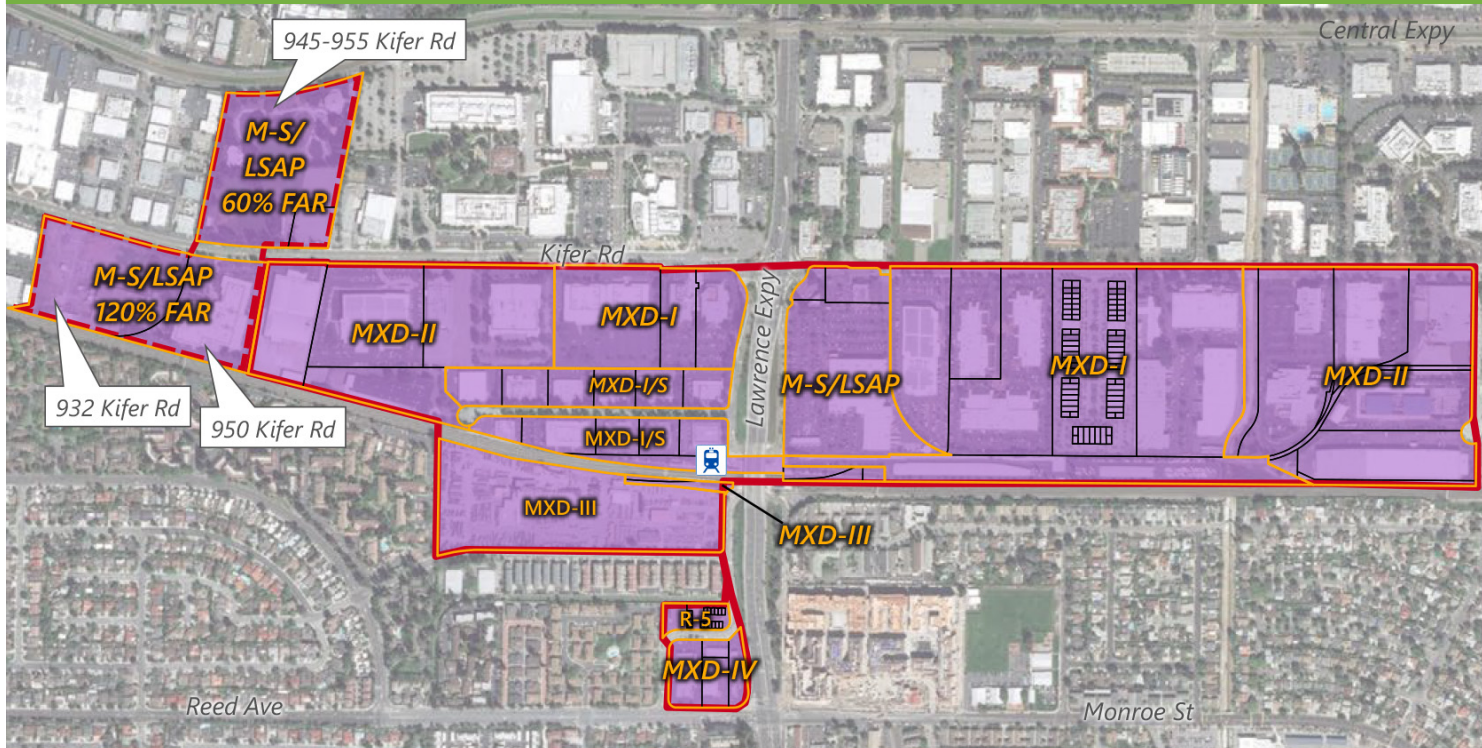


FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE

# LSAP Update/ Intuitive Surgical Corporate Campus Project



State Clearinghouse No. 2019012022

Prepared for



## Sunnyvale

City of Sunnyvale  
Community Development Department

Contact:  
George Schroeder  
Senior Planner

August 2021

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Prepared for:



City of Sunnyvale  
Community Development Department  
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455 Capitol Mall, Suite 300  
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Contact:

Kristen Stoner  
Project Manager

August 2021

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## LIST OF ABBREVIATIONS

ADA	American Disabilities Act
CEQA	California Environmental Quality Act
City	City of Sunnyvale
County	Santa Clara County
Draft SEIR	Draft Subsequent Environmental Impact Report
EV	electric vehicle
FAR	floor area ratios
Final SEIR	final subsequent environmental impact report
ft bgs	feet below ground surface
ISI project	Intuitive Surgical Corporate Campus
LEED	Leadership in Energy and Environmental Design
LSAP	Lawrence Station Area Plan
NOAA	National Oceanic and Atmospheric Administration
PRC	Pursuant to Public Resources Code
R&D	research and development
SCVWD	Santa Clara Valley Water District's
SMC	Sunnyvale Municipal Code
SR	State Route
Station	Caltrain Lawrence Station
STN	State Transportation Network
TDM	Transportation Demand Management
TMP	Transportation Management Plan
UHI	Urban heat islands
VCP	vittrified clay pipe
VTA	Santa Clara Valley Transportation Authority
WSA	water supply assessment

# 1 INTRODUCTION

This final subsequent environmental impact report (Final SEIR) has been prepared by the City of Sunnyvale (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final SEIR contains responses to comments received on the draft subsequent environmental impact report (Draft SEIR) for the Lawrence Station Area Plan (LSAP) modifications (LSAP Update) and the proposed Intuitive Surgical Corporate Campus (ISI project), herein referred to as the project. The Final SEIR consists of the Draft SEIR and this document (response to comments document), which includes comments on the Draft SEIR, responses to those comments, and revisions to the Draft SEIR. As part of this Final SEIR, the updated Amended LSAP policy document is included as Appendix A, updated Lawrence Station Sense of Place Plan document is included as Appendix B, and the Mitigation Monitoring and Reporting Program for the LSAP Update/ISI Project is included as Appendix C.

## 1.1 PURPOSE AND INTENDED USES OF THIS FINAL SEIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final SEIR has been prepared to respond to comments received on the Draft SEIR, which are reproduced in this document; and to present minor corrections, revisions, and other clarifications and amplifications to the Draft SEIR, including project updates, made in response to these comments and as a result of the City's ongoing planning efforts. The Final SEIR will be used to support the City's decision regarding whether to approve the LSAP Update/ISI project. With project approval, City actions would include the following:

- ▶ Adoption of an LSAP Amendment and General Plan Amendment and payments of the associated cost recovery fees
- ▶ Adoption of an ordinance to rezone the boundary expansion area and properties within the current adopted LSAP boundary and corresponding Zoning Map amendment
- ▶ General Plan and Zoning Code text amendments to reflect the LSAP Amendment and General Plan Amendment
- ▶ Adoption of the Lawrence Station Sense of Place Plan and payment of the associated sense of place fee
- ▶ Approval of a Special Development Permit for the ISI Site and architectural (i.e. design) review, removal of protected trees, and consideration of deviations from development standards as provided for under the City's Municipal Code (*ISI project only*)
- ▶ Amendments to the LSAP Incentives and Development Cap Administrative Regulations
- ▶ Establishment of a sewer facility fee program for improvements within the LSAP
- ▶ Approval of a Parcel Map, Easements and Improvement Plans for the ISI Site (*ISI project only*)
- ▶ Approval of a development agreement (*ISI project only*)
- ▶ Issuance of demolition permits for removal of existing buildings and parking lots and building permits for construction of ISI's project (*ISI project only*).
- ▶ Water discharge permits for construction dewatering. (*ISI project only*)

Other anticipated permits, approvals, and actions associated with the project include the following:

- ▶ Bay Area Air Quality Management District—authority to construct and permit to operate for any stationary sources (e.g., generators and fume hoods) of air contaminant emissions (*ISI project only*);

- ▶ San Francisco Regional Water Quality Control Board –Site Management Plan amendment and/or Remedial Action Plan for soil management, well abandonment and relocation approval and permits and/or approval of a Vapor Intrusion Mitigation System and/or NPDES wastewater permit for construction dewatering (*ISI project only*); and
- ▶ Santa Clara Valley Water District – well drilling permit(s) (*ISI project only*).

This Final SEIR will also be used by CEQA responsible agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction.

This SEIR provides a programmatic evaluation of proposed modifications to the adopted LSAP. Implementation of the proposed LSAP Update (i.e., approval of future projects) could involve many responsible agencies, depending on the details of a future project.

## 1.2 PROJECT LOCATION

The LSAP is located in the east-central part of the City of Sunnyvale in Santa Clara County, adjacent to the City of Santa Clara. The Caltrain Lawrence Station (Station) is located at 137 San Zeno Way, directly below the Lawrence Expressway overpass. U.S. 101 to the north and Interstate 280 to the south provide regional access to the plan area, and a network of major streets provides local access (i.e., Kifer Road, E. Evelyn Avenue, and Reed Avenue/Monroe Street). Proposed plan modifications would include expansion of the adopted plan area boundary to include three sites (containing four parcels) located just west/ northwest of the adopted LSAP boundary. Located in a light industrial area, ISI acquired these sites with the intent to expand and unify its operations adjacent to ISI's existing headquarters in Sunnyvale. The proposed LSAP boundary expansion area (also referred to as the ISI Site) contains four parcels (932, 945, 950, and 955 Kifer Road) on 32.4 acres located north and south of Kifer Road. To distinguish between the two areas bisected by Kifer Road, the proposed LSAP boundary expansion area/ ISI Site is also referred to as North Site and South Site for purposes of this SEIR.

## 1.3 PROJECT OBJECTIVES

The project modifications are intended to achieve the following objectives:

### LSAP Modifications (Housing Study/Boundary Expansion)

- ▶ Expand housing opportunities within the LSAP area to help address housing needs of the City.
- ▶ Provide for additional opportunities for higher intensity residential development near the Caltrain Lawrence Station that is environmentally, economically, and socially sustainable.
- ▶ Implement a Sense of Place Plan that will improve connectivity, wayfinding, and the aesthetic character of the LSAP area.
- ▶ Expand the LSAP boundary to the west for a comprehensive planning approach for the Kifer Road corridor, to accommodate future nonresidential development, and to obtain needed community benefits that are identified in the LSAP.
- ▶ Update the plan to improve the readability and consistency of the existing document and make revisions that comply with changes in State law and City codes since the original plan adoption.
- ▶ Make Zoning Code text amendments to reflect changes in building heights, land uses, floor area ratios, densities, and other associated development standards related to increased housing potential in the LSAP area and an expanded boundary to the west.
- ▶ Revise the LSAP Development Incentives Program to reallocate incentive points and add to the list of community benefits.

## ISI Project

- ▶ Create an innovative campus that unifies ISI's workforce in connected buildings to promote creativity and collaboration, and to reduce daily trips between existing ISI buildings and the new campus.
- ▶ Construct a project that accommodates ISI's existing needs in proximity to its existing employment base and allows for its long-term continued presence in the City.
- ▶ Fulfill the LSAP goals of increasing transit ridership and promoting economic, social, and environmental sustainability through integrated design and development of a sustainable campus in proximity to the Caltrain Lawrence Station.
- ▶ Promote transit and active commute modes through thoughtful site planning coupled with a robust Transportation Demand Management (TDM) program to reduce daily vehicle trips. The TDM program will provide amenities such as employee shuttle services between ISI buildings and public transit, extensive bicycle parking, showers and lockers, free Caltrain Go Passes, rideshare matching services, flexible work schedule programs and dedicated carpool spaces.
- ▶ Provide on-site amenities to promote ISI employees' health and well-being, reduce daily vehicle trips, and create a strong sense of place.
- ▶ Create a campus design that reflects ISI's innovative technology.
- ▶ Develop the campus over time in response to ISI's needs.
- ▶ Achieve the appropriate security and privacy required for the invention and manufacture of new surgical products and technologies by limiting public access to certain areas within the new campus.

## 1.4 SUMMARY DESCRIPTION OF THE PROJECT

The project consists of two primary components: (1) modifications to the adopted LSAP (i.e., an increase in housing potential within the LSAP, expansion of the western LSAP boundary, and a Sense of Place Plan that would function as a policy document for LSAP area circulation, open space, and streetscape improvements) and (2) an office/research and development (R&D) and manufacturing development project in the western LSAP boundary expansion area for the ISI project. This Draft SEIR provides a programmatic evaluation of proposed modifications to the adopted LSAP and a project-level evaluation of the ISI project proposed for inclusion within the LSAP's western boundary expansion area.

The LSAP Update would require amendments to the adopted LSAP policy provisions and guidelines. Within the adopted LSAP Boundary, rezoning would be required to clarify locations of the different types of allowable land uses. The allowable land uses, maximum building heights, residential densities, and nonresidential floor area ratios (FARs) would also change within the LSAP boundary. Consistent with the Housing Crisis Act of 2019 (SB 330), objective design standards would also be established within the plan. No change to the existing LSAP land use designation within the adopted LSAP boundary or maximum nonresidential development capacity within the LSAP is proposed.

## 1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft SEIR identified the following significant and unavoidable impacts under project and cumulative conditions:

### Air Quality

- ▶ Impact 3.2-1: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed BAAQMD-Recommended Thresholds

### Cumulative

- ▶ Impact 4-3: Cumulative Air Quality Impacts (criteria pollutant emissions during construction)
- ▶ Impact 4-22: Contribute to Cumulative Impacts on Wastewater Services

## 1.6 CEQA PUBLIC REVIEW PROCESS

The City published the Draft SEIR for public and agency review on May 26, 2021. A 45-day public review period was provided, ending on July 12, 2021. The Draft SEIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (<https://sunnyvale.ca.gov/business/projects/lawrence.htm>); and was made available at City of Sunnyvale Library, the City of Sunnyvale One-Stop Permit Center, and the City of Sunnyvale Community Center.

The City conducted virtual public meetings on the Draft SEIR at the following City commission meetings:

- ▶ Bicycle and Pedestrian Advisory Committee (June 17, 2021)
- ▶ Sustainability Commission (June 21, 2021)
- ▶ Housing and Human Services Commission (June 23, 2021)
- ▶ Planning Commission (June 28, 2021)

As a result of these notification efforts, written and verbal comments were received from agencies, organizations, individuals, and various City commission meetings on the content of the Draft SEIR. Chapter 2, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines Section 15088.5).

## 1.7 ORGANIZATION OF THE FINAL SEIR

This Final SEIR is organized as follows:

**Chapter 1, "Introduction,"** describes the purpose of the Final SEIR, summarizes the LSAP Update and ISI project and the major conclusions of the Draft SEIR, provides an overview of the CEQA public review process, and describes the content of the Final SEIR.

**Chapter 2, "Responses to Comments,"** contains a list of all parties who submitted comments on the Draft SEIR during the public review period, copies of the comment letters received, and responses to the comments.

**Chapter 3, "Revisions to the Draft SEIR,"** presents revisions to the Draft SEIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.

**Chapter 4, "References,"** identifies the documents used as sources for the analysis.

**Chapter 5, "List of Preparers,"** identifies the lead agency contacts as well as the preparers of the SEIR.



## 2 RESPONSES TO COMMENTS

This chapter contains comment letters and public meeting comments received during the public review period for the Draft Subsequent Environmental Impact Report (Draft SEIR), which concluded on July 12, 2021. The City has also included comment letters that were accepted after the public review period concluded. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft SEIR.

### 2.1 LIST OF COMMENTERS ON THE DRAFT SEIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

**Table 2-1 List of Commenters**

Letter No.	Commenter	Date
<b>STATE AGENCIES (S)</b>		
S1	California Department of Transportation (Caltrans), District 4 Mark Leong, District Branch Chief	July 12, 2021
<b>LOCAL AGENCIES (L)</b>		
L1	City of Santa Clara, Community Development John Davidson, Principal Planner	July 9, 2021
L2	County of Santa Clara Roads and Airports Department Ellen Talbo, AICP, County Transportation Planner	July 12, 2021
L3	Santa Clara Valley Water District (Valley Water) Shree Dharasker, Associate Engineer-Civil	July 15, 2021
L4	Santa Clara Valley Transportation Authority Brent Pearse, Transportation Planner	July 12, 2021
<b>ORGANIZATIONS (O)</b>		
O1	Silicon Valley is Home David Meyer, Director of Strategic Initiatives	July 12, 2021
<b>INDIVIDUALS (I)</b>		
I1	Beth Goodsell and Jeremy Wagner	June 6, 2021
I2	Bill Donnelly	June 30, 2021
I3	Margaret	July 12, 2021
I4	Ray Crump	July 12, 2021
I5	Chek F. Tang	July 13, 2021
I6	Colin Orr and Maria Bass	May 29, 2021
I7	Matt	May 29, 2021
I8	Rani Fischer	May 30, 2021
I9	Michael McDonald	July 10, 2021

Letter No.	Commenter	Date
<b>SUNNYVALE BICYCLE AND PEDESTRIAN ADVISORY COMMISSION (BPC)</b>		
BPC1	Arwen Davé, Commissioner	June 17, 2021
BPC2	Carl Hage, Member of the Public	
BPC3	Cliff Bargar, Member of the Public	
BPC4	Daniel Hafeman, Commissioner	
BPC5	Elizabeth Mehlman, Vice Chair	
BPC6	Timothy Oey, Commissioner	
<b>SUNNYVALE SUSTAINABILITY COMMISSION (SC)</b>		
SC1	Bruce Paton, Commissioner	June 21, 2021
SC2	Douglas Kunz, Vice Chair	
SC3	Kristel Wickham, Chair	
SC4	Tonya Veitch, Commissioner	
<b>SUNNYVALE HOUSING AND HUMAN SERVICES COMMISSION (HHC)</b>		
HHC1	Minjung Kwok, Commissioner	June 23, 2021
HHC2	Scott Duncan, Commissioner	
HHC3	Ken Hiremath, Chair	
<b>SUNNYVALE PLANNING COMMISSION (PC) – DEIR Public Hearing</b>		
PC1	David Simons, Vice Chair	June 28, 2021

## 2.2 COMMENTS AND RESPONSES

The verbal and written individual comments received on the Draft SEIR and the responses to those comments are provided below. The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

## 2.2.1 State Agencies

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

### DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

www.dot.ca.gov

<p><b>Letter S1</b></p>
-----------------------------

*Making Conservation  
a California Way of Life.*

July 12, 2021

SCH #: 2019012022

GTS #: 04-SCL-2019-00901

GTS ID: 15611

Co/Rt/Pm: SCL/82/VAR

George Schroeder, Senior Planner  
City of Sunnyvale  
456 West Olive Avenue  
Sunnyvale, CA 94088-3707

**Re: Lawrence Station Area Plan (LSAP) Update and Intuitive Surgical (ISI)  
Corporate Campus Project + Draft Subsequent Environmental Impact Report  
(SEIR)**

Dear George Schroeder:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the LSAP Update and ISI Corporate Campus Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the May 2021 Draft SEIR.

