

Final Environmental Impact Report

For the
915 DeGuigne Residential Project
SCH# 2014112001



October 2015

PREFACE

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (FEIR) for the 915 DeGuigne Residential project. The Draft EIR was circulated to affected public agencies and interested parties for a 45-day review period from July 1, 2015 to August 14, 2015. This volume consists of comments received by the City of Sunnyvale, the Lead Agency on the Draft EIR, during the public review period, responses to those comments, and revisions to the text of the Draft EIR.

In conformance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the FEIR provides objective information regarding the environmental consequences of the proposed project. The FEIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The FEIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the FEIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the DEIR by making written findings for each of those significant effects.

According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
 - (1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.
 - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

In accordance with CEQA and the CEQA Guidelines, the FEIR will be made available to the public prior to consideration of the Environmental Impact Report. All documents referenced in this FEIR

are available for public review in the office of the Department of Community Development, 456 W. Olive Avenue, Sunnyvale, California, on weekdays during normal business hours.

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**SECTION 1.0 LIST OF AGENCIES AND ORGANIZATIONS TO WHOM THE
DRAFT EIR WAS SENT**

State Agencies

California Air Resources Board
California Department of Fish and Wildlife, Region 3
California Department of Housing and Community Development
California Department of Transportation, District 4
Department of the Navy
Department of Toxic Substances Control
Hetch-Hetchy Water & Power
Native American Heritage Commission
State Clearinghouse – Office of Planning and Research
State Water Resources Control Board

Regional Agencies

Association of Bay Area Governments
Bay Area Air Quality Management District
California Regional Water Quality Control Board, San Francisco Bay Region II
Peninsula Corridor Joint Power Board
Northern California Carpenters Regional Council
San Francisco Bay Conservation and Development Commission
Santa Clara County Department of Roads and Airports
Santa Clara County Planning Office
Santa Clara Valley Transportation Authority (VTA)

Cities

City of Cupertino
City of Los Altos
City of Mountain View
City of San Jose
City of Santa Clara

Organizations and Individuals

Adams Broadwell Joseph & Cardoza
Amah Mutsun Band of Mission San Juan Bautista
Amah Mutsun Tribal Band
Cupertino Union School District
Fremont Union High School District
Indian Canyon Mutsun Band of Costanoan
NASA Ames Research Center

Muwekma Ohlone Indian Tribe of the SF Bay Area
Northern California Carpenters Regional Council
Onizuka – Base Realignment and Closure – Air Force Real Property Agency
Santa Clara Unified School District
Sunnyvale Elementary School District
The Ohlone Indian Tribe

SECTION 2.0 LIST OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

State Agencies

A. California Department of Transportation August 14, 2015

Regional Agencies

B. Santa Clara Valley Transportation Authority August 12, 2015

C. County of Santa Clara Roads and Airports Department August 14, 2015

Organizations and Individuals

D. Milton Wu July 22, 2015

E. Robert S. Lloyd July 28, 2015

F. Martin Landzaat August 10, 2015

G. Chris Walz August 10, 2015

H. Martin Landzaat August 13, 2015

I. Watt Development Company (Project Applicant) August 13, 2015

In addition to the comment letters listed above, the City received verbal comments during the August 10th, 2015 Planning Commission Meeting. The meeting minutes are included as “letter” J.

SECTION 3.0 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

The following section includes all the comments on the Draft EIR that were received by the City in letters and emails during the 45-day review period. The comments are organized under headings containing the source of the letter and the date submitted. The specific comments from each of the letters or emails are presented as “Comment” with each response to that specific comment directly following. Each of the letters submitted to the City of Sunnyvale are attached in their entirety in Section 5.0 of this document.

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. Section 1.0 of this document lists all of the recipients of the Draft EIR.

Three comment letters were received from public agencies, none of whom may be Responsible Agencies under CEQA for the proposed project. The CEQA Guidelines require that:

A responsible agency or other public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency or which are required to be carried out or approved by the responsible agency. Those comments shall be supported by specific documentation. [§15086(c)]

Regarding mitigation measures identified by commenting public agencies, the CEQA Guidelines state that:

Prior to the close of the public review period, a responsible agency or trustee agency which has identified what the agency considers to be significant environmental effects shall advise the lead agency of those effects. As to those effects relevant to its decisions, if any, on the project, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible or trustee agency is not aware of mitigation measures that address identified effects, the responsible or trustee agency shall so state. [§15086(d)]

The CEQA Guidelines state that the lead agency shall evaluate comments on the environmental issues received from persons who reviewed the DEIR and shall prepare a written response to those comments. The lead agency is also required to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report. This FEIR contains written responses to all comments made on the Draft EIR received during the advertised 45-day review period. Copies of this FEIR have been supplied to all persons and agencies that submitted comments.

A. RESPONSE TO COMMENTS FROM CALIFORNIA DEPARTMENT OF TRANSPORTATION, August 14, 2015:

Comment A1: Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. We have reviewed the DEIR to ensure consistency with our mission and state planning priorities of infill, conservationism, and efficient development. Please also refer to our previous comment letters on this project. We provide these comments consistent with the State’s smart mobility goals to support a vibrant economy and build communities, not sprawl.

Project Understanding

The proposed project is located approximately one-half mile southeast from the U.S. 101/N. Fair Oaks Avenue interchange. It would demolish all the occupied existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) and a public park. The townhouses would be located on Parcel 1 and the park would be located on Parcel 2. The townhouses would range from two to four bedrooms.

Lead Agency

As the lead agency, the City of Sunnyvale (City) is responsible for all project mitigation, including any needed improvements to State highways. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Response A1: As stated, the City is the Lead Agency under CEQA and will be responsible for project mitigation. The project applicant will pay all applicable fees and all mitigation measures will be monitored by the City to ensure compliance. The commenter’s concerns are acknowledged and will be provided to the decision-makers as part of the public record.

Comment A2: Traffic Impact Analysis (TIA)

1. **Responses 4 and 5:** The city’s Responses 4 and 5 (collectively Responses) to Caltrans comment letter on the Notice of Preparation requesting traffic fees be identified states, “The project would have no impacts to State facilities.” However, the Responses are incongruent because the TIA:
 - Identifies the U.S. 101/N. Fair Oaks Avenue northbound (NB) ramps as deficient under Existing, Existing Plus Project, Background, and Cumulative Conditions, with the left-turn pocket extending beyond the turn pocket by over 25 feet but does not propose any mitigation.
 - Does not include an analysis of the U.S. 101/N. Fair Oaks Avenue southbound (SB) ramps, so a determination has yet to be made whether the proposed project will have impacts to the SB on- and off-ramps. Please provide Caltrans with a traffic analysis of the SB on- and off-ramps at this interchange.

Caltrans recommends mitigation for impacts to these NB and SB ramps be identified in the TIA and DEIR.

Response A2: As specifically noted on page 54 of the DEIR, “The City does not have a formal adopted threshold for queuing impacts, but rather treats queuing issues as operational issues, unless overall intersection LOS thresholds are exceeded. Traffic trips associated with queuing, as discussed below, have already been accounted for in the LOS analysis.” Therefore, the potential transportation impacts caused by the proposed project or the maximum build-out/corner mixed use development scenario were fully analyzed and discussed in the TIA and the DEIR.

As noted in the comment, the U.S. 101/N. Fair Oaks NB ramps are deficient under existing conditions, and not as a result of the proposed project. Because there is no formal adopted threshold, no impact can be identified under CEQA and there is no mandate for mitigation. The City is, however, requiring an improvement at the Fair Oaks Avenue/US 101 Northbound Ramps as a condition of project approval, as discussed on page 54 of the DEIR.

The southbound ramps were not identified as a study intersection in the TIA because the project would not add at least 10 trips per lane per hour during one or more peak hours, consistent with VTA’s adopted TIA guidelines. Because the southbound ramps were not required to be analyzed as part of the LOS analysis, they were not included in the operational queuing analysis.

Comment A3: 2. Calculation Sheets: Please provide Caltrans with the Traffic and Synchro software calculation sheets for our review and comments, including calculation sheets for the NB and SB ramps identified above.

Response A3: The appendices of the TIA have been provided to the commenter.

**B. RESPONSE TO COMMENTS FROM SANTA CLARA VALLEY
TRANSPORTATION AUTHORITY, August 12, 2015:**

Comment B1: Santa Clara Valley Transportation Authority (VTA) staff have received the Draft EIR for 451 townhomes plus a park or mixed use development of 7,000 square feet of retail uses and 19 housing units on 25.2 acres at 915 DeGuigne Avenue and 936 Duane Avenue. We have the following comments.

Transportation Impact Analysis (TIA) Report

VTA commends the City for including an analysis of pedestrian and bicycle quality of service (QOS) in relation to the proposed “road diet” on DeGuigne Drive, per the updated 2014 VTA Transportation Impact Analysis (TIA) Guidelines. However, VTA notes that the analysis of potential effects on transit service (TIA pg. 35) is based on transit capacity rather than transit vehicle delay, as required per Section 9.2 of the 2014 TIA Guidelines. In addition, the TIA did not include an Auto Trip Reduction Statement (ATRS), as required per Section 8.2 and Appendix C of the 2014 TIA Guidelines. Please submit a revised TIA report or follow-up memo including the completed ATRS form and an analysis of transit vehicle delay due to the proposed project. As noted in the 2014 VTA Guidelines (page 46), the transit vehicle delay analysis may simply utilize information produced by the intersection Level of Service analysis, or other sources if available.

The October 2014 version of the VTA TIA Guidelines can be found online at - <http://www.vta.org/cmp/toa-guidelines>. For any questions about the updated TIA Guidelines, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

Response B1: The City acknowledges the new requirements per the updated October 2014 VTA TIA Guidelines. However, the City made VTA aware that the traffic scope of work for this project was developed before the October 2014 TIA Guidelines were adopted by VTA per an email with VTA dated January 30, 2015. The City voluntarily incorporated a QOS analysis for the DeGuigne Drive “road diet” even though it was not required, since the scope of work was developed before the new TIA Guidelines were adopted. The October 2014 VTA TIA Guidelines were adopted while the traffic analysis had already commenced for this project. Therefore, no transit vehicle delay analysis or Auto Trip Reduction Statement was included as part of the traffic study.

Comment B2: Pedestrian and Bicycle Accommodations

VTA commends the City and project sponsor for proposing to include multi-use trails within the site (Figure 2.0-2), green-colored bicycle lanes along E Duane Avenue, and a new pedestrian crossing of E Duane Avenue at San Miguel Avenue including high visibility crosswalks, in-pavement warning lights and curb bulb-outs (Figure 2.0-4). These improvements will encourage walking and bicycling for daily tasks and improve pedestrian access to transit, thereby reducing automobile trips, vehicle miles traveled and greenhouse gas emissions associated with the project.

Response B2: This comment is noted. No further response is required.

Comment B3: The existing sidewalks surrounding the site on Deguigne Drive and Duane Avenue appear to be only 4' in width, although the pedestrian conditions are improved by the presence of a planted buffer strip between pedestrians and automobiles with consistent street trees on all project street frontages. The site plans provided in the DEIR and TIA do not indicate whether the sidewalks will be widened as part of the project. VTA recommends increasing the sidewalk width while retaining the existing planted buffers as a condition of approval for the project. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve perceptions of comfort and safety on a roadway.

