is anticipated in the General Plan. Future changes to the city's

land uses or circulation system, if needed, would be made through updates to the Land Use and Transportation Element, which would be required to go through a separate CEQA process. Other improvements would similarly undergo a CEQA process once locations and project details are known. At this time, there is no way to know what, if any, improvements would be constructed.

In the event construction of future facilities is needed, construction of these facilities would result in short-term construction emissions of ozone-precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxides [NO_x]) and emissions of particulate matter (PM). Emissions of ozone precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely associated with ground-disturbing activities, such as those occurring during site preparation. Specifically, implementation of measure OR-2 would limit the emissions from heavy-duty construction equipment by minimizing idling times, requiring proper maintenance of equipment, and avoiding use of generators, substituting electric-powered and/or hybrid equipment, and using alternative fuels for equipment when practical. Implementation of this measure and its action items would self-mitigate any possible impacts that may occur if future projects are needed to implement the goals of the CAP.

The proposed CAP is intended to reduce GHG and pollutant emissions generated within the city by contributing to global efforts to reduce the effects of climate change by implementing reduction measures that would meet the following goals: maintain and conserve open space and promote urban forestry (measures OS-1 through OS-3); decrease energy consumption (measures EC-1 through ES-6); provide a sustainable energy portfolio (measures EP-1 and EP-2); decrease water consumption (measures WC-1 and WC-2); reduce landfilled waste (measures LW-1 and LW-2); reduce off-road equipment emissions (measures OR-1 and OR-2); increase awareness of sustainability issues (measures CA-1 and CA-2); improve mobility through land use planning (measures LUP-1 through LUP-5); expand sustainable circulation and transportation options (measures CTO-1 through CTO-5); and optimize vehicular travel (measures OVT-1 through OVT-3). The reader is referred to Chapter 3 of the proposed CAP for a full list of GHG reduction measures and details regarding the anticipated GHG emissions reduction for each goal.

Implementation of the CAP's reduction measures, along with existing actions and state programs, are intended to reduce GHG emissions in Sunnyvale by 438,050 MTCO₂e by 2020 and 659,910 MTCO₂e by 2035. In addition to reducing GHGs, each of these measures and policies would help to reduce criteria air pollutants. Also, by reducing air pollutant emissions, implementation of the CAP would help to improve any existing violations of air quality standards for criteria air pollutants that are currently in nonattainment. Therefore, the proposed CAP would not conflict with the BAAQMD's adopted air quality plans, violate air quality standards, result in a cumulatively considerable increase in criteria air pollutants, or expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

e) Less Than Significant Impact

The proposed CAP does not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Future implementing actions of the CAP could enable the future development of pedestrian and bicycle facilities, alternative-fuel vehicle and transit infrastructure, and alternative energy facilities, promote urban forestry, and decrease water and energy

consumption, none of which would create objectionable odors. The CAP provides policies and action items that would promote the future development or improvement for such facilities, but the CAP does not include any specific development proposals. The proposed CAP does not contain any components that would result in the creation of objectionable odors or expose a substantial number of people to objectionable odors. Therefore, this impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-d) Less Than Significant Impact

The CAP does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to adversely affect any candidate, sensitive, or special-status species, riparian habitat or other sensitive natural community, or federally protected wetlands or interfere substantially with the movement of any migratory species. The proposed CAP encourages efficient land use patterns and mobility, which can be achieved through the existing General Plan land use designations and Zoning Code. The CAP does not propose to change existing land use designations or zoning.

As a policy document, the CAP would have no direct impact on biological resources, but could have indirect impacts on such resources through future projects intended to implement the goals and actions of the CAP. At this time, it is unknown exactly what types of projects would be implemented and where they would be located, but it is possible that there could be some effect on habitat or jurisdictional waters. Construction of these facilities would have the potential to adversely affect biological resources. However, any future development project that would implement CAP measures and actions would be subject to applicable federal, state, and local regulations protecting biological resources. Future development projects would also be subject to project-specific CEQA analysis of project-level impacts. Several of the goals of the proposed CAP would have a positive impact on biological resources, particularly the promotion of open space and urban forestry in Sunnyvale. This could provide and enhance habitat for wildlife, as well as conserve water features and wetlands. This impact is less than significant.

e-f) No Impact

The conservation plans and policies that apply to Sunnyvale include the San Francisco Bay Plan (Bay Plan) and Chapter 19.94 of the Municipal Code. The Bay Plan gives the San Francisco Bay Conservation and Development Commission (BCDC) authority to issue permits for development within 100 feet of the shoreline of San Francisco Bay. The Bay Plan includes policies to protect and restore habitat along the shoreline. Chapter 19.94 of the Municipal Code contains the City's tree preservation ordinance.

