

# El Camino Real Specific Plan Final Environmental Impact Report

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SCH No. 2017102082

Prepared for:  
**City of Sunnyvale**



Prepared by:  
**Michael Baker International, Inc.**

**Michael Baker**  
INTERNATIONAL

June 2022

# **CITY OF SUNNYVALE**

## **EL CAMINO REAL SPECIFIC PLAN**

### **FINAL ENVIRONMENTAL IMPACT REPORT**

*SCH No. 2017102082*



**City of Sunnyvale**  
**Community Development Department**

456 West Olive Avenue  
Sunnyvale, CA 94088-3707

*Contact: Jeffrey Cucinotta, AICP, Senior Planner*  
*[jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov)*

**June 2022**



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## **Attachments**

- 1 – Revised Transportation Impact Analysis
- 2 – Revised Water Supply Assessment

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## 1.0 Introduction

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Sunnyvale, as the lead agency, has evaluated the comments received on the El Camino Real Specific Plan EIR (Draft EIR) (State Clearinghouse No. 2017102082).

The Draft EIR for the proposed El Camino Real Specific Plan ("project" or "Specific Plan") was distributed to responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on March 11, 2022 and concluded on April 25, 2022.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Draft EIR Public Review Summary
- Section 3.0 – Response to Draft EIR Comments
- Section 4.0 – Draft EIR Text Revisions

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes "significant new information" pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft EIR is not required.

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## 2.0 Draft EIR Public Review Summary

The Draft EIR for the proposed project was circulated to affected public agencies and interested parties for a 45-day review period from March 11, 2022, through April 25, 2022. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of the Draft EIR was published on the City's website (<https://sunnyvale.ca.gov/business/planning/ceqa.htm>) and in the Sunnyvale Sun;
- Notification of the availability of the Draft EIR was mailed to project-area residents and other members of the public who had indicated interest in the project;
- The Draft EIR was posted to the State Clearinghouse CEQANet Web Portal on March 11, 2022, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (<https://sunnyvale.ca.gov/business/planning/ceqa.htm>), City of Sunnyvale Library, the City of Sunnyvale One-Stop Permit Center, and the City of Sunnyvale Community Center.

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### 3.0 Responses to Draft EIR Comments

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments raising significant environmental issues received by the City of Sunnyvale on the Draft EIR. This section also summarizes and addresses verbal comments related to the Draft EIR received at the Planning Commission hearing on April 25, 2022.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the City of Sunnyvale are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below.

COMMENT LETTER No.	PERSON, FIRM, OR AGENCY	LETTER DATED
<b>Sunnyvale Planning Commission (PC) DEIR Public Hearing</b>		
N/A	Ed Gocka, Resident	April 25, 2022
<b>DEIR Public Review Comment Letters</b>		
1	Elaine and Paul Jae, Residents	March 14, 2022
2	Beverly and Joe Vierra, Residents	March 14, 2022
3	Cecil McGregor, Resident	March 15, 2022
4	Andi Martin, Resident	March 16, 2022
5	Mark Ridgeway, Resident	March 16, 2022
6	Claudia Giacomini, Resident	March 17, 2022
7	Sandy Wright, Resident	March 18, 2022
8	Denise Sils, Resident	March 19, 2022
9	James Takasugi, Resident	March 19, 2022
10	Brent Miller, Resident	March 20, 2022
11	Marc and Lita Ketzal, Residents	March 21, 2022
12	George Kasthuri, Resident	March 23, 2022
13	Rob Hurlston, Resident	March 28, 2022
14	Terry Blumenthal, Resident	March 31, 2022
15	Zachary Kaufman, Resident	March 31, 2022
16	Lisa Phylfe, Carmel Partners	April 7, 2022
17	Jon Cowan, Senior Director of Government Relations, El Camino Health	April 11, 2022
18	Jacob Foraker, President, Hanley Management Corporation	April 14, 2022
19	Jiarong Qian, Resident	April 15, 2022
20	Lisa Van Valkenburgh, Resident	April 18, 2022
21	Lisa Van Valkenburgh, Resident	April 20, 2022
22	Ari Feinsmith, Team Leader, Bike Sunnyvale	April 20, 2022
23	Josh Rupert, Hunter Properties	April 21, 2022