Response B3: As a Condition of Approval, the City is requiring the project applicant to remove and replace the existing curb, gutter and sidewalk along the Duane and DeGuigne frontages and install a new one-foot gutter and a six-foot sidewalk keeping the existing landscape strip.

Comment B4: Bus Service

VTA provides bus service on Duane Avenue and maintains a bus stop on eastbound Duane Avenue adjacent to the project site. VTA recommends that the project provide the following bus stop improvements:

- A 10' X 55' PCC bus stop pavement pad per VTA standards.
- Sidewalk must have a minimum 8' X 5' concrete boarding area at the front of the bus stop to be in compliance with ADA requirements.
- No street trees within the bus stop loading area. If street trees are to be planted in the bus stop area, their location must be coordinated with VTA Passenger Facilities by contacting bus.stop@vta.org or 408-321-5800.
- Bus stop should be moved to the east, outside of the "T" intersection.

Response B4: The VTA's recommendations for improvements to the existing bus stop on Duane Avenue are acknowledged. The commenter has provided no specific comment related to the environmental analysis in the DEIR. The commenter's concerns regarding the final bus stop design are acknowledged and will be provided to the decision-makers are part of the public record.

C. RESPONSE TO COMMENTS FROM SCC ROADS AND AIRPORTS DEPARTMENT, August 14, 2015:

Comment C1: The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to [sic] the draft environmental impact report (DEIR) and is submitting the following comments.

- On November 14, 2014, the County submitted a response to the Notice of Preparation for the DEIR requesting that all intersections on Lawrence Expressway between SR 237 and El Camino Real be studied as part of the Traffic Impact Analysis for the DEIR. However, the DEIR did not include the intersection of Lawrence Expressway/Kifer Road. Analysis for this intersection should be presented because traffic from Central Expressway accessing Lawrence Expressway would pass through this intersection which may cause significant impacts. Please provide a traffic impact analysis for this intersection and, should there be a significant impact, provide a mitigation measure to contribute a fair share toward the Lawrence Expressway Grade Separation Project.

Response C1: The Lawrence Expressway/Kifer Road intersection was not identified as a study intersection in the TIA because the project would not add at least 10 trips per lane per hour during one or more peak hours under either scenario, consistent with VTA's adopted guidelines. Please note that both the project site and Central Expressway are north of the Lawrence Expressway/Kifer Road intersection. As such, project traffic would not have to travel through the Lawrence Expressway/Kifer Road intersection to access Central Expressway from the project site or access the project site from Central Expressway.

Comment C2: The DEIR did not use the approved CMP 2014 counts for PM peak for the CMP intersections resulting inconsistent [sic] Level of Service (LOS) finding from other studies. For expressway intersections that are not CMP or when CMP data is not available (i.e., AM Peak), comparisons with 2013 data showed large differences in existing volumes must be used as it affects the results of the other scenarios and the identification of traffic impacts to expressway intersections. Please revise the Traffic Impact Analysis appropriately so that significant impacts can be properly identified and mitigated.

Response C2: Consistent with City and VTA guidelines, the latest available traffic volumes were utilized for the evaluation resulting in the study collecting new traffic counts. These counts were more recent than the 2013 and 2014 CMP volumes and, therefore, represent a more current state of development and employment associated with traffic on the local roadway network. In addition, per CEQA Guidelines 15125(a), collecting new traffic counts provides a description of the physical environmental conditions in the vicinity of the project as they exist at the time of Notice of Preparation (NOP) was published. Accordingly, the TIA and the Draft EIR appropriately identified the potential impacts from the project and the maximum build-out/corner mixed use development scenario, and no additional analysis is required.

All other VTA TIA guidelines were followed in the development of the Traffix model.

Comment C3: With the available information in the DEIR, the County was not able to verify if accurate signal timing information was used for the analysis. Please demonstrate that accurate signal timing data was used. You may request this information by contacting Ananth Prasad (Ananth.prasad@rda.sccgov.org). If accurate data was not used, the traffic analysis needs to be corrected so that significant impacts can be properly identified and mitigated.

Response C3: Signal timing information (provided in the TIA appendices) was based on the Synchro models that the transportation consultant developed for the Responsive Signal timing project along Lawrence Expressway. Since multiple models were developed for the responsive timings, the 190 second cycle length model was used since this is the cycle length for the AM and PM Peak Hour. The use of the 190 second cycle length can be found in the output sheets found in Appendix A of the DEIR.

Comment C4: Mitigation measure MM CUM-2.2 on Page 183 is not sufficient. The eastbound triple left turn alone on Lawrence Expressway/Duane Avenue-Oakmead Parkway will not mitigate impacts due to unbalanced lane utilization. Restriping of Lawrence Expressway between Duane Avenue and US 101 would also be need to be implemented along with the proposed mitigation measure to improve lane utilization for proposed triple left to redirect lanes that connect US 101 on ramps. Also, DEIR must demonstrate that the project is feasible geometrically – the eastbound and westbound left turn movements must operate simultaneously.

Response C4: The future no project volume in the AM Peak Hour is 628 vehicles. While there may be a volume imbalance, adding an additional left turn lane will provide additional capacity. There is no evidence in the records, however, that supports the commenters claim that unbalanced lane utilization would prevent Mitigation Measure CUM-2.2 from mitigating the impact of the maximum build-out/corner mixed use development scenario. In addition, there are two lanes that lead to the US-101 ramps, and the ramps are 800 feet from the intersection. The 800 feet will allow for sufficient maneuvering and queuing space for vehicles to enter the appropriate lane for their destination. Also, if eastbound and westbound left-turn phases couldn't run together due to right-of-way constraints, making the added left turn lane more difficult to design, the County should consider running the eastbound and westbound left turn phasing as lead-lag phases, thereby removing the need for additional right-of-way acquisition.

In addition, as noted on page 183 of the DEIR, this mitigation measure could or would not be implemented without the approval of Santa Clara County. As stated on page 184 of the DEIR, if the mitigation measure could not be implemented, the impact would remain significant and unavoidable.

D. RESPONSE TO COMMENTS FROM MILTON WU, July 22, 2015:

Comment D1: I'd like to comment on the proposal to add 450 townhomes at 915 DeGuigne. In general, I'm in favor of the project, however, I am concerned about the size of the project.

Is there any ways [sic] we can decrease the size of the project?

Response D1: Section 6.0 of the DEIR identifies possible alternative development scenarios to address the identified impacts of the proposed project. Based on the whole of the record, the City Council will make a determination on whether to deny the project, approve the project as proposed, or approve one of the project alternatives.

Comment D2: Also, I'd want to make sure that the location is pedestrian friendly.

Response D2: As discussed in Section 2.2 of the DEIR, the project and the maximum build-out/corner mixed use development scenario include the creation of a *Sense of Place Plan* with the purpose of creating design standards and guidelines for enhanced transit, pedestrian, bicycle, and automobile circulation specific to the area. Furthermore, as shown on the Site Plan and Open Space Plan (Figures 2.0-1 and 2.0-2 of the DEIR), the project includes pathways throughout the site, making it pedestrian friendly.

Comment D3: I'm also really concerned about increased traffic on Duane (already a busy street), and the related bottleneck point (Lawrence and Fair Oaks).

Response D3: As discussed in Section 4.2 of the DEIR, the proposed project and the maximum build-out/corner mixed use development scenario would not result in a significant transportation impact on any study intersections along Duane Avenue under either the existing plus project or background plus project conditions. The DEIR did identify an impact at the Duane Avenue/Fair Oaks Avenue intersection under cumulative conditions, but no feasible mitigation was identified due to the approved road diet for Duane Avenue (Section 5.0 of the DEIR).

Comment D4: Perhaps one way to mitigate traffic (rush hour and weekend) is to make sure there is a viable grocery store in the plaza across the street (and better commercial development). Could we please look into helping the shopping center flourish as a local destination of goods and services, minimizing the amount of traffic we see from local residents going OUT of the area to get daily needs? Thanks!

Response D4: Because the applicant does not own or control the shopping plaza referenced in the comment, it would not be feasible to require the development of a grocery store in this location as mitigation for the proposed project. Furthermore, because there is no proposed project involving a grocery store at the plaza referenced by the comment, such a use is speculative, and an EIR is not required to engage in sheer speculation as to future environmental consequences. This comment is acknowledged and will be provided to the decision makers as part of the public record for this project.

Comment D5: P.S. Please make the proposed park...BIG!

Response D5: While the project does not meet the City's Parkland Dedication Ordinance, the park on Parcel 2 would be 0.8 acres and there would be a total of 2.5 acres of public open space on the project site. This comment is acknowledged and will be provided to the decision makers as part of the public record for this project.

E. RESPONSE TO COMMENTS FROM ROBERT S. LLOYD, July 28, 2015:

Comment E1: My name is Robert S. Lloyd and wife Doreen Lloyd. We have lived at 641 Santa Paula Avenue since 1957. Now the traffic is so bad on Duane Ave we have a hard time getting on Duane Ave. The traffic is so bad. The City is rationed (?) our water. I wonder where all the water is coming from. There is already so many new town houses around here now. This should be a time to stop it.

Response E1: This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The commenter's concerns regarding the traffic are acknowledged and will be provided to the decision-makers as part of the public record.

Please note that the availability of water supply to support both the proposed project and the Maximum Build Out/Corner Mixed-Use Development scenario is addressed in Section 4.13 and Appendix H of the DEIR.

F. RESPONSE TO COMMENTS FROM MARTIN LANDZAAT, August 10, 2015:

Comment F1: I would like the Final EIR to analyze the impact of the 915 DeGuigne Residential Project on the following public services:

- EMS-paramedic capacity and response times
- Trauma emergency capacity and access times
- Emergency medical capacity and access times
- Mental health services

The provision of emergency medical services (EMS) is divided between basic life support (EMT) and advanced life support (paramedics). The traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to people in need of their services. In addition, the traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to local trauma/emergency medical care facilities. I would like the Final EIR to analyze the EMS-paramedic capacity and travel times. Sunnyvale Public Safety officers are trained to provide EMT-basic service, I am requesting an analysis of the EMS-paramedic service.

The growth of Sunnyvale's population induced by the 915 DeGuigne Residential Project will impact the region's trauma emergency facilities. I would like the Final EIR to analyze the capacity and access times to Sunnyvale's trauma emergency medical care facilities.

The Final EIR should analyze the impact of the 915 DeGuigne Residential Project on local mental health services. Mental health services include family counseling, mental health clinics and professionals, including those specializing in drug and alcohol abuse treatment.

The 915 DeGuigne Residential Project may have a limited effect on Sunnyvale's EMS-paramedic, trauma emergency, emergency medical and mental health care services, the cumulative impact of recent and future projects in the City of Sunnyvale should also be considered.

Response F1: Please note that under CEQA, only public services controlled by the City are analyzed. The determination of an impact to public services under CEQA is not directly based on an increase in the demand for services, but rather the need for additional facilities to be constructed to meet City service goals. This is consistent with CEQA's mandate to address the physical environmental effects of a proposed project.