The proposed CAP is a policy document that encourages conservation and sustainability. Future developments intended to implement the CAP would be required to undergo site-specific CEQA analysis once they are proposed. In any case, the CAP does not contain any components that would encourage development within 100 feet of the San Francisco Bay shoreline, so there would be no impact associated with the Bay Plan. One of the goals of the proposed CAP encourages the protection of open space and the promotion of urban forestry in Sunnyvale, so the CAP would assist the City in its goal of tree preservation. The CAP does not contain any components that would conflict with either the tree preservation ordinance or the Bay Plan.

The Santa Clara Valley Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) boundaries do not include Sunnyvale. There are no other approved local, regional, or state habitat conservation plans in place. Therefore, there would be no impact related to conflict with any plans or policies intended to protect biological resources, a habitat conservation plan, a natural community conservation plan, or any other approved conservation plans.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-d) Less Than Significant Impact

The proposed CAP is a policy document that does not include proposals for development projects and would not grant any entitlements for development that would have the potential to adversely affect cultural resources. Further, the CAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the City's General Plan. As a policy document, the CAP would have no direct impact on cultural or paleontological resources, but future development projects and improvements that could be proposed to implement the proposed CAP goals and actions could potentially result in adverse impacts on cultural resources during construction activities. However, any future development project that would implement CAP measures and actions would be subject to applicable City regulations and requirements, as well as subject to further CEQA analysis of project-specific impacts, which would occur with or without implementation of the CAP. Therefore, the CAP would not result in any cultural or paleontological resources, and this impact is less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a)i) No Impact

Sunnyvale is not located within a designated Special Study Zone as delineated by the most recent Alquist-Priolo Earthquake Fault Zoning map. Therefore, there would be no impact associated with rupture of an Alquist-Priolo fault zone.

a)ii)–a)iii), c) Less Than Significant Impact

As stated above, Sunnyvale is not located within an Alquist-Priolo Special Study Zone, and there are no known active fault traces within the city limits. However, there are three

potentially active faults in the city—the San Jose fault, the Stanford fault, and the Cascade fault—all of which cross the city in a northwesterly-southeasterly direction. In addition, Sunnyvale is situated within the San Francisco Bay region, which is the most seismically active zone in the United States. Three active faults are located within seismically significant proximity to the city—the Hayward fault (11.7 miles east), the San Andreas fault (7.5 miles west), and the Monte Vista-Shannon fault (4.3 miles west) (CGS 2010)—all of which are known to have a high probability of producing an earthquake of significant magnitude, which would be highly likely to result in seismic ground shaking in Sunnyvale.

Liquefaction, landslides, lateral spreading, subsidence, settlement, lurching, and collapse are all forms of ground failure that can occur during strong seismic ground shaking events and result in damage to structures and infrastructure. These effects usually occur in soft, fine-grained, water-saturated alluvium, as generally found in the Santa Clara Valley. Portions of Sunnyvale are located in an area zoned by the State of California as having potential for seismically induced liquefaction hazards. Portions of the city are designated as Liquefaction Hazard Zones (Sunnyvale 2011; CGS 2002). Furthermore, the liquefaction probability for the city is between 0 and 10% (USGS 2008). Specifically, the northern half of Sunnyvale starting at roughly Washington Avenue and the Central Expressway is considered susceptible to liquefaction.

As stated previously, the proposed CAP does not include any site-specific designs or proposals, nor does it grant any entitlements for development. Further, the CAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the City's General Plan. As a policy document, the CAP would not directly result in the exposure of people or structures to hazards associated with seismic activity or soil instability. Future projects that could be implemented to implement the CAP would not include any habitable structures and would be subject to site-specific environmental review and governed by existing regulations of the State of California (California Building Code [CBC], California Code of Regulations [CCR], Title 24, Part 2) and Chapter 16.16.020 of the Sunnyvale Municipal Code, which adopted the CBC, and City Municipal Code Chapter 18.20.100, which requires the preparation of geotechnical soils reports for all new development. These regulations require that project designs reduce potential adverse soils, geology, and seismicity effects to less than significant levels. Compliance with these regulations is required, not optional. Compliance must be demonstrated by a project applicant to have been incorporated in the project's design before permits for project construction would be issued. Therefore, this would be a less than significant impact.

a)iv) Less Than Significant Impact

Landslides are least likely to occur in areas of low relief, such as topographically low alluvial fans and at the margin of San Francisco Bay. Since Sunnyvale is generally of low relief, the potential for significant landslides or large-scale slope instability within the city is considered low. In addition, Sunnyvale is not mapped in a landslide hazard zone (CGS 2002). None of the measures, actions, or possible projects that could be developed to implement the proposed CAP would result in changes which would change the potential for landslide hazards. Therefore, the potential for landslides to occur within Sunnyvale, even during strong seismic ground shaking events, is less than significant.