#### **Project Understanding**

The LSAP and ISI Corporate Campus Project are located in east-central Sunnyvale between Kifer Rd and Reed Ave. US-101 is located to the north of the project site and State Route (SR)-82 to the south. The proposed LSAP update would primarily increase the allowable housing potential within the adopted LSAP, expand the western LSAP boundary, and adopt the Lawrence Station Sense of Place Plan. The ISI Corporate Campus Project would construct an office/Research & Development (R&D)/manufacturing development in the western LSAP boundary expansion area.

#### **Highway Operations**

Appendix E, Transportation Impact Analyses, Table 20. Please note that the actual ramp capacity can be lower than the capacity used in the study due to ramp meters. To understand the full impact of the project on the affected

S1-1
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*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

George Schroeder, Senior Planner  
 July 12, 2021  
 Page 2

freeway segments, an updated queuing analysis should be performed for the ramp terminal intersections to determine whether vehicle queues can be accommodated within the ramps. Please include the updated queuing analysis in the Final SEIR.

Vehicle queues due to project-added traffic shall be accommodated within the ramps and freeway traffic shall not be impacted. If the project generated traffic impacts ramp operations, impacts shall be mitigated, or a fair share fee shall be allocated for mitigation. The Traffic Impact Assessment report identifies that the project is anticipated to have an adverse impact on two SR-237 segments. To mitigate the project impact on the freeway traffic, please consider a fair share contribution to projects listed below.

S1-1  
 cont.

**Fair Share Contributions**

As the Lead Agency, the City of Sunnyvale is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. The project applicant shall also coordinate with the City of Sunnyvale, Santa Clara Valley Transportation Authority and Caltrans for the proposed mitigation.

Fair share contributions should be considered to projects listed below:

- Improvement projects to mitigate operational deficient intersections along El Camino Real at Wolfe Road and San Tomas Expressway.
- Improvement projects to mitigate operational impacts on freeway segments as identified in the study along SR-237, US-101, and I-880.
- The LSAP identifies the intersections at Flor Vista Ave and Halford Ave, on SR-82 at the Lawrence Expressway off-ramps as high traffic stress locations for bicyclists. These intersections would benefit from bicycle and pedestrian improvements.
- As listed in the Caltrans District 4 Bike Plan (link), and as stated in previous comments:
  - Class IV separate bikeway on El Camino Real from Bernardo Ave to Lawrence Expressway in the City of Sunnyvale (Project ID SC-82-C02)
  - Class IV separated bikeway on El Camino Real from Lawrence Expressway to I-880 in the City of Santa Clara (Project ID SC-82-C03)

S1-2

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

George Schroeder, Senior Planner  
July 12, 2021  
Page 3

**Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on state roadways require a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

S1-3

**Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

S1-4

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon at [Llisel.Ayon@dot.ca.gov](mailto:Llisel.Ayon@dot.ca.gov). Additionally, for future notifications and requests for review of new projects, please contact [LDIGR-D4@dot.ca.gov](mailto:LDIGR-D4@dot.ca.gov).

Sincerely,



MARK LEONG  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

**Letter S1 California Department of Transportation (Caltrans, District 4)**

Mark Leong, District Branch Chief

July 12, 2021

S1-1

The comment titled "Highway Operations" refers to Table 20 in Appendix E, Transportation Impact Analysis, of the Draft SEIR and states that an updated queuing analysis should be performed for the ramp terminal intersections to determine whether vehicle queues can be accommodated within the ramps to understand the full impact of the project on the affected freeway segments. The comment also states that if project generated traffic results in impacts ramp operations, the impact should be mitigated via a fair share fee along with the two State Route (SR) 237 segments identified in the traffic impact analysis.

A 95<sup>th</sup> percentile queuing analysis for the AM and PM peak hours for intersections at the freeway ramps was included in the near-term study for the Intuitive Surgical project. Existing field observations indicated that study intersections do not experience queue feedback issues lasting beyond the peak hours. Therefore, the volumes evaluated in the analysis are considered demand volumes. Queuing analysis was only performed for intersections where Intuitive Surgical would add 10 or more project trips per left-turn lane. Through movement queues were not analyzed because they are highly dependent on signal coordination and arrival patterns. The queuing analysis is shown in Table 2-2.

The ISI project would create operational deficiencies at the Fair Oaks Avenue and US 101 northbound ramps intersection. The project is expected to add 47 vehicles during the PM peak hour onto the northbound left-turn lane under background plus project conditions and would lengthen the 95<sup>th</sup> percentile queue. This left-turn movement has one turn lane with a total queue storage space of approximately 260 feet. Under background conditions during the PM peak hour, the 95<sup>th</sup> percentile queue length would be 350 feet, with the back-of-queue extending out of the turn pocket. Under background plus project conditions, the 95<sup>th</sup> percentile queue length would be extended by 50 feet to 400 feet that already extends outside of the turn pocket. There is no room to further extend this left-turn lane. There is no feasible improvement for the identified queuing deficiency.

Excessive queues at freeway on-ramps are usually a function of ramp meter rates, and rate meter rates are a function of limited freeway capacity. Ramp metering helps keep the freeways flowing by limiting the number of vehicles that can enter the freeway at any one point. If traffic cannot get on the freeway because of ramp metering or merge point congestion, the impact is manifested as longer queues. In addition, the queuing analysis described above showed no queues that would extend to the freeway mainline at signalized off-ramps.

**Table 2-2 Queuing Analysis**

Movement: Peak Hour:	Lawrence Expressway and SR-82 <sup>3</sup>	Fair Oaks Avenue and US 101 NB Ramps	Lawrence Expressway and US 101 NB Ramps
	SBL PM	NBL PM	WBL AM
<b>Existing</b>			
Cycle/Delay <sup>1</sup> (sec)	100	95	85
Volume (vphpl)	252	231	258
Avg. Queue (veh./ln.)	7	6	6
Avg Queue <sup>2</sup> (ft./ln.)	175	150	150
95th% Queue (veh./ln.)	12	10	10
95th% Queue <sup>2</sup> (ft./ln.)	300	250	250
Storage (ft./ln.)	380	260	615
Adequate (Y/N)	Y	Y	Y
<b>Background</b>			
Cycle/Delay <sup>1</sup> (sec)	100	95	85
Volume (vphpl)	252	344	312
Avg. Queue (veh./ln.)	7	9	7
Avg Queue <sup>2</sup> (ft./ln.)	175	225	175
95th% Queue (veh./ln.)	12	14	12
95th% Queue <sup>2</sup> (ft./ln.)	300	350	300
Storage (ft./ln.)	380	260	615
Adequate (Y/N)	Y	N	Y
<b>Background Plus Project</b>			
Cycle/Delay <sup>1</sup> (sec)	100	95	85
Volume (vphpl)	268	391	325
Avg. Queue (veh./ln.)	7	10	8
Avg Queue <sup>2</sup> (ft./ln.)	175	250	200
95th% Queue (veh./ln.)	12	16	12
95th% Queue <sup>2</sup> (ft./ln.)	300	400	300
Storage (ft./ln.)	380	260	615
Adequate (Y/N)	Y	N	Y
<b>Project Related Operational Deficiency?</b>	No	<b>Yes</b>	No

<sup>1</sup> Vehicle queue calculations based on cycle length for signalized intersections.

<sup>2</sup> Assumes 25 feet per vehicle queued.

<sup>3</sup> This intersection was not included in the Intuitive Surgical project

**BOLD** indicates that the storage cannot accommodate the anticipated 95th percentile queue under background plus project conditions and the 95th percentile queue is expected to increase by at least one vehicle compared to background conditions.

S1-2

The comment states the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN) and that the project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed within mitigation measures. The comment also states that the project applicant should coordinate with the City, Santa Clara Valley Transportation Authority (VTA), and Caltrans on proposed mitigation and consider four improvement projects listed in the comment letter for fair share contribution.

The reader is referred to Response to Comment S1-1 regarding CEQA requirements for addressing traffic operational impacts associated with automotive delay. The fair share contributions referenced within the comment pertaining to the intersections of El Camino Real at Wolfe Road and El Camino Real at San Tomas Expressway (1<sup>st</sup> project listed in comment), along with those proposed for segments of SR 237, US 101, and I 880 (2<sup>nd</sup> project listed in comment) are identified as operational deficiencies issues within the comment. These operational deficiencies are quantified and analyzed using vehicular capacity, traffic congestion, and/or automobile delay. As detailed above, a project's effect on automobile delay shall no longer constitute a significant impact under CEQA; and thus, these recommended fair share contributions are not included as mitigation in the Draft SEIR. However, intersection improvements at the intersection of El Camino Real at Wolfe Road are included in the City's Traffic Impact Fee (TIF), which the additional 3,612 housing units studied under the LSAP Update will be contributing to. For the intersection of El Camino Real at San Tomas Expressway, the housing units studied under the LSAP Update will pay its fair share contribution toward the grade separation improvement that was identified in the Santa Clara Multimodal Improvement Plan. Future residential projects will also be required to participate in VTA's Voluntary Freeway Contribution Program and contribute their fair share payments toward the VTA's Express Lane Projects along US-101, SR 237, and I-880 as identified in the VTA's Valley Transportation Plan (VTP) 2040. Intuitive Surgical is required to participate in VTA's Voluntary Freeway Contribution Program and contribute their fair share payments towards the VTA's Express Lane Projects along SR 237, as identified in the VTA's Valley Transportation Plan (VTP) 2040.

As detailed in Impacts 3.14-3 and 3.14-4 of the Draft SEIR, it was determined that the LSAP Update and the ISI project would both result in a less-than-significant impacts to bicycle and pedestrian facilities. Although the comment suggests fair share contribution for specific bicycle and pedestrian projects be considered, it does not raise any CEQA issues or address the adequacy of the EIR analysis. However, the City shall consider the fair share contributions for the project improvements suggested in the comment and will conduct coordination with the Caltrans and any other affected entities, such as City of Santa Clara, Santa Clara Valley Transportation Authority (VTA), and Caltrans.

S1-3 The comment states that project work will require a transportation permit issued by Caltrans for movement of oversized or excessive load vehicles on state roadways. The comment also states that coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

The comment is correct. However, the comment does not raise any CEQA issues or address the adequacy of the SEIR analysis. No further response is necessary. The comment is included within the record for consideration as part of the project.

S1-4 The comment states that any Caltrans facilities impacted by the project must meet American Disabilities Act (ADA) Standards after project completion and maintain bicycle and pedestrian access during construction.

The comment is correct. As described on page 3.14-6 of the Draft SEIR, the adopted LSAP includes Policy P-P12; this policy ensures that all new and improved pedestrian facilities are designed to comply with ADA standards. In addition, Mitigation Measure 3.14-7: Prepare and Implement a Temporary Traffic Control Plan for the ISI Project, requires a temporary traffic control plan that shows a plan to address pedestrians, bicycle and ADA requirement throughout the work zone per CA-MUTCD Part 6 and City of Sunnyvale's SOP for bicycle lane closures. The comment does not raise any CEQA issues or address the adequacy of the SEIR analysis. No further response is necessary. The comment is included within the record for consideration as part of the project.



## 2.2.2 Local Agencies



**City of  
Santa Clara**  
The Center of What's Possible

Community Development

Letter  
L1

July 9, 2021

City of Sunnyvale Community Development Department  
Attn: George Schroeder, Senior Planner  
**456 W. Olive Avenue**  
**Sunnyvale, CA 94086**  
e-mail to: [gschroeder@sunnyvale.ca.gov](mailto:gschroeder@sunnyvale.ca.gov)

**Subject: Comments on the Draft Lawrence Station Area Plan Subsequent EIR**

Dear George:

Attached are comments on the City of Sunnyvale's Draft Subsequent EIR for the Lawrence Station Area Plan from the City of Santa Clara's Traffic Engineering Division, along with comments on the Lawrence Station Area Plan itself, and on the Lawrence Station Sense of Place Plan.

Please contact Carol Shariat, Principal Transportation Planner, if you have any questions.

Thanks,

A handwritten signature in black ink that reads "John Davidson".

John Davidson  
Principal Planner, City of Santa Clara

cc: Carol Shariat, Principal Transportation Planner  
Ralph Garcia, Senior Civil Engineer  
Blossom Dulos, Associate Civil Engineer



**City of Santa Clara**  
The Center of What's Possible

**PUBLIC WORKS DEPARTMENT  
TRAFFIC ENGINEERING DIVISION**  
1500 Warburton Ave, Santa Clara, CA 95050  
TEL: 408.615.3000 FAX: 408-985-7936  
EMAIL: [engineering@santaclaraca.gov](mailto:engineering@santaclaraca.gov)  
WEBSITE: [www.santaclaraca.gov](http://www.santaclaraca.gov)

**Traffic Comments on Sunnyvale’s Lawrence Station Area Plan Update SEIR:**

- 1. Page 3.2-6, Item P-P2 and on Page 3.7-6  
No definition or ID for "The Loop" as referenced. This seems to be the first mention of "The Loop" in the document. Any prior mention of a loop road is on Page 2-11, which may be where this should be IDed as "The Loop". L1-1
- 2. Page 3.7-6, Item P-P2: On the reference to one of the two new Caltrain track crossings for pedestrians and bicyclists that needs to be provided (as policy) being the Calabazas Creek Trail (per study by the City of Santa Clara), the work for the track crossing should be coordinated with the City of Santa Clara. L1-2
- 3. Page 3.7-6, Item P-P2 – On the reference to one of the two new Caltrain track crossings for pedestrians and bicyclists that needs to be provided (as policy) being the Calabazas Creek Trail (per study by the City of Santa Clara), the work for the track crossing should be coordinated with the City of Santa Clara. L1-3

General:

- For future development projects within the LSAP, developers shall work with the City of Santa Clara to provide room for the rail crossing L1-4
- Documentation should indicate the difference between a policy and a goal and future compliance requirements for both policies and goals. L1-5
- Any inconsistencies between the Lawrence Station Area Plan, Sense of Place Plan, and EIR documents shall be resolved. L1-6

Traffic Comments on Appendix A:

- Page 12 of 449:  
Updated information for contact for the City of Santa Clara with letter (Nguyen Cam no longer works for the City):  
Jonathan Yee, Transportation Manager, 408-615-3021, [JYee@santaclaraca.gov](mailto:JYee@santaclaraca.gov) or Main Number 408-615-3000, and [engineering@santaclaraca.gov](mailto:engineering@santaclaraca.gov) L1-7

**Traffic Comments on the Amended Lawrence Station Area Plan**

- 1. Pg. 4.5 – See text change - The crossing east of Lawrence Expressway at Calabazas Creek is being evaluated as part of the Calabazas Creek Trail study by the City of Santa Clara and would likely include a pedestrian/bicycle ~~overcrossing spanning under-crossing~~ of the tracks. Further north on Calabazas Creek where it intersects with Kifer Road, a trail undercrossing beneath Kifer Road is shown on Figure 4.2. This would provide continuous access for bicyclists and pedestrians on the trail without having to cross through vehicular traffic on Kifer Road. L1-8
- 2. Pg. 4.8:CF-P11: Consider building Class IV bike lanes on Kifer Road within Sunnyvale to match and extend the proposed Class IV bike lanes on Kifer within Santa Clara.
- 3. Pg. 4.15: Figure 4.3: Bicycle Framework: Please make any changes to match comments provided within the Lawrence Station Sense of Place Plan.
- 4. Pg. 6.52 - Primary Class I Shared-Use Paths → Primary Shared-Use Paths Cross-Section



**City of Santa Clara**  
The Center of What's Possible

**PUBLIC WORKS DEPARTMENT  
TRAFFIC ENGINEERING DIVISION**  
1500 Warburton Ave, Santa Clara, CA 95050  
TEL: 408.615.3000 FAX: 408-985-7936  
EMAIL: engineering@santaclaraca.gov  
WEBSITE: www.santaclaraca.gov

Suggested Text Changes:

PT-UDG1: When located in an open landscape, provide a minimum width of ~~20~~ **30** feet, and strive for ~~26~~ **36** feet.

PT-UDG2: Within this shared-use path width, provide a minimum paved width of ~~44~~ **16** feet, with 2-foot shoulders totaling **20** feet. ~~inclusive of shoulders.~~ This will allow adequate room for multiple pedestrian and bicycle users as well as **City and Valley Water** maintenance and emergency vehicles. ~~, if needed.~~

**Comment** – These setbacks indicated in PT-UDG1 and PT-UDG2 are insufficient to accommodate the trail, anticipated volume of trail users, Valley Water maintenance access vehicles and riparian plantings to identify/celebrate the creek corridor and provide wildlife with forage and cover. We recommend a minimum paved width of 16 feet with 2-foot shoulders totaling 20 feet for this regional trail. Valley Water requires 18 feet for maintenance access vehicles. We also recommend 10 feet for riparian tree plantings along the creek and trail. Thus, the minimum setback to support these functions is 30 feet. These setbacks should also consider any Valley Water needs for future flood control improvements. Design elements shall be coordinated with Valley Water to meet their operational needs.

L1-8  
cont.

5. Pg. 6.54 – Design and Materials Guidelines

PT-UDG4: Provide continuous pedestrian-scaled lighting on all shared-use paths to ensure a feeling of security.

PT-UDG5: Use overhead lighting rather than with bollards to allow easy visibility of oncoming pedestrians and bicyclists.

**Comment** – Lighting along a Calabazas Creek Trail should be intended to protect wildlife. Lighting should be low and directed to the trail surface, should screen the creek corridor and riparian trees and should dim in the late evening to support wildlife movement through the corridor.

L1-9

PT-UDG6: Plantings may be of a design that is either consistent with the palette of adjoining properties or of a design that delineates the trail.

**Comment** – The selection of plant material adjacent to Calabazas Creek and the East Drainage Channel should take into consideration environmental sustainability including:

- Use of California native plants that support wildlife within the urban environment.
- Use of trees to provide shade islands in a changing climate.
- Restriction on any invasive, non-native plant species in residential landscaping adjacent to urban creek corridors.