COMMENT LETTER No.	PERSON, FIRM, OR AGENCY	LETTER DATED
24	Mark Leong, District Branch Chief, California Department of Transportation District 4	April 22, 2022
25	Mark Toothacre, President, PMB	April 22, 2022
26	Brian McAloon, Project Manager, Department of Toxic Substances Control	April 22, 2022
27	Sunnyvale Resident	April 24, 2022
28	Brent Pearce, Transportation Planner, Santa Clara Valley Transportation Authority	April 25, 2022
29	Zachary Kaufman, Resident	April 25, 2022
30	Mike Serrone, Livable Sunnyvale Board and the Livable Sunnyvale ECR Specific Plan Committee	April 25, 2022
31	Reza Fardid, Resident	April 25, 2022
32	Ari Feinsmith and John Cordes, Bike Sunnyvale	April 25, 2022
33	Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home	April 25, 2022
34	Ari Feinsmith, Bike Sunnyvale	April 25, 2022
35	Alison Warner, Senior Vice President, Balboa Retail Partners	April 25, 2022
36	Ed Gocka, Resident	April 26, 2022



### 3.1 Sunnyvale Planning Commission (PC) DEIR Public Hearing Comments

#### **Ed Gocka, Resident**

Mr. Gocka spoke during the Draft EIR Public Comment portion of the April 25, 2022, Planning Commission Meeting. He noted concerns related to the Draft EIR and stated that he submitted a letter summarizing his concerns. Refer to Comment Letter 36 for a detailed response to each of Mr. Gocka's comments. No further response is warranted.



## 3.2 DEIR Public Review Comment letters

**Page 1 of 1**  
**Comment Letter 1**  
**Elaine and Paul Jae**

**Christie, David**

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**From:** Elaine Jae <elainejae324@gmail.com>  
**Sent:** Monday, March 14, 2022 5:20 PM  
**To:** Jeffrey Cucinotta  
**Subject:** Draft Environmental Impact Report  
  
**Categories:** El Camino Real Specific Plan Update

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

We have received your letter re: the subject: We could not understand the map in the letter. We would please ask you to explain this and include another, clearer map at what you or Sunnyvale wishes to do.

1-1

Our address is: 1308 Arleen Avenue, SV 94087

Thanks in advance for your help with this.

Elaine and Paul Jae  
408-738-3587



**Response No. 1**  
**Elaine and Paul Jae**  
**March 14, 2022**

- 1-1 The commentors state that the ECRSP Local Vicinity Map that was contained in the Notice of Availability (also provided as Exhibit 2-2, *Local Vicinity Map*, in the EIR) is unclear and they were unable to understand the map. The commentors have requested that a clearer copy of the map be provided. A clearer version of this map has been prepared and provided in the Final EIR as Figure 2-2, Local Vicinity Map/Specific Plan Area.

**Page 1 of 1**  
**Comment Letter 2**  
**Beverly and Joe Vierra**

**Christie, David**

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**From:** Vierra <j.vierra@sbcglobal.net>  
**Sent:** Monday, March 14, 2022 6:55 PM  
**To:** Jeffrey Cucinotta  
**Subject:** Identified Potential Environment Impacts  
  
**Categories:** El Camino Real Specific Plan Update

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

2-1

I am a Sunnyvale resident and received the letter on Environmental Impacts, both myself and husband read it but do not understand what this means to the home owner of Sunnyvale. You almost need an attorney to explain this letter means at a level we all understand. My neighbor called to see if we understood what it means. It would be nice if you could explain your plans are at a level we all understand.

Thank You,  
Beverly & Joe Vierra

Sent from my iPad



**Response No. 2**

**Beverly and Joe Vierra**

**March 14, 2022**

- 2-1 The commentors state that they are unable to understand the Notice of Availability released by the City and have requested an additional explanation regarding the project details. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Page 1 of 2**  
**Comment Letter 3**  
**Cecil McGregor**

**Christie, David**

**From:** cecil.mcgregor@hushmail.com  
**Sent:** Tuesday, March 15, 2022 8:47 AM  
**To:** Jeffrey Cucinotta  
**Cc:** cecil.mcgregor@hushmail.com  
**Categories:** El Camino Real Specific Plan Update