b) Less Than Significant Impact

The proposed CAP does not include proposals for development projects, would not grant any entitlements for development, and does not propose to change existing land use designations or zoning. Therefore, the CAP would not directly result in any soil erosion. Future projects and action intended to implement the goals of the CAP involving land clearing, grading, and/or excavations could potentially result in soil erosion and loss of topsoil. All future development, including actions intended to implement the proposed CAP, are subject to CBC Chapter 70 standards, which would ensure implementation of appropriate measures during grading activities to reduce soil erosion. Any activities that would cause soil disturbance of 1 or more acres would be required to prepare and comply with a stormwater pollution prevention plan (SWPPP) that describes the required erosion control best management practices (BMPs).

Additional protection against substantial soil erosion would be provided by the State Water Resources Control Board–required Construction General Permit (CGP) (Order No. 2009-0009DWQ) and the City’s grading standards (Chapter 18.12.110 of the Sunnyvale Municipal Code). All regulations ensure that all development projects include the necessary control measures for erosion and sediment control as well as permanent features to minimize stormwater pollution.

The City’s current development review process also ensures that construction projects have the necessary permits and that on-site regional control measures are considered for new development projects. Continued implementation of the City Municipal Code and compliance with state law would minimize potential soil erosion impacts that may be associated with the implementation of actions intended to implement the proposed CAP. This impact would be less than significant.

d) Less Than Significant Impact

The proposed CAP does not include proposals for development projects, would not grant any entitlements for development, and does not propose to change existing land use designations or zoning. No locations or site-specific information for future projects that would assist the City in implementing the actions of the proposed CAP have been identified. The proposed CAP is a policy document, so it would not result in direct impacts associated with potential development on unstable soils.

Sunnyvale’s surficial soils are largely composed of expansive clays, which swell when wet and shrink when dry, producing ground surface desiccation cracks. Portions of Sunnyvale have been identified as having slight to moderate shrink-swell potential, which could result in development constraints for future projects intended to implement the CAP (e.g., alternative energy installations in new and existing development, recycled water infrastructure installations, and alternative transportation improvements including transit, bicycle, and pedestrian facilities). As mentioned above, the City requires all new development to conduct geotechnical soils reports under Municipal Code Chapter 18.20.100. Geotechnical reports recommend specific engineering design elements, which would address any site-specific conditions for future development in areas containing expansive soil conditions. This would ensure that impacts associated with development and actions intended to implement the proposed CAP located in areas with expansive soils are less than significant.

e) No Impact

Sunnyvale is fully urbanized, and wastewater conveyance and treatment services are provided by the City's Environmental Services Department. Section 12.08.010 of the City Municipal Code requires sewer connections for all new development. Septic tanks would therefore not be used for new development. Therefore, there would be no impact associated with septic systems.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-b) Less Than Significant Impact

According to the CAP, unmitigated GHG emissions in the city would total 1,494,980 metric tons of carbon dioxide equivalents (MTCO₂e) in 2020, an 18% increase over baseline (2008) emissions. By 2035, community-wide emissions are expected to increase to 43% over 2008 levels to 1,810,160 MTCO₂e. Consistent with AB 32, the City has identified a 15% community reduction target below baseline (2008) emissions by 2020.

As discussed in the CAP, implementation of existing state reduction programs (i.e., Renewable Portfolio Standard (RPS), updates to Title 24 Energy Efficiency Standards, California Solar Initiative Rebates, and the implementation of the Clean Car Fuel Standard, commonly referred to as the Pavley Standard), as well as regional reduction programs (e.g., Caltrain electrification) is projected to reduce emissions by 205,060 MTCO₂e by 2020, a 2% reduction from baseline (2008) levels, and by 440,650 MTCO₂e (8%) by 2035.

Implementation of the measures and actions contained in the proposed CAP are projected to result in a further emissions reduction of 438,050 MTCO₂e by 2020 and 659,910 MTCO₂e by 2035, reductions of 34% and 52% from baseline (2008) levels, respectively. Without implementation of proposed CAP Policy EP-1, which supports participation in a Community Choice Aggregation (CCA) to increase renewable energy use in the City, the CAP would result in emissions reductions of 204,650 MTCO₂e by 2020 and 321,490 MTCO₂e by 2035, which would still meet the applicable AB 32 targets.

Total reductions with both the CAP measures and the state and regional reduction programs would be 643,110 MTCO₂e by 2020 and 1,100,560 MTCO₂e by 2035. Combined with the state and local programs, GHG emissions would be reduced by 51% by 2020 and by 87% by 2035. These projected emissions reductions are summarized in **Table 5**.

