

CITY OF
SUNNYVALE

STRATFORD SCHOOL AT PARTRIDGE AVENUE
ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 2015



SCH #2015042054

PREPARED FOR:

CITY OF SUNNYVALE
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ES EXECUTIVE SUMMARY

This section provides a summary of the Stratford School at Partridge Avenue project in the City of Sunnyvale, identification of the alternatives evaluated in this Draft Environmental Impact Report (Draft EIR), a discussion of areas of controversy, and a summary of the environmental impacts of the project.

ES.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This Draft EIR provides an analysis of the potential physical environmental effects associated with project implementation, pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000–21177).

The analysis focuses on the physical environmental impacts that could arise from project implementation through operation of a private school in the City of Sunnyvale located next to Raynor Park. The Stratford School at Partridge Avenue Draft EIR is an environmental impact focusing on the project's environmental impacts and is considered a Project EIR, per CEQA Guidelines Section 15161.

ES.2 PROJECT CHARACTERISTICS

The project would modernize existing buildings to serve a population of approximately 460 middle schools or a mix of students, although peak enrollment could be approximately 520 students.

The project would include modernization of all existing buildings and improvements to meet any required Americans with Disabilities Act (ADA) standards and fire codes. Minor exterior nonstructural improvements would include a new circulation driveway, and fencing would be part of the site improvements. The project would include modifications to the building façade with contemporary colors and materials. Following construction, all surfaces would be repainted and landscaping would be upgraded.

The project would include the construction of a basketball court inside Raynor Park near the southeast corner of the school property. The full-size court would feature an asphalt play surface and would be surrounded by a 12-foot-tall vinyl-coated chain-link fence. The court would be approximately 104 feet long by 7 feet wide and would require the removal of three existing trees. The court would be used by the school during the school day and would be available for public use during the evening and on weekends and holidays. The project would also include a new volleyball court inside the school courtyard to be used by the school exclusively.

The project would include the following improvements to existing facilities:

- ADA compliance upgrades, as necessary
- Required fire code upgrades, as required
- Seismic evaluation and upgrades, as necessary
- New windows, classroom walls, and exit doors where necessary
- Newly painted surfaces (interior and exterior)
- Upgrades to restrooms, cabinets, counters, plumbing, whiteboards, and any other building needs

- Fencing of entire campus area for safety and security
- Upgrade of existing open space to include a student courtyard
- A new volleyball court
- A new basketball court, located park-side for both school and public use
- Landscaping upgrades throughout the project site
- Addition of on-site circulation driveway
- Addition of an accessible route to the public right-of-way
- Addition of bicycle parking for students
- Sealcoat and striping of all asphalt parking areas

PROJECT CONSTRUCTION

Project construction would take approximately 5 months. Construction techniques would include grading, repaving, revegetation, and any other activities associated with building improvements. During construction, streets would not be closed and materials would be hauled in and out of the project area using city streets. The project would generate an estimated 52 daily round trips for material hauling and deliveries (materials brought to the site or hauled off-site) over the construction period. While an average haul truck can carry up to 16 cubic yards of material, many of these daily trips would include the transport of smaller amounts of materials (i.e., paints, tools, debris, etc.).

Project construction would require the use of off-road equipment, such as haul trucks and small bulldozers, as well as graders and pavers. The project is not expected to use major groundborne vibration-generating construction equipment, such as pile drivers, since it entails the updating of existing structures and the addition of a driveway and basketball court.

Project construction would require up to 182 crew workers, depending on the timing and potential overlap of various construction activities. All crew members would park in designated areas in the project area and are not anticipated to all be working at the same time.

Grading

The project would include earthwork and spoils removal in preparation for the new circulation driveway. Approximately 6,050 square feet of the total 154,500 square feet would be disturbed during construction. Grading activities would take place in accordance with City of Sunnyvale regulations.

JOINT USE AGREEMENT

Project approvals would include a joint use agreement between the City and the Stratford School at Partridge Avenue (**Appendix C**). The joint use agreement outlines the portions of Raynor Park for which Stratford would be given priority use during certain hours of the day.

ES.3 PROJECT ALTERNATIVES SUMMARY

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project which could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. Further, CEQA Guidelines Section 15126.6(e) requires that a “no project” alternative be evaluated in an EIR. The Draft EIR evaluates the following alternatives:

- **Alternative 1 – No Project Alternative.** Under this alternative, the project would not be approved and the structures at Raynor Park would not be improved as proposed by Stratford School. There would be no site improvements and park additions like the basketball court would not be implemented. Under Alternative 1, the City may elect to use the existing buildings and rent them out for various uses. These uses would be similar to past uses like daycare and artist studios.
- **Alternative 2 – Reduced Capacity Alternative.** Alternative 2 would be similar to the proposed project but would have a 20 percent lower student maximum than the proposed project. The project would be approved for a maximum occupancy of 416 total students. Under Alternative 2, the project would modernize existing buildings to serve a population of approximately 416 students, rather than 520 students under the proposed project. Alternative 2 would include all project site improvements as described in Section 2.0, Project Description, of the Draft EIR, and construction would be the same in scope and duration.
- **Alternative 3 – Adult School Alternative.** Alternative 3 considers operation of the existing project site as an adult school. The adult school would be modeled on the Santa Clara Unified School District adult schools and would offer a combination of the following programs: English as a Second Language, General Education Diploma, Enrichment Courses, Health and Fitness, Parenting and Careers, and Computers. Student enrollment would be capped at 200 students. Typical of adult schools, most offerings would take place in the evening to accommodate an adult student population. Looking at comparable schools in Santa Clara County, evening course offerings typically start between 6:30 p.m. and 7:30 p.m., while recreational classes, like cooking or fitness, take place on weekend mornings or evenings.