The services listed above are not controlled or operated by the City, but by third-party entities. The City has no adopted service goals for these services. In addition, the entities that own and operate these facilities and services would, on their own, need to make a determination as to whether any increase in local population would require additional facilities or personnel. If additional facilities or expansion of existing facilities was deemed necessary, it would require separate CEQA review. Therefore, no additional analysis will be provided as part of this EIR. The concerns raised will be provided to the decision-makers as part of the public record when considering the approval of this project.

G. RESPONSE TO COMMENTS FROM CHRIS WALZ, August 10, 2015:

Comment G1: I live a few blocks from the East Sunnyvale 936 E. Duane Ave development and I am concerned about the proposed corner community park. There doesn't look to be much functionality with the proposed park layout – it's mostly trees with a little walkway and a tiny bit of grass. Are there any alternate layouts being considered?

It seems like the perfect size for a small playground (along with some picnic tables and BBQ pits). Or maybe instead of “redwood grove”, a beach volleyball or bocce ball court could be added.

Response G1: This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The commenter's concerns regarding the final park design are acknowledged and will be provided to the decision-makers as part of the public record.

H. RESPONSE TO COMMENTS FROM MARTIN LANDZAAT, August 13, 2015:

Comment H1: I have the following comments:

In section 4.14.1.2 (School Facilities) and 4.14.3.2 (Schools), only data for current school enrollments and estimated increases due to the project are given. The Final EIR should analyze the cumulative impact of recent and future projects in the City of Sunnyvale on the listed schools. The Sunnyvale School District (SSD) and Fremont Union High School District (FUHSD) have 10 year enrollment projections, data from those projections should be included in the Final EIR. I have attached the enrollment projections for the SSD and FUHSD for your convenience.

Response H1: The cumulative impact of the proposed project on local schools is addressed in Section 5.0, page 177 of the DEIR. With regards to the student projection data provided for SSD, while the report prepared by Enrollment Projection Consultants shows an increase in enrollment at both San Miguel Elementary and Columbia Middle schools (Table 3), the projections are well below the current capacity of both schools. As a result, the project would not have a cumulatively considerable impact on these school facilities.

Fremont High School is currently over capacity as noted in the DEIR. The report by Enrollment Projection Consultants shows an increase in enrollment and an exceedance of capacity throughout the FUHSD. As discussed on page 177 of the DEIR, “school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. Under the terms of this statute, payment of statutory fees by property owners or property developers is deemed to mitigate in full for the purposes of CEQA any impacts to school facilities associated with a qualifying project. The fees are assessed based upon the proposed square footage of the new or expanded development. The project and all other residential projects will pay the maximum allowable school impact fees as described in California Government Code Section 53080 to offset the increased demands on school facilities. The project, by itself, would not have a cumulative considerable impact on local schools.”

Beyond the payment of fees, no other mitigation is required under CEQA. If the FUHSD determines that additional school facilities will be required, the effects of the development would be addressed in a separate CEQA analysis. Please see page 44 of this Final EIR for proposed text amendments that further discuss FUHSD.

Comment H2: In Section 4.14.1.2 (School Facilities), it says the distance from the project to Fremont High School (FHS) is approximately 2.5 miles. According to Google Maps the walking distance is 3.4 miles.

Since the distance to FHS is great, the FUHSD sells discounted VTA bus passes to any student that lives north of El Camino Real.

Response H2: This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The availability of transit passes will be provided to the decision-makers as part of the public record.

Please note, the distance referenced in the DEIR is “as the crow flies” (consistent with all other distance measurements in the DEIR) and is not based on walking distance.

Comment H3: In section 4.2.2.7 (Pedestrian/Bicycle Facilities and Transit Operations) it says [sic] *Currently, VTA bus routes that serve the project area are operating below capacity. As a result, existing bus services can accommodate an increase in ridership demand resulting from the proposed project.*

VTA route 55 is used by FHS students. From as far away as Lakewood Village, the route 55 bus picks up FHS students in several Sunnyvale neighborhoods. Due to the frequency of the route 55 bus and the school schedule, the route 55 bus is heavily impacted at certain times. The Final EIR should determine how many Fremont High students currently use the VTA route 55 bus. The author of the Final EIR should actually ride the route 55 bus from Lakewood Village to FHS on a school day morning and again at the end of the school day from [sic] FHS to Lakewood Village to get an accurate count of FHS related ridership. The Final EIR should explain how an additional 45-68 FHS students generated by the 915 DeGuigne Project will be able to use the VTA route 55 bus.

Response H3: Based on bus load factor data obtained from VTA, the City was able to confirm that the Route 55 bus is over capacity at approximately 8:15 AM, 1:40 PM, and 3:20 PM. Only the 8:15 bus operates within the designed Peak Hour periods.

Based on the analysis completed for the TIA and DEIR, it was determined that the proposed project would generate 20 AM and 24 PM Peak Hour transit trips dispersed among the five routes nearest the project site, including Route 55. Based on 30-minute headways, it was determined that two new passengers would be added per bus (not taking into account any credit for possible ridership from the existing development when it was operational). Due to day to day variations in ridership the City has concluded that two additional passengers would not have a significant impact on transit facilities that support the project.

Additional text has been added to the EIR to clarify this. Please see page 40 of this Final EIR for the proposed text amendment.

I. RESPONSE TO COMMENTS FROM WATT DEVELOPMENT COMPANY, August 13, 2015:

Comment I1: Throughout the DEIR, please note that with respect to statement that the implementation of the Proposed Project and the Maximum Building Out/Corner Mixed-Use Development Scenario would result in a degradation of LOS under cumulative conditions at the Fair Oaks Avenue/Duane Avenue intersection, it should be better clarified that the reason is because the “road diet” that has already been approved by the City Council for Duane Avenue would remove a travel lane and not allow for an increase in roadway capacity that could otherwise be created by adding a southbound left turn lane on Fair Oaks Avenue (i.e., a receiving lane cannot be added on the east leg of the intersection). As described on page 42 of the DEIR, the roadway configuration of Duane Avenue will be modified between Fair Oaks Avenue and Steward Drive. The changes will include reducing the Duane Avenue roadway width from four lanes to two lanes and adding buffered bicycle lanes. The planned improvement consists of restriping the east leg of the intersection to allow for one left-turn lane, one through lane, and one right-turn lane.

Response I1: The analysis in the DEIR is clear that there is no feasible mitigation to reduce the identified project impact at the Fair Oaks Avenue/Duane Avenue intersection under cumulative conditions because of the approved road diet (see Section 5.1.4). The road diet in and of itself does not cause the cumulative impacts at the Fair Oaks Avenue/Duane Avenue intersection under the Maximum Building Out/Corner Mixed-Use Development Scenario. No text amendments are proposed.

Comment I2: Please add the following not to the text as further explanation for Table 4.2-9 and Table 4.2-11:

“Please note that as shown in Table 4.2-9 (Existing Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the existing traffic, plus the traffic from the Proposed Project remains an acceptable LOS C. The AM peak hour delay is reduced from 24.0 to 23.6 and the PM peak hour delay is increased from 29.8 to 30.0. Similarly, please note that as shown on Table 4.2-11 (Background Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the background traffic, plus the traffic from the Proposed Project is materially reduced from the background only traffic for the AM peak hour delay from 29.6 to 26.5 and slightly increased for the PM peak hour delay from 38.6 to 39.0. The decreases from the addition of the Proposed Project are “because of a net negative generated in traffic trips resulting from the proposed change in land use.”

Response I2: Table 4.2-9 and 4.2-11 of the DEIR clearly show changes in delay resulting from the project. In addition, the reason for the decreases in delay are noted. As the primary intent of the DEIR is to identify overall impacts from the proposed project, the City has determined that there is no need to overemphasize minor decreases in delay at local intersections when it does not result in any measurable change in the LOS. No additional information or explanation is required. No text amendments are proposed.

Comment I3: In a couple of instances, with respect to the Proposed Project, the DEIR refers to “451” residences. Please note that the Proposed Project is up to “450” residences.

Response I3: The difference of one residential unit does not change the conclusions of the DEIR. The DEIR analyzes 451 dwelling units, consistent with the Notice of Preparation.

Comment I4: For clarity of future reference only, on pages 46-47, the heading for Table 4.2-9 should be revised as follows: “Existing Plus Proposed Project Levels of Service”, and on pages 49-50, the heading for Table 4.2-11 should be revised as follows: “Background Plus Proposed Project Levels of Service.

Response I4: The requested text amendments haven been made. Please see page 40 of this document.

Comment I5: On page 72, please correct: “(see footnote ~~24~~ 27).”

Response I5: The requested text amendments haven been made. Please see page 41 of this document.

Comment I6: On pages 89 and 90, and throughout the DEIR with respect to this noise impact, especially Section 4.5.2.2, Noise Impacts to the Project Site, please clarify that this impact is TO the PROPOSED residences from existing road noise, not to existing residences. Please revise Impact NOI-1 as follows: “Residences located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards” to “New residences within the project site located along Duane Avenue could be exposed to interior noise levels from existing Duane Avenue Traffic in excess of acceptable City standards.”

Response I6: The heading of the section is clear in that the discussion refers to impacts to the project site. Impacts from the project are specifically addressed in the following section (Section 4.5.2.3). Please see page 41 of this document for the proposed text amendment

Comment I7: On page 6, in Section 2.0, second paragraph, please correct: “The project site is accessed by ~~three~~ four driveways....”

Response I7: The requested text amendments haven been made. Please see page 40 of this document.

Comment I8: On page 16, in Section 3.2, under the subtitle “Consistency”, please clarify that all references to “itigation” [sic] apply only to the Maximum Build Out/Corner Mixed-Use Development Scenario, not the Proposed Project.

Response I8: As stated in the consistency statement in Section 3.2, “The proposed project would have a less than significant impact on CMP intersections in the study area under existing and background conditions. The maximum build out/corner mixed-use development scenario would have a significant impact on one CMP intersection (Lawrence Expressway and Duane Avenue) under cumulative conditions.” (Emphasis added) It is clear from this statement that the impacts were identified under the maximum build out/corner mixed-use

development scenario and that the mitigation noted would apply only to this development scenario. No text amendments are proposed.

Comment I9: On pages 18 and 19, in Section 3.4, City of Sunnyvale General Plan, under Policy LT-5-1c “Consistency”, please clarify that all references to “mitigation” apply only to the Maximum Build Out/Corner Mixed-Use Development Scenario, not the Proposed Project.

Response I9: The fact that the identified cumulative impacts are under the Maximum Build Out/Corner Mixed-Use Development Scenario only is made clear throughout the analysis in the DEIR. No text amendments are proposed.

Comment I10: On pages 17 to 20, in Section 3.4, City of Sunnyvale General Plan, please clarify that references to the “project” refer to the “Proposed Project”.

Response I10: In most cases, the consistency discussion describes the project, which makes it clear that the reference is to the proposed project. No text amendments are proposed.

Comment I11: On page 45, Table 4.2-7 and Table 4.2-8 should be replaced with new tables that incorporate the text of footnotes 13 and 14, which will result in a reduction of 75 Daily Trips and a reduction of 36 AM peak hour trips and 35 PM peak hour trips.

Response I11: Per direction from the City’s Department of Transportation, the tables will remain as is with the clarifying footnotes. No text amendments are proposed.