**City of Santa Clara**  
The Center of What's Possible

**PUBLIC WORKS DEPARTMENT  
TRAFFIC ENGINEERING DIVISION**  
1500 Warburton Ave, Santa Clara, CA 95050  
TEL: 408.615.3000 FAX: 408-985-7936  
EMAIL: engineering@santaclaraca.gov  
WEBSITE: www.santaclaraca.gov

**Traffic comments on Lawrence Station Sense of Place Plan:**

1. The City of Santa Clara is in favor of the signalized intersection at Kifer Road and Uranium Drive.
2. Figure 3-1 (pg. 16) - Please ensure the proposed E/W Class I trail shown north of Agate Drive and south of the Caltrain tracks is solely on the Sunnyvale side and not backing up onto our residents' backyards. Santa Clara does not want to take ROW from the single-family homes in order to implement this Class I trail.
3. Figure 3-8 (pg. 22) – Recommend Class IV bike lanes on Kifer Road within City of Sunnyvale to match and extend Class IV bike lanes on Kifer within City of Santa Clara. Please show Class IV bike lanes on Kifer within the City of Santa Clara on this graphic as it currently shows only a buffered bike lane and does not match what is in our Bike Plan Update.
4. Figure 3-10 (pg. 24) – Please show Class IV protected bike lane with 6' bike lane and 2' buffer on Kifer Road east of Uranium Drive to be more consistent with Figure 3-8 on page 22 of the plan. Also please show Class IV protected bike lanes on the north side of Kifer west of Uranium Drive to match what is proposed in Santa Clara's Bike Plan Update.

L1-10

**Traffic Studies for LSAP and Intuitive Surgical**

1. The City of Sunnyvale shall coordinate with Santa Clara related to any affected intersections found within the traffic analysis for both Lawrence Station Area Plan and the Intuitive Surgical project. Improvements identified for any affected intersections within Santa Clara shall be discussed and coordinated with Santa Clara. Fair share contributions shall be made for adverse effects found along roadways and/or intersections, including expressways.

L1-11

**Reviewed by:**

Carol Shariat, Principal Transportation Planner  
Ralph Garcia, Senior Civil Engineer  
Blossom Dulos, Associate Engineer  
Jana Sokale, Consultant, CSC Creek Trail Network Expansion Master Plan

## Letter L1 City of Santa Clara, Community Development Department

John Davidson, Principal Planner

July 9, 2021

- L1-1 The comment recommends that reference to “The Loop” be first identified on p. 2-11 of the Draft SEIR. The following text changes are made to page 2-11 of the Draft SEIR to describe reference to “The Loop” (Loop Road). Both references refer to the same circulation route. These changes do not alter the conclusions of the Draft SEIR.
- The Sense of Place Plan would require new development in the area to implement public street improvements, including a ~~Loop Road~~ (i.e., a roadway network improvement analyzed under Impact 3.4.4 of the 2016 LSAP EIR that would extend Sonora Court to both Kifer Road and the east side of the Lawrence Expressway Overcrossing), rail crossings (if determined by the City to be feasible), sidewalks, curb ramps, the addition and removal of on-street parking, new roadways, intersection improvements, buffered bicycle lanes, Class I multi-used paved trails, bus stop improvements along Kifer Road, lighting, wayfinding signage, and other public amenities.
- L1-2 The comment refers to adopted LSAP policy P-P2 on page 3.7-6 of the Draft SEIR and requests that work related to one of the new Caltrain track crossings (Calabazas Creek Trail) should be completed in coordination with City of Santa Clara.
- The final draft of the amended LSAP will replace adopted LSAP policy P-P2 with revised policy CF-P4 and will require that any work related to the Caltrain track crossing (Calabazas Creek Trail) would be completed in coordination with the City of Santa Clara.
- L1-3 The comment refers to adopted LSAP policy P-P2 on page 3.7-6 of the Draft SEIR and requests that work related to one of the new Caltrain track crossings (Calabazas Creek Trail) should be completed in coordination with City of Santa Clara.
- Please refer to response to comment L1-2 above.
- L1-4 The comment states that future development projects within the LSAP should require developers to work with the City of Santa Clara to provide room for the rail crossing.
- Please refer to response to comment L1-2 above.
- L1-5 The comment states documentation should indicate the difference between a policy and a goal and future compliance requirements for both policies and goals.
- This comment pertains to the Draft Amended LSAP Policy document and does not raise an issue related to the EIR for the proposed project. The comment is included in the record for consideration by decisionmakers.
- L1-6 This comment requests that inconsistencies between the Lawrence Station Area Plan, Sense of Place Plan, and EIR documents be resolved.
- The commenter does not specify what the inconsistencies between documents are. The City has reviewed these documents and has not identified inconsistencies that would require modifications to the SEIR.
- L1-7 The comment identifies that the City of Santa Clara’s contact should be updated to Jonathan Yee, Transportation Manager, 408-615-3021, JYee@santaclaraca.gov or the main number 408-615-3000 and engineering@santaclaraca.gov.
- This change in the point of contact from the prior City of Santa Clara comment letter is noted and will be used as needed to coordinate on future LSAP implementation.

- L1-8 The comment requests traffic-and path width-related additions and changes to text, figures, and policy CF-P11, PT-UDG1, and PT-UDG2 of the Draft Amended LSAP policy document.
- This comment pertains to the Draft Amended LSAP Policy document and does not raise an issue related to the Draft SEIR analysis prepared for the project. The City considered the commenters requests as part of revisions to the Amended LSAP policy document. As indicated in the updated Amended LSAP policy document (see Appendix A of this Final SEIR), text has been revised for policy PT-UDG1 to require a minimum width of 22 feet for Class I shared-use paths (20 feet was previously proposed). In addition, text has been added to policy PT-UDG2 to clarify that the minimum paved width requirement is excludes path shoulders. It should be noted that policy PT-UDG1 and PT-UDG2 are applicable to primary Class I shared-use paths on private property. These policies are not applicable to paths on City, County, or Valley Water properties, including the Calabazas Creek trail. The comment is included in the record for consideration by decisionmakers.
- L1-9 The comment requests revisions to path-related lighting in policy PT-UDG4 and PT-UDG5 of the Draft Amended LSAP policy document. The comment also requests that policy PT-UDG6 of the Draft Amended LSAP policy document take into consideration plant material selection adjacent to Calabazas Creek and the East Drainage Channel.
- This comment pertains to requested changes to the Draft Amended LSAP Policy document and does not raise an issue related to the Draft SEIR analysis prepared for the project. The City considered the commenters requests as part of revisions to the Amended LSAP policy document. As indicated in the updated Amended LSAP policy document (see Appendix A of this Final SEIR), text has been added to policy PT-UDG5 that would ensure lighting is directed to the path surface and dimmed during late night hours. In addition, text has been added to Policy PT-UDG6 that recommends consideration of native plants, shade trees, and non-invasive plantings. It should be noted that policies PT-UDG4, PT-UDG5, and PT-UDG6 are applicable to primary Class I shared-use paths on private property; these policies are not applicable to paths on City, County, or Valley Water properties, including the Calabazas Creek trail. The comment is included in the record for consideration by decisionmakers.
- L1-10 The comment states City of Santa Clara favors a signalized intersection at Kifer Road and Uranium Drive and provides requests and recommendations related to Figures 3-1, 3-6, and 3-10 of the Draft Lawrence Station Sense of Place Plan document.
- This comment pertains to the Draft Lawrence Station Sense of Place Plan document and does not raise an issue related to the Draft SEIR for the proposed project. Regarding the comment on Figure 3-1 of the Lawrence Station Sense of Place Plan, the proposed Class 1 shared-use path would be located on the City of Sunnyvale's side of the railroad tracks and would not require any action or right-of-way on City of Santa Clara properties. It should be noted that Class I shared-use paths proposed within the Lawrence Station Sense of Place Plan are limited to private property within the City of Sunnyvale. Regarding the comments on Figure 3-8 and 3-10, the City is not proposing Class IV bike lanes on the segments of Kifer Road indicated by the commenter. The comment is included in the record for consideration by decisionmakers.
- L1-11 The comment states that the City of Sunnyvale should coordinate with City of Santa Clara related to any affected intersections found within the traffic analysis for both the LSAP Update and ISI project. The comment also states that Improvements identified for any affected intersections within City of Santa Clara shall be discussed and coordinated with City of Santa Clara and fair share contributions shall be made for adverse effects found along roadways and/or intersections, including expressways.
- The reader is referred to response to comment S1-2.

**County of Santa Clara**

Roads and Airports Department

101 Skyport Drive  
San Jose, CA 95110-1302  
(408) 573-2460 FAX 441-0276



**July 12, 2021**

**George Schroeder**  
City of Sunnyvale  
456 West Olive Avenue  
Sunnyvale, CA 94088-3707

**SUBJECT:** LSAP Update/Intuitive Surgical Corporate Campus Draft Subsequent EIR

**Dear Mr. Schroeder,**

The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the most recent Draft Subsequent EIR for the Lawrence Station Area Plan. We submit the following comments:

The County previously submitted comments to the Intuitive Surgical TIA dated April 21, 2020 noting that page ii of the TIA explains that an 8% trip reduction was applied to the trip generation. However, footnotes in Table 1 and further explanation on page iii explain that that project’s required TDM plan is required to reduce trips by 20% in the peak hour and 30% overall. In our comment letter, we inquired that only an 8% reduction would be met by the proposed development. Appendix E of the Draft Supplemental EIR (TIA dated August 13, 2020) does not provide clarification to this question. Please clarify.

L2-1

Regarding the TDM requirement of the project, in general the County is highly supportive of efforts to reduce overall vehicle miles travelled and reducing trip generation. To that end, we believe that the monitoring of TDM programs ensures their success by virtue of validating their effectiveness in reducing vehicle travel. From what is described in the initial LSAP Draft EIR and Subsequent EIR regarding City policies and TIAs, the level of the City’s monitoring and/or oversight of TDM programs is nondescript. Please describe how the City will oversee its TDM requirements of developments in the LSAP boundary to ensure their effectiveness to the extent possible in reducing vehicle miles travelled by up to 30%.

L2-2

The County is continuing to develop the plan line and further engineering analyses for the Lawrence Expressway Grade Separation project. While we continue to coordinate with the City of Sunnyvale and City of Santa Clara on these issues, please note that the right of way of Lawrence Expressway between Kifer Road and Reed/Monroe Ave is sensitive to near-term future development. The County reserves its right to plan for future dedications/easements or otherwise to preserve the right of way for constructing the Lawrence grade separation project in the future.

L2-3

**Board of Supervisors:** Mike Wasserman, Otto Lee, Susan Ellenberg, S. Joseph Simitian, Cindy Chavez  
**County Executive:** Jeffrey V. Smith



Thank you again for your continued coordination with the County. We are supportive of the City's planning efforts toward addressing regional housing conditions. Further, we are supportive of the City's transit-oriented development approach. We look forward to working with you on the grade separation project and the implementation of the Lawrence Station Area Plan.

If you have any questions or concerns about these comments, please contact me at 408-573-2484 or [ellen.talbo@rda.sccgov.org](mailto:ellen.talbo@rda.sccgov.org).

L2-3  
cont.

Thank you,



Ellen Talbo, AICP  
County Transportation Planner



## Letter L2 County of Santa Clara Roads and Airports Department

Ellen Talbo, AICP, County Transportation Planner

July 12, 2021

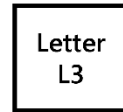
- L2-1 The comment requests clarification related to an 8 percent trip reduction applied to trip generation in the ISI Project TIA (Appendix E of the Draft SEIR).
- The commenter is correct; the City's adopted LSAP include a policy (TDM-P2) that requires projects to achieve a daily trip reduction target of 20 percent and a peak hour trip reduction target of 30 percent for new Office/R&D development. The ISI project will be required to reach these trip reduction goals by implementing a Transportation Demand Management (TDM) program. For purposes of the ISI TIA, a standard trip reduction of 8 percent was used for a more conservative analysis. As stated in the notes of Table 1 of the ISI TIA (dated August 13, 2021; Appendix E of the Draft SEIR), the 8 percent standard TDM reduction was applied to the project's trip generation, as prescribed by the VTA's 2014 Transportation Impact Analysis Guidelines.
- L2-2 The comment states that the LSAP Draft EIR and Subsequent EIR discussion of City policies and TIA's is nondescript in regard to the City's monitoring and/or oversight of TDM programs. The comment asks how the City will oversee its TDM requirements of developments in the LSAP boundary to ensure their effectiveness to the extent possible in reducing vehicle miles travelled by up to 30 percent.
- As described in Impact 3.2-3 (page 3.2-20 and 3.2-21 of the Draft SEIR), the LSAP Update requires projects within the LSAP, including the ISI project, to implement TDM measures and the ISI project would be required to implement a TDM plan with a 30 percent trip reduction requirement or pay a penalty.
- Per Sunnyvale Municipal Code (SMC) 19.45, Transportation Demand Management, TDM programs required for high-intensity industrial and office development are administered and enforced by the director of public works (Section 19.45.030) and TDM programs for multi-family residential developments are administered and enforced by the director of community development (Section 19.45.040 (c)). Section 19.45.040(c)(2) of the SMC states "The procedures for compliance documentation shall include, but not be limited to, the following:
- (i) Upon submittal of an application for any discretionary planning entitlement (if required) for any covered project, application materials shall include a TDM plan that documents how the development will comply with the requirements of the multi-family TDM Program.
  - (ii) Upon submittal of an application for a building permit, building plans shall show any physical improvement measures required by the approved TDM plan for the project.
  - (iii) Prior to final building inspection and occupancy, evidence shall be provided to the director of community development to confirm that all required physical improvements and programmatic measures in the approved TDM plan for the project have been installed or implemented (Sunnyvale 2020).
- Per Section 19.45.040(d) of the SMC, a stop work order may be issued if the director determines that the project during construction does not or is unlikely to comply with the approved TDM plan; final certificate of occupancy shall be withheld until the director determines that the project will be brought into compliance with the approved TDM plan (Sunnyvale 2020).
- This comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary. The comment is included within the record for consideration as part of the project.

L2-3

The comment states that Santa Clara County (County) is continuing to develop the Lawrence Expressway Grade Separation project and asks the City to note that the right of way of Lawrence Expressway between Kifer Road and Reed/Monroe Ave is sensitive to near-term future development. The comment also states that the County reserves its right to plan for future dedications/easements or otherwise to preserve the right of way for constructing the Lawrence grade separation project in the future. The comment also identifies support of the planning efforts to address regional housing conditions.

Comments pertaining to the Lawrence Expressway Grade Separation project are noted. There are many references in the draft amended LSAP that disclose that right-of-way dedications are likely required for the project, including text references in the descriptors of the plan zoning districts and design guideline subareas, and in guidelines SA-UDG9 and policy LE-P1. This comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary. The comment is included within the record for consideration as part of the project. The commenters support of the LSAP Update planning efforts are noted.

**From:** Shree Dharasker <sdharasker@valleywater.org>  
**Sent:** Thursday, July 15, 2021 3:56 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Cc:** Michael Martin <MichaelMartin@valleywater.org>  
**Subject:** RE: LSAP DSEIR Comments due July 12th



ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi George,

Thanks for providing an extension to the comments deadline. The Santa Clara Valley Water District (Valley Water) has reviewed the Draft Supplemental Environmental Impact Report (DSEIR), and has the following comments:

- 1) The parcels to be added to the proposed Lawrence Station Area Plan (LSAP) expansion contain several active and abandoned ground water wells. Any abandoned well found on the subject property during development must be properly destroyed under a Valley Water permit or registered with Valley Water and protected from damage. Any active wells that will continue to be used must be protected so that they do not become lost or damaged during development. Active wells that will not be used following development must be properly destroyed under permit from Valley Water.  
 While Valley Water has records for most wells located in the County, it is always possible that a well exists that is not in Valley Water records. If previously unknown wells are found on the subject property during development, they must be properly destroyed under permit from Valley Water or registered with Valley Water and protected from damage.  
 For more information, please call Valley Water’s Well Ordinance Program Hotline at (408)630-2660. L3-1
- 2) Page 2-32 – Valley Water encourages the use of recycled water to assist with water supply demands and management. L3-2
- 3) Page 3.9-9, 3.15-9, and 3.15-10  
 SCVWD’S legal name has not changed.  
 “per Valley Water (formerly formally known as the Santa Clara Valley Water District)”. Valley Water previously formally known as the Santa Clara Valley Water District L3-3
- 4) Page 3.9-9 - The proposed project is likely to encounter shallow groundwater. Valley Water recommends that a detailed analysis of construction dewatering be conducted, including estimating dewatering volumes/durations and evaluating related impacts. A construction dewatering system should be designed such that the volume and duration of dewatering are minimized to the greatest extent possible. We also recommend that the geotechnical investigation identify the foundation design and waterproofing that will avoid the need for permanent dewatering after construction is complete L3-4
- 5) Table of Contents: TOC – typo Hydrology and Water Quality  
 ..... 3.19-1 Page number should be 3.9-1 L3-5

Please contact me if there are any questions

Shree Dharasker  
 Associate Engineer-Civil  
 Community Projects Review Unit  
 (408)630-3037

## Letter L3 Santa Clara Valley Water District (Valley Water)

Shree Dharasker, Associate Engineer-Civil

July 15, 2021

L3-1 The comment states that several active and abandoned ground water wells are located within the proposed LSAP expansion area and that any abandoned wells must be properly destroyed under a Valley Water permit and active wells must be registered with Valley Water and protected from damage. The comment also states that if any previously unknown wells that are found during project development must be properly destroyed under permit from Valley Water or registered with Valley Water and protected from damage.

As described in Section 3.8, "Hazards and Hazardous Materials" and 3.9, "Hydrology and Water Quality" of the Draft SEIR, a parcel within the LSAP expansion area (i.e., ISI project site) is under regulatory oversight of the RWQCB and is subject to Order Number R2-2007-0047 (Order) due to soil and groundwater contamination. Extensive infrastructure (i.e., groundwater monitoring wells, extraction wells, injection wells, etc.) associated with subsurface environmental investigations and remediation programs exist on the western third of the 932 Kifer Road parcel. As part of the Order, removal of all groundwater monitoring, vapor extraction, and most injection points are required before any construction activities. The Order also requires four replacement groundwater monitoring wells and recommendations to be included in the anticipated dewatering program for the ISI site.

As discussed in Impact 3.8-4 and Impact 3.9-1 of the Draft SEIR, Mitigation Measure 3.8-1 requires the City to prohibit issuance of a building permit for an identified contaminated site until remediation and effective site management controls appropriate for the use of the site have been completed, consistent with applicable regulations and to the satisfaction of the City of Sunnyvale, DTSC, or San Francisco Bay RWQCB (as appropriate) and before initiation of ground-disturbing activities. This would include compliance with any applicable Valley Water standards regarding the destruction of a permitted or registered Valley Water wells.

L3-2 The comment refers to page 2-32 of the Draft SEIR and states that Valley Water encourages the use of recycled water to assist with water supply demands and management.