ES.4 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

In accordance with CEQA Guidelines Section 15082, the City of Sunnyvale prepared and distributed a Notice of Preparation (NOP) for this project that was circulated for public review on April 20, 2015. The NOP included a summary of probable effects on the environment from project implementation. Written comments received in response to the NOP were considered in the Draft EIR preparation. Areas of controversy and issues raised to date regarding the project, and the sections where they are discussed in the Draft EIR, include the following:

- Project Description: school hours of operation; coordination of bell times; carpooling; pick-up and drop-off policies (Section 2.0, Project Description)
- Aesthetics: impacts of building retrofit and existing mural (Section 3.1, Aesthetics)
- Air Quality: impacts of increase in number of vehicles (Section 3.2, Air Quality)

ES EXECUTIVE SUMMARY

- Greenhouse Gas Emissions: impacts of car usage (Section 3.6, Greenhouse Gas Emissions)
- Hazardous Materials: impacts from previous site contamination; requirements for Phase I assessment (Section 3.7, Hazards and Hazardous Materials)
- Hydrology and Water Quality: site drainage issues (Section 3.8, Hydrology and Water Quality)
- Noise: increase in noise from cars, children, and school activities (Section 3.10, Noise)
- Utilities: water usage; water pressure in the neighborhood; impacts on City well (Section 3.13, Utilities)
- Recreation: joint use agreement; priority use; loss of park space; park hours for public usage (Section 3.12, Recreation)
- Transportation/Safety: cumulative impacts from projects, from other school traffic, and from Apple campus; unsafe intersections; cumulative impact on Dunford Way; parking for park users and during special events; pedestrian and bike safety; lack of sidewalks and curb markings (Section 3.14, Transportation and Traffic)
- Project Alternatives: suggestions such as demolishing the buildings and expanding the park; a public school on the site; a private school with no priority use of the park; leasing the buildings (Section 4.0, Alternatives)

The complete text of the NOP and scoping comments are included as **Appendix A**.

ES.5 SUMMARY OF ENVIRONMENTAL IMPACTS

Table ES-1 displays a summary of project impacts and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure.

For detailed discussions of these environmental impacts, refer to the appropriate environmental topic section (i.e., Sections 3.1 through 3.14 and Section 4.0).

Project implementation has the potential to generate one significant and unavoidable impact associated with traffic and transportation. CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. Throughout the Draft EIR, the terms “project” and “proposed project” are used to refer to the structure’s demolition. The term “cumulative” refers to development as outlined in the City of Sunnyvale General Plan EIR and the cumulative list of project provided by the City of Sunnyvale for this analysis.

**TABLE ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Aesthetics			
Impact 3.1.1 The project would not have a substantial effect on a scenic vista, and the project would have no impact	NI	None required.	NI
Impact 3.1.2 The project would not substantially degrade the visual character or quality of the project site. This impact would be less than significant .	LS	None required.	LS
Impact 3.1.3 The project would operate a private school, which would result in an increase in lighting and the introduction of additional potential sources of daytime glare. With implementation of existing City regulations, this impact would be less than significant .	LS	None required	LS
Impact 3.1.4 The project would not result in a significant contribution to the cumulative conversion of open space or illumination of the night sky. This impact would be less than cumulatively considerable .	LCC	None required	LCC
Air Quality			
Impact 3.2.1 The project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards. This would be a less than significant with mitigation incorporated impact.	S	MM 3.2.1a During construction activities, the applicant and/or its contractor shall ensure that all off-road diesel-fueled equipment (e.g., rubber-tired dozers, graders, scrapers, excavators, asphalt paving equipment, cranes, and tractors) is	LS

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ES EXECUTIVE SUMMARY

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		<p>California Air Resources Board (CARB) Tier 3 Certified or better.¹</p> <p>MM 3.2.1b</p> <p>Prior to the issuance of grading or building permits, the City of Sunnyvale shall ensure that the Bay Area Air Quality Management District's (BAAQMD) Basic Construction Mitigation Measures are noted on the construction documents. These basic construction mitigation measures include the following:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be 	

¹ NO_x emissions are primarily associated with use of diesel-powered construction equipment (e.g., graders, excavators, rubber-tired dozers, tractor/loader/backhoes). The Clean Air Act of 1990 directed the EPA to study, and regulate if warranted, the contribution of off-road internal combustion engines to urban air pollution. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to off-road diesel engines was signed between the EPA, CARB, and engine makers (including Caterpillar, Cummins, Deere, Detroit Diesel, Deutz, Isuzu, Komatsu, Kubota, Mitsubishi, Navistar, New Holland, Wis-Con, and Yanmar). On August 27, 1998, the EPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 horsepower and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards.

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		<p>limited to 15 miles per hour (mph).</p> <p>5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</p> <p>6. All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>7. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.</p>	
<p>Impact 3.2.2 The project would not result in long-term operational emissions that could violate or substantially contribute to a violation of federal and state standards. This would be a less than significant impact.</p>	<p>LS</p>	<p>None required</p>	<p>LS</p>
<p>Impact 3.2.3 The project would not conflict with implementation of the Bay Area 2010 Clean Air Plan. This would be a less than significant impact.</p>	<p>LS</p>	<p>None Required</p>	<p>LS</p>
<p>Impact 3.2.4 The project would not contribute</p>	<p>LS</p>	<p>None Required</p>	<p>LS</p>

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ES EXECUTIVE SUMMARY

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to localized concentrations of mobile-source CO that would exceed applicable ambient air quality standards. This would be a less than significant impact.			
Impact 3.2.5 The project would not result in increased exposure of existing or planned sensitive land uses to construction-source toxic air contaminant emissions (i.e., diesel PM). This impact is less than significant .	LS	None Required	LS
Impact 3.2.6 The project would result in the development of a school (sensitive land use) near stationary or mobile-source TACs. This impact would be less than significant .	LS	None Required	LS
Impact 3.2.7 The proposed project would not include sources that could create objectionable odors affecting a substantial number of people or expose new residents to existing sources of odor. Thus, this impact would be less than significant	LS	None Required	LS
Impact 3.2.8 The proposed project, in combination with cumulative development in the SFBAAB, would not result in a cumulatively considerable net increase of criteria air pollutants for which the air basin is designated nonattainment. This would be a less than cumulatively considerable impact.	LCC	MM 3.2.1a and MM 3.2.1b.	LCC
Biological Resources			
Impact 3.3.1 Project implementation could result in substantial adverse effects, either directly or through habitat modifications, to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, regulations, or by the CDFW or the USFWS. These effects would be a significant impact .	S	MM 3.3.1 Nesting Bird Preconstruction Surveys. If clearing and/or construction activities will occur during the raptor or migratory bird nesting season (February 15–August 15), the applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer	LS

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		<p>surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season.</p> <p>If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.</p>	
<p>Impact 3.3.2 Project implementation would not result in the disturbance, degradation, and/or removal of riparian habitat or sensitive natural communities. The project would have no impact.</p>	N	None required.	N
<p>Impact 3.3.3 The project would not result in the disturbance, degradation, and/or removal of riparian habitat or sensitive natural communities. There would be no impact.</p>	N	None required.	N
<p>Impact 3.3.4 The project would not result in the disturbance, degradation, and/or removal of federally protected wetlands or other waters. There would be no impact.</p>	N	None required.	N
<p>Impact 3.3.5 The project would not conflict with any local policies or ordinances protecting biological resources. This would be a less than significant impact.</p>	LS	None required	LS
<p>Impact 3.3.6 The project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.</p>	N	None required	N