The proposed CAP measures and actions would achieve these reductions by reducing emissions by promoting the conservation of open space and urban forestry, decreasing energy consumption, providing a sustainable energy portfolio, decreasing water consumption, reducing landfilled waste, increasing awareness of sustainability issues, improving mobility through land use planning, expanding sustainable circulation and transportation options, and optimizing vehicular travel.

TABLE 5
GHG EMISSIONS REDUCTION SUMMARY

	2008	2020	Percentage Change from Baseline	2035	Percentage Change from Baseline
Business-as-Usual Emissions (MTCO ₂ e)	1,270,170	1,464,980	+ 15%	1,810,160	+ 42%
State/Regional Reduction Efforts (MTCO ₂ e)		-205,060	-16%	-440,650	-35%
CAP Reduction Efforts (MTCO ₂ e), excluding Policy EP-1		-204,650	-16%	-321,490	-52%
Subtotal Emissions Reductions (MTCO₂e)		-409,710	-32%	-762,140	-60%
CAP Policy EP-1 (CCA)		-233,400	-18%	-338,420	-27%
Total Emissions Reductions (MTCO₂e)		-643,110	-51%	-1,100,560	-87%

The proposed CAP would be consistent with AB 32 and the AB 32 Scoping Plan, as the proposed CAP would achieve a 34% reduction below baseline (2008) levels by 2020, which far exceeds the 15% reduction as required under the provisions of AB 32. Therefore, implementation of the proposed CAP would be consistent with state goals to reduce GHG emissions, and this impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-c) Less Than Significant Impact

The proposed CAP is a policy document that does not include any site-specific designs or proposals, grant any entitlements for development, or change any land use designations or zoning and would have no potential to directly result in the routine

handling, generation, transportation, emission, or accidental release of hazardous materials or otherwise expose the public to hazardous substances. While future projects may be proposed to implement some of the goals and actions of the proposed CAP (e.g., alternative energy installations in new and existing development, recycled water infrastructure installations, and alternative transportation improvements including transit, bicycle, and pedestrian facilities), the types of projects would not be likely create hazards or hazardous conditions. There would be no uses that would transport, use, store, or dispose of hazardous materials which could potentially result in a potential release of hazardous materials in the environment, including near schools.

Construction of future projects could potentially result in some hazards or use of hazardous materials. Any operational use of hazardous materials would likely be limited. Any possible use of hazardous materials during construction or operation of any future projects intended to implement the goals and actions of the proposed CAP would be subject to extensive hazardous materials regulations, which are codified in Titles 8, 22, and 26 of the California Code of Regulations, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. These regulations were established at the state level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. Compliance with required regulations is assumed. Therefore, this impact would be less than significant.

d) Less Than Significant Impact

The proposed CAP is a policy-level document that does not include any site-specific designs or proposals, grant any entitlements for development, or change any land use designations or zoning. Therefore, it would have no potential to directly result in development of a known hazardous release site. However, future projects may occur in order to implement the goals and actions of the proposed CAP (e.g., alternative energy installations in new and existing development, recycled water infrastructure installations, and alternative transportation improvements including transit, bicycle, and pedestrian facilities). The city contains many hazardous material sites known to handle and store hazardous materials or known to be associated with a past hazardous material-related release.

Because specific improvement projects are not known at this time, it cannot be determined whether they would be constructed on or near a known hazardous release site. However, any future development project that would implement CAP goals and actions would be subject to future environmental review, which would include a search of appropriate databases to determine whether the site is a listed hazardous materials site and the status of the site at the time improvements are proposed (e.g., whether further evaluation or cleanup action is required or if the case is closed). If improvements would occur on a listed hazardous materials site, the project would be required to comply with applicable federal, state, and local regulations related to hazardous materials, which would ensure there would be minimal risk of significant hazard to the public or the environment. Therefore, this impact would be less than significant.

e) No Impact

A portion of Moffett Federal Airfield, a US government airport that supports NASA test flights and US government personnel and air cargo flights, is located in Sunnyvale, adjacent to San Francisco Bay. The city is within the airfield's Comprehensive Land Use

Plan. There are a limited number of civilian operations at the airport, which are anticipated to remain for some time. Operations at the airfield are an existing known source of noise in Sunnyvale. The proposed CAP is a policy document that would not result in the development of land uses that would expose people to safety hazards associated with operations at the airfield. There would be no impact.

f) No Impact

There are no private airports or airfields in the vicinity of the city. Therefore, there would be no impact associated with safety hazards from private airports or airfields.