Comment I12: On pages 66 and 67, in Table 4.3-4, please note that references to the “project” or “proposed development” refer to the “Proposed Project.” Under “Tree Planting” and “Project Consistency” please modify the text as follows: “As designed, the Proposed Project ~~project~~ proposes ~~up to .8 acres of new public park, plus 1.7 acres of new publically accessible~~ open space including lawns and new trees. The Proposed Project proposes planting 693 new trees, plus maintaining 22 existing street trees. The new trees...”

Response I12: The requested text amendments haven been made as appropriate. Please see page 41 of this document.

Comment I13: On page 68, please correct the title to Table 4.3-6 as follows: “Operational Emissions for the ~~Proposed Project~~ Maximum Build Out/Corner Mixed-Use Development Scenario”.

Response I13: The requested text amendments haven been made. Please see page 41 of this document.

Comment I14: On pages 149 to 151, in Section 4.11.3, Mitigation and Avoidance Measures for Cultural Resources, for clarity, the reference to “the southwest corner of Parcel 1” in MM CUL 1-1 should be revised to add “the southwest corner of Parcel 1, within a radius of 100 feet of CA-SCI-9.”; and the reference to “the project site” in MM CUL 1-2 should be revised to “within the project site a radius of 100 feet of CA-SC1-9.”; and, the reference to “the East Sunnyvale ITR parcel” in

MM CUL 1-4 should be revised to “within ~~the East Sunnyvale ITR parcel~~ a radius of 100 feet of CA-SCI-9.”.

Response I14: The request text amendment cannot be included because the boundary of site CA-SCI-9 is not fully defined. Mitigation measure CUL 1-4 was, however, modified to clarify the testing area. Please see page 43 of this document for the proposed text amendment.

Comment I15: On page 171, in Section 4.14.3.1, Public Safety, please note that the Proposed Project provides for access to the site for emergency vehicles from driveways on DeGuigne Drive, and from an Emergency Vehicle Access Easement on Duane Avenue.

Response I15: The requested text amendments haven been made. Please see page 44 of this document.

Comment I16: On page 173, Section 4.14.3.3, Parks, should be revised to read “The ~~proposed project~~ Proposed Project would include approximately 1.7 acres of public publically accessible open space within the ~~housing development project site~~ and dedicate a new, .8 acre public park for a total of 2.5 1.4 acres of new publically accessible open space-park land....”

Response I16: The requested text amendments haven been made as appropriate. Please see page 44 of this document.

Comment I17: Throughout the document, reference to US EPA residential RSLs should be referenced as EPA RSLs and reference to the Regional Water Quality Control Board (RWQCB) residential ESLs should be referenced as RWQCB ESLs.

Response I17: This comment is acknowledged. The City’s Hazardous Materials consultant determined that this is not substantial and no change is required. No text amendments are proposed.

Comment I18: Page 12 – first bullet: Within the two-inch layer of sand, horizontal ventilation piping will be evenly spaced through the building footprint, connected to a header, and directed through the building walls to the roof line;

Response I18: This comment is acknowledged.

Comment I19: Page 132 – last paragraph – The facility operated until 2003 when AMD transferred ownership of the property to Spansion. Spansion continues to occupy the site, but manufacturing operations on-site ceased in July 2013.

Response I19: The City’s understanding of the site history, based on a review of all available information by the City’s Hazardous Materials consultant, is outlined in the DEIR. No text amendments are proposed.

Comment I20: The accurate historic of ownership is as follows: In 2003, AMD transferred ownership of the property to FASL LLC, a joint venture of Fugitsu and AMD. In December 2005, FASL LLC became Spansion, Inc. (Spansion), a corporation specializing in flash memory devices (EPA 2009). The SDC building was built in approximately 1991 and used for flash memory manufacturing until the 915 DeGuigne Drive facility, including the SDC, was decommissioned in 2009 (T&R 2001a).

Response I20: Please refer to Response I19.

Comment I21: Page 133 – 4.10.2.2 first paragraph – The historic agricultural land uses on-site resulted in the accumulative of residual pesticides (~~DDT organochlorine pesticides compounds, arsenic, and lead~~) in the shallow soil.

As discussed, neither arsenic nor lead were detected on-site above background concentrations.

Response I21: As stated in Appendix G, the US EPA ESL reference is dated January 2015. The requested text amendment has been made. Please see page 42 of this document.

Comment I22: Page 136 final paragraph – In 2011, 25 exterior soil gas samples were collected at depths of approximately five feet. Soil vapor exceeded the EPA (Year of RSLs cited?) Residential Regional Screening Level (RSL) in eight of the 25 samples, generally in the western portion of the project site. In 2013, 20 soil gas samples were collected at depths of approximately five feet. The Residential RSL was exceeded in three of the 20 samples, again in the western portion of the site.

As discussed, I recommend the FEIR more clearly reference the RSLs as the EPA RSLs and the ESLs as the RWQCB ESLs. The citations in the document appear to be accurate otherwise.

Response I22: As stated in Appendix G, the US EPA ESL reference is dated January 2015. The City's Hazardous Materials consultant determined that the citations in the DEIR are correct and no change is required. No text amendments are proposed.

Comment I23: Page 137 first paragraph section 4.10.2.3 – Historic and current land uses on-site and up-gradient of the project site have resulted in site wide pesticide contamination, localized soil contamination, groundwater contamination, and limited soil vapor contamination.

Response I23: The term limited soil vapor contamination cannot be defined or quantified. The DEIR are correct as written and no change is required. No text amendments are proposed.

Comment I24: Page 138 footnote 57 – 57 Any soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be excavated and removed from the site or buried on-site in the basement of the ~~925~~ 915 DeGuigne building after demolition with approval from the RWQCB. No soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be located within two feet of the surface.

Response I24: The requested text amendment referencing the address of the basement has been made. Please see page 42 of this document.

The City has presented the preferred language for the Pesticide Mitigation Plan in the DEIR. No text amendments are proposed.

Comment I25: Page 139 second bullet – Within the two-inch layer of sand, horizontal ventilation piping will be evenly spaced through the building footprint, connected to a header, and directed through the building walls to the roof line;

Response I25: This comment is acknowledged.

Comment I26: Page 143 – MM HAZ-1.6: Trichlorobenzene (TCB) isomers 1,2,4-trichlorobenzene and 1,2,3-trichlorobenzene were detected in a soil sample collected from a depth of approximately 8.5 feet within the PAD C excavation backfill at concentrations of 57 and 18 mg/kg, respectively. These concentrations exceed the residential RSL. The project developer shall obtain written Water Board approval to leave impacted (concentrations exceeding the lower of the then-current Water Board or US EPA residential screening levels) soil beneath residences. A deed restriction or land use covenant shall detail the location of these soils. This document shall include a map of these impacted soils; shall restrict future excavation in these areas; and shall require future excavation be conducted in these areas only upon written approval by the Water Board and in accordance with the SMP.

As we discussed, at 8.5 ft below ground surface the TCB was likely in groundwater floating on the surface, and therefore would be covered by the existing deed restriction. We request that this MM Haz be dropped since the issue is covered by the existing deed restriction and TCB does not represent a risk to home owners by vapor intrusion, which is the only possible exposure pathway remaining under the deed restriction.

Response I26: As TCB isomers were detected in the remedial excavation backfill, it was assumed that this impact was likely associated with impacted ground water and thus would be covered by the Site deed restriction. The reported depth of ground water is nine to 10 feet, which is similar to the depth of the TCB isomer contamination. The contamination was, however, detected in a soil sample and the extent of this impact is unknown. Lastly, the TCB isomers are present (near the surface of the ground water table) above residential screening levels. Thus, as a conservative measure, the City wants an additional deed restriction that details the location of these soils.

Comment I27: Page 143 – MM HAZ-1.7: MM Haz-1.7 specifies one sample for every 250 cuyd of soil. SMP calls every 500 cuyds which is common language the RWQCB agrees to for large fill projects. DTSC guidance calls for 1 sample every 250 cuyd for the first 1000 cuyd then 1 every 500 cuyd. MM Haz-1.7 also calls for marking on a figure where OCP soils above residential ESLs will be located on the site.

I suggest that the following phrase will be edited in the recommended manner:

“discrete soil samples shall be collected of stockpiled soils and analyzed for potential contaminants of concern at a frequency of one sample per every 250 cubic yards (cy) for the first 1,000 cy and one sample every 500 cy thereafter.”

Response I27: The requested text amendment has been made based on concurrence from the City’s Hazardous Materials consultant. Please see page 43 of this document.

J. RESPONSE TO COMMENTS FROM PUBLIC HEARING, August 10, 2015:

Comment J1: Deborah Marks – Sunnyvale Resident.

Ms. Marks noted the number of trees of the site, those of significant size, and those in good or excellent condition. She also noted that all on-site trees have been proposed for removal, discussing the benefits of maintaining mature trees and suggested preserving the mature trees located at the periphery of the site.

Response J1: As noted on page 126 of the DEIR, the analysis assumed all trees on the project site would be removed. This provides the most conservative assessment of the potential impacts from the project relative to the loss of trees. It is reasonable to assume that some of the perimeter trees could be retained. If the project is approved, a final determination on which trees could be preserved would be made at the development permit stage of the project.

The project will be retaining at least 22 street trees along DeGuigne Drive. The following table indicates the proposed number of on-site trees removed, required replacements based on City policy, and number of trees proposed:

Tree Qty To Be Removed	Tree Sizes To Be Removed	Replacement Tree Size Required	Required Replacement Qty and Size	Proposed Replacement Qty and Size
101	12-18nches	1 24" Box or 2 15 gallon	101 24" Box	---
72	18-24 inches	1 36" Box or 2 24" Box	144 24" Box	---
33	Over 24 inches	1 48" Box or 2 36" Box or 3 24" Box	32 36" Box 51 24" Box	---
Total			296 24" Box 32 36" Box	661 24" Box 32 36" Box

Comment J2: Commissioner Klein.

Commissioner Klein said he is unsure of whether the level of service table 4.2-5 on page 41 captures the current or expected level of service and the subsequent impacts of the project. He said the City is currently redoing the stretch along Duane Avenue, and he hopes the Final EIR will capture the expected level of service and impacts of the project.

Response J2: Table 4.2-5 specifically lists the current level of service (LOS) for the study intersections. This represents the existing physical conditions of the roadway and the current traffic volumes. As noted on page 42, the analysis of background conditions takes into account the Duane Avenue Road Diet Project. As a result, the LOS listed in table 4.2-6 for the study intersections assumes the Duane Avenue Road Diet to be in place. This methodology is repeated in the project analysis. The existing plus project scenarios do not account for the Duane Avenue Road Diet. The road diet is, however, accounted for in the background plus project scenarios.

Comment J3: Chair Melton.

Chair Melton clarified with Trudi Ryan, Planning Officer, that even technical questions regarding the meaning of words in the document are best made as comments. Chair Melton noted that page ix, the Cultural Resources section makes reference to hazardous materials mitigation, and section 4.10.2.2 regarding On-Site Sources of Contamination, it would be helpful if definitions could be added, particularly for “cutoff wall” and “dewatering”.

Response J3: The Chair is correct that the summary table in the DEIR incorrectly references hazardous materials mitigation under Section 4.11. Please see page 33 of this Final EIR for the proposed text amendment.

Definitions have been added consistent with the requests of the Planning Commissions. Please see page 42 of this Final EIR for the proposed text amendments.