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 September 2015

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Stratford School at Partridge Avenue
Draft Environmental Impact Report

ES EXECUTIVE SUMMARY

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<p>Impact 3.3.7 The project, in combination with other reasonably foreseeable projects, could result in mortality and loss of habitat for special-status species. This impact would be cumulatively considerable.</p>	CC	Mitigation measure MM 3.3.1	LCC
Cultural Resources			
<p>Impact 3.4.1 There are no locally designated historic structures within the project area. The project would have no impact.</p>	N	None required	N
<p>Impacts 3.4.2 The project could indirectly result in the potential disturbance of undiscovered cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features), paleontological resources ((i.e., fossils and fossil formations), and unrecorded human remains. This impact would be less than significant with mitigation incorporated.</p>	PS	<p>MM 3.4.2 If during the course of grading or construction unknown archeological and paleontological resources are discovered, the contractor shall halt work immediately within 20 feet of the discovery, the City of Sunnyvale shall be notified, and a professional archaeologist, who meets the Secretary of the Interior’s Professional Qualifications Standards in prehistoric or historical archaeology, or paleontologist shall be retained to determine the significance of the discovery. A qualified professional shall determine impacts, significance, and mitigation in consultation with recognized local Native American groups, if appropriate. In addition, prior to the commencement of project site preparation, all construction personnel shall be informed of the potential to inadvertently uncover cultural resources and the procedures to follow subsequent to an inadvertent discovery of cultural resources.</p>	LS

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<p>Impact 3.4.3 The project, in addition to existing, approved, proposed, and reasonably foreseeable development in the region, could result in cumulative impacts to cultural resources. This impact would be less than cumulatively considerable.</p>	LCC	Mitigation measures MM 3.4.2	LCC
GEOLOGY AND SOILS			
<p>Impact 3.5.1 Because of the seismically active nature of the San Francisco Bay region, the project would inherently result in the exposure of people, structures, and infrastructure to adverse effects associated with seismic activity. However, California Building Code standards address seismic hazards and the project proposes seismic retrofits to the existing buildings as necessary. Therefore, this would be a less than significant impact.</p>	LS	None required	LS
<p>Impact 3.5.2 The project would involve the renovation and reuse of an existing school site, requiring minimal ground-disturbing construction activities. Construction of the proposed circulation driveway and basketball court would be subject to the City's Municipal Code, which requires measures to reduce soil erosion. Therefore, this impact would be less than significant.</p>	LS	None required	LS
<p>Impact 3.5.3 The project site is currently developed, with no indication of damage from underlying unstable or expansive soils. Further, the project does not propose the construction of any new habitable structures. Therefore, this impact would be less than significant.</p>	LS	None required	LS

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Impact 3.5.4 The project, in addition to other existing, planned, proposed, approved, and reasonably foreseeable development projects in Santa Clara County, may result in cumulative soil erosion impacts. However, compliance with existing regulations intended to reduce soil erosion during construction would reduce this impact to a less than cumulatively considerable impact.	LCC	None required	LCC
GREENHOUSE GAS EMISSIONS			
Impact 3.6.1 The project would generate greenhouse gas emissions. This would be a less than cumulatively considerable impact.	LCC	None required	LCC
Impact 3.6.2 The project would not conflict with an applicable plan adopted for the purpose of reducing GHG emissions. There would be no impact .	N	None required	N
Hazardous Materials			
Impact 3.7.1 The project would involve the transport, use, and disposal of hazardous materials during construction. Such activities would continue to be regulated under existing law in order to protect public health. This impact would be less than significant .	LS	None required	LS
Impact 3.7.2 The project would entail the update of structures that were found to potentially contain asbestos and lead-based materials. The project site was used as a former agricultural site and is located in proximity to a Superfund site. As such, project implementation	S	MM 3.7.2a Prior to construction, the applicant shall implement an Operations and Maintenance Plan. The plan shall include measures which would ensure that the assessment, repair, and maintenance of damaged materials within the buildings shall be done in a manner to protect the	LS

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<p>could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Such activities would continue to be regulated under existing laws to protect public health. This impact would be significant.</p>		<p>MM 3.7.2b</p> <p>health and safety of workers and building occupants as described in applicable state and local regulations. If necessary, the applicant shall retain a Division of Occupational Safety and Health (Cal/OSHA) registered asbestos contractor to remove asbestos-containing materials to ensure safety to the surrounding neighborhoods.</p> <p>Prior to construction, the applicant shall consult with a certified lead risk assessor to determine options for control and correction of lead-based paint hazards. If lead-based paints are found to be present, to prevent accidental release of lead-based paint, the applicant and/or its contractor shall use the following techniques during construction:</p> <ul style="list-style-type: none"> ▪ Stabilize loose and flaky paint prior to construction activities. ▪ Require all workers to wear OSHA-level protective material for handling lead-based paint per OSHA requirements for lead in construction. ▪ Remove all lead-based paint materials to a scrap yard or landfill that can accept such materials. <p>MM 3.7.2c</p> <p>If project construction includes removing existing site improvements that would expose unimproved areas, the applicant shall contact the local planning or other applicable oversight agency department to determine whether sampling relating to the former agricultural use of the subject property is required prior to construction activities. Sampling activities shall take place as directed by the applicable oversight agency.</p> <p>MM 3.7.2d</p> <p>If hazardous materials are encountered during construction or accidentally released as a result of</p>	

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		construction activities, the applicant and/or its contractor shall implement the following procedures: <ul style="list-style-type: none"> ▪ Stop all work in the vicinity of any discovered contamination or release. ▪ Identify the scope and immediacy of the problem. ▪ Coordinate with responsible agencies (Department of Toxic Substances Control, San Francisco Bay Regional Water Quality Control Board, or EPA). ▪ Conduct the necessary investigation and remediation activities to resolve the situation before continuing construction work. 	
Impact 3.7.3 The project would involve the use, transport, disposal, and/or release of hazardous materials in the vicinity of an existing school site. This impact would be significant .	S	MM 3.7.1a through MM 3.7.1d above	LS
Impact 3.7.4 The proposed project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, it would not create a significant hazard to the public or the environment and would have a less than significant impact .	LS	None required	LS
Impact 3.7.5 The project would not result in a safety hazard for people residing or working in the project area. There would be no impact on airports and private airstrips from the project.	N	None required	N
Impact 3.7.6 The project would not interfere with adopted emergency response and evacuation plans that apply to the project area. This impact would be less than significant .	LS	None required	LS