As described in Impact 3.15-1 of the Draft SEIR, Impact 3.11.5.1 of the 2016 LSAP EIR analysis noted that while implementation of the LSAP would result in a potable water demand of 814 acre-feet annually, the LSAP included policies intended to maximize the use of recycled water when it becomes available. Draft SEIR pages 3.15-11 through 3.15-14 and the water supply assessment provided in Draft SEIR Appendix G document current and planned expanded recycled water use by the City.

L3-3 The comment requests text revisions to clarify that Santa Clara Valley Water District's (SCVWD's) name has not legally changed to Valley Water.

The following text changes are made to page 3.9-9, 3.15-9, and 3.15-10 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

Page 3.9-9:

Pursuant to SGMA, future developments would be required to comply with all applicable programs, policies, and regulations per Valley Water (~~formerly~~ formally known as Santa Clara Valley Water District), specifically the 2016 Groundwater Management Plan (Valley Water 2016).

Page 3.15-9:

The City obtains its potable water supply from three sources: purchased surface water from the San Francisco Public Utilities Commission (SFPUC), purchased treated surface water from Valley Water (~~formerly~~ formally known as the Santa Clara Valley Water District), and groundwater from six City-owned and operated wells.

Page 3.15-10:

Valley Water, ~~previously formally~~ known as Santa Clara Valley Water District (SCVWD), supplies the City of Sunnyvale treated surface water through an entitlement of the imported Central Valley Project (CVP) water and the State Water Project (SWP) water, in combination with water from local reservoirs.

L3-4

The comment refers to text on page 3.9-9 of the Draft SEIR. The comment states that the project is likely to encounter shallow groundwater and that Valley Water recommends that a detailed analysis of construction dewatering be conducted, including estimating dewatering volumes/durations and evaluating related impacts. A construction dewatering system should be designed such that the volume and duration of dewatering are minimized to the greatest extent possible. We also recommend that the geotechnical investigation identify the foundation design and waterproofing that will avoid the need for permanent dewatering after construction is complete.

As stated in Impact 3.9-2 of the Draft SEIR, the ISI project includes construction of a two-level below-grade parking garage on the North Site and a one-level below-grade basement on the South Site with foundations that would extend to depths of 23 and 28 feet below ground surface (ft bgs) and that shallow groundwater beneath the two properties is currently encountered at a depth of approximately 10 ft bgs (Todd Groundwater 2019). Since the water table is shallower than the total depth of the proposed subsurface foundations, temporary dewatering would be required during construction using dewatering wells and slurry walls around the excavation perimeters. Groundwater dewatering during construction of foundations, and the permanent foundations themselves, may alter shallow groundwater flow directions and rates. Based on groundwater flow models for the proposed subsurface parking structures, only limited, short-term impacts to groundwater flow are predicted to occur during construction dewatering.

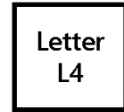
A groundwater flow modeling analyses was completed for ISI's proposed project. A copy of the *Dewatering and Foundation Groundwater Flow Model, 950 Kifer Road, Sunnyvale, California*, is included as Appendix D to this Final SEIR. As stated in Impact 3.9-2 of the Draft SEIR, the ISI project would be required to comply with all applicable programs, policies, and regulations per Valley Water's 2016 Groundwater Management Plan.

L3-5

The comment identifies a page number typo within the Draft SEIR's Table of Contents.

The following text changes are made to page i, Table of Contents, of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

3.9 Hydrology and Water Quality .....	3.49-1
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July 12, 2021

City of Sunnyvale
Department of Community Development, Planning Division
456 West Olive Avenue, Sunnyvale, CA 94088

Attn: George Schroeder
By Email: gschroeder@sunnyvale.ca.gov

Dear George,

VTA appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Report (DSEIR) for the Lawrence Station Area Plan Update and Intuitive Development Project. VTA has reviewed the document and has the following comments:

Access to Transit

VTA recognizes that there are significant gaps in the pedestrian sidewalk network in the Lawrence Station Area due to previous development patterns. VTA supports making the Lawrence Station Area more walkable and bikeable. Kifer Road in particular lacks sidewalks; this present condition makes it difficult for pedestrians to access VTA's ACE shuttle stops on Kifer Road or other surrounding streets due to lack of connectivity. VTA recommends closing gaps in the pedestrian network be made a priority as properties develop and grant funding becomes available.

L4-1

VTA supports the proposed signalization of the Commercial Street and Kifer Road intersection as identified in the Sense of Place Plan. This signalized intersection will provide a safer protected crossing for pedestrians. The nearest protected crossing is approximately 1500' in each direction. These long walking distances can make it difficult for those who would like to walk or safely take transit. Shortening walking distances to transit has been shown to increase ridership.

L4-2

VTA cautions removing the traffic signal near Texas Instruments on Kifer Road. Removing this protected crossing will lengthen the distance for pedestrians to safely cross Kifer Road. It will also affect how transit users (pedestrians) are able to access nearby bus stops and could potentially increase jaywalking. VTA strongly recommends further study of a mid-block controlled crossing, perhaps a rectangular rapid flashing beacon or pedestrian hybrid beacon.

L4-3

If a new traffic signal is installed at 1020 Kifer Road, VTA recommends potentially reassessing the location of bus stops along this stretch of Kifer Road. VTA requests a meeting with Sunnyvale staff to discuss this potential action.

L4-4

Bus Stops

VTA appreciates the previous coordination with Sunnyvale staff to coordinate potential future bus stops on Sonora Court and/or Santa Vitoria Terrace even though no current service is planned at those locations. These forward-thinking solutions will support access to transit in the future.

L4-5

City of Sunnyvale  
LSAP  
Page 2 of 2

VTA commends City of Sunnyvale for clearly identifying specific stops in need of upgrades in the Sense of Place Plan. We look forward to working together to make improvements to these stops as development occurs. Implementation strategy for bus stop improvements should be made in Chapter 6: Implementation of the Sense of Place Plan. Noting bus stop improvements here will make clear to developers how bus stops are to be incorporated into the future entitlement process. VTA can provide general costs for bus stop improvements upon request.

L4-5  
cont.

Thank you again for the opportunity to review this project. If you have any questions, please do not hesitate to contact me at 408-546-7985 or [brent.pearse@vta.org](mailto:brent.pearse@vta.org).

Sincerely,



Brent Pearse  
Transportation Planner

## Letter L4 Santa Clara Valley Transportation Authority

Brent Pearce, Transportation Planner

July 12, 2021

- L4-1 The comment refers to gaps in the pedestrian sidewalk network within the Lawrence Station Area as a result of previous development, particularly along Kifer Road and other connecting streets that make it difficult for pedestrians to access Santa Clara Valley Transportation Authority's (VTA's) ACE shuttle stops. The comment recommends prioritizing closure of gaps in the pedestrian network as properties develop and grants become available.
- As detailed in Section 3.14, "Transportation," of the Draft SEIR, the Lawrence Station Sense of Place Plan would require new development in the LSAP area to implement a variety of transit, pedestrian, bicycle, and automobile circulation improvements and develop associated design standards and guidelines. The conceptual plan for the Lawrence Station Sense of Place Plan is provided in Figure 2-4 of Chapter 2, "Project Description." Improvements associated with enhancing pedestrian facilities, connectivity, and safety could include rail crossings (if determined to be feasible), sidewalks, curb ramps, Class I shared-use paved paths, pathways, and grade-separated bicycle and pedestrian crossings. This includes sidewalk improvements to Kifer Road. Improvements would be accomplished through a combination of developer requirements, Sense of Place fees, and grant funds. As described in Impact 3.14-4 of the Draft SEIR, any demand for pedestrian facilities generated by the LSAP Update, including the ISI project, would be satisfied by the multimodal improvements required of new development based on adopted LSAP policies and the proposed Sense of Place Plan. Sidewalks are required along all streets, and existing gaps would be remediated upon site redevelopment. This comment does not raise any CEQA issues or address the adequacy of the EIR analysis. No further response is necessary. The comment is included within the record for consideration as part of the project.
- L4-2 The comment expresses support of signalization of the Commercial Street and Kifer Road intersection identified in the Lawrence Station Sense of Place Plan and explains it will provide a safer crossing for pedestrians.
- This comment is noted.
- L4-3 The comment cautions against removal of the traffic signal near Texas Instruments on Kifer Road and explains that removal of the crossing will lengthen the distance for pedestrians to safely cross Kifer Road, affect how pedestrians' access nearby bus stops, and may result in increased jaywalking.
- This comment is referring to circulation improvements at signal-controlled intersections on page 15 of the May 2021 Draft Lawrence Station Sense of Place Plan document (see Appendix B2 of the Draft SEIR). Text on page 15 of the Sense of Place Plan document explains that the signal at 3833 Kifer Road (in front of Texas Instruments) would be removed once the new traffic signal is installed at the 1020 Kifer Road driveway (approximately 0.2 miles west of 3833 Kifer Road crosswalk). This reflects a requirement of an approved Intuitive Surgical project at 1050 Kifer Road that is referenced in Chapter 2, Project Description, Section 2.1.3, of the Draft SEIR. The comment is included within the record for consideration as part of the project.
- L4-4 The comment states that VTA recommends potentially reassessing the location of bus stops along the stretch of Kifer Road if a new traffic signal is installed at 1020 Kifer Road. The comment also requests a meeting between VTA and City staff.
- This comment is referring to proposed circulation improvements at signal-controlled intersections described on page 15 of the May 2021 Draft Lawrence Station Sense of Place Plan document. As discussed in response to comment O1-3 above, the effects of the Sense of Place Plan on pedestrian facilities are analyzed under Impact 3.14-4 of the Draft SEIR. As described in Chapter 2, Project Description, of the Draft SEIR, the Sense of Place Plan would require future development within the



LSAP to implement public street improvements, including the potential intersection improvement at 1020 Kifer Road discussed above. The City would like to meet with VTA to understand their concerns about the effect of a new traffic signal at 1020 Kifer Road on nearby bus stops.

L4-5

The comment expresses appreciation for the City's previous coordination with the VTA on potential future bus stops and for identifying bus stop upgrades needed in the Lawrence Station Sense of Place Plan. The comment requests an implementation strategy for bus stop improvements be made in Chapter 6 (of the Lawrence Station Sense of Place Plan).

This comment pertains to requested additions to Chapter 6 of the Draft Lawrence Station Sense of Place Plan document and does not raise an issue related to the Draft SEIR analysis prepared for the project. The commenter is referred to policies PT-P1 through PT-P5 of the draft Amended LSAP policy document, which require coordination with the VTA on future bus stop placement. The comment is included in the record for consideration by decisionmakers.

## 2.2.3 Organizations

**From:** David Meyer  
**Sent:** Monday, July 12, 2021 4:59 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Cc:** Yuju Park  
**Subject:** RE: LSAP DSEIR Comments due July 12th

Letter  
O1

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi George,

Thanks for this reminder. While we don't have specific comments on the DSEIR, I did want to just say SV@Home remains strongly supportive of the proposed amendments and the increase in total housing capacity to 5,935 units. We think this is an important opportunity for the City of Sunnyvale to maximize potential residential development along a key transit node.

O1-1

I'm no EIR expert, but did this analysis take into consideration the proposed/underway Caltrain electrification and service improvements? I'm just curious how that impacted the overall analysis, since it is always strange for me to see the language around how reducing the overall amount of housing would decrease environmental impacts. I know this is more to do with how EIRs are written and assessed (and the various archaic elements and approaches contained therein) but I think everyone would agree that concentrating our residential development on transit is key to meeting our overall climate goals.

O1-2

In any event, thank you so much for all of your work on this, we're very excited for this to go to Council. **Is there an estimated date for when the Council will hear this item? And is the plan that the Council hearing will be to take action or will there be a study session before actual action?**

O1-3

Thank you,

David

**David Meyer**  
**Director of Strategic Initiatives**



***Silicon Valley Is Home. Join our Houser Movement. Become a member!***

**Letter O1 Silicon Valley is Home**

David Meyer, Director of Strategic Initiatives

July 12, 2021

- O1-1 The comment expresses support of the proposed LSAP amendments and increase in potential residential development along a key transit node.
- This comment is noted.
- O1-2 The comment asks if the EIR analysis takes Caltrain electrification and service improvements into consideration. The comment also questions EIR language that reducing the overall amount of housing would decrease environmental impacts.
- Impact 3.14-2 of the Draft SEIR analyses how demand for transit facilities generated by the LSAP Update or ISI project would be satisfied by the proposed Caltrain electrification project and transit improvements identified in the LSAP. The SEIR analysis concluded that the increase in transit demand generated by the project would be accommodated by existing and potential future transit services as required by the LSAP Update and the increased transit capacity provided by Caltrain and other transit services (e.g., bus). Page 3.5-33 of the 2016 LSAP EIR identified that electrification of Caltrain would improve exposure to toxic air contaminants in the LSAP area.
- State CEQA Guidelines Section 15126.6 requires that EIRs evaluate a reasonable range of feasible alternatives to the project that could avoid or substantially lessen significant environmental effects of the project. Draft SEIR Chapter 5, "Alternatives," evaluates two reduced residential development alternatives to the LSAP Update. While these alternatives would have reduced environmental impacts for air quality, energy, greenhouse gases, transportation, and utility service demands, they would not substantially reduce or avoid significant impacts identified for the LSAP Update (see Draft SEIR Chapter, "Alternatives").
- O1-3 The comment expresses excitement for the project and asks when the project is expected to go to Council and whether a study session will occur prior to taking action on the project.
- Public hearings on the project before the Planning Commission and City Council are anticipated to occur starting in August and through the fall of 2021.

## 2.2.4 Individuals

**From:** Beth Goodsell  
**Sent:** Sunday, June 6, 2021 11:28 AM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** LSAP Feedback

**Letter  
I1**

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi George,

We've reviewed the draft amended Lawrence Station Area Plan and Sense of Place Plan. As nearby homeowners, we're writing in support of the proposed updates. We believe the area is well-suited to increased density and that the plan will bring a lot of positive improvements to our neighborhood.

Our home is closest to the Lawrence/Reed/Willow subarea. We're supportive of the proposal to reduce on street parking along Willow, and of increasing the allowable housing potential in that subarea.

Thanks,

Beth Goodsell & Jeremy Wagner  
 1095 Reed Ave, Unit B

I1-1

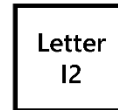
### **Letter I1 Beth Goodsell and Jeremy Wagner**

June 6, 2021

I1-1 The comment expresses support of the LSAP Update and proposal to reduce parking along Willow and increase housing potential in that subarea.

This comment is noted.

**From:** Bill Donnelly  
**Sent:** Wednesday, June 30, 2021 2:02 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** Additional housing units proposed for Lawrence Station Project



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Dear Mr. Schroder:

I am a long time resident of Sunnyvale and live insider the triangle formed by Reed, Eveleyn, and Wolfe Road. I also wok at East Maude Avenue.

While my commute is a short one, prior to the pandemic, the traffic on Wolfe and Fair Oaks Blvd, shortly after 5 PM workdays, could and often Did lead to a long commute for a 2 mile journey. The city now proposes to double the amount of housing for the project and allow a hugh Office building to be added to the project.

12-1

Assuming a return to more normal times , the additional housing and office space you propose will add traffic that the current infrastructure Cannot not handle.

In addition, how can you add this additional development at time when there is not enough water to presently take care of the county's needs?

12-2

I am very concerned about some of the decisions this City has made in recent years.

1. Why was road work delayed during the Pandemic, when there will never be a better time to take care of road work?
2. Each day I go to work I get to look at a Maude Avenue on which one never sees bike riders, but money was spent creating it.
3. Now, during a water crisis, and lacking infrastructure, the City wants to increase the number of individuals located in a small section of The city.

12-3

12-4

In closing The city should not implement the proposed additions to the Lawrence Station Project for the reasons Stated above.

Best Regards,

Bill

**Donnelly Accountancy Corporation**  
Certified Public Accountants



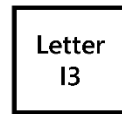
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**Letter I2 Bill Donnelly**

June 30, 2021

- I2-1 The comment states concern related to his commute during evening weekday traffic on Wolfe and Fair Oaks Boulevard and the City's proposal to increase housing and allow a huge office building. The comment expresses concern that the additional housing and office space proposed will add traffic that existing infrastructure cannot handle.
- The Draft SEIR evaluates the project's impact on existing transportation facilities and conditions. As discussed under Impact 3.14-2 in Section 3.14, "Transportation," of the Draft SEIR, the increase in housing density (up to 3,612 housing units) associated with implementation of the LSAP Update would serve to further enhance the transit-oriented nature of the LSAP plan area by locating a greater number of residents in a mixed-use environment, and in close proximity to the Lawrence Caltrain Station and high-quality transit corridors. Additionally, the ISI project would enhance the bicycle and pedestrian facilities in the area and connect to the Lawrence Caltrain Station. The LSAP Update and ISI project would not expand the extent of office uses allowed under the 2016 LSAP.
- I2-2 The comment asks how the City can add development at a time when there is not enough water to serve the County's existing needs.
- Water supply is analyzed in Section 3.15, "Utilities and Service Systems," of the Draft SEIR. As discussed in Impact 3.15-1 of the Draft SEIR, a water supply assessment (WSA) prepared for the project demonstrated that the City has adequate water supply to accommodate the additional residential units of the LSAP Update and the ISI project under normal, single dry, multiple dry year conditions between 2020 and 2040.
- I2-3 The comment expresses concern about decisions made by the City in recent years and references road work delays during the pandemic and Maude Avenue.
- This comment is unrelated to the proposed project and does not raise an issue related to the SEIR for the proposed project. The comment is included in the record for consideration by decisionmakers.
- I2-4 The comment states that the City wants to increase the number of individuals in the project area during a water crisis and lack of infrastructure.
- The reader is referred to Response to Comment I2-1 and I2-2 above. The LSAP Update would also improve sewer conveyance infrastructure that would include the upsizing of the existing 10-inch vitrified clay pipe (VCP) sewer main in San Zeno Way to a 12-inch PVC sewer main; upsizing of the existing 10-inch VCP sewer main at the intersection of Willow Avenue and Aster Avenue to an 18-inch PVC sewer main; and upsizing of the existing 27-inch VCP sewer main in Lawrence Expressway to a 30-inch PVC sewer main.

**From:** Margaret <mugs2115@aol.com>  
**Sent:** Monday, July 12, 2021 7:55 AM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** Re: LSAP DSEIR Comments due July 12th



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Why does this city continue building high rise housing? There is a major water shortage. More people - more water usage. Outrageous!