Comment J4: Chair Melton.

Chair Melton noted that in section 4.10.2.3 in the paragraph discussing historical data showing TCE concentrations, there are three instances where he believes the narrative is describing the Pad C remediation. He said he believes the former source area, soil excavation and dewatering program and ANS leak are all talking about the Pad C remediation, and that if those three things are talking about something other than that he suggests clarification. Chair Melton said the title of this same section, “Off-Site Sources of Soil and Groundwater Contamination,” is confusing because many narratives talk about on-site sources of soil and groundwater contamination. Chair Melton noted that the report discusses four facilities to the south where underground water contamination has come on-site, and then mentions the former AMD facilities on parcel 1 of the project site. He noted that the narrative then abruptly transitions from things happening off-site to the discussion about Pad C remediation, and suggests moving the paragraph beginning with a discussion of TCE concentrations in its entirety to 4.10.2.2 to conclude the section about on-site sources of contamination or including a paragraph explaining this transition.

Chair Melton noted that the following paragraph describes 20 soil gas samples collected at depths of approximately five feet, and said it is unclear as to whether they pertain to Pad C remediation or elsewhere on parcel 1. He suggested some clarification in the narrative or a transition between paragraphs, and suggested writing in a footnote with an explanation on what a Residential Regional Screening Level (RSL) is, who owns the metric and the purpose of it. He asked about the meaning of the final sentence that states the Residential RSL was exceeded in three of the 20 samples on this portion of the site, and whether that is a big deal or not.

Response J4: The discussion in Section 4.10.2.3 is in reference to the groundwater contamination that has migrated on-site from four off-site sources. The TCE contamination in the groundwater leached into the surrounding soils resulting in both soil and groundwater contamination on-site. Groundwater monitoring and soil excavation were completed as part of the remediation of the project site. The Pad C contamination, while also TCE, was more localized. Confusion between on-site and off-site contamination sources is due to the fact that on-site and off-site contaminants are similar chemical compounds, remediation activities occurred within the same time period, and on-site monitoring wells address both on-site and off-site sources as they are within the same groundwater layer. While Section 4.10.2.3

primarily discusses off-site sources of contamination, the off-site groundwater contamination cannot be separated from the on-site sources of contamination. Please see page 42 of this Final EIR for the proposed text amendments to clarify this issue.

The potential health risks for future residents of the site relative to the soil vapor samples are discussed in Section 4.10.3.2.

Comment J5: Chair Melton observed in section 4.10.4.2 on Project Specific Mitigation Measures that the construction of townhomes contemplated on parcel 1 would not disturb the underground cutoff walls that were built at the former Pad C site, and suggested that we need a new mitigation measure along the lines that nobody will disturb underground cutoff walls at the former Pad C site. He commented on mitigation measure Haz 1.7 as not contemplating possible underground storage tanks and associated piping on parcel 2 from the former gas station and it should.

Response J5: Based on the analysis completed by the City's Hazardous Materials consultant, no significant impact was identified regarding disturbance of the cutoff walls associated with the former Pad C (appendix G of the DEIR). As such, no mitigation was imposed on the project, under either development scenario. The City's Hazardous Materials consultant has, however, drafted a condition of project approval to address the concerns of the Planning Commission. Please see page 42 of this Final EIR for the proposed text amendments to clarify this issue.

Comment J6: Chair Melton suggested that the narrative of section 4.14.1.2 on School Facilities be expanded to include the plan at Fremont High School to deal with the overcapacity situation.

Response J6: Please see page 44 of this Final EIR for the proposed text amendments to clarify this issue.

Comment J7: Chair Melton disclosed that he met with the applicant and the environmental consultant advisor a week ago to discuss section 4.10 on environmental issues.

Response J7: This comment is noted.

SECTION 4.0 REVISIONS TO THE TEXT OF THE DRAFT EIR

The following section contains revisions/additions to the text of the *Draft Environmental Impact Report, 915 DeGuigne Residential Project*, dated July 2015. Revised or new language is underlined. All deletions are shown ~~with a line through the text~~.

Page ix Summary, Cultural Resources – Section 4.11 of this EIR, the text will be **REVISED** as follows:

Please see Section 4.11.3.2 for a complete list of ~~hazardous materials~~ cultural resources mitigation.

Page xii Summary, the following text has been **ADDED**¹ at the end of the Summary section to provide additional project details pertaining to the two project scenarios and the impacts of the proposed project:

Summary of the Project Scenarios

As proposed, the proposed project would demolish all the existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) on parcel 1 and a public park on parcel 2 (“proposed project”). This EIR also analyzes a maximum build out scenario that could construct up to 678 residential units (659 units on parcel 1 and 19 units on parcel 2) and 7,000 square feet of retail space on parcel 2 (“maximum build out/corner mixed-use development scenario”).

Summary of Direct and Cumulative Impacts of the Project Scenarios

Proposed Project

In summary, construction of the proposed project would result in the following potentially significant impacts prior to mitigation: noise levels temporarily in excess of City standards at nearby sensitive receptors, potential disturbance to yet unrecorded subsurface cultural resources, and disturbance to nesting birds related to construction activity. With implementation of mitigation, no significant impacts related to the construction of the proposed project would remain.

Operation of the proposed project would result in the following potentially significant impacts at new residences built within the project site (not neighboring residences or other sensitive receptors) prior to mitigation: noise levels from traffic on Duane Avenue in excess of City standards and exposure to the existing hazardous materials on the project site. With implementation of mitigation, no significant impacts directly related to the operation of the proposed project would remain.

The proposed project would result in one cumulatively-considerable significant unavoidable impact with regard to LOS degradation at the Fair Oaks Avenue/Duane Avenue intersection, which cannot

¹ As noted at the beginning of Section 4.0, added text is typically underlined. The proposed text to be added to the summary, however, is extensive and for ease of reading it has not been underlined.

be feasibly mitigated because an additional southbound left turn lane cannot be added to Fair Oaks Avenue due to the City's previously approved road diet for Duane Avenue.

Maximum Build Out/Corner Mixed-Use Development Scenario

In summary, construction of the maximum build out/corner mixed-use development scenario would result in the following potentially significant impacts prior to mitigation: temporary air quality impact on nearby sensitive receptors, noise levels temporarily in excess of City standards at nearby sensitive receptors, potential disturbance to yet unrecorded subsurface cultural resources, and disturbance to nesting birds related to construction activity. With implementation of mitigation, no significant impacts related to the construction of the maximum build out/corner mixed-use development scenario would remain.

Operation of the maximum build out/corner mixed-use development scenario would result in the following potentially significant impacts at new residences built within the project site (not neighboring residences or other sensitive receptors) prior to mitigation: noise levels from traffic on Duane Avenue in excess of City standards and exposure to the existing hazardous materials on the project site. In addition, prior to mitigation, the maximum build out/corner mixed-use development scenario would result in potentially significant impacts on hydrology and utilities related the existing storm drainage system. With implementation of mitigation, no significant impacts directly related to the operation of the maximum build out/corner mixed-use development scenario would remain.

The maximum build out/corner mixed-use development scenario would result in two cumulatively-considerable significant unavoidable impacts with regard to (i) LOS degradation at the Fair Oaks Avenue/Duane Avenue intersection, which cannot be feasibly mitigated because an additional southbound left turn lane cannot be added to Fair Oaks Avenue due to the City's previously approved road diet for Duane Avenue, and (ii) LOS degradation at the Lawrence Expressway/Duane Avenue intersection that cannot be feasibly mitigated without the approval of Santa Clara County. In addition, the maximum build out/corner mixed-use development scenario would result in a cumulatively-considerable contribution to a significant impact at the Wolfe Road/Maude Avenue intersection that can be reduced to a less than significant level with the implementation of mitigation.

The following is a tabular summary of the significant impacts and mitigation measures addressed within this EIR with a comparison of the impacts and mitigation relative to the proposed project and the maximum buildout scenario. The project description and full discussion of impacts and mitigation measures can be found in *Section 2.0 Description of the Proposed Project*, *Section 4.0 Environmental Setting, Impacts, & Mitigation*, and *Section 5.0 Cumulative Impacts* of this EIR.

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>Impact AIR-1: Construction of the <i>maximum build out/corner mixed-use development scenario</i> could have a significant, temporary impact on nearby sensitive receptors.</p> <p>MM AIR 1-1: A Health Risk Analysis shall be completed for the <i>maximum build out/corner mixed-use development scenario</i> prior to issuance of any demolition or grading permits for the project.</p> <p>The analysis shall be based on project specific construction data. If emissions are calculated to be above the BAAQMD thresholds, mitigation measures will be required to reduce emissions below BAAQMD thresholds during all phases of construction. Measures may include, but are not limited to:</p> <ul style="list-style-type: none"> • Use of newer or retrofitted construction equipment that has lower emissions rates than standard equipment; • Use of alternative fuel equipment; • Modification of construction techniques to avoid use of diesel-powered equipment; and • Phasing of construction activities. 	Less Than Significant Impact	Temporary: Less Than Significant with Mitigation
<p>Impact NOI-1: Residences located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards. [Note: Applies only to new residences built within the project site]</p> <p>MM NOI 1-1: Consistent with Title 24 requirements, a design-level acoustical analysis shall be completed by the project developer for new residential uses where exterior noise levels would exceed 60 dBA Ldn. The analysis shall meet the following noise reduction requirements:</p> <ul style="list-style-type: none"> • Interior average noise levels shall be reduced to 45 dBA Ldn or lower to meet the local standard. • Building sound insulation requirements would need to include the provision of forced-air mechanical ventilation for all new units exposed to exterior noise levels greater than 60 dBA Ldn, so that windows could be kept closed at the occupant’s discretion to control noise. • Special building construction techniques (e.g., sound-rated windows and building facade treatments) may be required for new residential uses adjacent to East Duane Avenue. These treatments include, but are not 	Less Than Significant with Mitigation	Less Than Significant with Mitigation

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>limited to, sound rated windows and doors, sound rated wall constructions, and acoustical caulking.</p> <p>The specific determination of what treatments would be necessary shall be completed on a unit-by-unit basis during the final building design. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City along with the building plans and approved prior to issuance of building permits.</p> <p>Impact NOI-2: Students at the adjacent school could be exposed to interior and exterior noise levels in excess of acceptable City standards during construction.</p> <p>MM NOI 2-1: Construct solid plywood fences (minimum eight feet in height) or erect noise control blanket barriers between the construction site and adjacent classrooms, school playgrounds, or sensitive interior spaces to reduce noise levels to the extent feasible.</p> <p>MM NOI 2-2: Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.</p> <p>MM NOI 2-3: Locate stationary noise generating equipment as far as possible from adjacent school receivers.</p> <p>MM NOI 2-4: Acoustically shield stationary equipment located near existing school receivers.</p> <p>MM NOI 2-5: Utilize "quiet" air compressors and other stationery noise sources where technology exists.</p> <p>MM NOI 2-6: The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses and the school so that construction activities can be scheduled to minimize noise disturbance.</p>	<p>Temporary:</p> <p>Less Than Significant with Mitigation</p>	<p>Temporary:</p> <p>Less Than Significant with Mitigation</p>