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Impact 3.7.7 There are no Fire Hazard Severity Zones in Sunnyvale. Therefore, the project would have no impact .	N	None required	N
Impact 3.7.8 The project, along with increased urban development in Santa Clara County, would not result in cumulative hazards impacts. This impact would be less than cumulatively considerable .	LCC	None required	LCC
HYDROLOGY AND WATER QUALITY			
Impact 3.8.1 The project would include construction-related activities that could expose soil to erosion during storm events, causing degradation of water quality. The project would also increase impervious surfaces and, as a result, alter drainage patterns and increase runoff rates and runoff over existing conditions. Runoff from urban uses may contribute to the degradation of downstream water quality. Compliance with existing regulations would reduce this impact to less than significant .	LS	None required	LS
Impact 3.8.2 The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge impact. This impact would be less than significant .	LS	None required	LS
Impact 3.8.3 The project would result in an increase in impermeable surfaces and would modify drainage patterns in the project area. With implementation of applicable city and state regulations, this impact would be less than significant .	LS	None required	LS
Impact 3.8.4 The project would not result in the	LS	None required	LS

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exposure of additional people and/or structures to potential risks from flooding hazards and sea level rise. This impact would be less than significant .			
Impact 3.8.5 The project would not result in the exposure of additional people and/or structures to potential risks from inundation by seiche, tsunami, or mudflow. This impact would be less than significant .	LS	None required	LS
Impact 3.8.6 The project, in combination with current land uses in the local watersheds and land use activities and development of the cities and other agencies in Santa Clara County, could introduce additional non-point source pollutants to surface waters. This impact would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.8.7 The project would not be expected to significantly increase impervious surfaces or alter drainage conditions or rates in the project area. This impact would be less than cumulatively considerable .	LCC	None required	LCC
LAND USE			
Impact 3.9.1 The project would be consistent with all applicable land use plans, policies, and regulations. There would be no impact .	N	None required	N
Impact 3.9.2 The project would not contribute to cumulative land use impacts associated with the division of an established community, nor would it conflict with land use plans and regulations that provide environmental protection. This would be a less than	LCC	None required	LCC

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cumulatively considerable impact.			
NOISE			
Impact 3.10.1 Project operation would generate increased local traffic volumes that could cause a substantial permanent increase in ambient noise levels in the project vicinity. This would be a less than significant impact.	LS	None required	LS
Impact 3.10.2 Project implementation would not result in on-site noise levels that would exceed the City's applicable noise standards, nor would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels. This would be a less than significant impact.	LS	None required	LS
Impact 3.10.3 Groundborne vibration levels associated with short-term construction and long-term operational activities would not exceed applicable groundborne vibration criterion at nearby land uses. This impact is less than significant .	LS	None required	LS
Impact 3.10.4 Project construction would not result in the exposure of persons to or generation of noise levels in excess of the City of Sunnyvale's noise standards, as short-term construction noise is exempt from all noise level standards and construction is limited to daytime hours. This impact would be less than significant .	LS	None required	LS
Impact 3.10.5 Project operation would result in a substantial contribution to cumulative noise levels. This impact would be considered less than cumulatively considerable	LS	None required	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
PUBLIC SERVICES			
Impact 3.11.1 The project could increase the demand for fire protection and emergency medical services at the currently vacant project site by operating it as a school facility. However, the anticipated increase in demand for fire protection services would be minimal, and no new or expanded facilities would be needed. This impact would be less than significant .	LS	None required	LS
Impact 3.11.2 The project, along with potential development in the surrounding area, would increase cumulative demand for fire protection and emergency medical services. The project's contribution to this impact would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.11.3 The project would result in increased demand for law enforcement services at the currently vacant project site by operating it as a school facility. However, the anticipated increase in demand for law enforcement services would be minimal and no new or expanded facilities would be needed. This impact would be less than significant .	LS	None required	LS
Impact 3.11.4 The project, along with potential development in the surrounding area, could result in a cumulative increase in demand for law enforcement services. The project's contribution to this impact would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.11.5 The project would use the existing buildings as a school, thereby increasing use of the adjacent joint-use park. In addition, the project proposes to construct new recreational facilities including volleyball and	LS	None required	LS

N – No Impact

LS – Less Than Significant

SU – Significant and Unavoidable

S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
basketball courts. This impact would be less than significant .			
Impact 3.11.6 The project, along with other potential development in Santa Clara County, would increase the use of existing parks and require additional parks and recreational facilities. The project's contribution to this impact would be less than cumulatively considerable .	LCC	None required	LCC
RECREATION			
Impact 3.12.1 The project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Due to the joint use agreement restrictions on project use and existing City turf management policies; this would be a less than significant impact.	LS	None required	LS
Impact 3.12.2 The project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The project would have a less than significant impact.	LS	None required	LS
Impact 3.12.3 The project would not result in a significant contribution to the cumulative degradation of recreational resources. This impact would be less than cumulatively considerable .	LCC	None required	LCC
UTILITIES			
Impact 3.13.1 The project would not increase demand for water supply beyond what was considered in the City's Urban Water	LS	None required	LS

N – No Impact

LS – Less Than Significant

SU – Significant and Unavoidable

S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

ES EXECUTIVE SUMMARY

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Management Plan. Therefore, increased groundwater production would not be required to serve the project. This would be a less than significant impact .			
Impact 3.13.2 The project, in combination with other existing, planned, proposed, approved, and reasonably foreseeable development in the region, would increase the cumulative demand for water supplies and related infrastructure. The project's contribution to cumulative water supply and infrastructure impacts would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.13.3 The project would increase wastewater generation in the city. However, projected wastewater flows would remain within the capacity of Sunnyvale's wastewater collection and treatment system and would not exceed applicable wastewater treatment requirements of the RWQCB or require expansion of conveyance or treatment infrastructure. This impact would be less than significant .	LS	None required	LS
Impact 3.13.4 The project, along with other existing, planned, proposed, approved, and reasonably foreseeable development in the cumulative setting area, would contribute to the cumulative demand for wastewater service. However, continued implementation of City standards would ensure adequate wastewater facilities are provided. This impact would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.13.5 The project would generate increased amounts of solid waste that would need to be disposed of in landfills or recycled.	LS	None required	LS

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SU – Significant and Unavoidable