I 13-1

## Letter I3 Margaret

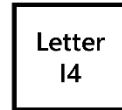
July 12, 2021

I3-1

The comment asks why the City continues to build high rise housing and makes reference to a major water shortage and that more people creates more water usage.

As discussed in Chapter 2, "Project Description," of the Draft SEIR, The LSAP Update would result in changes to development standards (i.e., maximum building heights, land uses, and/or floor area ratios) to adopted and proposed LSAP zoning districts. As reflected in Table 2-9 in the Draft SEIR, a height increase of 15 feet above existing height allowances is proposed for residential in Zoning District MXD-I, MXD-I/S, and MXD-III (i.e., maximum 100 feet in height). Pursuant to CEQA, the SEIR evaluates the project's impact on aesthetics (see Section 3.1 of the Draft SEIR) and concludes the implementation of the project would less than significant impact on visual character or quality of public views. As discussed in response to comment I2-2 above, the project's impact on water supply is analyzed in Section 3.15, "Utilities and Service Systems," of the Draft SEIR.

**From:** Ray Crump  
**Sent:** Monday, July 12, 2021 5:00 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** LSAP update



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My only comments as a 50 year homeowner in the Ponderosa neighborhood is that the existing neighborhood streets need to be protected from cut-thru traffic!!! This would include Timberpine, Sequoia, Bluebonnet, Aster, etc.!!  
Ray Crump

I4-1

**Letter I4 Ray Crump**

July 12, 2021

I4-1

The comment states that the Ponderosa neighborhood streets, including Timberpine, Sequoia, Bluebonnet, and Aster, need to be protected from cut-through traffic.

This comment is noted. The proposed Lawrence Station Sense of Place Plan includes roadway and overall transportation system improvements to direct transportation activities along the Caltrain corridor between Reed Avenue and Kifer Road (see Draft SEIR Figure 2-4). This area is outside of the residential areas southwest of the LSAP. This comment does not raise an issue related to the SEIR for the proposed project. The comment is included in the record for consideration by decisionmakers.



**From:** Chek-Fong Tang  
**Sent:** Tuesday, July 13, 2021 5:02 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** RE: LSAP DSEIR Comments due July 12th

**Letter  
15**

**ATTN:** Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hello George,

Thank you for the invite for comments. Hope you and family are doing well. Looks like I maybe a day late on comments but wanted to relate to you that live/work or work/live space where you can actually get an business license is anticipated to be a quasi residential use that will work well in place of traditional retail which will be struggling for a while. In addition, as we had proposed on our 1202 Kifer project that co-living maybe a use that will pop up again in the future development. Not sure how this is addressed or not in the SEIR or sense of place plan.

I5-1

Thank you.

Chek

**Chek F. Tang** AIA NCARB  
**President**

*Studio T-Square is fully functional and working remotely, observing social-distancing precautions for the Coronavirus (COVID-19). Our team will continue to focus on our craft as we service our clients and partners as seamlessly as possible during this time.*



1970 Broadway, Suite 615 | Oakland, CA 94612  
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## Letter I5 Chek F. Tang

July 13, 2021

I5-1

The comment expresses an opinion that live/work spaces that allow business licenses will work well in traditionally retail areas. The comment also refers to co-living uses in future development and how this may have been addressed in the SEIR or Sense of Place Plan.

The LSAP and the update provides a mix of land uses to allow people to live, work, shop, and relax in the area without needing an automobile for access. As described in Chapter 2, "Project Description," of the Draft SEIR, the LSAP Update proposes revisions and additions to LSAP zoning districts, including the addition of new mixed-use LSAP zoning districts (Flexible Mixed-Use I/Sonora Court District [MXD-I/S] and Flexible Mixed-Use IV [MXD-IV]) that would allow for vertical and combined mix of residential, retail, and office uses on a single site. Chapter 19.35 of the Sunnyvale Municipal Code already considers live/work units with a Special Development Permit, and this would be continued with the revisions and additions to the code chapter.

Letter 16

**George Schroeder**

**Subject:** FW: Objection to the proposed amendment to the Lawrence Station Area Plan

**From:** Colin Orr

**Sent:** Saturday, May 29, 2021 11:37 AM

**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>

**Cc:** Maria Bass

**Subject:** Objection to the proposed amendment to the Lawrence Station Area Plan

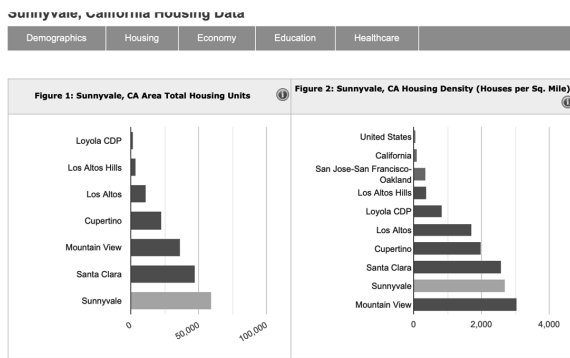
ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Mr. Schroeder,

I am reaching out on behalf of my wife (copied) and I who live at 1002 Bluebonnet Drive in Sunnyvale to provide comments on the draft subsequent environmental impact report and the proposed amendments to the Lawrence Station Area Plan and the Intuitive Surgical Inc. development project.

We strongly oppose the update/amendment and urge the city to reject it.

Sunnyvale is already the city with the most housing units in the area and one of the most densely populated cities in the area based on data from the 2020 American Community Survey:



16-1

Living less than a mile from the Lawrence Station Area, I can tell you that traffic and congestion are already bad in this area, particularly the intersection of Kifer and Lawrence where you already have the Costco that draws a tremendous amount of traffic and new housing developments and new spec buildings that are not yet even fully occupied. Things are already about to get much worse for existing residents in this area as businesses begin to occupy those empty spec buildings, Intuitive continues with their plans to increase their footprint and another 2,323 new homes already part of the existing plan come to life, and now this amendment would up that number of new housing units to 5,935! Why? Does the city really require this much new housing? I'm sure the developers have lots of good reasons why they think this amendment is a good idea and certainly I understand the city, like the developers, have financial motivations (more housing means more tax base for the city) but by approving the amendments to this plan City of Sunnyvale will be making this a less desirable city to live in

16-2

Financial concerns are at the top of the list of my concerns about this proposed amendment. Specifically these changes I expect will decrease the desirability of the neighborhood and will hurt property values.

16-3

We strongly urge the city to reject the proposed amendment.

Thank you,

Colin Orr & Maria Bass

**Letter I6 Colin Orr and Maria Bass**

May 29, 2021

- 16-1 The comment states opposition to the project and identifies that the City already has the most housing units and more densely populated cities in the area and provides a housing unit and density counts for the region from the 2020 American Community Survey.
- Section 3.12, "Population, Employment, and Housing," of the Draft SEIR evaluates the potential for population and housing impacts associated with the LSAP Update and ISI project. As described in Impact 3.12-1 of the Draft SEIR, the LSAP Update would not induce substantial unplanned population growth because the LSAP Update would provide additional housing opportunities within the LSAP that would serve an existing housing shortage in the region and would be developed over time in response to market demand. This comment does not raise an issue related to the SEIR for the proposed project. The comment is included in the record for consideration by decisionmakers.
- 16-2 The comments states traffic and congestion are bad in the LSAP area, particularly at the intersection of Kifer and Lawrence, located where Costco traffic and new housing and buildings not yet fully occupied are. The comment expresses concern for existing residents in the area that would result from buildout under the adopted LSAP and proposed LSAP Update and ISI project.
- Environmental impacts associated with buildout of the adopted LSAP were evaluated in the 2016 LSAP EIR. The Draft SEIR evaluates the environmental impacts associated with proposed buildout of the LSAP Update and ISI project and planned growth under the adopted LSAP is accounted for throughout the SEIR. This includes impacts to traffic, population, and housing. The reader is also referred to Response to Comment S1-1 regarding CEQA requirements for addressing traffic operational impacts associated with automotive delay.
- As discussed under Impact 3.14-2 in Section 3.14, "Transportation," of the Draft SEIR, the increase in housing density (up to 3,612 housing units) associated with implementation of the LSAP Update would serve to further enhance the transit-oriented nature of the LSAP area by locating a greater number of residents in a mixed-use environment, and in close proximity to the Lawrence Caltrain Station and high-quality transit corridors. Additionally, the ISI project would enhance the bicycle and pedestrian facilities in the area and would provide connections to the Lawrence Caltrain Station. The LSAP Update and ISI project would not expand the extent of office uses allowed under the 2016 LSAP. As detailed in Chapter 3.14 of the Draft SEIR, the LSAP Update would include the creation of the Lawrence Station Sense of Place Plan which would require new development to implement public street improvements, including intersection improvements and other public amenities.
- 16-3 The comment expresses concern that the proposed amendment will cause financial issues, including a decrease in property value and neighborhood desirability.
- This comment is noted. CEQA is an environmental protection statute that is concerned with foreseeable physical changes on the environment from the project. Significant effects on the environment are those that result in a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by implementation of the LSAP Update and ISI project, including conditions related to land, air, water, mineral resources, flora, fauna, noise, and objects of historic or aesthetic significance. CEQA Guidelines Section 15064(e) provides that economic and social changes (such as property value) resulting from a project shall not be treated as significant effects on the environment (see also CEQA Guidelines Sections 15358[b], 15064[e], and 15382). As a result, evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment do not provide substantial evidence of a significant impact that require analysis under CEQA.

Letter  
17

**George Schroeder**

**Subject:** FW: LSAP

**From:** Matt  
**Sent:** Saturday, May 29, 2021 4:19 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** LSAP

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

I received in mail, a content-free notice from you. And, there was some confusion included: Why does the map indicate that Sunnyvale is Santa Clara?

So far as I can tell the activities proposed are in Santa Clara (where I live). The future plans had better be under Santa Clara's scrutiny if this is proposed by Sunnyvale... If this is just notice that developer's are planning more housing for more illegal immigrants, it's on their shoulders...

The notice is antagonizing because it reflects poor management from politicians, lawyers and snake oil salesmen..

All The Same--

mat t

17-1

**Letter 17 Matt**

May 29, 2021

17-1

The comment refers to a piece of mail from the City about the project and expresses concern that the letter seems to show the project activities will occur within the City of Santa Clara. The comment requests that the proposed Sunnyvale plan be scrutinized by Santa Clara and expresses the opinion that the mailed notice was antagonizing because it reflects poor management.

The proposed LSAP Update/ISI project is located entirely within the City of Sunnyvale. However, any future improvements identified by the City of Sunnyvale that may affect City of Santa Clara will be discussed and coordinated with City of Santa Clara. The City sent the notice of availability for the Draft SEIR to residents located near the LSAP area, which included Santa Clara properties.

Letter  
18

**George Schroeder**

**Subject:** FW: 70% native plants

**From:** Rani Fischer  
**Sent:** Sunday, May 30, 2021 5:44 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** 70% native plants

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Mr. Schroeder,

As an environmentalist concerned about the plummeting insect population globally, I request that you landscape the LSAP with 70% native plants. I am not aware of the city's ordinance on this, but I do know that nurturing caterpillars, in particular, which will only feed off certain native plants with which they have evolved over time is often overlooked. Consequently bird populations are falling as well. Here is a resource: <https://www.youtube.com/watch?v=PKe0UzqazuU>

18-1

Thank you for your time and attention to making LSAP a good place to live for us all!

Rani Fischer  
resident of Courtyard condos off Evelyn

**Letter 18 Rani Fischer**

May 30, 2021

18-1 The comment expresses concerns about insect and bird populations globally and requests that landscaping within the LSAP include 70 percent native plants.

Future development projects under the LSAP Update would be required to comply with landscape plant materials and irrigation requirements of City Municipal Code (SMC) Chapter 19.37 (Landscaping, Irrigation, and Useable Open Space). In addition, Section 19.37.120 requires that all landscape plans be reviewed and permitted by the Director of Community Development to ensure the design complies with this SMC. The landscaping plan for the ISI project is described on page 2-34 and 2-35 of the Draft SEIR. Per Section 19.37.050 of the SMC, if no turf is proposed in a landscape plan, at least eighty percent of the plants installed shall be native, low water use or no water use plants.

**George Schroeder**

**Letter  
19**

**Subject:** FW: LSAP DSEIR Comments due July 12th

**From:** Michael McDonald  
**Sent:** Saturday, July 10, 2021 1:23 PM  
**To:** George Schroeder <GSchroeder@sunnyvale.ca.gov>  
**Subject:** RE: LSAP DSEIR Comments due July 12th

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Thank you for the reminder. And the EIR is an interesting read. It was quite comprehensive. A couple comments/thoughts (and I think many are already incorporated into the plan, and some may not be directly applicable to the EIR, but I hope they are considered at the appropriate point).

1. **Educational impact:** The support of higher density options, including the proposed impact of 5935 housing units (or greater with state density bonus laws, etc) will likely have an impact on schools that are already largely underfunded. *It would be nice to see mitigation measures that would support improvement of schools and/or to understand the impact of the proposed housing on the schools. (I see now that this is discussed in Impact 3.12-2 and Impact 3.11.4.1 of the 2016 LSAP EIR, but I'm still nervous and skeptical that the schools will see increased funds, but I'm sure they'll see increased students... resulting in a strain on the schools and making this a less desirable place to live for families)*
2. **Rental property.** The development of housing units that align with long-term rental properties may further exacerbate long-term ownership and resulting reduction of property tax increases. I don't know how to mitigate this, but my concern is that property owners (often those who are already well off) get rich, while people who can't afford housing (often people of color and lower incomes) see their rental rates go up, and the community doesn't see any increasing tax revenue due to Prop 13. At the same time, these investment property owners are able to buy in a nice, desirable area, see their investments increase in value and they simply hold on to them with the resulting stagnation on tax revenue. Just doesn't seem equitable; rich get richer on the backs of the poorer.
3. **Industrial development.** Continuing above thought, having companies carry the tax burden for a community/municipality may benefit a broader population. Having increased industry in this area may bring more revenue, eg to schools, while not increasing the school population. Allowing the industrial buildings to add sf through additional floors would increase school revenue without increasing school population. *(I'm not an economist, so I don't know the answer. But it would be great to see how the EIR and proposed rezoning improves equitable growth of the community and shifts tax burden to companies from individuals. Maybe it has to do with the ratio of industrial to housing in some of the proposed zoning).*
4. **Public Transportation.** The development of a plan that encourages public transportation and discourages cars and car ownership (eg, through limited parking, good Uber/Lyft access, improvements to CalTrain station and services, limited on-street parking, bike depots, etc), as well as supports street-side dining away from traffic flows (not by restricting dining options, but by limiting traffic!) would be great.
5. **Electrification of transportation.** Any large buildings and rental properties should require charging facilities for EV. And there should be sufficient power (as well as a policy) to enable an increasing percentage of EV cars to be charged in the future. Go radical and only allow EV cars to come into this area and/or mandate every parking spot to have EV charging. ☺ (Not realistic... but a nice fantasy)
6. **Advanced transportation.** Would love to see some advanced transportation options running in this area. Eg. Automated electric shuttles with in-road charging going end to end in the LSAP, for example.
7. **Height.** Are height restrictions due to airport/FAA restrictions? Earthquake? Though perhaps unpopular, I'd actually like to see some taller heights on buildings (read: more floors, not taller ceilings) to encourage lower

19-1

19-2

19-3

19-4

19-5

19-6

19-7

- prices, greater supply, more competition, etc. Coupled with good access to transportation hubs to alleviate traffic, of course.
- 8. **LEEDS** requirement. Hopefully owners can be mandated or strongly encouraged to build LEED compliant residential and commercial properties. This is especially important for any higher density residential properties where residents would benefit from lower utilities, etc.
  - 9. **Art.** Programs that encourage the integration of art, especially by local members of the community, would be great.
  - 10. **Lawrence Expressway.** Obviously the development of Lawrence Expressway should be considered closely with LSAP. I would hate to see LSAP preclude good options for Lawrence, and developments for Lawrence preclude good options for LSAP.
  - 11. **Periodic structural review.** In light of the Florida building collapse coupled with our local exposure to earthquakes coupled with proposed heights/etc, it would be nice to see something re re-examination of facilities in x years.

| 19-7  
| cont.  
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| 19-8  
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| 19-9  
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| 19-10  
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| 19-11

Again, interesting and comprehensive document. Thanks for sharing.

Michael McDonald  
Resident on Timberpine Court

## Letter I9 Michael McDonald

July 10, 2021

- 19-1 The comment states concerns related to higher density housing and the impact on schools that are underfunded. The comment acknowledges the 2016 LSAP EIR impact discussions related to proposed housing on schools but expresses skepticism that the schools will receive increased funding that is commensurate to increased students.
- This comment is noted. As discussed in Impact 3.13-2 of the Draft SEIR, new development is required to pay school impact fees which would be used by school districts to fund new or expanded facilities. Future developments proposed under the LSAP Update would require project-level CEQA review and would be subject to school impact fees. The payment of development fees to school districts would ensure that districts have funds to build new or expanded facilities to accommodate students generated in the LSAP area. California Government Code 65995 et seq. establishes the statutory criteria for assessing construction fees. This section also states that the payment of school mitigation impact fees is deemed to provide “full and complete mitigation of impacts” from the development of real property on school facilities.
- 19-2 The comment states concerns that development of housing units will benefit wealthy investment property owners, raise rental rates for those struggling to afford housing, and not result in tax revenue increases for the community due to Proposition 13.
- As stated on page ES-2 of the Draft SEIR, one of the objectives of the LSAP Update is to provide additional opportunities for higher intensity residential development near the Caltrain Lawrence Station that is environmentally, economically, and socially sustainable. The reader is referred to Response to Comment I6-3 for a discussion of how economic and social changes are addressed under CEQA. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.
- 19-3 The comment expresses the opinion that having companies carry the tax burden for community/municipality may benefit a broader population and that allowing the industrial buildings in the area to add square footage (sf) through additional floors would increase school revenue without increasing school population. The comment expresses interest in seeing how the EIR and rezoning could improve equitable growth of the community and shifts tax burden to companies from individuals.
- This comment is noted. As discussed in Impact 3.13-2 of the Draft SEIR, all commercial development would be required to pay applicable development impact fees to local school districts. For a discussion of how economic and social changes are addressed under CEQA, the reader is referred to Response to Comment I6-3 above. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.
- 19-4 The comment expresses support in development of a plan that encourages use of public transportation, discourages car use, and supports street-side dining away from traffic flows.
- This comment is noted. As discussed throughout the Draft SEIR, the LSAP Update includes the creation of the Lawrence Station Sense of Place Plan with the purpose of creating design standards and guidelines for enhanced transit, pedestrian, bicycle, and automobile circulation specific to the LSAP. The comment is included in the record for consideration by decisionmakers.
- 19-5 The comment requests that electric vehicle (EV) charging be required for large buildings and rental properties and provides ideas on how electrification of cars could be further promoted in the plan area.