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

- I have briefly scanned the draft EIR and find several items disturbing.
- 3-1 1. I notice an over planning for bicycles. Current problems with bicycles with bicycles are not addressed. Bicyclists do not obey traffic laws and they act as if they are special: they ignore stop signs, they pass exceeding close to pedestrians, they ignore red lights whenever possible, they ride on sidewalks causing impediments to pedestrians.
  - 3-2 2. It appears as if the EIR leans over backwards to accommodate bicyclists. Residents vote with their feet. People would rather commute long distances rather than crowd into overpriced real estate in the city. Attempting to create a Manhattan area to force people to use buses, walking and bicycles will not work. What is the group pushing bicyclists?
  - 3-3 3. Parking for all the additional residents does not appears to be mandated. Each housing unit must have specific parking constructed for cars. What is this ratio?
  - 3-4 4. I see nothing addressing the increased petty crime. No increased police presence, no CCTV systems to protect the merchants and residences. The police appear to be unwilling or unable to handle this increasing problem.
  - 3-5 5. Have you actually run a study on why people would rather commute long distances rather than live in the more concentrated areas?
    - a. Close to work? People change jobs every few years. They may be on different sides of the valley and thus far away from their residence. Solution: Establish residence in affordable housing and pay the difference in long commutes.
    - b. Buses, light rail, etc. do not work since these are not convenient, run infrequently,



**Page 2 of 2**  
**Comment Letter 3**  
**Cecil McGregor**

take excessive time to transit to work.

3-6

6. This entire proposal seems to be a real estate developer's wet dream. Paying for this project comes out of my pocket. These are the people benefiting from this development, \*not\* the current residents. The real estate developers will take the money and move on. The taxpayers of Sunnyvale will be left with the headache for decades.

Cecil McGregor  
1241 Morningside Dr  
Sunnyvale, CA 94087

**Response No. 3**  
**Cecil McGregor**  
**March 15, 2022**

- 3-1 The commentor expresses concern regarding the project's plans to implement additional bicyclist facilities within the project area, generally citing safety concerns associated with existing bicyclists. As stated in Section 3.15, *Transportation*, of the EIR, the El Camino Real corridor through Sunnyvale is designated as a Priority Development Area and a Transit Priority Area and the proposed intersection improvements provided in the project's *Transportation Impact Analysis* prepared by Hexagon Transportation Consultants (2020) would serve to improve access to the Sunnyvale Caltrain Station and the Lawrence Caltrain Station, improve multimodal safety, and enhance the overall transit-oriented nature of the project area. Improvements associated with enhancing bicyclist and pedestrian facilities, connectivity, and safety could include sidewalks, curb ramps, Class I shared-use paved trails, pathways, and bicycle and pedestrian crossings.

In addition, the project would not conflict with the policies concerning bicycle facilities within the Specific Plan and would provide increased connectivity consistent with adopted plans and policies. Therefore, the project would not increase safety risks associated with bicyclists, but rather, would enhance multimodal safety throughout the project area. Furthermore, because bicycles and public transportation have a less substantial impact on the environment (i.e., fewer air and GHG emissions), the reduction in vehicle miles traveled (VMT) that would occur as a result of project implementation would be considered a beneficial impact to the environment.

The EIR has appropriately addressed transportation impacts relative to bicycle facilities as required by CEQA, provided in Impact 3.15.3 (Bicycle Facilities, Standard of Significance 3). No further response is warranted.

- 3-2 The commentor reiterates their concern regarding bicycle facility planning associated with the project, and in particular, feels that people would prefer to commute long distances rather than shift towards increased multimodal transportation such as transit. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.) However, additional information can be found at the Governor's Office of Planning and Research regarding recent California legislation passed with the intent of reducing VMT (such as Senate Bill 743 which updates the way transportation impacts are measured in California for new development projects, making sure they are built in a way that allows Californians more options to drive less.)
- 3-3 The commentor feels that parking issues were not addressed in the EIR and requests to know the mandated parking ratio for the residential component of the project. As stated



in Section 3.15, *Transportation*, of the EIR, Sunnyvale Municipal Code (SMC) Chapter 10.60 sets forth the City's Transportation Demand Management (TDM) program. SMC Section 19.46 includes minimum and maximum requirements for parking spaces for new development (number and type of spaces).

Due to the programmatic nature of this environmental document, it is unknown at this time whom the specific project proponents (developers) would be with regard to site-specific future development in the project area. However, implementation of future development projects in the project area will be subject to compliance with parking requirements and would not exceed maximum parking requirements or propose higher parking requirements than what is allowed per the development standards provided in the SMC parking requirements.