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>MM NOI 2-7: Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.</p>		
<p>Impact HYD-1: If the final site plan of the <i>maximum build out/corner mixed-use development scenario</i> has a total impervious surface area greater than the existing conditions, the project could have a significant impact on the existing storm drainage system.</p> <p>MM HYD-1.1: The project developer shall design the project to reduce directly connected impervious areas to ensure the flood design storm flows are maintained at or under the existing project flows.</p>	Less Than Significant Impact	Less Than Significant with Mitigation
<p>IMPACT BIO-1: Implementation of the proposed development project or any future development under the proposed General Plan Amendments could result in the loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment.</p> <p>MM BIO 1-1: Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors, in the San Francisco Bay area extends from February 1 through August 31.</p> <p>MM BIO 1-2: If it is not possible to schedule demolition and construction between September and January, then pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. This survey shall be completed no more than 14 days prior to the initiation of grading, tree removal, or other demolition or construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August).</p> <p>During this survey, the ornithologist will inspect all trees and other possible nesting habitats (e.g., grasslands and buildings) within and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, will determine the extent of a construction-free buffer zone to be established around the nest, typically 250 feet, to ensure that nests of bird species protected by the MBTA or State Code will not be disturbed during project construction.</p>	Less Than Significant with Mitigation	Less Than Significant with Mitigation

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>MM BIO 1-3: A final report of nesting birds, including any protection measures, shall be submitted to the Director of Community Development prior to the issuance of grading permits.</p>		
<p>Impact HAZ 1.1: Even with implementation of the proposed contamination remediation plan, redevelopment of the site with residential land uses could have a significant impact to future residents of the project site.</p> <p>Please see Section 4.10.4.2 for a complete list of mitigation measures related to Impact HAZ 1.1.</p>	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<p>Impact CUL-1: Future development on the project site could impact as yet unrecorded subsurface cultural resources.</p> <p>Please see Section 4.11.3.2 for a complete list of mitigation measures related to Impact CUL-1.</p>	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<p>Impact UTL-1: If the final site plan of the <i>maximum build out/corner mixed-use development project</i> has a total impervious surface area greater than the existing conditions, the project could have a significant impact on the capacity of the existing storm drainage system.</p> <p>MM UTL-1.1: The project developer shall design the project to reduce directly connected impervious areas to ensure the flood design storm flows are maintained at or under the existing project flows.</p>	Less Than Significant Impact	Less Than Significant with Mitigation

Cumulative Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>Impact CUM-1: Implementation of the proposed project would result in a degradation of LOS under cumulative conditions at the Fair Oaks Avenue/Duane Avenue intersection.</p> <p>There are no feasible mitigation measures to reduce the identified impacts to the Fair Oaks Avenue/Duane Avenue intersection due to the road diet that is approved for Duane Avenue.</p>	Significant Unavoidable Impact	Significant Unavoidable Impact
<p>Impact CUM-2: Under cumulative conditions, implementation of the <i>maximum build out project</i> would result in result in a degradation of LOS at the Fair Oaks Avenue/Duane Avenue intersection, trigger a signal warrant at the Wolfe Road/Maude</p>	Less Than Significant Impact	Significant Unavoidable Impact

Cumulative Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
<p>Avenue intersection, and result in a degradation of LOS at the Lawrence Expressway/Duane Avenue intersection.</p> <p>MM CUM-2.1: If the <i>maximum build out/corner mixed use development scenario</i> is implemented, the project developer will be required to install traffic signals at the Wolfe Road/Maude Avenue intersections. Signalization of the intersection would be required prior to the issuance of occupancy permits for the residences.</p> <p>MM CUM-2.2: If the <i>maximum build out/corner mixed use development scenario</i> is implemented, the project developer will be required to restripe the eastbound approach to be three left-turn lanes, one through lane, and one right turn lane at the Lawrence Expressway/Duane Avenue intersection. This mitigation measure could not be implemented without the approval of Santa Clara County. Restriping of the intersection would be required prior to the issuance of occupancy permits for the residences.</p> <p>The City of Sunnyvale, as the Lead Agency, cannot implement MM CUM-2.2 without approval of Santa Clara County. Thus, it is not certain that the identified mitigation measure could be implemented. In the event that MM CUM-2.2 could be implemented, the project’s impact would be reduced to less than significant.</p>		

Summary of Alternatives to the Project Scenarios

CEQA requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines specify that an EIR identify alternatives which “would feasibly attain the most basic objectives of the project but would avoid or substantially lessen many of the significant environmental effects of the project.”

This EIR analyzes six alternatives to the proposed project and the maximum build out/corner mixed-use development scenario. The following are brief descriptions of each alternative and key conclusions. A full analysis of the project alternatives is provided in Section 6.0 of this EIR.

A. NO PROJECT ALTERNATIVE – NO BUILD

Alternative A assumes that the existing 471,000 square feet of office/manufacturing buildings remain on-site and could either be re-occupied by another industrial user or could remain partially occupied or vacant for the foreseeable future.

Conclusion: Implementation of Alternative A could avoid the all of the significant impacts and significant unavoidable transportation impacts identified in this EIR, but only if the buildings remain partially occupied. If the buildings were re-tenanted, full occupancy of the buildings on-site would produce traffic at a level that would result in a significant unavoidable cumulative transportation impact that is greater than the proposed project, but less than the maximum build out/corner mixed use development scenario. Alternative A does not meet any of the project objectives.

B. NO PROJECT ALTERNATIVE – BUILD OUT UNDER EXISTING LAND USE DESIGNATIONS

Alternative B assumes the project site would be redeveloped to the maximum capacity allowed under the current industrial general plan designation and zoning classification, which would entail demolition of the existing 471,000 square feet of office/manufacturing buildings on the project site and redevelopment of 478,000 square feet of industrial buildings on the project site.

Conclusion: Implementation of Alternative B could avoid the significant impacts related to noise, hazards and hazardous materials caused by the project or the maximum build out/corner mixed use development scenario because no housing would be developed on the site. Because the site would be redeveloped under this alternative, the significant impacts related to air quality, hydrology, biological resources, cultural resources, and traffic would be similar to the impacts caused by the project or the maximum build out/corner mixed use development scenario. Similar to Alternative A, Alternative B would produce traffic at a level that would result in a significant unavoidable cumulative transportation impact that is greater than the proposed project, but less than the maximum build out/corner mixed use development scenario. Alternative B would not meet the majority of the project objectives.

C. MIXED-USE DEVELOPMENT ALTERNATIVE

The mixed-use development alternative would consist of a General Plan Amendment and rezoning to allow for a maximum of 384,199 square feet of retail/office and up to 609 residential units on-site. To maintain for-sale townhouses on-site, however, the total residential unit count in this alternative would have to be reduced to 281 units. The basic building design and orientation for the residences would be the same as the proposed project, and Alternative C would still include all identified green building design measures. This alternative would, however, construct two-story office buildings along the Duane Avenue frontage.

Conclusion: This alternative would avoid the noise impact on residences on the project site from Duane Avenue and provide more jobs and services within walking distance of existing housing than the project or the maximum build out/corner mixed use development scenario. This alternative would, however, substantially reduce the density of for-sale housing that could be placed on the site, which does not meet the City's and project applicant's objectives to the same extent as the project or the maximum build out/corner mixed use development scenario. The residential uses could include apartments as opposed to townhouses, but that would also be inconsistent with the City's goal of providing more for-sale housing, as outlined in the General Plan.

Implementation of Alternative C would avoid the significant noise impact identified in this EIR but most other impacts would be comparable to the proposed project or the maximum build out/corner mixed use development scenario. In addition, this alternative does not meet the project objectives to the same extent as the project or the maximum build out/corner mixed use development scenario. The Mixed-Use Development Alternative is identified as the Environmentally Superior Alternative.

D. COMMERCIAL/OFFICE DEVELOPMENT ALTERNATIVE

In an effort to avoid the significant noise and hazardous materials impacts that would result from residential development on the project site, but still redevelop approximately 25.2 acres of underutilized land within Sunnyvale, this alternative evaluates a commercial development on the site. Under the commercial development alternative, the site could be developed as a new office campus, a mix of office and retail, or a large retail center.

Conclusion: This alternative would avoid the noise and hazardous materials impacts of the project, and provide more jobs and services within walking distance of existing housing. Most other impacts would be comparable to the proposed project or the maximum build out/corner mixed use development scenario, and Alternative D would not provide for any new housing within Sunnyvale, which is inconsistent with the City's and project applicant's objectives and the General Plan.

E. REDUCED DENSITY ALTERNATIVE

In an effort to avoid the significant cumulative traffic impact at the Fair Oaks Avenue/Duane Avenue intersection that would result from both project scenarios, but still redevelop the site for housing, this alternative evaluates a reduced housing density alternative of 9.5 dwelling unit per acre, which would allow 239 units on-site, a net reduction of 211 units compared to the proposed project and a net reduction of 439 compared to the maximum buildout/corner mixed use scenario.

Conclusion: Alternative E avoids the cumulative traffic impact at Fair Oaks Avenue/Duane Avenue intersection. Due to redevelopment activity on the site, biology and cultural impacts remain comparable to both project scenarios, but temporary impacts to air quality and noise would be reduced due to the reduced amount of total construction. Impacts to the new residential units would be similar to both project scenarios, although there would be a reduced number of total units affected. The reduced density alternative would generally meet most of the project objectives, but would result in fewer for-sale residential units than the proposed project and would not meet the City's share of the regional housing needs to the same extent as the proposed project.

F. MIXED PROJECT ALTERNATIVE

The EIR addresses two development scenarios, the proposed project (450 residences and a park) and the maximum build out/corner mixed use development scenario (678 residential and 7,000 square feet of retail). The mixed project alternative evaluates the combined development of 450 residences on Parcel 1 (the same as the proposed project) and 19 residential units and 7,000 square feet of retail on Parcel 2 (the same as the corner mixed use scenario).

Conclusion: Alternative F would not avoid the noise impact from Duane Avenue or the cumulative traffic impacts to Fair Oaks Avenue/Duane Avenue intersection, but impacts would be otherwise comparable to the proposed project. This alternative would provide more housing than the proposed project, but less than the maximum build-out scenario, and it would provide more jobs and services within walking distance of existing housing. While this alternative would reduce the overall amount of open space proposed by the project because this alternative does not include a public park, it meets all but one of the project objectives to the same or a greater extent than the project.

The following two tabular summaries compare the impacts of each alternative to: first, impacts of the proposed project; and second, to impacts of the maximum build out/corner mixed use development scenario.