S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
This impact would be less than significant .			
Impact 3.13.6 The project, along with other existing, planned, proposed, approved, and reasonably foreseeable development in the region, would result in increased demand for solid waste services. This impact would be less than cumulatively considerable .	LCC	None required	LCC
Impact 3.13.7 The project would increase demand for electrical, natural gas, and telecommunications services, including associated infrastructure. This is considered to be a less than significant impact.	LS	None required	LS
Impact 3.13.8 The project, along with other existing, planned, proposed, approved, and reasonably foreseeable development in the region, would contribute to the cumulative demand for electrical, natural gas, and telecommunications services and associated infrastructure. This impact would be less than cumulatively considerable .	LCC	None required	LCC
TRANSPORTATION AND TRAFFIC			
Impact 3.14.1 The project would have a less than significant impact with mitigation incorporated on applicable plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system, including other modes of transportation like transit, bicycling, and walking. Since the level of service calculations indicate that all study intersections operate at acceptable service levels based on the City of Sunnyvale's and the VTA's criteria, the project would have a less than significant impact at all study intersections under the Existing plus Project scenario and thus would not conflict with applicable congestion		<p>MM 3.14.1a To reduce the conflict point in the drive aisle between the two southern parking lots and to improve the efficiency of the drop-off/pick-up loop, the project applicant shall restrict project site access at the Partridge Avenue driveway to only allow outbound travel during drop-off/pick-up times. The applicant shall place a sign indicating no left or right turns during the specified drop-off and pick-up times on the school property and the public right-of-way to enforce the one-way operation of the driveway.</p> <p>MM 3.14.1b To improve pedestrian circulation and visibility</p>	

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S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

ES EXECUTIVE SUMMARY

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
management programs.		<p>at the Partridge Avenue driveway, the project applicant shall construct a curb extension at the northern end of the driveway as shown on Figure 3.14-10. Additionally, the project applicant shall install an ADA-compliant raised crosswalk across the driveway to facilitate a continuous and direct extension of the sidewalk. The driveway exit shall include a stop sign and stop bar to clearly delineate the right-of-way.</p> <p>MM 3.14.1c</p> <p>The project applicant shall implement the following enforcement strategies:</p> <ul style="list-style-type: none"> • Provide at least three staff stationed throughout the project site to facilitate drop-off/pick-up procedures: one along the northern parking lot; one adjacent to the drop-off/pick-up area, and one at the Partridge Avenue driveway. • Install a “no stopping/passenger loading” sign along the northern parking lot. • Restrict passenger loading on Dunford Way and Partridge Avenue during peak drop-off and pick-up times. • Discourage parking in the neighborhood through communication with parents and students. • Encourage carpooling, walking, and biking to school, to the extent feasible. <p>MM 3.14.1d</p> <p>The project applicant shall continually monitor circulation around the immediate area and work with the City and community to identify and resolve issues as appropriate and reasonable. Additionally, the project applicant shall continue to actively communicate with parents about</p>	

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CC – Cumulatively Considerable

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		drop-off/pick-up procedures.	
Impact 3.14.3 Project implementation would not substantially increase hazards due to a design feature. This impact would be less than significant .	LCC	None required	LCC
Impact 3.14.4 Project implementation may conflict with emergency response times due to increase traffic congestion on roadways. This would be a less than significant impact.	LCC	None required	LCC
Impact 3.14.5 Project implementation would increase motor vehicle traffic and congestion on roadways used by transit, bicyclists, and pedestrians. The project would increase biking and pedestrian usage in the project area and could decrease the safety of existing facilities for users due to an increase in the volume of motor vehicles. The project could lead to delays in transit times. The project would not lead to a substantial decrease in performance or safety of such facilities and would not conflict with adopted policies or plans. This impact would be less than significant with mitigation incorporated .	S	<p>MM 3.14.5a</p> <p>The project applicant shall install sharrows on Dunford Way between Wolfe Road and the eastern city limits to clearly delineate Dunford Avenue as a bike route and increase driver awareness of possible bicyclists on the road (shown in Figure 3.14-13A).</p> <p>MM 3.14.5b</p> <p>The project applicant shall fund the City's engineering study to determine the need for the installation of crosswalks and yield signs as shown in Figure 3.14 13A. If the engineering study finds that crosswalks are warranted, the applicant shall fund the installation of crosswalks. Additionally, the applicant shall fund the installation of advance school warning signs in both directions along Dunford Way and Partridge Avenue along the school's frontage. The signs will be SW 24 1 (CA) signs as defined by the California Manual on Uniform Traffic Control Devices (MUTCD).</p>	LS
Impact 3.14.6 The project has a less than significant impact at all study intersections under the Background plus Project scenario and no mitigation measures are required.	LTS	None required	LTS
Impact 3.14.7 The project would have no cumulative impacts on bicycle and pedestrian facilities, and a less than cumulatively	LCC	None required	LCC

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SU – Significant and Unavoidable

S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

ES EXECUTIVE SUMMARY

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
considerable impact on transit facilities.			
Impact 3.14.8 The project would have a less than cumulatively considerable impact on emergency access. The project would have no cumulative impact on road hazards.	LCC	None required	LCC
Impacts 3.14.9 The project would have a less than cumulatively significant on Intersection 3.	LCC	None required	LCC
Impact 3.14.10 During the AM peak hour, the addition of project traffic would exacerbate unacceptable LOS F operations at the intersection of Lawrence Expressway and Benton Street and the project would have a significant and unavoidable impact .	CC	None Viable	SU
Impact 3.14.11 The project would have a less than cumulatively considerable impact during the PM peak hour at the Lawrence Expressway/Benton Street intersection based on the VTA's impact criteria.	LCC	None required	LCC
Impact 3.14.12 The project would have a less than cumulatively considerable impact at Intersection 15.	LCC	None required	LCC
Impact 3.14.13 The project would have a less than cumulatively considerable impact at Intersection 16.	LCC	None required	LCC

N – No Impact

LS – Less Than Significant

SU – Significant and Unavoidable

S – Significant

LCC – Less than Cumulatively Considerable

CC – Cumulatively Considerable

TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 Purpose of the EIR..... 1.0-1
1.2 Known Trustee and Responsible Agencies..... 1.0-1
1.3 Type of Document..... 1.0-2
1.4 Intended Use of the EIR 1.0-2
1.5 Organization and Scope 1.0-2
1.6 Environmental Review Process..... 1.0-4
1.7 Comments Received on the Notice of Preparation 1.0-5

2.0 PROJECT DESCRIPTION

2.1 Overview of Environmental Setting..... 2.0-1
2.2 Project Objectives..... 2.0-13
2.3 Project Characteristics..... 2.0-13
2.4 Regulatory Requirements, Permits, and Approvals 2.0-26