g) Less Than Significant Impact

The proposed CAP is a policy document that does not include any development proposals, entitlements, or changes to existing land use designations. The CAP does encourage more efficient land use and circulation patterns, so it is possible that the City could propose future projects or actions that are intended to implement the goals of the CAP. It is possible that some of these future projects or actions could require temporary road closures during their construction, which could adversely affect evacuation during an emergency event or emergency response. However, any closures would be short term, and alternative routes would be provided as necessary. It is unlikely that these actions would significantly interfere with adopted emergency response or evacuation plans. Further, all future improvement projects could be subject to further CEQA analysis of project-specific impacts. Therefore, this impact would be less than significant.

h) No Impact

According to the California Department of Forestry and Fire Protection (2007), there are no Fire Hazard Severity Zones for state responsibility areas or Very High Fire Hazard Severity Zones for local responsibility areas within or adjacent to Sunnyvale. In addition, the proposed CAP would not result in the development of any residences. Therefore, there would be no impact associated with wildland fires.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a, f) Less Than Significant Impact

The CAP does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade water quality or violate any water quality standards or waste discharge requirements. As a policy document, the CAP would have no direct impact on water quality, but future construction projects undertaken to implement some of the goals of the proposed CAP (e.g., alternative energy installations in new and existing development, recycled water infrastructure installations, and alternative transportation improvements including transit, bicycle, and pedestrian facilities) could result in erosion or introduce pollutants into stormwater runoff, which could potentially degrade downstream water quality if regulations concerning pollutants of stormwater and erosion control measures are not properly implemented during construction activities. However, all future development projects, including those intended to implement the CAP, would be required to comply with Regional Water Quality Control Board standards for site drainage, as well as obtain coverage under the National Pollutant Discharge Elimination System (NPDES) statewide General Construction Permit. In addition, as mentioned under the analysis of Item b) in subsection IV, Geology and Soils, all future projects are also required to prepare a SWPPP, which would include a list of best management practices that would need to be implemented for each future project site to minimize erosion and sedimentation. Continued implementation of these requirements would ensure that when future projects intended to implement the goals of the CAP are constructed, their impacts associated with water quality are less than significant.

b) Less Than Significant Impact

The CAP is a policy document that does not propose any development, but it does include goals and actions that may result in future development projects that could potentially have environmental impacts, including the development of infrastructure for recycled water use (also called "purple pipe") citywide. The type of development that would occur in order to implement the goals of the proposed CAP would not be likely to result in new demand for water supplies, including groundwater supplies, and it would not likely result in the development of land uses with paved surfaces, which could interfere with groundwater recharge. In fact, two of the major components of the proposed CAP are to decrease water consumption and to provide for open space and urban forestry. By implementing the CAP, Sunnyvale's water demand would decrease substantially, which would result in less demand from the city's seven groundwater wells, as well as from other groundwater sources used by the city's other water sources. In addition, the CAP's focus on providing open space and urban forestry would prevent the development of impervious surfaces and ensure there are ample groundwater recharge areas available throughout the city. Combined with the CAP's goals to substantially decrease water consumption (partially through the use of purple pipe), the CAP would have a beneficial effect on groundwater supplies. Therefore, this impact is less than significant.

c-e) Less Than Significant Impact

The proposed CAP does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to alter existing drainage patterns or increase the rate or amount of surface runoff. Implementation of the proposed CAP goals and actions may require the construction of some future

projects, such as infrastructure for purple pipes, but for the most part, the CAP promotes reduced consumption and optimized use of existing structures and development. In most cases, the development that could occur in order to implement the CAP is planned to occur as part of the adopted General Plan regardless of whether or not the CAP is adopted. The CAP also provides incentives for sustainability and attempts to increase awareness of sustainability practices. Because of this, it is unlikely that the CAP would result in the need to develop structures or infrastructure which could result in alteration to drainage patterns or contribute new sources of stormwater that could exceed the capacity of the existing stormwater drainage system. However, if it is determined that improvements are needed to implement the CAP that could affect drainage patterns or runoff rates, or exceed the capacity of the city's stormwater drainage facilities, those future projects, as with all development in the city, would be subject to the City's development standards, which would minimize impacts related to surface runoff and the city's drainage system. This impact would be less than significant.

g) No Impact

Portions of Sunnyvale are located within the 100-year flood hazard area, according to the Federal Emergency Management Agency (FEMA). However, the proposed CAP would not directly or indirectly result in the development of housing anywhere in the city, including within the 100-year flood hazard areas. Therefore, there would be no impact associated with placing housing in a flood hazard area.

h) Less Than Significant Impact

As mentioned above, it is possible that implementation of the CAP may require the construction of future projects, although it is unknown at this time what and where such projects could be. However, in the event that new structures or infrastructure is needed to implement some of the goals and actions of the CAP, those future projects would be subject to all required building and construction requirements, including the Prevention of Flood Damage chapter of Sunnyvale's Buildings and Construction Ordinance (Ordinance No. 2916-10), which requires new structures built within a FEMA-designated Special Flood Hazard Area to meet certain requirements to ensure safety. In addition, it is unlikely that the types of future projects which could be built to implement the goals and actions of the proposed CAP would include the type and size of structures that could impede or redirect flood flows. This, combined with required compliance with regulations for building within flood hazard zones, would ensure this impact is less than significant.