- 3-4 The commentor cites concerns regarding increased crime as a result of the project. The EIR has appropriately addressed public services impacts relative to police protection services as required by CEQA. As discussed in Section 3.13, *Public Services*, of the EIR (Impact 3.13.2, Police Protection Services, Standard of Significance), While the project does not contain policies or actions that would substantially affect law enforcement services, projected growth under the project could increase the need for law enforcement protection services due to the development of additional residential housing units and nonresidential uses (i.e., commercial). Public uses, such as a police station, would be a permitted use in all land use designations, subject to City review and approval.

The project recognizes that a variety of public facilities would be needed to serve the area as development proceeds. Some of these would be provided through mandatory fees and assessments consistent with existing City policies. For example, General Plan Policy SN-3.1 directs that rapid and timely response to all emergencies be provided, and Policy SN5.1 requires that equipment and facilities are provided and maintained to meet reasonable standards for law enforcement. Additionally, the City is currently implementing Phase I of the Civic Center Modernization Project, which will expand the existing Public Safety Headquarters and provide a new Emergency Operations Center which will enhance operations of the detectives' bureau and relieve overcrowding in the existing Public Safety Building. Additionally, Phase III will include a brand-new Department of Public Safety Headquarters.

Furthermore, implementation of the project may also help to reduce crime as the area is revitalized by the influx of businesses, residential development, and improved infrastructure. The project would bring additional annual revenue to the City in the form of increased local property taxes and sales taxes that would help offset the increased demand for police service by funding increases in police personnel, training, and equipment. The EIR determined that impacts relative to police protections services would be less than significant.



- 3-5 The commentor reiterates their concern regarding commuting versus using transit. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 3-6 The commentor expresses financial concerns regarding the project, stating that the project's financial benefits would result for the developers and not the residents. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Page 1 of 1**  
**Comment Letter 4**  
**Andi Martin**

**Christie, David**

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**From:** Martin, Andi <Andi.Martin@cbnocal.com>  
**Sent:** Wednesday, March 16, 2022 10:42 AM  
**To:** Jeffrey Cucinotta  
**Subject:** DEIR Project No 2014-7432  
**Categories:** El Camino Real Specific Plan Update

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

Dear Mr. Cucinotta,

I just received a notice of public review regarding a seemingly huge and very ambitious plan to revitalize a section of El Camino Real between Sunnyvale and Santa Clara.

I own my home at 1201 Sycamore Terrace #51, Sunnyvale, 94086, APN 213-37-501.

4-1

The map sent out in the letter is rather small and unclear. Is Rancho La Mesa Mobile Home Park at 1201 Sycamore Terrace, Sunnyvale, included in this plan? If so, will there be a vote taken to change the land use designation of the park from a mobile home park to mixed use or similar?  
If so, what is to become of the residents? Will you be offering us fair market value for our homes? In how long of a time frame is this to take place?

I look forward to your response. As I am sure you know, mobile home parks are the last bastion of affordable housing in the Bay Area. To remove this park would displace 200 families. This is worrisome. Thank you.

Best,

Andi Martin  
Realtor  
International Diamond Society  
Coldwell Banker  
BRE 01979519  
408 502 2286  
People love me on Yelp! <https://www.yelp.com/biz/andi-martin-coldwell-banker-residential-brokerage-cupertino>  
**\*Wire Fraud is Real\*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions.** Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

**Response No. 4**  
**Andi Martin**  
**March 16, 2022**

- 4-1 The commenter states that the ECRSP Local Vicinity Map that was contained in the Notice of Availability (also provided as Exhibit 2-2, *Local Vicinity Map*, in the EIR) is too small and unclear, and as a result, the commenter is unable to determine whether or not their property located at 1201 Sycamore Terrace within the Rancho La Mesa Mobile Home Park is included on the map. A clearer version of this map is being provided in the Final EIR as Figure 2-2, Local Vicinity Map/Specific Plan Area.

The property referenced by the commenter is not one of the properties subject to the ECR Plan, although it is located within the study boundaries identified on Exhibit 2-2 of the EIR. Therefore, this property would not be affected by land use/zoning designation changes or relocations associated with the project.