3.0 ENVIRONMENTAL ANALYSIS

3.0 Introduction to the Environmental Analysis and Assumptions Used 3.0-1
3.1 Aesthetics..... 3.1-1
3.2 Air Quality..... 3.2-1
3.3 Biological Resources..... 3.3-1
3.4 Cultural Resources..... 3.4-1
3.5 Geology and Soils..... 3.5-1
3.6 Greenhouse Gas Emissions 3.6-1
3.7 Hazards and Hazardous Materials 3.7-1
3.8 Hydrology and Water Quality..... 3.8-1
3.9 Land Use..... 3.9-1
3.10 Noise..... 3.10-1
3.11 Public Services 3.11-1
3.12 Recreation..... 3.12-1
3.13 Utilities 3.13-1
3.14 Transportation 3.14-1

4.0 ALTERNATIVES

4.1 Introduction 4.0-1
4.2 Alternatives under Consideration 4.0-1
4.3 Alternative 1..... 4.0-2
4.4 Alternative 2..... 4.0-10
4.5 Alternative 3..... 4.0-22
4.6 Comparison of Alternatives/Environmentally Superior Alternative..... 4.0-34
4.7 Alternatives Considered but not Selected for Analysis 4.0-36

TABLE OF CONTENTS

5.0 OTHER CEQA ANALYSIS

5.1 Significant Unavoidable Impacts..... 5.0-1
5.2 Growth-Inducing Impacts 5.0-1
5.3 Significant Irreversible Environmental Changes 5.0-2

6.0 REPORT PREPARERS

7.0 REFERENCES

TABLES

Table 3.2-1 Criteria Air Pollutants Summary of Common Sources and Effects 3.2-4

Table 3.2-2 Summary of Ambient Air Quality Data 3.2-5

Table 3.2-3 Federal and State Ambient Air Quality Attainment Status for Sunnyvale 3.2-6

Table 3.2-4 Air Quality Standards 3.2-8

Table 3.2-5 BAAQMD Basic and Additional Construction Mitigation Measures..... 3.2-11

Table 3.2-6 BAAQMD Significance Thresholds..... 3.2-13

Table 3.2-7 Construction-Related Criteria Pollutant and Precursor Emissions – Unmitigated
(Maximum Pounds per Day) 3.2-15

Table 3.2-8 Construction-Related Criteria Pollutant and Precursor Emissions – Mitigated
(Maximum Pounds per Day) 3.2-17

Table 3.2-9 Long-Term Operational Emissions 3.2-18

Table 3.5-1 Effects of Richter Magnitude and Modified Mercalli Intensity 3.5-2

Table 3.6-1 Greenhouse Gases 3.6-2

Table 3.6-2 Global Warming Potential for Greenhouse Gases 3.6-2

Table 3.6-3 Potential Statewide Impacts from Climate Change 3.6-4

Table 3.6-4 Construction-Related Greenhouse Gas Emissions (Metric Tons per Year) 3.6-12

Table 3.6-5 Unmitigated Project Greenhouse Gas Emissions – Project Operation
(Metric Tons per Year) 3.6-12

Table 3.7-1 Known Hazardous Contamination Sites Within 1 Mile of Project Site 3.7-3

Table 3.8-1 Increase in Impervious Area..... 3.8-16

Table 3.10-1 Existing Traffic Noise Levels 3.10-6

Table 3.10-2 Human Response to Different Levels of Groundborne Vibration 3.10-7

Table 3.10-3 City of Sunnyvale Maximum Permissible Noise Criteria for Determination of
Land Use Compatibility 3.10-8

Table 3.10-4 Predicted Increases in Traffic Noise Levels Existing Plus Project Conditions 3.10-11

Table 3.10-5 Representative Vibration Source Levels for Construction Equipment 3.10-14

Table 3.10-6 Typical Construction Equipment Noise Levels 3.10-15

Table 3.10-7 Predicted Increases in Cumulative Traffic Noise Levels 3.10-18

Table 3.13-1 Historical, Present, and Projected Water Production (afy) 3.13-7

Table 3.13-2 Past, Current, and Projected Water Use by Customer Type (afy) 3.13-7

Table 3.13-3 Projected Demand by Source (afy) 3.13-8

Table 3.13-4 Recycled Water – Wastewater Collection and Treatment (afy) 3.13-9

Table 3.13-5 Solid Waste Disposal Facilities 3.13-10

Table 3.13-6 Electricity Consumption for PG&E's Service Area
(in millions of kWh) 2006–2013 3.13-12

Table 3.13-7 Santa Clara County Electricity Consumption (in millions of kWh)
2006–2010..... 3.13-12

Table 3.13-8 Natural Gas Consumption for PG&E's Service Area (in millions of therms)
2006–2013..... 3.13-12

Table 3.13-9 Santa Clara County Natural Gas Consumption (in millions of therms)
2006–2013..... 3.13-13

Table 3.14-1 Existing Transit Service..... 3.14-16

TABLE OF CONTENTS

Table 3.14-2 Existing Intersection Levels of Service.....	3.14-21
Table 3.14-3 Existing Freeway Segment Levels of Service.....	3.14-24
Table 3.14-4 Qualitative Description of Level of Service	3.14-35
Table 3.14-5 Signalized Intersection Level of Service Definitions Using Average Control Vehicular Delay.....	3.14-36
Table 3.14-6 Unsignalized Intersection Level of Service Definitions Using Average Control Vehicular Delay	3.14-37
Table 3.14-7 Freeway Segment Level of Service Definitions.....	3.14-37
Table 3.14-8 Existing and Existing plus Project Intersection Levels of Service	3.14-39
Table 3.14-9 Trip Generation Estimates.....	3.14-49
Table 3.14-10 Existing plus Project Freeway Segment Levels of Service.....	3.14-50
Table 3.14-11 Existing and Existing plus Project Intersection Levels of Service	3.14-59
Table 3.14-12 Existing and Existing Plus Project Intersection Levels of Service	3.14-61
Table 3.14-13 Additional Transit Vehicle Delay by Corridor.....	3.14-83
Table 3.14-14 Background and Background plus Project Intersection Levels of Service	3.14-91
Table 3.14-15 Annual Growth Rates	3.14-94
Table 3.14-16 Cumulative and Cumulative plus Project Intersection Levels of Service.....	3.14-95
Table 3.14-17 Left-Turn Vehicle Queue Evaluation.....	3.14-109