i-j) Less Than Significant Impact

Tsunamis, or seismically generated sea waves, are rare in California due to the lack of submarine earthquake faults. However, due to its proximity to the Pacific Ocean, San Francisco Bay, and the Santa Cruz Mountains, Sunnyvale is subject to risk of inundation from tsunami, seiche, and mudflow. However, the proposed CAP would not directly or indirectly result in the construction of any housing or other habitable structures and would not result in population growth. In addition, the General Plan determined that the failure of the Stevens Creek reservoir dam could result in the inundation of portions of Sunnyvale under a worst-case scenario event, although the Santa Clara Valley Water District (SCVWD) actively maintains the dam to prevent this from occurring. Each of these potential events is extremely rare and unlikely to happen. In any event, the CAP would not increase exposure of persons to the risk of inundation from tsunami, seiche, mudflow, or inundation resulting from levee or dam failure. This fact, combined with the rarity of these events, make this a less than significant impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a) No Impact

Division of an established community commonly occurs as a result of development and construction of physical features that constitute a barrier to easy and frequent travel between two or more constituent parts of a community. For example, a large freeway structure with few crossings could effectively split a community. Likewise, geographic features could similarly affect the community, such as the development of a large residential project on the opposite side of a river from the existing community. The proposed CAP does not propose any changes to existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the City's General Plan. Any future projects that may be developed to implement the proposed CAP would not be of the type and size that could physically divide the community. There would be no impact.

b) Less Than Significant Impact

The proposed CAP is a policy-level document that does not include any changes to existing land use designations or zoning. The CAP also contains provisions to ensure it is consistent with the General Plan. The CAP would promote more efficient land use patterns, including more mixed uses, to improve mobility, circulation, and sustainability. While this eventually could lead to changes in land uses, the current General Plan already promotes these land uses. The CAP would simply provide incentives for future projects to take advantage of more efficient land use patterns. These types of land use changes would not substantially conflict with existing uses. This impact is less than significant.

Similarly, the CAP would promote land use patterns that—in certain places that are well served by transit—are denser and contain more mixed uses than under existing conditions. These types of land use changes would not substantially conflict with existing uses.

c) No Impact

Santa Clara County is currently in the process of developing the Santa Clara Valley HCP/NCCP. No HCP/NCCP has been adopted as of the writing of this Initial Study. In addition, the Santa Clara Valley HCP/NCCP boundaries do not include Sunnyvale. Therefore, there would be no impact related to conflict with a habitat conservation plan or natural community conservation plan.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-b) No Impact

The proposed CAP does not propose improvements or changes to existing land use designations that would have the potential to result in the loss of availability of a known mineral resource or of a locally important mineral resource recovery site. Further, future activities would occur within Sunnyvale, which is an urbanized area that contains no known significant mineral resources or resource recovery sites. Therefore, there would be no impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-d) Less Than Significant Impact

The proposed CAP does not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. As a policy document, the proposed CAP would have no direct impact related to noise or vibration, but future projects that could be proposed to implement the goals and actions of the CAP (e.g., alternative energy installations in new and existing development, recycled water infrastructure installations, and alternative transportation improvements including transit, bicycle, and pedestrian facilities) could potentially result in construction noise and vibration or uses that result in changes in noise levels.

Construction noise generated during construction activities associated with future projects intended to assist in implementing the CAP would be regulated through the City Municipal Code, which sets the legal hours of construction between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday. These hours are intended to mitigate temporary noise impacts by avoiding construction during nighttime periods that would disturb noise-sensitive land uses. It

would also ensure that groundborne vibration does not occur during restricted hours, which would reduce potential impacts associated with vibration.

The proposed CAP would not likely promote the construction of land uses that would substantially increase ambient noise levels. The most likely types of projects that would be built would include things like purple pipe for the delivery of recycled water and the improvement of open space. At this time, it is unknown what other types of projects could be proposed to implement the proposed CAP and what kind of changes in the city's ambient noise environment could occur as a result. It is important to note that while the proposed CAP could promote future projects to implement its goals and actions, future CEQA evaluation would be required for future development in Sunnyvale. For this reason, combined with compliance with the City Municipal Code's requirements regarding noise, this impact is considered to be less than significant.