Comparison of Proposed Project to Alternatives							
	Proposed Project	Alt. A: No Project – No Build	Alt. B: No Project – Build Out Existing Land Use Designations	Alt. C: Mixed-Use Development*	Alt. D: Commercial/ Office Development	Alt. E: Reduced Density	Alt. F: Mixed Project
Meets Project Objectives?	All	None	Few	Some	Some	Most	Most
Air Quality (During Construction)	Less Than Significant	Less (Less Than Significant)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Less (Less Than Significant)	Greater (Less Than Significant)
Noise (Operational Impact to Residences on Project Site)	Less Than Significant with Mitigation	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Noise (Temporary Impact During Construction)	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Hydrology	Less Than Significant	Less (Less Than Significant)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Similar (Less Than Significant)	Greater (Less Than Significant with Mitigation)
Biology	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Hazards	Less Than Significant with Mitigation	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Cultural	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Utilities (Storm Drain System)	Less Than Significant	Less (Less Than Significant)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Similar (Less Than Significant)	Greater (Less Than Significant with Mitigation)
Transportation (Cumulative Only)	Significant Unavoidable Impact	Greater¹ (Significant Unavoidable Impact)	Greater (Significant Unavoidable Impact)	Greater (Significant Unavoidable Impact)	Greater (Significant Unavoidable Impact)	Less (Less Than Significant with Mitigation)	Greater (Significant Unavoidable Impact)

*Environmentally superior alternative

¹Traffic generated under Alternative A would be greater than the traffic generated by the proposed project if the existing buildings on Parcel 1 were re-tenanted and fully occupied.

Comparison of Maximum Build Out/Corner Mixed Use Development Scenario to Alternatives							
	Maximum Build Out/Corner Mixed Use Development Scenario	Alt. A: No Project – No Build	Alt. B: No Project – Build Out Existing Land Use Designations	Alt. C: Mixed-Use Development*	Alt. D: Commercial/ Office Development	Alt. E: Reduced Density	Alt. F: Mixed Project
Meets Project Objectives?	Most	None	Few	Some	Some	Most	Most
Air Quality (Temporary Impact During Construction)	Less Than Significant with Mitigation	Less (Less Than Significant)	Greater (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant)	Less (Less Than Significant)
Noise (Operational Impact to Residences on Project Site)	Less Than Significant with Mitigation	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Noise (Temporary Impact During Construction)	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Hydrology	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)
Biology	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Hazards	Less Than Significant with Mitigation	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Cultural	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Utilities (Strom Drain System)	Less Than Significant with Mitigation	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant)	Similar (Less Than Significant with Mitigation)
Transportation (Cumulative Only)	Significant Unavoidable Impact	Less² (Significant Unavoidable Impact)	Less (Significant Unavoidable Impact)	Similar (Significant Unavoidable Impact)	Greater (Significant Unavoidable Impact)	Less (Less Than Significant with Mitigation)	Less (Significant Unavoidable Impact)

*Environmentally superior alternative

²Traffic generated under Alternative A would be less than the traffic generated under the Maximum Build Out/Corner Mixed Use Development Scenario even if the existing buildings on Parcel 1 were re-tenanted and fully occupied.

Areas of Known Controversy

Based on comments received, areas of known controversy include increased traffic.

Page 2 Section 2.0, Description of the Proposed Project, the second paragraph will be **REVISED** as follows:

Parcel 1 is 24.4 acres and is currently developed with 471,000 square feet of office/manufacturing facilities in three buildings, one of which is occupied (the occupied space totals 265,343 square feet with 495 employees). The site is accessed by ~~three~~ four driveways on E. Duane Avenue and three driveways on DeGuigne Drive. Parcel 2 is 0.8 acres and is currently developed with a 12,000 square foot industrial office building that is currently occupied by approximately 75 employees and is accessed by one driveway on E. Duane Avenue and one driveway on DeGuigne Drive.

Page 46 Section 4.2.2.4, Existing Plus Project Intersection Operations, the title of Table 4.2-9 will be **REVISED** as follows:

Existing Plus Proposed Project Intersection Levels of Service.

Page 49 Section 4.2.2.5, Background Plus Project Intersection Operations, the title of Table 4.2-11 will be **REVISED** as follows:

Background Plus Proposed Project Intersection Levels of Service.

Page 52 Section 4.2.2.7, Pedestrian/Bicycle Facilities and Transit Operations, the fifth paragraph will be **REVISED** as follows:

Currently, all but one of the VTA bus routes that serve the project area are operating below capacity. Route 55 currently has an average ridership of 10 passengers (average bus capacity is 38 seat), but has a maximum ridership demand of 49 passengers at approximately 8:15 AM, 1:40 PM, and 3:20 PM.

Because Route 55 is over capacity at specific points during the day, the anticipated ridership resulting from the project was calculated based on the Maximum Build Out/Mixed Use Scenario because it is a higher density project. Under this scenario, the project site would generate one passenger² during the AM peak hour, which aligns with the school peak. Although Route 55 is over capacity and serves Fremont High School, under either development scenario, the project would add no more than one passenger to the AM Peak Hour (the afternoon peak usage times on the bus route do not correlate to the Peak Hour traffic times). Taking into account day to day variations in travel times and transit use, the addition of one passenger in the AM

² This number was estimated based on 92 AM Peak Hour trips multiplied by 6.6 percent assumed transit use which equates to six riders. The six riders would be divided between five routes, equating to approximately one rider per route.

Peak Hour would not constitute a significant impact. As a result, existing bus services can accommodate an increase in ridership demand resulting from the proposed project. The proposed project will not alter existing transit facilities or conflict with the operation of existing or planned facilities. Therefore, the proposed project will have a less than significant impact on transit operations. **(Less Than Significant Impact)**

Page 67 Section 4.3.3.1, Bay Area 2010 Clean Air Plan, the last row of Table 4.3.4 will be **REVISED** as follows:

As designed, the project proposes up to 2.5 ~~1.7~~ acres of new open space including lawns and up to 693 new trees. The new trees will help with the absorption of air pollutants but could have a measurable effect on the urban heat island effect on-site. The proposed project, therefore, is consistent with this control measure.

Page 68 Section 4.3.3.2, Impacts to Regional and Local Air Quality, the title of Table 4.3-6 will be **REVISED** as follows:

Operational Emissions for the ~~Proposed Project~~ Maximum Build Out/Corner Mixed Use Development Scenario.

Page 72 Section 4.3.3.3, Construction Impacts, the paragraph after Table 4.3-10 will be **REVISED** as follows:

Construction of the project would involve demolition of the existing buildings and hardscape, grading and trenching, paving, building construction, and architectural coating. As shown in Table 4.3-9, the emissions of ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust associated with construction of the project would not exceed the BAAQMD significance thresholds and, therefore, would not result in a significant impact from construction emissions. It should be noted that in addition to the shorter construction schedule (see footnote ~~24~~ 27), concrete crushing was not assumed as part the maximum build out/corner mixed-use development scenario. For these reasons, the overall emissions of the maximum build out/corner mixed-use development scenario are estimated to be lower than the proposed project, even though it is a larger development.

Page 90 Section 4.5.2.2, Noise Impacts to the Project Site, impact statement NOI-1 will be **REVISED** as follows:

Future residences on the project site located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards. **(Significant Impact)**

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, the first paragraph will be **REVISED** as follows:

As noted above, Parcel 1 was historically agricultural land and was then developed with the exiting land uses in 1974. The historic agricultural land uses on-site resulted in the accumulation of residual organochlorine pesticides (~~DDT compounds, arsenic, and lead~~) in the shallow soil. Chemicals historically used by AMD for semiconductor fabrication included solvents used as cleaning and degreasing agents as well as corrosives for manufacturing and waste treatment. Based on available records, these chemicals were stored in both aboveground and underground storage tanks. There were a total of 28 underground storage tanks (USTs), both vaulted and unvaulted, as well as below-grade acid neutralization systems (ANS). Of the 28 tanks, two had reported leaks.

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, a footnote will be **ADDED** the second paragraph as follows:

A cutoff wall is a wall of impervious material usually of concrete, asphaltic concrete, or steel sheet piling constructed used to reduce seepage.

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, a footnote will be **ADDED** the second paragraph as follows:

Dewatering is the action of removing groundwater or surface water from a construction site. The dewatering process is typically done by pumping or evaporation and is usually done before excavation for footings or to lower a water table that might interfere with excavations.

Page 136 Section 4.10.2.3, Off-Site Sources of Soil and Groundwater Contamination, the second paragraph will be **DELETED** from Section 4.10.2.3 and **ADDED** after the fourth paragraph in Section 4.10.2.2.

Page 136 Section 4.10.2.3, Off-Site Sources of Soil and Groundwater Contamination, the last paragraph will be **REVISED** as follows:

In 2011, 25 exterior soil gas samples were collected at depths of approximately five feet. Soil vapor exceeded the EPA 2015 Residential Regional Screening Level (RSL) in eight of the 25 samples, generally in the western portion of the project site. In 2013, 20 soil gas samples were collected at depths of approximately five feet. The Residential RSL was exceeded in three of the 20 samples, again in the western portion of the site.

Page 138 Section 4.10.3.2, Hazardous Materials Impacts to the Project Site, footnote 57 will be **REVISED** as follows:

Any soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be excavated and removed from the site or buried on-site in the basement of the ~~925~~ 915 DeGuigne building after demolition with approval from the RWQCB. No soil exceeding the RWQCB

Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be located within two feet of the surface.

Page 140 Section 4.10.3.2, Hazardous Materials Impacts to the Project Site, the following language will be **ADDED** before impact statement HAZ 1.1:

Grout curtain/cut-off walls are located near the former Pad C. As a condition of project approval, the following construction measures shall be implemented to protect these features during construction:

- Developer shall not damage the cut-off walls; if Developer needs to modify the cut-off walls, written approval shall be obtained from the Water Board prior to performing this work.
- Any damage to the cut-off walls shall be immediately repaired by the Developer under the oversight of the Water Board.

Page 143 Section 4.10.4.2, Project Specific Mitigation Measures, mitigation measure HAZ-1.7 will be **REVISED** as follows:

During construction activities, undocumented fill in former UST pits located beneath residential structures and in the park shall be removed and replaced as engineered fill. If an organic vapor meter detects vapors greater than background levels, discrete soil samples shall be collected of stockpiled soil and analyzed for contaminants of potential concern at a frequency of one sample per every 250 cubic yards (cy) for the first 1,000 cy and one sample every 500 cy thereafter. If concentrations of contaminants of potential concern are detected exceeding the lower of the then current Water Board or US EPA residential screening levels, this soil shall be appropriately disposed off-site and confirmation samples shall be collected in the excavation (one per each sidewall and two at the base of the excavation, and in areas of stained or odorous soil). If contaminant concentrations in the confirmation samples exceed residential screening levels, written approval shall be obtained from the Water Board to leave impacted soil in-place. Alternatively, this soil shall be remediated to the lower of the then-current Water Board or US EPA residential screening levels. If this soil is left in-place, a deed restriction or land use covenant shall detail the location of these soils. This document shall include a map of these impacted soils; shall restrict future excavation in these areas; and shall require future excavation be conducted in these areas only upon written approval by the Water Board and in accordance with the SMP.

Page 149 Section 4.11.3.2, Project Specific Mitigation Measures, the first paragraph of mitigation measure CUL-1.1 will be **REVISED** as follows:

Prior to the initiation of any ground disturbing activities or issuance of grading permits for the southwest corner of Parcel 1, a qualified professional archaeologist shall undertake a presence/absence testing program to identify the horizontal and vertical extent of any potential buried archaeological deposits associated with CA-

SC1-9 or other as yet unknown cultural resources at this location within the project site. The boundaries of the area to be tested within southwest corner of Parcel 1 shall be determined by the archaeologist based on available records for site CA-SC1-9.