- This comment is noted. As discussed in Section 3.5, "Energy," of the Draft SEIR, new development proposed under the LSAP Update, including the ISI project, would be required to comply with the City's reach codes to increase building electrification, renewable energy from solar, and the installation of EV chargers. Specifically, the ISI project would be required to install 155 EV charging stations. Future developments proposed under the LSAP Update would require project-level CEQA review and would also be subject to similar requirements.
- 19-6 The comment identifies interest in having advanced transportation options, such as automated electric shuttles with in-road charging, in the LSAP area.
- This comment is noted. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.
- 19-7 The comment asks if there are height restrictions for buildings and expresses interest in taller buildings to encourage lower prices, greater supply, and more competition coupled with good access to transportation hubs.
- As discussed in Chapter 2, "Project Description," the LSAP Update proposes Zoning Code text amendments to reflect changes in building heights, land uses, floor area ratios, densities, and other associated development standards related to increased housing potential in the LSAP area. Table 2-9 of the Draft SEIR shows proposed maximum allowable building heights for each LSAP zoning district; three of the nine proposed LSAP zoning districts would allow a maximum building height of 100 feet. There are no height restrictions associated with the operation of local airports. All buildings would be required to meet local and state building standards.
- 19-8 The comment identifies interest in mandating or encouraging LEED compliant residential and commercial properties and states that this is important for higher density residential properties where residents would benefit from lower utilities.
- As discussed in Section 3.5, "Energy," of the Draft SEIR, buildout under the LSAP Update would be required to comply with the latest building energy efficiency standards and the ISI project would implement energy efficiency measures to meet U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold certification for building design and construction and go above and beyond the 2019 Building Energy Efficiency Standards the with the implementation of onsite solar PV, electric vehicle charging, light-emitting diode lighting, all electric EnergyStar®-certified appliances, and no natural gas use.
- As described in Section 3.15 of the Draft SEIR, the City's Green Building Program offers incentives for projects that exceed the minimum green building standards and encourages project applicants and developers to provide additional green building features. Mixed-use projects are required to meet the appropriate Build It Green standard for the residential portion and LEED for the nonresidential portion.
- 19-9 The comment expresses interest in programs that encourage the integration of art.
- The comment is noted. Public art is required for nonresidential projects per Chapter 19.52 of the Sunnyvale Municipal Code. This comment does not raise an issue related to the project or Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.
- 19-10 The comment states development of Lawrence Expressway should be considered closely with LSAP and that development of one should not preclude good options for the other.
- The comment is noted. The Lawrence Expressway Grade Separation Project is addressed in the draft amended LSAP, and coordination with the County of Santa Clara is noted in policies P-P5, CON-P4, LE-P1, and guideline SA-UDG9. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.

I9-11

The comment expresses interest in periodic structural review in light of the recent Florida building collapse and local earthquake exposure.

This comment is noted. As discussed in Section 3.6, "Geology, Soils, and Paleontological Resources," Sunnyvale is not within an Alquist-Priolo Earthquake Fault Zone and would not be subject to hazards associated with significant fault surface rupture. However, the plan area is in a seismically active area and could experience strong seismic ground shaking and seismic-related ground movement (e.g., liquefaction and settlement) from earthquakes on active faults located outside of the plan area. Impact 3.7-1 of the 2016 LSAP EIR evaluated the seismic hazards within the plan area. Subsequent projects developed under the LSAP would result in the exposure of people, structures, and infrastructure to strong seismic ground shaking. However, California Building Code standards, as implemented by the City through Chapter 16.16 of the Municipal Code, would address seismic hazards. Conditions of concern on the ISI site include: potential for significant static and seismic settlement; shallow groundwater; presence of undocumented fill; presence of expansive soil; soil corrosion potential; and reduced bearing capacity at depth. These are reflective of the typical concerns throughout the plan area. The City requires geotechnical evaluations for all discretionary development as part of the permit process. There are no aspects of the LSAP Update or ISI project that would increase the potential for seismic activity, or the inherent risks associated with such activity.

## 2.2.5 Sunnyvale Bicycle and Pedestrian Advisory Commission

Letter  
BPC

**Lawrence Station Area Plan (LSAP) Update and Intuitive Corporate Campus  
Bicycle and Pedestrian Advisory Commission Hearing Comments during DSEIR Comment Period  
June 17, 2021**

Arwen Davé, Commissioner

- Sense of Place: Appreciates there would be shortcuts introduced in the plan area with new pedestrian and bicycle circulation routes.
- Privately-owned, public open space should be an incentive offered for new development.

I BPC1-1  
I BPC1-2

Carl Hage, Member of the Public

- Sense of Place Plan: There is a bicycle hazard in accessing Lawrence Station from the northbound Willow Avenue bicycle lane. This is because there is a blind curve on Willow Avenue when it goes underneath Lawrence Expressway and turns into French Street in Santa Clara. A bicyclist would need to cross vehicular traffic from the northbound Willow Avenue bicycle lane in order to access the station. There should be a left turn pocket for bicyclists to safely turn into Lawrence Station. Otherwise, there should be a two-way bike lane on west side of Willow Avenue.
- On the south side of Lawrence Station, there is railroad track spur next to the entryway curb approach on Willow Avenue which is a hazard for bicyclists to ride over.

I BPC2-1  
I BPC2-2

Cliff Bargar, Member of the Public

- Supportive of most of the project, particularly added housing near Lawrence Station and new Class I shared-use paths.
- Sense of Place Plan: Disappointed with plan for Kifer Road in that the proposed Class IIB buffered bike lanes are inadequate. Instead, a separated Class IV bicycle lane is needed. Concerned people will not feel safe to bike on this street given more housing and traffic that would come with the project. More should be done on the Kifer Road corridor to make it a better walking and biking experience. Additional traffic volumes can be accommodated on Central Expressway.

I BPC3-1  
I BPC3-2

Daniel Hafeman, Commissioner

- Would like to see a town center with retail opportunities.
- Would like to see local pocket parks in the area.

I BPC4-1  
I BPC4-2

Elizabeth Mehlman, Vice Chair

- Would like to see as much middle and low-income housing as possible.
- Concerned about the lack of open space and recreation areas within the plan area. Smaller parks and park in-lieu fee payments may not address this need. The private open space area on the Intuitive north site would be a good opportunity for public recreation.
- Sense of Place Plan: Having buffered bicycle lanes rather than physically separated bicycle lanes (Class IV) on Kifer Road is a concern. People will not feel safe to walk and bike on this street with higher speed limits and traffic volumes.

I BPC5-1  
I BPC5-2  
I BPC5-3

Timothy Oey, Commissioner

- Sense of Place Plan: Consider naming the new pedestrian and bicycle circulation routes to improve wayfinding and navigation.

I BPC6-1

## Comment BPC1 Arwen Davé, Commissioner

June 17, 2021

- BPC1-1 The comment identifies benefits of the Lawrence Station Sense of Place Plan.  
This comment is noted.
- BPC1-2 The comment states that privately-owned, public open space should be an incentive offered for new development.  
The comment is noted, and privately-owned, public open space is included as an incentive in the draft LSAP Development Incentives Program. This comment does not raise any CEQA issues or address the proposed project and adequacy of the EIR analysis. No further response is necessary. The comment is included in the record for consideration by decisionmakers.

## Comment BPC2 Carl Hage, Member of the Public

June 17, 2021

- BPC2-1 The comment makes reference to the Lawrence Station Sense of Place Plan and requests a left turn pocket on Willow Avenue for bicyclists to safely turn into Lawrence Station or a two-way bike lane on the west side of Willow Avenue.  
The Draft SEIR evaluates the project's impacts to bicycle facilities in Section 3.14, "Transportation." Impact 3.14-3 of the Draft SEIR concludes that the LSAP Update and ISI project would enhance, not disrupt any existing or planned bicycle facilities and would not conflict with a program, plan, ordinance, or policy addressing bicycle facilities. This specific bike lane improvement request is included in the record for consideration by decisionmakers.
- BPC2-2 The comment states there is a railroad track spur that is a hazard for bicyclists on the south side of Lawrence Station next to the entryway curb approach on Willow Avenue that is a hazard for bicyclists.  
The proposed Lawrence Station Sense of Place Plan includes bicycle and pedestrian improvements in this area (see Draft SEIR Figure 2-4). This specific rail spur removal request is included in the record for consideration by decisionmakers.

## Comment BPC3 Cliff Bargar, Member of the Public

June 17, 2021

- BPC3-1 The comment expresses support for added housing near Lawrence Station and new Class I shared-use paths as part of the project.  
This comment is noted.
- BPC3-2 The comment expresses inadequacy concerns related to Class IIB buffered bike lanes along Kifer Road in the Lawrence Station Sense of Place Plan. The comment recommends a separated Class IV bicycle lane instead so that riders feel safe to bike on this street given the addition of project-related housing and traffic. The comment also states that more should be done on the Kifer Road corridor to make it a better walking and biking experience and that additional traffic volumes can be accommodated on Central Expressway.  
The Draft SEIR evaluates the project's impacts to bicycle facilities in Section 3.14, "Transportation." Impact 3.14-3 of the Draft SEIR concludes that the LSAP Update and ISI project would enhance, not disrupt any existing or planned bicycle facilities and would not conflict with a program, plan, ordinance, or policy addressing bicycle facilities. Additionally, the analysis concludes any new demand for bicycle facilities generated by the LSAP Update or the ISI project would be satisfied by the multimodal improvements required of new development based on adopted LSAP policies and the proposed Lawrence Station Sense of Place Plan. This comment recommends that a specific bike

lane improvement within the Draft Lawrence Station Sense of Place Plan document be revised and does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.

## **Comment BPC4 Daniel Hafeman, Commissioner**

June 17, 2021

BPC4-1 The comment requests a town center with retail opportunities.

The LSAP and the update provides a mix of land uses to allow people to live, work, shop, and relax in the area without needing an automobile for access. As described in Chapter 2, "Project Description," of the Draft SEIR, the LSAP Update proposes revisions and additions to LSAP zoning districts, including the addition of new mixed-use LSAP zoning districts (Flexible Mixed-Use I/Sonora Court District [MXD-I/S] and Flexible Mixed-Use IV [MXD-IV]) that would allow for vertical and combined mix of residential, retail, and office uses on a single site. Additionally, in the MXD-I zoning district, the Santa Vittoria Terrace portion of the Loop Road is envisioned as the plan area's "Main Street" and primary retail corridor.

BPC4-2 The comment requests local pocket parks in the area.

Residential development is subject to park dedication standards as outlined in Chapter 18.10 (ownership projects) and 19.74 (rental projects) of the Sunnyvale Municipal Code. In addition, provision of privately-owned public open space is also an incentive for additional density in the draft LSAP Development Incentives Program.

## **Comment BPC5 Elizabeth Mehlman, Vice Chair**

June 17, 2021

BPC5-1 The comment requests as much middle and low-income housing as possible.

Draft SEIR page 2-9 identifies that the current residential development capacity under the 2016 adopted LSAP allowed for a maximum of 2,323 net new dwelling units. The proposed LSAP Update would substantially increase the allowed housing capacity of the LSAP area. Because of changes in state law, the LSAP would no longer impose a maximum housing cap for the plan area. Instead, the LSAP will establish base maximum residential densities. By using local incentives and the state Density Bonus Law, the proposed plan would potentially add an additional 3,612 net new units to the plan area, which is the result of increasing housing opportunities in areas where housing is already permitted and expanding areas where housing may be considered. The adopted LSAP maximum of 2,323 net new dwelling units plus the additional 3,612 net new units that could be created as a result of the LSAP Update has the potential to add a total of 5,935 net new dwelling units. Residential development is subject to the City's inclusionary below market rate requirements as specified in Chapter 19.67 (ownership projects) and Chapter 19.77 (rental projects) of the Sunnyvale Municipal Code.

BPC5-2 The comment expresses concern related to lack of open space and recreation areas within the plan area and that small parks and park in-lieu fee payments may not address needs. The comment also states that the private open space area proposed on the ISI site would provide a good opportunity for public recreation.

Impact 3.13-3 of the Draft SEIR evaluates demand on parks and recreational facilities. The SEIR determined total need within the LSAP to serve the existing and future population growth associated with buildout under the LSAP Update would be at least 54 acres of open space (5,935 dwelling units multiplied by 0.009 acre). Residential development is subject to park dedication standards as outlined in Chapter 18.10 (ownership projects) and 19.74 (rental projects) of the Sunnyvale Municipal Code. In addition, provision of privately-owned public open space is also an incentive for additional density in the draft LSAP Development Incentives Program. Because the open space on the ISI is privately-

owned and not subject to City park dedication requirements, the property owner does not propose public access.

BPC5-3 The comment expresses interest in buffered bicycle lanes on Kifer Road instead of physically separated bicycle lanes (Class IV) on Kifer Road and states that people won't feel safe on Kifer Road with higher speed limits and traffic volumes.

The reader is referred to response to comment BPC3-2.

## **Comment BPC6 Timothy Oey, Commissioner**

June 17, 2021

BPC6-1 The comment requests that the Sense of Place Plan consider naming the new pedestrian and bicycle circulation routes to improve wayfinding and navigation.

This comment is noted. This comment does not raise an issue related CEQA or the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.

## 2.2.6 Sunnyvale Sustainability Commission

**Lawrence Station Area Plan (LSAP) Update and Intuitive Corporate Campus  
Sustainability Commission Hearing Comments during DSEIR Comment Period  
June 21, 2021**

Letter SC
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Bruce Paton, Commissioner

- If the GHG emissions took into account the City's Reach Codes, there should be a net decrease, in addition to transportation-related emissions reduced with adding more housing near a transit station. What is the baseline the project is being compared against? I SC1-1
- Excited about the plan and its incentives, and thinks this project is an example of good planning. I SC1-2
- The recently constructed Savoy project at 1120-1130 Kifer Road (developed by Greystar) shows that transit-oriented development can fit in well with the community. I SC1-3

Douglas Kunz, Vice Chair

- How do the residential unit counts in the LSAP Update compare with residential units planned near the Redwood City and Downtown Palo Alto Caltrain stations? I SC2-1
- For the Intuitive south site parking structure, it should be designed so that it can be used for other uses rather than parking should there be lesser parking demand in the future. I SC2-2
- For VMT modeling, was there any modeling done for a transit-dependent population versus an auto-dependent population? I SC2-3
- Interested in north-south pedestrian/bicycle connections from Lawrence Station. I SC2-4
- The intersection of Kifer Road and Lawrence Expressway should be made safer for bicyclists and pedestrians. I SC2-5

Kristel Wickham, Chair

- Interested in reducing construction emissions. Asks that the Intuitive project consider other measures to reduce emissions such as carbon offsets and use of electric construction equipment. I SC3-1
- The Intuitive project should also use low carbon concrete, and lower carbon or recycled materials in their actual project construction. I SC3-2
- If housing is constructed on sites with a history of contamination, and it is later determined after the project is built that the required environmental remediation was not sufficient, what is the recourse? I SC3-3

Tonya Veitch, Commissioner

- Interested in affordable housing. I SC4-1

## Comment SC1 Bruce Paton, Commissioner

June 21, 2021

- SC1-1 The comment states that if the GHG emissions took into account the City's Reach Codes, there should be a net decrease in emissions, in addition to transportation-related emissions reduced with adding more housing near a transit station. The comment also asks what baseline the project is being compared against.
- Section 3.7 of the Draft SEIR states that new development proposed under the LSAP Update would be required to comply with the City's reach codes to increase building electrification, renewable energy from solar, and the installation of EV chargers. LSAP operational-generated GHG emissions identified in Impact 3.7-1 of the Draft SEIR are compared to emissions anticipated under buildout of the 2016 LSAP. The GHG modeling and associated emission estimates are conservative because it does not reflect the increase in building energy efficiency that technological advances will provide or renewable energy procurement over time and cannot reflect the exact form and type of future development as it is not currently known.
- Impact 3.7-1 acknowledges the LSAP Update could result in an overall increase in GHG emissions compared to the adopted LSAP. Although total emissions would increase, so would the service population of the LSAP area, and as a result, the LSAP Update would be more efficient than the adopted LSAP on a GHG per service population basis (1.94 metric tons of GHG emissions under the 2016 LSAP as compared to 1.23 metric tons under the proposed LSAP Update). In addition, new development proposed under the LSAP Update would be required to comply with the City's reach codes to increase building electrification, renewable energy from solar, and the installation of EV chargers. Sustainable building features such as energy efficient lighting and efficient building material (L-UDG4, BM-UDG3, BM-UDG4, BM-UDG4) would also contribute to the decarbonization of buildings.
- SC1-2 This comment expresses excitement about the plan and states the project is an example of good planning.
- This comment is noted.
- SC1-3 The comment states that a newly constructed Savoy project at 1120-1130 Kifer Road shows that transit-oriented development can fit in well with the community.
- This comment is noted.

## Comment SC2 Douglas Kunz, Vice Chair

June 21, 2021

- SC2-1 The comment asks how the residential unit counts in the LSAP Update compare with residential units planned near the Redwood City and Downtown Palo Alto Caltrain stations.
- This comment is noted. These planning areas vary in size and land use mix. Thus, it is difficult to make a meaningful comparison with other areas in the region.
- SC2-2 The comment states that ISI's proposed south site parking structure should be designed so that it can be used for other uses rather than parking in case of less parking demand in the future.
- The ISI project would be subject to the LSAP and the associated parking requirements under the City of Sunnyvale Municipal Code. The comment is included within the record for consideration as part of the project.
- SC2-3 The comment asks if any modeling done for a transit-dependent population versus an auto-dependent population was factored into VMT modeling for the LSAP Update.
- VMT modelling was not conducted for the Draft SEIR analysis. State CEQA Guidelines Section 15064.3(b)(3), allows a lead agency to analyze a project's VMT qualitatively. As described in Draft SEIR Impact 3.14-1, the density and mix of land uses, and the transit accessibility around which the LSAP was designed to promote aligns with the three statutory goals contained in Senate Bill 743 that established VMT and the stated purpose of Council Policy 1.2.8 of reducing GHG emissions, increasing multimodal



transportation networks, and facilitating mixed use development. The increase in housing density associated with implementation of the LSAP Update would serve to further enhance the transit-oriented nature of the LSAP plan area by locating a greater number of residents in a mixed-use environment, and in close proximity to the Lawrence Caltrain Station and high-quality transit corridors.