FIGURES

Figure 2.1 Regional Location	2.0-3
Figure 2.2a Existing Setting 3	2.0-5
Figure 2.2b Existing Setting	2.0-7
Figure 2.2c Existing Setting Plan	2.0-9
Figure 2.3 Existing Land Use Designations	2.0-11
Figure 2.4 Proposed Site Plan.....	2.0-19
Figure 2.5 Circulation Plan.....	2.0-21
Figure 2.6 Landscape Plan.....	2.0-23
Figure 2.7 Joint Use Agreement Area 1 & Area 2.....	2.0-27
Figure 3.1a Existing Setting Photos	3.1-3
Figure 3.1b Existing Setting Photos	3.1-5
Figure 3.3.1 Recorded Occurrences of Special-Status Species within 1 Mile of the Project Site	3.3-5
Figure 3.7.1 Intersil Location	3.7-7
Figure 3.7.2 Location of Groundwater Monitoring Wells S-3B and S-4C.....	3.7-19
Figure 3.7.3 Location of City Water Well and Diesel Generator	3.7-23
Figure 3.8.1 Project site FEMA Designation	3.8-5
Figure 3.9.1 General Plan Designation.....	3.9-3
Figure 3.9.2 Zoning Designation	3.9-5
Figure 3.10.1 Typical Community Noise Levels.....	3.10-2
Figure 3.12.1 Open Space in Sunnyvale.....	3.12-5
Figure 3.12.2 Joint Use Agreement	3.12-7

Figure 3.14 -1 Project intersection and Study locations..... 3.14-5

Figure 3.14-2 Project Area Existing Bicycle Network..... 3.14-11

Figure 3.14-3 Existing Transit 3.14-13

Figure 3.14-4a Existing Peak Hour Traffic Volumes 3.14-17

Figure 3.14-4b Existing Peak Hour Traffic Volumes 3.14-19

Figure 3.14-5A Background No Project Peak Hour Traffic Volumes 3.14-41

Figure 3.14-5B Background No Project Peak Hour Traffic Volumes..... 3.14-43

Figure 3.14-6 Project Trip Distribution 3.14-47

Figure 3.14-7a Project Trip Assignment 3.14-51

Figure 3.14-7b Project Trip Assignment 3.14-53

Figure 3.14-8a Existing Plus Project Peak Hour Traffic Volumes 3.14-55

Figure 3.14-8b Existing Plus Project Peak Hour Traffic Volumes 3.14-57

Figure 3.14-9a Existing Neighborhood Volumes..... 3.14-65

Figure 3.14-9b Existing Neighborhood Volumes..... 3.14-67

Figure 3.14-10a Neighborhood Project Trip Assignment 3.14-69

Figure 3.14-10b Neighborhood Project Trip Assignment 3.14-71

Figure 3.14-11a Existing Plus Project Neighborhood Volumes 3.14-73

Figure 3.14-11b Existing Plus Project Neighborhood Volumes 3.14-75

Figure 3.14-12a Proposed Site Plan Recommendations 3.14-79

Figure 3.14-12b Project Neighborhood Improvements 3.14-84

Figure 3.14-13 Planned Safe Routes to Schools Improvements 3.14-85

Figure 3.14-14a Background Plus Project Peak Hour Traffic Volumes..... 3.14-87

Figure 3.14-14b Background Plus Project Peak Hour Traffic Volumes..... 3.14-89

Figure 3.14-15a Cumulative No Project Peak Hour Traffic Volumes 3.14-97

Figure 3.14-15b Cumulative No Project Peak Hour Traffic Volumes 3.14-99

Figure 3.14-16a Cumulative Plus Project Peak Hour Traffic Volumes 3.14-101

Figure 3.14-16b Cumulative Plus Project Peak Hour Traffic Volumes 3.14-103

APPENDICES

- Appendix A:** Notice of Preparation and Comments
- Appendix B:** Project Plans
- Appendix C:** Joint Use Agreement
- Appendix D:** Air Quality and Greenhouse Gas Emissions
- Appendix E:** Biological Resources
- Appendix F:** Cultural Resources
- Appendix G:** Hazardous Materials
- Appendix H:** Noise
- Appendix I:** Transportation
- Appendix J:** Recreation

1.0 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) was prepared in accordance with and in fulfillment of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. As described in CEQA Guidelines Section 15121(a), an environmental impact report (EIR) is a public informational document that assesses the potentially significant environmental impacts of a project. CEQA requires that an EIR be prepared by the agency with primary responsibility over the approval of a project (the lead agency). The City of Sunnyvale (City) is the lead agency for the proposed Stratford School at Partridge Avenue (the project). Public agencies are charged with the duty to consider and minimize environmental impacts of proposed development where feasible and have the obligation to balance economic, environmental, and social factors.

1.1 PURPOSE OF THE EIR

CEQA requires the preparation of an EIR prior to approving any project which may have a significant effect on the environment. The City has determined that the proposed school is a project under CEQA.

This Draft EIR provides a review of the environmental effects of the project.

The City has prepared this Draft EIR for the following purposes:

- To satisfy the requirements of CEQA (Public Resources Code, Sections 21000–21178) and the CEQA Guidelines (California Code of Regulations, Title 4, Chapter 14, Sections 15000–15387).
- To inform the general public, the local community, and responsible and interested public agencies of the project's nature, the possible environmental effects, possible measures to mitigate those effects, and alternatives to the project.
- To enable the City to consider environmental consequences when deciding whether to approve the project.
- To serve as a source document for regulatory agencies, as needed, to issue permits and approvals for the Stratford School at Partridge Avenue.
- To evaluate the project's potential significant environmental effects.

1.2 KNOWN TRUSTEE AND RESPONSIBLE AGENCIES

For the purpose of CEQA, the term *trustee agency* means a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the state of California. Because of the potential to impact migratory birds during project construction from selected tree removal, the following trustee agency may have an interest in the project:

- California Department of Fish and Wildlife (CDFW)

In CEQA, the term *responsible agency* includes all public agencies other than the lead agency that may have discretionary actions associated with the project or an aspect of subsequent project implementation. Besides the City of Sunnyvale there are no other agencies that would have discretionary actions associated with the project.

1.0 INTRODUCTION

1.3 TYPE OF DOCUMENT

The Stratford School at Partridge Avenue Draft EIR is a project-level EIR. Project EIRs are defined by the CEQA Guidelines (Section 15161) as:

The most common type of EIR examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

The project-level analysis considers the project's environmental effects.

1.4 INTENDED USE OF THE EIR

This Draft EIR is intended to evaluate the environmental impacts of the project and to help decision-makers in the permit approval process. The EIR in its final form may also be considered in the review of any subsequent permit actions, if any, to facilitate the project.