Page 171 Section 4.14.3.1, Public Safety, the first paragraph will be **REVISED** as follows:

The existing conditions on-site (office/manufacturing facilities) create a demand for fire and police services because the site is occupied. Redevelopment of the project site would result in a change in land use from industrial to residential which would increase the permanent resident population of the City which could result in an increase in demand for fire and police protection services. Under either development scenario, the project will be required to be built to applicable Fire Code standards in use when construction permits are issued, including sprinklers and smoke detectors, and will include features that would reduce potential fire hazards. Access to the site for emergency vehicles will be provided from project driveways on DeGuigne Drive, built to the Fire Service Bureau's specifications. In addition, an Emergency Vehicle Access Easement will be provided from Duane Avenue. The Department of Public Safety will review the final project design to ensure that it incorporates appropriate safety features to minimize criminal activity.

Page 172 Section 4.14.3.2, Schools, the second paragraph will be **REVISED** as follows:

Based on Fremont Union High School District's student generation rate of 0.10 students per unit, the proposed project would generate approximately 45 high school structure and the maximum building out/corner mixed-use development would generate approximately 68 students.¹⁰⁴ Though Fremont High School is already currently above capacity and would not be able to accommodate students generated by either project. In response to larger than expected enrollment at Fremont High School, the FUHSD Measure B K Bond program was modified designed to address future projected enrollment needs at Fremont High School, which includes enrollment created by this project. The current Measure K Bond program includes the construction of additional classrooms and other facilities that would increase the educational capacity of Fremont High School and prevent overcrowding.³

Page 173 Section 4.14.3.3, Parks, the second paragraph will be **REVISED** as follows:

The proposed project would include 1.7 acres of public open space within the housing development and dedicate a new 0.8-acre public park for a total of approximately ~~1.4~~ 2.5 acres of new parkland publically accessible open space. The total park space, does not meet the five-acre minimum and, as a result, the project will also be required to pay the City Park In-Lieu Fees. With payment of the park in-lieu fees and the proposed open space on-site, the proposed project would have a less than significant impact on park facilities within the City. The maximum build

³ Personal Communication with City Staff – Jason Crutchfield, FUHSD, September 21, 2015.

out/corner mixed-use development scenario would also be require to meet the City's parkland dedication requirements through a combination of on-site open space and fees, in compliance with applicable City standards, and would have a less than significant impact. **(Less Than Significant Impact)**

SECTION 5.0 COPIES OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Serious Drought.
Help save water!*

August 14, 2015

SCL101945
SCL/101/PM 44.5
SCH# 2014112001

Mr. Ryan Kuchenig
Planning Division
City of Sunnyvale
456 W. Olive Avenue
Sunnyvale, CA 94088

Dear Mr. Kuchenig:

De Guigne Residential Project (945 De Guigne Drive) – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We have reviewed the DEIR to ensure consistency with our mission and state planning priorities of infill, conservationism, and efficient development. Please also refer to our previous comment letters on this project. We provide these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl.

Project Understanding

The proposed project is located approximately one-half mile southeast from the U.S. 101/N. Fair Oaks Avenue interchange. It would demolish all the occupied existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) and a public park. The townhouses would be located on Parcel 1 and the park would be located on Parcel 2. The townhouses would range from two to four bedrooms.

Lead Agency

As the lead agency, the City of Sunnyvale (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Traffic Impact Analysis (TIA)

1. Responses 4 and 5: The City's Responses 4 and 5 (collectively Responses) to Caltrans comment letter on the Notice of Preparation requesting traffic fees be identified states, "The

Mr. Ryan Kuchenig/City of Sunnyvale
August 14, 2015
Page 2

project would have no impacts to State facilities." However, the Responses are incongruent because the TIA:

- Identifies the U.S. 101/N. Fairoaks Avenue northbound (NB) ramps as deficient under Existing, Existing Plus Project, Background, and Cumulative Conditions, with the left-turn pocket extending beyond the turn pocket by over 25 feet but does not propose any mitigation.
- Does not include an analysis of the U.S. 101/N. Fairoaks Avenue southbound (SB) ramps, so a determination has yet to be made whether the proposed project will have impacts to the SB on- and off-ramps. Please provide Caltrans with a traffic analysis of the SB on- and off-ramps at this interchange.

Caltrans recommends mitigation for impacts to these NB and SB ramps be identified in the TIA and DEIR.

2. Calculation Sheets: Please provide Caltrans with the Traffix and Synchro software calculation sheets for our review and comments, including calculation sheets for the NB and SB ramps identified above.

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

- o: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy



August 12, 2015

City of Sunnyvale
Planning Division
P.O. Box 3707
Sunnyvale, CA 94088-3707

Attention: Ryan Kuchenig

Subject: 915 DeGuigne Residential Project

Dear Mr. Kuchenig:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for 451 townhomes plus a park or mixed use development of 7,000 square feet of retail uses and 19 housing units on 25.2 acres at 915 DeGuigne Avenue and 936 Duane Avenue. We have the following comments.

Transportation Impact Analysis (TIA) Report

VTA commends the City for including an analysis of pedestrian and bicycle quality of service (QOS) in relation to the proposed "road diet" on DeGuigne Drive, per the updated 2014 VTA Transportation Impact Analysis (TIA) Guidelines. However, VTA notes that the analysis of potential effects on transit service (TIA pg. 35) is based on transit capacity rather than transit vehicle delay, as required per Section 9.2 of the 2014 TIA Guidelines. In addition, the TIA did not include an Auto Trip Reduction Statement (ATRS), as required per Section 8.2 and Appendix C of the 2014 TIA Guidelines. Please submit a revised TIA report or follow-up memo including the completed ATRS form and an analysis of transit vehicle delay due to the proposed project. As noted in the 2014 VTA TIA Guidelines (page 46), the transit vehicle delay analysis may simply utilize information produced by the intersection Level of Service analysis, or other sources if available.

The October 2014 version of the VTA TIA Guidelines can be found online at <http://www.vta.org/cmp/tia-guidelines>. For any questions about the updated TIA Guidelines, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

Pedestrian and Bicycle Accommodations

VTA commends the City and project sponsor for proposing to include multi-use trails within the site (Figure 2.0-2), green-colored bicycle lanes along E Duane Avenue, and a new pedestrian crossing of E Duane Avenue at San Miguel Avenue including high visibility crosswalks, in-pavement warning lights and curb bulb-outs (Figure 2.0-4). These improvements will encourage

walking and bicycling for daily tasks and improve pedestrian access to transit, thereby reducing automobile trips, vehicle miles traveled and greenhouse gas emissions associated with the project.

The existing sidewalks surrounding the site on Deguigne Drive and Duane Avenue appear to be only 4' in width, although the pedestrian conditions are improved by the presence of a planted buffer strip between pedestrians and automobiles with consistent street trees on all project street frontages. The site plans provided in the DEIR and TIA do not indicate whether the sidewalks will be widened as part of the project. VTA recommends increasing the sidewalk width while retaining the existing planted buffers as a condition of approval for the project. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve perceptions of comfort and safety on a roadway.

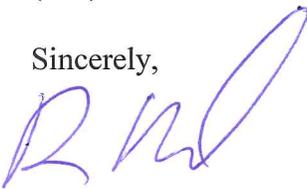
Bus Service

VTA provides bus service on Duane Avenue and maintains a bus stop on eastbound Duane Avenue adjacent to the project site. VTA recommends that the project provide the following bus stop improvements:

- A 10' X 55' PCC bus stop pavement pad per VTA standards.
- Sidewalk must have a minimum 8' X 5' concrete boarding area at the front of the bus stop to be in compliance with ADA requirements.
- No street trees within the bus stop loading area. If street trees are to be planted in the bus stop area, their location must be coordinated with VTA Passenger Facilities by contacting bus.stop@vta.org or 408-321-5800.
- Bus stop should be moved to the east, outside of the "T" intersection

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Brandert, Caltrans

County of Santa Clara

Roads and Airports Department



101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

August 14, 2015

Ryan Kuchenig
Senior Planner
456 West Olive Avenue
Sunnyvale, CA 94088-3707

**SUBJECT: Notice of Availability of Draft Environmental Impact Report
915 DeGuigne Residential Project**

Dear Mr. Kuchenig:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to the draft environmental impact report (DEIR) and is submitting the following comments.

- On November 14, 2014, the County submitted a response to the Notice of Preparation for the DEIR requesting that all intersections on Lawrence Expressway between SR 237 and El Camino Real be studied as part of the Traffic Impact Analysis for the DEIR. However, the DEIR did not include the intersection of Lawrence Expressway/Kifer Road. Analysis for this intersection should be presented because traffic from Central Expressway accessing Lawrence Expressway would pass through this intersection which may cause significant impacts. Please provide a traffic impact analysis for this intersection and, should there be a significant impact, provide a mitigation measure to contribute a fair share toward the Lawrence Expressway Grade Separation Project.
- The DEIR did not use the approved CMP 2014 counts for PM peak for the CMP intersections resulting inconsistent Level of Service (LOS) findings from other studies. For expressway intersections that are not CMP or when CMP data is not available (i.e., AM Peak), comparison with 2013 data showed large differences in existing volumes resulting in better LOS than field conditions indicate. The correct existing traffic volumes must be used as it affects the results of the other scenarios and the identification of traffic impacts to expressway intersections. Please revise the Traffic Impact Analysis appropriately so that significant impacts can be properly identified and mitigated.
- With the available information in the DEIR, the County was not able to verify if accurate signal timing information was used for the analysis. Please demonstrate that accurate signal timing data was used. You may request this information by contacting Ananth Prasad (Ananth.prasad@rda.sccgov.org). If accurate data was not used, the traffic analysis needs to be corrected so that significant impacts can be properly identified and mitigated.
- Mitigation measure MM CUM-2.2 on Page 183 is not sufficient. The eastbound triple left turn alone on Lawrence Expressway/Duane Avenue-Oakmead Parkway will not mitigate impacts due to unbalanced lane utilization. Restriping of Lawrence Expressway between Duane Avenue and US 101 would also need to be implemented along with the proposed mitigation measure to improve lane utilization for proposed triple left to redirect lanes that connect to US 101 on ramps. Also, DEIR must demonstrate that the project is feasible geometrically – the eastbound and westbound left turn movements must operate simultaneously.

915 DeGuigne Residential Project
August 14, 2015
Page 2 of 2

If you have any questions about these comments, please contact Aruna Bodduna at 408-572-2462 or at aruna.bodduna@rda.sccgov.org.

Sincerely,



Dawn S. Cameron
County Transportation Planner

cc: MA, AP

On Wed, Jul 22, 2015 at 9:46 AM, Milton Wu <miltonjwu@gmail.com> wrote:
Hi,

I'd like to comment on the proposal to add 450 townhomes at 915 DeGuine. In general, I'm in favor of the project, however, I am concerned about the size of the project.

Is there any ways we can decrease the size of the project? Also, I'd want to make sure that the location is pedestrian friendly. I'm also really concerned about increased traffic on Duane (already a busy street), and the related bottleneck point (Lawrence and Fair Oaks).

Perhaps one way to mitigate traffic (rush hour and weekend) is to make sure there is a viable grocery store in the plaza across the street (and better commercial development). Could we please look into helping that shopping center flourish as a local destination of goods and services, minimizing the amount of traffic we see from local residents going OUT of the area to get daily needs? Thanks!

—Milton

P.S. Please make the proposed park... BIG!