SC2-4 The comment expresses interest in north-south pedestrian/bicycle connections from Lawrence Station.

This comment is noted. The comment is included in the record for consideration by decisionmakers

SC2-5 The comment states the intersection of Kifer Road and Lawrence Expressway should be made safer for bicyclists and pedestrians.

As detailed in Impacts 3.14-3 and 3.14-4 of the Draft SEIR, it was determined that the LSAP Update and the ISI project would both result in a less-than-significant impacts to bicycle and pedestrian facilities. The Draft SEIR concludes that the LSAP Update and ISI project would enhance, not disrupt any existing or planned bicycle and pedestrian facilities and would not conflict with a program, plan, ordinance, or policy addressing bicycle and pedestrian facilities. Additionally, the analysis concludes any new demand for bicycle and pedestrian facilities generated by the LSAP Update or the ISI project would be satisfied by the multimodal improvements required of new development based on adopted LSAP policies and the proposed Lawrence Station Sense of Place Plan. The comment is included in the record for consideration by decisionmakers.

### **Comment SC3 Kristel Wickham, Chair**

June 21, 2021

SC3-1 The comment expresses interest in reduction of construction emissions and requests that the ISI project consider other measures, such as carbon offsets and use of electric construction equipment, to reduce emissions.

Construction emissions were evaluated in Impact 3.2-1, 3.7-1, and 4-3 of the Draft SEIR and implementation of adopted Mitigation Measures 3.5.3a and 3.5.3b and Mitigation Measure 3.2-1 would reduce construction-related emissions. Though the specific policies of the LSAP Update are not intended to reduce GHG emissions from all-electric new construction, the LSAP Update would contribute to the decarbonization of buildings through the applicable building energy efficiency standards at the time of development. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.

SC3-2 The comment states that the ISI project should use low carbon concrete or recycled materials during construction.

The reader is referred to response to comment SC3-1.

SC3-3 The comment asks what happens if housing is constructed on sites that are later determined to have contamination that was insufficiently remediated.

Impact 3.8-4 of the Draft SEIR evaluates the potential for disturbance of known or unknown hazardous contamination. Adopted LSAP Mitigation Measure 3.3.3 ensures any grading or improvement plan or building permit from the City includes a statement if hazardous materials contamination is discovered or suspected during construction activity and that all work shall stop immediately until a qualified professional has determined an appropriate course of action. This mitigation measure was updated in the Draft SEIR (Mitigation Measure 3.8-1: Draft SEIR page 3.8-23).

### **Comment SC4 Tonya Veitch, Commissioner**

June 21, 2021

SC4-1 The comment expresses interest in affordable housing.

The reader is referred to response to comment BPC5-1.

## 2.2.7 Sunnyvale Housing and Human Services Commission

**Lawrence Station Area Plan (LSAP) Update and Intuitive Corporate Campus  
Housing and Human Services Commission Hearing Comments during DSEIR Comment Period  
June 23, 2021**

Letter HHC
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Minjung Kwok, Commissioner

- With increase in housing, there should be increased park space.

I HHC1-1
----------

Scott Duncan, Commissioner

- With mixed-use zoning, is the City confident it can achieve increased residential development?

I HHC2-1
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Ken Hiremath, Chair

- Welcomes the increase in residential density and hopes the study is finished quickly.

I HHC3-1
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## **Comment HHC1 Minjung Kwok, Commissioner**

June 23, 2021

- HHC1-1 The comment states that with an increase in housing, there should be increased park space.  
The reader is referred to response to comment BPC5-2.

## **Comment HHC2 Scott Duncan, Commissioner**

June 23, 2021

- HHC2-1 The comment asks if the City is confident it can achieve increased residential development with mixed-use zoning.

By using local incentives and the state Density Bonus Law, the proposed plan would potentially add an additional 3,612 net new units to the plan area, which is the result of increasing housing opportunities in areas where housing is already permitted and expanding areas where housing may be considered. The project would expand where new housing may be considered to all sites currently zoned as M-S/LSAP (which would be rezoned to MXD-II) and to all sites currently zoned as O-R (which would be rezoned to MXD-IV, a new zoning district). Another new zoning district, MXD-I/S, would be established for properties on Sonora Court (currently zoned MXD-I) and would continue to permit residential uses. This comment does not raise an issue related to the Draft SEIR analysis prepared for the project. The comment is included in the record for consideration by decisionmakers.

## **Comment HHC3 Ken Hiremath, Chair**

June 23, 2021

- HHC3-1 This comment expresses appreciation for the increase in residential density and hopes the study is finished quickly.  
This comment is noted.

## 2.2.8 Sunnyvale Planning Commission

**Lawrence Station Area Plan (LSAP) Update and Intuitive Corporate Campus  
Planning Commission Hearing Comments during DSEIR Comment Period  
June 28, 2021**

Letter  
PC

David Simons, Vice Chair

- Is the plan area included in a federal mapping program for the heat island effect? Wants to ensure sufficient tree shading is provided in the plan area to mitigate the heat island effect.
- Concerned that the increase in residential units may result in development project requests for concessions or deviations from tree planting requirements, exacerbating the heat island effect.

PC1-1

PC1-2

**Comment PC1 David Simons, Vice Chair**

June 28, 2021

- PC1-1 The comments asks whether the plan area is included in a federal mapping program for the heat island effect and whether sufficient tree shading is provided in the plan area to mitigate the heat island effect.
- Over the past four years, National Oceanic and Atmospheric Administration (NOAA) has funded CAPA Heat Watch to support 21 communities across the United States in mapping their urban heat islands (UHI). CAPA Strategies LLC has developed a process to help cities plan and execute a volunteer-based community science field campaign that builds upon local partnerships, engages residents in a scientific study to map and understand how heat is distributed in their communities, and produces high-quality outputs that have been used in city sustainability plans, public health practices, urban forestry, research projects, and other engagement activities. Sunnyvale is not currently participating in this program. However, the neighboring City of Santa Clara completed their community science campaigns to map urban heat islands and identified areas where they can take action to protect people from heat stress.
- The Draft SEIR provides a programmatic evaluation of proposed modifications to the adopted LSAP. Future developments proposed under the LSAP Update would require project-level CEQA review and would also be subject to tree requirements consistent with LSAP policies, urban design guidelines, applicable City design standards, and Chapter 19.94 of the Sunnyvale Municipal Code (Tree Preservation). The LSAP Update does not propose any modifications to current City and LSAP provisions regarding landscaping, shade, or tree protection/replacement.
- The Draft SEIR also provides a project-level evaluation of the ISI project proposed for inclusion within the LSAP's western boundary expansion area. As shown in Figures 2-7 through 2-9b and described under Impact 3.1-1 of the Draft SEIR, the ISI project includes the planting of trees and shrubs throughout the ISI Site and along the boundaries of the site. Consistent with the requirements of City Municipal Code Section 19.94.120, the ISI project would retain 85 percent (581 of 679) of the protected trees on the North Site, 3 percent of all protected onsite trees (11 of 383) on the South Site and mitigate for the removed trees (Figure 2-9a in Chapter 2, "Project Description" of the Draft SEIR).
- PC1-2 The comment expresses concern that the increase in residential units may result in development project requests for concessions or deviations from tree planting requirements, exacerbating the heat island effect.
- The reader is referred to response to comment PC1-1.

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# 3 REVISIONS TO THE DRAFT SEIR

This chapter presents specific text changes made to the Draft Subsequent Environmental Impact Report (Draft SEIR) since its publication and public review. The changes are presented in the order in which they appear in the original Draft SEIR and are identified by the Draft SEIR page number. Text deletions are shown in ~~striethrough~~, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft SEIR and does not constitute "significant new information" requiring recirculation.

## Revisions to Table of Contents

The following text changes are made to page i, Table of Contents, of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

3.9 Hydrology and Water Quality.....3.49-1

## Revisions to Executive Summary

The following text changes are made to page ES-3 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

### ES.3.2 Significant and Unavoidable Impacts and Cumulative Impacts

The project would result in the following significant and unavoidable impacts under project and cumulative conditions:

#### Air Quality

- ▶ Impact 3.2-1: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed BAAQMD Recommended Thresholds

#### Cumulative

- ▶ Impact 4-3: Cumulative Air Quality Impacts (criteria pollutant emissions during construction)
- ▶ Impact 4-22: Contribute to Cumulative Impacts on Wastewater Services (LSAP Update only)

The following text changes are made to Table ES-1, Summary of Impacts and Mitigation Measures on page ES-13 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

Impacts	Applicable 2016 LSAP Adopted Mitigation Measures	DSEIR Significance	Mitigation Measure	Significance after Mitigation
<b><u>Cumulative</u></b>				
<u>Impact 4-1: Contribute to Cumulative Visual Character Impacts</u>	None.	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-2: Contribute to Cumulative Light and Glare Impacts</u>	None.	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-3: Cumulative Air Quality Impacts</u>	Adopted LSAP Mitigation Measure 3.5.3a Adopted LSAP Mitigation Measure 3.5.3b	<u>Would be cumulatively considerable and significant and unavoidable</u>	Implement Mitigation Measure 3.2-1: Reduce construction-related NOX emissions for the ISI project	SU
<u>Impact 4.4: Cumulative Impacts on Cultural and Tribal Cultural Resources</u>	Adopted LSAP Mitigation Measure 3.10.2	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-5: Contribute to Cumulative Impacts on Biological Resources</u>	Adopted LSAP Mitigation Measure 3.9.2 Adopted LSAP Mitigation Measure 3.9.3	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-6: Contribute to Cumulative Energy Impacts</u>	None.	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-7: Contribute to Cumulative Disturbance to or Loss of Paleontological Resources</u>	Adopted LSAP Mitigation Measure 3.7.4	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-8: Contribute to Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change</u>	None.	<u>Would be less than cumulatively considerable.</u>	None required.	LTS
<u>Impact 4-9: Contribute to Cumulative Impacts Related to Creation of a Hazard through the Routine Transport, Use, or Disposal of Hazardous Materials, Including Reasonably Foreseeable Upset or Accidents during Construction and Operation</u>	None.	<u>Would be less than cumulatively considerable.</u>	None required.	LTS



Impacts	Applicable 2016 LSAP Adopted Mitigation Measures	DSEIR Significance	Mitigation Measure	Significance after Mitigation
<u>Impact 4-10: Contribute to Cumulative Impacts Related to Encountering Contamination on Areas with Known Hazardous Materials</u>	<u>None. Mitigation Measure 3.8-1 would replace adopted LSAP Mitigation Measure 3.3.3.</u>	<u>Would be less than cumulatively considerable.</u>	<u>Implement Mitigation Measure 3.8-1: Reduce Potential for Disturbance of Hazardous Contaminants</u>	<u>LTS</u>
<u>Impact 4-11: Contribute to Cumulative Impacts Related to Interference with an Adopted Emergency Response or Emergency Evacuation Plan</u>	<u>Adopted LSAP Mitigation Measure 3.3.5</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-12: Contribute to Cumulative Water Quality or Groundwater Recharge Impacts</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-13: Contribute to Cumulative Impacts Related to Physically Dividing an Established Community, Conflicts with a Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-14: Contribute to Cumulative Traffic Noise</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-15: Contribute to Cumulative Inducement of Unplanned Growth</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-16: Contribute to Cumulative Impacts on Public Services and Recreation</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-17: Contribute to Cumulative Impacts on Vehicle Miles Traveled</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-18: Contribute to Cumulative Impacts on Transit, Bicycle, and Pedestrian</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>None required.</u>	<u>LTS</u>
<u>Impact 4-19: Contribute to Cumulative Construction-Related Transportation Impacts</u>	<u>None.</u>	<u>Would be less than cumulatively considerable.</u>	<u>Implement Mitigation Measure 3.14-7: Prepare and Implement a Temporary Traffic Control Plan for the ISI Project</u>	<u>LTS</u>

Impacts	Applicable 2016 LSAP Adopted Mitigation Measures	DSEIR Significance	Mitigation Measure	Significance after Mitigation
<u>Impact 4-20: Contribute to Cumulative Water Supply Impacts</u>	None.	<u>Would be less than cumulatively considerable</u>	None required.	LTS
<u>Impact 4-21: Contribute to Cumulative Impacts Related to Water Supply Infrastructure</u>	None.	<u>Would be less than cumulatively considerable</u>	None required.	LTS
<u>Impact 4-22: Contribute to Cumulative Impacts on Wastewater Services</u>	None.	<u>LSAP Update: would be cumulatively considerable and significant and unavoidable</u>  <u>ISI Project: Would be less than cumulatively considerable</u>	None required.	<u>LSAP Update: SU</u>  <u>ISI Project: LTS</u>
<u>Impact 4-23: Contribute to Cumulative Impacts to Stormwater Facilities</u>	None.	<u>Would be less than cumulatively considerable</u>	None required.	LTS

## Revisions to Chapter 2, Project Description

The following text changes are made to page 2-11 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

### LSAP BOUNDARY EXPANSION

The proposed expansion of the western LSAP boundary was requested by ISI for inclusion of three sites, consisting of four parcels (932, 950, and 945-955 Kifer Road) totaling approximately 32.4 acres (1,410,945 sf). Inclusion of these sites within the LSAP boundary would allow ISI to expand business operations adjacent to their headquarters in Sunnyvale that would be located near the Caltrain Lawrence Station.

As part of the LSAP Update, the LSAP boundary would be expanded to include the ISI Site and ISI would redevelop the ISI Site for a total of approximately 1,211,000 gross sf of office/R&D development, including amenity space. ISI would demolish approximately 172,706 sf of existing industrial development (of which approximately 105,000 sf is currently being used) on the ISI parcels, resulting in approximately 1,038,294 sf of net new Office/R&D area. For the purposes of tabulation towards the LSAP development capacity, the net new sf is ~~1,106,000~~ 717,169, because ~~vacant area is not credited~~ of the addition of the existing allowable development potential of 35 percent floor area ratio (FAR) (or 493,831 sf) on the ISI Site. This would not be an increase the current LSAP allocated new office/R&D development capacity.

Under the adopted LSAP, a total of 1.2 million gross sf of net new office/R&D development is allowable within the plan area. Since the City adopted the LSAP, 392,465 net new sf of office/R&D development has been approved and is under construction. Demolition of existing office/R&D buildings associated with other LSAP development projects and the ~~undeveloped addition of existing allowable development potential (between existing square footage and 35 percent FAR) on the ISI parcels return 493,831 sf to square footage within~~ the allowable office/R&D development capacity of the adopted LSAP. With implementation of the proposed LSAP boundary expansion and associated ISI project, a remaining balance of ~~423,503~~ 191,209 sf net new office/R&D development would be available under the LSAP (Table 2-5). Therefore, an increase to the overall LSAP office/R&D development capacity would not be required.

**Table 2-5 Remaining Office/R&D New Development Capacity Under LSAP Update**

Office/R&D development capacity available under adopted LSAP (net new sf)	1,200,000
Office/R&D development approved under adopted LSAP (net new sf)	-392,465
Office/R&D demolition associated with approved LSAP development projects	+100,843
Addition of undeveloped potential sf (up to 35% FAR) of the ISI Site	+321,125
Net new office/R&D proposed on ISI Site (above 35% FAR)	<del>-1,106,000</del> <u>-717,169</u>
<b>Remaining office/R&amp;D development capacity with implementation of LSAP Update and ISI project (net new sf)</b>	<b><del>423,503</del> <u>191,209</u></b>

Source: data provided by City of Sunnyvale in 2020<sup>1</sup>

As shown in Figure 2-3, the proposed expansion area is currently designated as Industrial (IND) in the City's General Plan. Within the expansion area, the parcel located north of Kifer Road (herein referred to as North Site) is zoned M-S (Industrial and Service) and the two parcels south of Kifer Road (herein referred to as South Site) are zoned M-3 (General Industrial). ~~Combined, the proposed expansion area has an allowable development potential of 494,000 sf (assuming a base FAR of 35 percent).~~ With implementation of the LSAP Update, a General Plan amendment would be required to change the land use designation of the expansion area from IND to TMU, an LSAP designation of Office/R&D would be assigned to the Project site, and rezoning of the sites to an LSAP-specific zoning designation would occur.

The following text changes are made to page 2-11 of the Draft SEIR to describe reference to “The Loop” (Loop Road). These changes do not alter the conclusions of the Draft SEIR.

The Sense of Place Plan would require new development in the area to implement public street improvements, including a ~~Loop Road~~ (i.e., a roadway network improvement analyzed under Impact 3.4.4 of the 2016 LSAP EIR that would extend Sonora Court to both Kifer Road and the east side of the Lawrence Expressway Overcrossing), rail crossings (if determined by the City to be feasible), sidewalks, curb ramps, the addition and removal of on-street parking, new roadways, intersection improvements, buffered bicycle lanes, Class I multi-used paved trails, bus stop improvements along Kifer Road, lighting, wayfinding signage, and other public amenities.

The following text changes are made to page 2-17 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

### City of Sunnyvale General Plan Amendments

The City’s General Plan would be amended to update the residential buildout for the LSAP and land use/density descriptions, revise the Land Use Map to show the Transit Mixed Use designation for the LSAP boundary expansion area, and include text edits to be consistent with the proposed LSAP amendment, ~~and include references to the LSAP Sense of Place Plan.~~

### Lawrence Station Area Plan Amendments

The adopted LSAP would be amended to reflect proposed updates as summarized below:

- ▶ Integrate the text edits in final 2016 adopted redline version with the graphics and formatting of the 2015 public draft and make cleanup edits throughout.
- ▶ Increase the residential units at buildout of the LSAP.
- ▶ Amend the LSAP Incentives and Development Cap Administrative Regulations.
- ▶ Include objective design standards.
- ▶ Incorporate and reference the ~~LSAP~~ Lawrence Station Sense of Place Plan.
- ▶ Establish an LSAP Sense of Place fee. Fee credit may be given for construction of improvements from development projects.
- ▶ Amend the LSAP land use designations of parcels where zoning changes are occurring.
- ▶ Updates to certain figures to be consistent with the LSAP boundary expansion, Sense of Place Plan, and changes in state law and City policies and direction since original adoption.
- ▶ Include goals and policies for the LSAP boundary expansion area and amend other existing goals and policies to be consistent with land use and density amendments.
- ▶ Update the utilities chapter based on the infrastructure analysis for the project.
- ▶ Update the circulation chapter based on the transportation impact analysis for the project and Sense of Place Plan.
- ▶ Integrate results from the current market and fiscal analysis.
- ▶ Establish a sewer impact fee for the LSAP area. The following sewer facility upgrades would be implemented to support buildout of the LSAP: upsizing of the existing 10-inch vitrified clay pipe (VCP) sewer main in San Zeno Way to a 12-inch PVC sewer main; upsizing of the existing 10-inch VCP sewer main at the intersection of Willow Avenue and Aster Avenue to an 18-inch PVC sewer main; and upsizing of the existing 27-inch VCP sewer main in Lawrence Expressway to a 30-inch PVC sewer main. The sewer upgrades would occur in existing road right-of-way within the LSAP. Fee credit may be given for construction of improvements from subsequent development projects.