1.5 ORGANIZATION AND SCOPE

CEQA Guidelines Sections 15122 through 15132 identify content requirements for Draft and Final EIRs. An EIR must include a description of the environmental setting, an environmental impact analysis, mitigation measures, alternatives, growth-inducing impacts, and cumulative impacts. The environmental issues addressed in the Draft EIR were established through review of environmental documentation developed for the project, environmental documentation for nearby projects, and responses to the Notice of Preparation (NOP) and public scoping meeting comments. This Draft EIR is organized in the following sections:

SECTION ES – EXECUTIVE SUMMARY

This section provides a project narrative and identifies environmental impacts and mitigation measures through a summary matrix consistent with CEQA Guidelines Section 15123.

SECTION 1.0 – INTRODUCTION

This section provides an overview that describes the intended use of the EIR, as well as the review and certification process.

SECTION 2.0 – PROJECT DESCRIPTION

This section provides a detailed project description and project objectives, along with background information and physical characteristics consistent with CEQA Guidelines Section 15124.

SECTION 3.0 – ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

This section contains technical analyses relative to each environmental topic. Included in this section is a comprehensive analysis related to impacts and mitigation measures that correspond to the project. Each subsection contains a description of the existing setting of the project area. The environmental topics are summarized as follows:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services
- Utilities
- Recreation
- Transportation and Traffic

SECTION 4.0 – PROJECT ALTERNATIVES

This section discusses alternatives to the project, including the CEQA mandatory “No Project” alternative, that are intended to avoid or reduce the project's significant environmental impacts.

SECTION 5.0 – OTHER CEQA ANALYSIS

This section discusses significant unavoidable impacts, including those that can be mitigated but not reduced to a level of insignificance, and growth-inducing effects associated with the Stratford School at Partridge Avenue.

SECTION 6.0 – REPORT PREPARERS

This section lists all authors and agencies that assisted in the preparation of the report by name, title, and company or agency affiliation.

TECHNICAL APPENDICES

The appendices contain all technical material prepared to support the analyses.

1.0 INTRODUCTION

APPROACH TO CUMULATIVE IMPACT ANALYSIS

CEQA Guidelines Section 15130 requires that EIRs include an analysis of the project's cumulative impacts, when the project's effect is considered cumulatively considerable. Each technical section in the Draft EIR considers whether the project's effect on anticipated cumulative setting conditions is cumulatively considerable (i.e., a significant effect).

1.6 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR will involve the following general procedural steps:

NOTICE OF PREPARATION

In accordance with CEQA Guidelines Section 15082, the City prepared a Notice of Preparation (NOP) of an EIR for the project on April 20, 2015. The City was identified as the lead agency for the project. The notice was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the project. A scoping meeting was held on May 6, 2015, to receive additional comments. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP and responses by interested parties are presented in **Appendix A**.

DRAFT EIR

This document constitutes the Draft EIR. The Draft EIR contains a project description, an environmental setting description, identification of project impacts, mitigation measures for impacts found to be significant, and an analysis of project alternatives. Upon completion of the Draft EIR, the City will file the Notice of Completion (NOC) with the Governor's Office of Planning and Research to begin the public review period (Public Resources Code Section 21161).

PUBLIC NOTICE/PUBLIC REVIEW

Concurrent with the NOC, the City will provide public notice of the availability of the Draft EIR for public review and invite comment from the general public, agencies, organizations, and other interested parties. The public review and comment period is required to be a minimum of 45 days. Public comment on the Draft EIR will be accepted both in written form and orally at public hearings. Notice of the time and location of the hearing will be published prior to the hearing. All comments or questions regarding the Draft EIR should be addressed to:

City of Sunnyvale
Community Development Department
456 West Olive Avenue
PO Box 3707
Sunnyvale, CA 94088-3707
Attention: Momoko Ishijima, Associate Planner

RESPONSE TO COMMENTS/FINAL EIR

Following the public review period, a Final EIR will be prepared. The Final EIR will respond to written comments received during the public review period and to oral comments made at any public hearing.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The City will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the City may certify the Final EIR. Following review and consideration of the Final EIR, the City may act upon the project. A decision to approve the project will be accompanied by written findings in accordance with CEQA Guidelines Section 15091 and, if applicable, Section 15093. The City will also adopt a Mitigation Monitoring and Reporting Program, as described below, for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. The Mitigation Monitoring and Reporting Program will be designed to ensure that these measures are carried out during project implementation.

MITIGATION MONITORING AND REPORTING PROGRAM

CEQA Section 21081.6(a) requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval to mitigate or avoid significant effects on the environment. The specific "reporting or monitoring" program required by CEQA is not required to be included in the EIR; however, it will be presented to the Planning Commission for adoption and incorporation into the Stratford School at Partridge Avenue project plans.

1.7 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

The City received numerous comment letters on the NOP for the Stratford School at Partridge Avenue Draft EIR. A copy of each letter is provided in **Appendix A** of this Draft EIR. The comments were taken into account during the preparation of this Draft EIR. Comments not pertaining to the CEQA process were provided to the City for consideration and were not incorporated in the Draft EIR analysis.

Table A in Appendix A lists the main issues outlined during the public comment process, which are summarized below. The topics were identified and addressed in the appropriate EIR section as follows:

- Project Description: school hours of operation; coordination of bell times; carpooling; pick-up and drop-off policies (Section 2.0, Project Description)
- Aesthetics: impacts of building retrofit and existing mural (Section 3.1, Aesthetics)
- Air Quality: impacts of increase in number of vehicles (Section 3.2, Air Quality)
- Greenhouse Gas Emissions: impacts of car usage (Section 3.6, Greenhouse Gas Emissions)
- Hazardous Materials: impacts from previous site contamination; requirements for Phase I assessment (Section 3.7, Hazards and Hazardous Materials)
- Hydrology and Water Quality: site drainage issues (Section 3.8, Hydrology and Water Quality)
- Noise: increase in noise from cars, children, and school activities (Section 3.10, Noise)

1.0 INTRODUCTION

- Utilities: water usage; water pressure in the neighborhood; impacts on City well (Section 3.13, Utilities)
- Recreation: joint use agreement; priority use; loss of park space; park hours for public usage (Section 3.12, Recreation)
- Transportation/Safety: cumulative impacts from projects, from other school traffic, and from Apple campus; unsafe intersections; cumulative impact on Dunford Way; parking for park users and during special events; pedestrian and bike safety; lack of sidewalks and curb markings (Section 3.14, Transportation and Traffic)
- Project Alternatives: suggestions such as demolishing the buildings and expanding the park; a public school on the site; a private school with no priority use of the park; leasing the buildings (Section 4.0, Alternatives)
- Revenue: loss of revenue from not renting out the park fields; cost to taxpayers of maintaining the fields; Stratford pay per use. Revenue issues are not analyzed in Draft EIR; however, subsequent City reports will note any economic impacts from the project, as appropriate.