e) No Impact

A portion of Moffett Federal Airfield, a US government airport that supports NASA test flights and US government personnel and air cargo flights, is located in Sunnyvale, adjacent to San Francisco Bay. There are a limited number of civilian operations at the airport, which are anticipated to remain for some time. Operations at the airfield are an existing known source of noise in Sunnyvale. The proposed CAP is a policy document that would not result in the future development of any sensitive land uses that could be adversely affected by excessive noise levels resulting from operations at the airfield. Therefore, there would be no impact.

f) No Impact

There are no private airports or airstrips in the vicinity of Sunnyvale. Therefore, there would be no impact associated with exposure to excessive noise from private airports or airstrips.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-c) No Impact

The proposed CAP does not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Future improvements would not include the development of any new housing or employment centers that would increase the population directly or induce population. Similarly, the proposed CAP would not result in displacement of housing or people for the same reasons. Therefore, there would be no impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-e) No Impact

The proposed CAP does not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Therefore, the CAP would have no direct impact on public services. Future actions associated with the CAP would not include any residential uses or employment centers that would generate demand for public services. The proposed CAP does include goals and actions that would encourage and remove obstacles to improving open spaces and green spaces, which may include parks. However, the CAP would not result in increases in population that would trigger the need for new or improved park facilities. Therefore, there would be no impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-b) No Impact

The proposed CAP would not increase population or the demand for park facilities. The CAP contains goals and actions that may promote the improvement of green spaces, but no specific improvements or land use changes are included as part of the CAP. With no planned changes to residential or nonresidential uses in the city, the CAP would not result in physical deterioration of park facilities or require new park facilities, the construction of which could cause physical environmental impacts. Therefore, there would be no impact related to parks and recreation.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-b) Less Than Significant Impact

One of the major goals of the proposed CAP is to reduce GHG emissions, and a large component of the anticipated reductions would be through reducing emissions from transportation sources. Part of the proposed reductions would occur through improved mobility and land use planning, which promotes mixed land uses and transit-oriented development; the promotion of sustainable circulation patterns and transportation options to promote safe and efficient alternative modes of travel (e.g., bicycling, walking, public transit), commute programs and carpooling incentives to reduce the number of single-occupant vehicles on the road; and optimization of vehicular travel by promoting use of alternative fuels, car sharing, and circulation improvements. Each of these measures would help to improve circulation and existing congestion issues throughout Sunnyvale, which would comply with applicable traffic plans and policies.

The CAP would assist the City in complying with, and even improving, its level of service standards. Therefore, the proposed CAP would likely have a beneficial effect with regard to performance of Sunnyvale's circulation system. Therefore, this impact would be less than significant.

c) Less Than Significant Impact

A portion of Moffett Federal Airfield is located in Sunnyvale, adjacent to San Francisco Bay. The CAP is a policy document that would have no direct effects, although it provides policies supporting the development of future projects that could have an effect on the physical environment. However, the type of projects that may be implemented would not be likely to have an effect on air traffic patterns or result in changes in location that would cause substantial safety risks. In addition, the safety and compatibility policies of the airfield's Comprehensive Land Use Plan would be considered when reviewing any future projects proposed to implement the CAP. Such projects would also go through site-specific CEQA analysis. This would ensure that this impact would be less than significant.

d-e) Less Than Significant Impact

The proposed CAP does not include any site-specific designs or proposals, grant any entitlements for development, or propose to change existing land use designations or zoning. Future projects intended to implement the goals and actions of the CAP have not yet been designed, and it is not known whether any future project would actually be needed. One of the goals of the CAP is to provide safe facilities for bicycles, pedestrians, and public transit, so if future projects need to be constructed, these facilities would be designed to increase safety and access. The City would review future development proposals to ensure they are safe and would not substantially increase hazards due to design features or result in inadequate emergency access. Furthermore, any future construction activities initiated to develop projects would go through future CEQA analysis to ensure their safety. This impact is less than significant.

f) No Impact

The proposed CAP includes goals that promote the use of alternative modes of travel by encouraging sustainable circulation and transportation options to facilitate safe and efficient bicycling, walking, and transit use throughout Sunnyvale (measures CTO-1, CTO-2, and CTO-3) and improving mobility through land use planning by promoting transit-oriented development (measure LUP-2). This is consistent with the City's adopted plans and policies promoting these modes of travel, including the goals of the General Plan. Implementation of the goals and actions of the proposed CAP would assist the City in complying with its existing goals to promote the use of alternative modes of transportation, so its impact would be beneficial. There would be no impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a-b, d-e) Less Than Significant Impact

The proposed CAP would not generate population or result in the development of land uses that would increase demand for water supplies, water treatment and conveyance, and wastewater treatment and conveyance. In fact, one of the goals of the CAP is to decrease water consumption, which would reduce GHG emissions by requiring less energy to pump, treat, collect, and discharge water. The CAP proposes measures that advocate for the expansion of Sunnyvale's recycled water system, which would allow more land uses to use recycled water for appropriate purposes, thereby reducing the demand for potable water supplies and the need for new or expanded treatment and distribution infrastructure. Similarly, with reduced demand for water, the demand for wastewater treatment capacity and conveyance infrastructure would also be expected to decrease accordingly. No new treatment capacity or conveyance lines would be needed.