- ▶ Establish a cost recovery fee for the plan amendments.

The following text changes are made to the last bullet on page 2-24 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

- ▶ Improvements to a bus stop located in front of the South Site, including design consistent with Valley Transportation Authority (VTA) and Americans with Disabilities Act (ADA) standards.

The following text changes are made to the third and fourth bullet on page 2-42 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

- ▶ General Plan and Zoning Code text amendments to reflect the LSAP Amendment and General Plan Amendment
- ▶ Adoption of the LSAP Lawrence Station Sense of Place Plan and payment of the associated sense of place fee

### Revisions to Section 3.9, Hydrology and Water Quality

The following text changes are made to page 3.9-9 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

Pursuant to SGMA, future developments would be required to comply with all applicable programs, policies, and regulations per Valley Water (~~formerly~~ formally known as Santa Clara Valley Water District), specifically the 2016 Groundwater Management Plan (Valley Water 2016).

### Revisions to Section 3.10, Land Use and Planning

The following text changes are made to page 3.10-9 of the Draft SEIR for the purpose of consistency with text changes made in Chapter 2, Project Description, of the Draft SEIR (described above). These changes do not alter the conclusions of the Draft SEIR.

#### City of Sunnyvale Zoning Code

Within the LSAP boundary expansion Area/ISI Site, the parcel located north of Kifer Road (North Site) is zoned M-S (Industrial and Service) and the two parcels south of Kifer Road (South Site) are zoned M-3 (General Industrial). ~~Combined, the proposed expansion area has an existing allowable development potential of 494,000 sf (assuming a base FAR of 35 percent).~~ With implementation of the LSAP Update, rezoning of the sites to an LSAP-specific zoning designation would occur.

There is currently an M-S/LSAP zoning designation that applies to industrial parcels east of Calabazas Creek and is reserved for industrial uses such as offices and research and development. Residential uses are prohibited. This zoning designation is pertinent to the ISI site because nonresidential uses consistent with this district are proposed and residential uses are not allowed because of an existing covenant for environmental restrictions on the South Site. Therefore, the M-S/LSAP designation would be modified for the ISI site to include a maximum FAR qualifier, similar to other industrial intensification sites in the City zoned M-S 100 percent FAR. To support the proposed FAR of the ISI project and retain existing open space on the North Site, rezoning to M-S/LSAP 60 percent is proposed for the North Site and rezoning to M-S/LSAP 120 percent is proposed for the South Site. With approval of these proposed rezones and zoning code amendments, the ISI project would be consistent with the City of Sunnyvale Zoning ordinance.

#### LSAP

As part of the ISI project, the ISI site would be included within the boundaries of the LSAP and an LSAP designation of Office/R&D would be assigned to the ISI site. A total of 1.2 million gross sf of net new office/R&D development is allowable within the adopted LSAP. With implementation of the proposed LSAP boundary expansion and associated ISI project, a remaining balance of ~~423,503~~ 191,209 sf net new office/R&D development would be available under the adopted LSAP (see Table 2-5 of this Draft SEIR). Therefore, an

increase to the overall LSAP office/R&D development capacity would not be required. The LSAP would be amended to include the boundary expansion area/ISI site and update the remaining LSAP office/R&D development capacity with implementation of the ISI project.

With implementation of the ISI project, amendments to the City's General Plan, Zoning Code, and LSAP would be required. Similar to the adopted LSAP, the ISI project would result in a less-than-significant impact related to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, there is no new significant effect, and the effect is not more severe than the impact identified in the 2016 LSAP EIR. The ISI project would result in **less-than-significant** impacts to fire protection, police protection, and emergency medical services.

### Revisions to Section 3.12, Population, Employment, and Housing

The following text changes are made to page 3.12-7 of the Draft SEIR for the purpose of consistency with text changes made in Chapter 2, Project Description, of the Draft SEIR (described above). These changes do not alter the conclusions of the Draft SEIR.

#### ISI Project

As of 2019, there are 307 ISI employees working within the ISI site. At buildout, the ISI project would be designed to serve approximately 3,500 employees. There is a potential for expanded employment opportunities to induce population growth and associated demand for housing within the LSAP, the City of Sunnyvale, and greater Santa Clara County. Under the adopted LSAP, the anticipated demand for employment, housing, and retail has been balanced with the intent of creating a plan for population growth wherein employees have access to community features within the plan area and easy access to transit. The ISI project would not exceed the amount of new office/R&D development identified in the adopted LSAP. As indicated in Chapter 2, "Project Description," a total of 1.2 million gross sf of net new office/R&D development is allowable within the plan area, with 908,378 sf remaining. With implementation of the proposed ISI Corporate Campus, a remaining balance of ~~123,503~~191,209 sf net new office/R&D development would be available under the adopted LSAP. Therefore, the ISI project would not be anticipated to generate employment opportunities that exceed the planned capacity of the LSAP or induce substantial population growth. No new significant effect would occur, and the effect is not more severe than the impact identified in the 2016 LSAP EIR. Therefore, due to consistency with the adopted LSAP, the planned increase in residential development under the LSAP Update, and proximity to the Caltrain station, the ISI project would result in a **less-than-significant impact**.

### Revisions to Section 3.15, Utilities and Service Systems

The following text changes are made to page 3.15-9, and 3.15-10 of the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

Page 3.15-9:

The City obtains its potable water supply from three sources: purchased surface water from the San Francisco Public Utilities Commission (SFPUC), purchased treated surface water from Valley Water (~~formerly~~ formally known as the Santa Clara Valley Water District), and groundwater from six City-owned and operated wells.

Page 3.15-10:

Valley Water, ~~previously formally~~ known as Santa Clara Valley Water District (SCVWD), supplies the City of Sunnyvale treated surface water through an entitlement of the imported Central Valley Project (CVP) water and the State Water Project (SWP) water, in combination with water from local reservoirs.

### Revisions to Chapter 5, Alternatives

The following text changes are made to Draft SEIR page 5-3:

## AIR QUALITY

- ▶ Construction of the ISI project would result in project-generated emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction phase activity, material and equipment delivery trips, worker commute trips, and other miscellaneous activities (e.g., application of architectural coatings). Implementation of the ISI project would require adopted Mitigation Measures 3.5.3a and 3.5.3b, with the addition of Mitigation Measure 3.2-1 to reduce NO<sub>x</sub> emissions. However, with mitigation applied, ISI construction-related emissions would continue to exceed BAAQMD's threshold for NO<sub>x</sub>. Similar to the 2016 LSAP EIR, the LSAP Update and ISI project would result in a **significant and unavoidable** impact to air quality. (see Impact 3.2-1) Expanded development potential under the LSAP Update in combination of the ISI project would contribute to cumulative air quality impacts from construction-related activities associated with nitrogen oxides (NO<sub>x</sub>) emissions. Mitigation (adopted LSAP Mitigation Measure 3.5.3a and 3.5.3b and Mitigation Measure 3.2-1) has been identified to reduce the extent of this impact. However, implementing the mitigation measures would not completely offset this impact. Therefore, the impact would be **cumulatively considerable and significant and unavoidable** (see Impact 4-1).

## TRANSPORTATION

- ▶ Construction activities associated with the ISI project could potentially result in temporary but prolonged impacts including, but not limited to, road, lane, bicycle lane, and sidewalk closures. Therefore, the ISI project could result in a new significant impact that was not analyzed in the 2016 LSAP EIR. Mitigation (Mitigation Measure 3.14-7) has been identified to reduce this impact to **less than significant** (see Impact 3.14-7).

## CUMULATIVE IMPACTS

- ▶ Projects that emit criteria air pollutants in exceedance of BAAQMD's thresholds would contribute to the regional degradation of air quality within the SFBAAB, while exacerbating health risk, and would be considered cumulatively considerable. Because the LSAP Update and ISI project would contribute to the potential cumulative impact related to criteria pollutant emissions during construction, the LSAP Update and ISI project **would be considered cumulatively considerable and significant and unavoidable** and would not result in a new or greater contribution to cumulative air quality impact beyond what was identified in the 2016 LSAP EIR. (see Impact 4-3).
- ▶ If construction of the ISI project were to occur simultaneously with one or more nearby projects, the construction-related transportation impacts of these projects may combine to exacerbate construction-related transportation impacts from the project and create a significant cumulative impact. Implementation of Mitigation Measure 3.14-7 would require that a temporary traffic control plan be completed and implemented for the ISI project. Implementation of Mitigation Measure 3.14-7 would reduce the temporary impact to the degree feasible. Additionally, construction traffic impacts would be localized and temporary. As a result, with the implementation of Mitigation Measure 3.14-7, the ISI project's contribution to cumulative impacts **would be less than cumulatively considerable**. (see Impact 4-19)

The following text changes are made to Draft SEIR page 5-7:

## UTILITIES AND SERVICE SYSTEMS

The No Project Alternative would involve land uses from planned development that would increase the demand for water, wastewater, drainage, and solid waste services as evaluated in the 2016 LSAP EIR and 2017 LUTE EIR. This extent of development would increase from the expanded residential development potential under the LSAP Update. As addressed in Section 3.15, "Utilities and Service Systems," the LSAP Update would include sewer pipeline improvements to address existing and anticipated capacity issues that are not addressed in the 2016 LSAP (No Project Alternative). The LSAP Update and ISI project would not result in any new significant impacts or a substantial increase in severity of a previously identified significant impact from

the 2016 LSAP EIR. The LSAP Update would contribute to cumulatively considerable wastewater capacity impacts as identified in Impact 4-22 from increased residential development over the 2016 LSAP. The No Project Alternative avoids this cumulative impact because it would not increase residential development potential under the LSAP. Therefore, impacts under the No Project Alternative would be greater to those that would occur under the project as it would not address existing sewer conveyance issues. (*Greater*)

The following text changes are made to Draft SEIR page 5-10:

## UTILITIES AND SERVICE SYSTEMS

Because Alternative 2 would not expand planned residential development potential in the LSAP area to the extent of the proposed LSAP Update, this alternative would generate lower utility demands (water supply, wastewater service, and solid waste service) than the proposed LSAP Update. As addressed in Section 3.15, "Utilities and Service Systems," the LSAP Update and ISI project would not result in any new significant impacts or a substantial increase in severity of a previously identified significant impact from the 2016 LSAP EIR. The LSAP Update would contribute to cumulatively considerable wastewater capacity impacts as identified in Impact 4-22 from increased residential development over the 2016 LSAP. Alternative 2 would also contribute to this impact but would have a reduced extent of impact because of the reduced development potential as compared to the LSAP Update. Therefore, impacts under Alternative 2 would be less than those that would occur under the project. (*Less*)

The following text change are made to Draft SEIR page 5-13:

## UTILITIES AND SERVICE SYSTEMS

Because Alternative 3 would not expand planned residential development potential in the LSAP area to the extent of the proposed LSAP Update, this alternative would generate lower utility demands (water supply, wastewater service, and solid waste service) than the proposed LSAP Update. As addressed in Section 3.15, "Utilities and Service Systems," the LSAP Update and ISI project would not result in any new significant impacts or a substantial increase in severity of a previously identified significant impact from the 2016 LSAP EIR. The LSAP Update would contribute to cumulatively considerable wastewater capacity impacts as identified in Impact 4-22 from increased residential development over the 2016 LSAP. Alternative 3 would also contribute to this impact but would have a reduced extent of impact because of the reduced development potential as compared to the LSAP Update. Therefore, impacts under Alternative 3 would be less than those that would occur under the project. (*Less*)

The following text changes are made to Draft SEIR Table 5-1:

**Table 5-1 Summary of Environmental Effects of the Alternatives Relative to the LSAP Update and ISI Project**

Environmental Topic	Project Impacts As Compared to the 2016 LSAP EIR Impacts	Alternative 1: No Project Alternative	Alternative 2: Reduced Development Alternative A	Alternative 3: Reduced Development Alternative B
Aesthetics	No new impact (less than significant)	Similar	Similar	Similar
Air Quality	Significant and unavoidable ( <u>Impact 3.2-1 and cumulative impacts only</u> )	Less	Less	Less
Cultural and Tribal Cultural Resources	No new impact (less than significant)	Similar	Similar	Similar
Biological Resources	No new impact (less than significant)	Similar	Similar	Similar



Environmental Topic	Project Impacts As Compared to the 2016 LSAP EIR Impacts	Alternative 1: No Project Alternative	Alternative 2: Reduced Development Alternative A	Alternative 3: Reduced Development Alternative B
Energy	No new impact (less than significant)	Less	Less	Less
Geology and Soils	No new impact (less than significant)	Similar	Similar	Similar
Greenhouse Gas Emissions and Climate Change	No new impact (less than significant)	Less	Less	Less
Hazards and Hazardous Materials	No new impact (less than significant)	Similar	Similar	Similar
Hydrology and Water Quality	No new impact (less than significant)	Similar	Similar	Similar
Land Use and Planning	No new impact (less than significant)	Similar	Similar	Similar
Noise and Vibration	No new impact (less than significant)	Similar	Similar	Similar
Population, Employment, and Housing	No new impact (less than significant)	Greater	Greater	Greater
Public Services and Recreation	No new impact (less than significant)	Similar	Similar	Similar
Transportation	Less than significant (with mitigation)	Less	Less	Less
Utilities and Service Systems	<u>Significant and unavoidable</u> No new impact (cumulative impact only less than significant)	Greater	Less	Less

## Revisions to Chapter 6

After release of the Draft SEIR, the City noticed an error related to Impact 4-22 in Chapter 4, Cumulative, of the Draft SEIR. To provide clarification, text on page 6-4 of the Draft SEIR is revised as follows:

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” and Chapter 4, “Cumulative Impacts,” of this Draft SEIR, after implementation of the recommended mitigation measures, all but three two impacts associated with the proposed LSAP Update/ISI project would be reduced to a less-than-significant level remain significant and unavoidable after implementation of the recommended mitigation measures and one impact for the LSAP Update project (Impact 4-22) would result in a more severe cumulative impact than what was identified in the 2016 LSAP EIR:

- ▶ Impact 3.2-1: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed BAAQMD-Recommended Thresholds
- ▶ Impact 4-3: Cumulative Air Quality Impacts (criteria pollutant emissions during construction)
- ▶ Impact 4-22: Contribute to Cumulative Impacts on Wastewater Services (LSAP Update Only)

### Revisions to Appendix E, Transportation Impact Analyses

After release of the public Draft SEIR, the City identified some incorrect information under the 'Volume' column in Table 19 of Appendix E to the Draft SEIR. To provide clarification, the following text changes are made to the 'Volume' column in Table 19, page 67 of Appendix E, Traffic Impact Analyses, to the Draft SEIR. These changes do not alter the conclusions of the Draft SEIR.

**Table 19 Project Conditions Freeway Analysis Summary**

Freeway	Dir.	Segment	Peak Hour	Existing Conditions – Mixed Flow Lanes <sup>1</sup>						Project Conditions	
				Avg. Speed (mph)	# of Lanes	Capacity	Density (pc/mi/ln)	Volume	LOS	Project Trips	% Capacity
US 101	SB	Mathilda Avenue to Fair Oaks Avenue	AM	63.0	3	6,900	24.0	<del>4,613,477</del>	C	81	1.17%
			PM	<b>20.6</b>	<b>3</b>	<b>6,900</b>	<b>67.0</b>	<b>4,149,803</b>	F	9	0.13%
US 101	SB	Fair Oaks Avenue to Lawrence Expressway	AM	60.0	3	6,900	30.0	<del>5,346,710</del>	D	40	0.58%
			PM	<b>12.4</b>	<b>3</b>	<b>6,900</b>	<b>79.0</b>	<b>2,949,058</b>	F	5	0.07%
US 101	SB	Lawrence Expressway to Great America Parkway	AM	55.0	3	6,900	35.0	<del>5,850,905</del>	D	7	0.10%
			PM	<b>6.4</b>	<b>3</b>	<b>6,900</b>	<b>91.0</b>	<b>1,746,616</b>	F	47	0.68%
US 101	NB	Great America Parkway to Lawrence Expressway	AM	17.2	<b>3</b>	<b>6,900</b>	<b>72.0</b>	<b>3,702,794</b>	F	40	0.58%
			PM	47.6	3	6,900	42.0	<del>5,964,299</del>	D	5	0.07%
US 101	NB	Lawrence Expressway to Fair Oaks Avenue	AM	<b>18.2</b>	<b>3</b>	<b>6,900</b>	<b>70.0</b>	<b>3,840,905</b>	F	7	0.10%
			PM	47.2	3	6,900	42.0	<del>5,958,616</del>	D	47	0.68%
US 101	NB	Fair Oaks Avenue to Mathilda Avenue	AM	<b>26.0</b>	<b>3</b>	<b>6,900</b>	<b>61.0</b>	<b>4,740,794</b>	F	15	0.22%
			PM	54.8	3	6,900	36.0	<del>5,859,299</del>	D	93	1.35%
SR 237	EB	Lawrence Expressway to Great America Parkway	AM	58.0	2	4,400	32.0	<del>3,746,262</del>	D	10	0.23%
			PM	<b>9.8</b>	<b>2</b>	<b>4,400</b>	<b>84.0</b>	<b>1,643,116</b>	F	<b>62</b>	<b>1.41%</b>
SR 237	WB	Great America Parkway to Lawrence Expressway	AM	<b>24.6</b>	<b>2</b>	<b>4,400</b>	<b>62.0</b>	<b>3,066,718</b>	F	<b>54</b>	<b>1.23%</b>
			PM	57.8	2	4,400	33.0	<del>3,760,230</del>	D	6	0.14%

Notes: Dir. = direction; NB = northbound; SB = southbound; mph = miles per hour; pc/mi/ln = passenger cars per mile per lane

<sup>1</sup> Source: Santa Clara Valley Transportation Authority Congestion Management Program Monitoring Study, 2018.

**BOLD** indicates substandard level of service.

**BOLD** and boxed indicates an adverse project impact.

## 4 REFERENCES

City of Sunnyvale. 2020 (April). Sunnyvale Municipal Code. Title 19. Zoning. Article 4. General Development Standards. Chapter 19.45. Transportation Demand Management. Available at: <<http://qcode.us/codes/sunnyvale/>>. Accessed on August 3, 2021.

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