However, this would increase the demand for recycled water, which could result in the need for new or expanded recycled water treatment facilities and conveyance infrastructure. Expansion of the recycled water system was considered and evaluated in the General Plan. The proposed CAP would encourage the continued use and possible expansion of the recycled water system, but this goal could be implemented through the currently planned facilities. In the event additional recycled water infrastructure is determined to be needed, the expansion of the system would undergo CEQA evaluation using specific project details such as appropriate sizing and locations of facilities. At this time, it is assumed that currently planned facilities could adequately allow for the implementation of the proposed CAP.

Overall, the proposed CAP would result in a reduction in demand for potable water supplies, so no additional water supply sources would be needed. Furthermore, the demand in water would result in a reduction in wastewater generation, which would ensure that the capacity of the wastewater treatment plant and the wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board would not be exceeded. Recycled water could be used and would be provided via the city's existing and planned system. Therefore, this impact is less than significant.

c) Less Than Significant Impact

As demonstrated under subsection IX, Hydrology and Water Quality, of this Initial Study, because the proposed CAP is a policy document that does not propose any specific development, it would not directly result in the development of uses that would have the potential to increase the amount of surface runoff. Therefore, there would be no need to provide new or expanded stormwater drainage facilities. If it is determined later that projects that would require stormwater drainage facilities are needed to implement the goals and actions of the proposed CAP, then additional CEQA analysis would be conducted to determine the extent of possible impacts based on project-specific information. This impact is less than significant.

f-g) Less Than Significant Impact

As mentioned above, the proposed CAP is a policy document that would not result in the development of housing or land uses that would generate solid waste which would need to be disposed of in a landfill. In fact, the CAP includes several measures and action items to reduce the amount of solid waste generated in Sunnyvale and encourages recycling and composting. Implementation of these measures and actions would reduce the amount of waste that would go to landfills. This would ensure compliance with applicable solid waste regulations. Therefore, this impact is less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ANALYSIS AND CONCLUSIONS

a) Less Than Significant Impact

As described in subsection IV of this Initial Study, the proposed CAP would have no direct impact on biological resources, and any future projects intended to implement the goals and actions of the CAP, if needed, would be subject to applicable federal, state, and local regulations that protect such resources. Compliance with these existing regulations would ensure that future projects would have a less than significant impact on plant and wildlife species and their habitat, or that mitigation would be required, if necessary. Similarly, as described in subsection V, the proposed CAP would have no direct impact on prehistoric and historic resources, and future projects carried out to implement the goals and actions of the CAP would be subject to General Plan policies and existing state regulations protecting such resources. Continued compliance with these policies and existing regulations would ensure that the CAP would have a less than significant impact on prehistoric and historic resources. Furthermore, future projects intended to implement the goals and actions of the proposed CAP would be subject to further CEQA analysis of project-specific impacts. This impact is less than significant.

b) Less Than Significant Impact

The proposed CAP is a policy document that would not directly result in any development, so there would be no direct physical effects that could combine with the

physical effects of other projects in the region and result in "cumulatively considerable" impacts. Although there are currently none planned, future projects could be proposed to implement portions of the CAP. Any such future projects could have impacts on the physical environment that could combine with the impacts of other projects. Any future projects intended to implement the goals and actions of the proposed CAP would be required to undergo CEQA analysis, which would evaluate the project- and site-specific impacts that could occur, as well as the potential for cumulative impacts. However, at this time it is unknown whether any future projects would be needed and if so where and when they would be implemented. Since direct impacts would not occur, and it is unknown whether future projects would be implemented, making the evaluation of any possible indirect impacts speculative, this is considered to be a less than significant impact.

c) Less Than Significant Impact

The proposed CAP would not result in any direct impacts that would have impacts on the physical environment, including effects that would cause substantial adverse impacts on human beings. However, it is possible that future projects intended to implement the goals and actions of the CAP could be proposed, which could result in indirect impacts, although at this time, it is unknown whether any future projects would actually have to be developed, so it is possible that no indirect impacts would occur. In any event, the types of future projects that could be proposed as a means to implement the CAP (i.e., development of recycled water infrastructure, facilities that support alternative modes of transit such as bicycle racks and transit stops, etc., encouraging the planting of trees, and the conservation of open space) would not be the types of projects that would be likely to cause adverse effects on human beings. For this reason, this impact is considered to be less than significant.

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