**Page 1 of 1**  
**Comment Letter 5**  
**Mark Ridgeway**

**Christie, David**

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**From:** Mark Ridgeway <mridgeway@addisonengineering.com> on behalf of mr078912@gmail.com  
**Sent:** Wednesday, March 16, 2022 3:33 PM  
**To:** Jeffrey Cucinotta  
**Subject:** Sunnyvale Planning Project #2014-7432  
**Categories:** El Camino Real Specific Plan Update

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Jeff –

Per the letter I received for development projects along the El Camino Real.

Questions –

5-1

1. Are there investment companies spearheading this request? If so who are they and what state do they reside.
2. As a resident of Sunnyvale – we are asked to conserve water. Adding 6900+ residential units is going in the opposite direction of water conservation. What is Sunnyvale going to offer to satisfy that no penalties or added burden be placed on existing residences?

These are just a few opening questions – looking forward to your reply.

Regards,

**Mark Ridgeway**  
O: +1 (408) 750-4172

**Response No. 5**  
**Mark Ridgeway**  
**March 16, 2022**

- 5-1 The commentor requests to know details regarding whether investment companies are involved with the project. It should be noted that the Specific Plan has been prepared at the direction of the City Council; refer to the City Council staff report dated September 13, 2016. In addition, this comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 5-2 The commentor cites concerns over water supply issues associated with the project and how existing residences might be impacted. The EIR has appropriately addressed water supply impacts as required by CEQA. As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR (Impact 3.16.1, Standard of Significance 1 and Impact 3.16.2, Standard of Significance 2), a Water Supply Assessment (WSA) was conducted to ensure that adequate water supply and reliability within the City, now and into the future, is available to serve the growth envisioned in the Specific Plan. Analysis in the WSA estimates that implementation of the Specific Plan would add approximately 600 acre-feet per year (AFY) of demand to the City's water system. The potable water demand for the project is estimated to be 967 AFY under normal conditions by the buildout year 2025. The WSA determined that the City can meet future water demands, including the demands associated with buildout of the Specific Plan, during drought years by utilizing a combination of groundwater, conservation, recycled water, and the available San Francisco Public Utilities Commission (SFPUC) and Santa Clara Valley Water District (SCVWD) contractual water supply limits. In addition, the WSA found that supplies of imported water are expected to remain relatively stable throughout the forecast period and that water conservation and increased local well production would balance the demand for water in the City.

Because the WSA found that the City has an adequate supply of water to provide water service to the project throughout 2035 under normal and drought conditions, the project would not require any new or expanded water supply facilities and the EIR found this impact to be less than significant.



1 of 1

**Comment Letter 6**

**Claudia Giacomini**

**Christie, David**

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**From:** Claudia Giacomini <claudia645@icloud.com>  
**Sent:** Thursday, March 17, 2022 4:59 PM  
**To:** Jeffrey Cucinotta  
**Subject:** ECRSP

**Categories:** El Camino Real Specific Plan Update

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

6-1 Does this plan involve changing the community center in Sunnyvale? And will it involve getting rid of the Apricot orchard?

Sent from my iPad

**Response No. 6**  
**Claudia Giacomini**  
**March 17, 2022**

- 6-1 This comment consists of questions concerning the impact of the project relative to the Community Center and the apricot orchard. The Community Center and adjacent orchard are located within the project's boundaries and future retail development would occur in this area; however, neither the Community Center nor the orchard would be removed with the project because the City considers it to be an asset for the community. The following text from Section 2.4.3, *Land Uses and Design*, in the Project Description section of the EIR, provides the following explanation regarding this area:

*"The Orchard District Node, which has been referred to in past planning studies as the Community Node, includes the Sunnyvale Community Center. The Sunnyvale Community Center serves as a significant public amenity, and new development in this node should facilitate safe and attractive pedestrian access to this public gathering space. Immediately south of the Orchard District Node is Heritage Park and the historic 10-acre orchard. This community asset provides this neighborhood with a tangible link to Sunnyvale's cultural history. As such, it can become a unique community icon for the neighborhood. Future development in this node should ensure that buildings shape a vibrant pedestrian realm with access to ground-floor restaurants and retail/service establishments as well as upper-level residential entries when allowed."*

**Page 1 of 1**  
**Comment Letter 7**  
**Sandy Wright**

**Christie, David**

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**From:** sandy wright <wrong1wright@yahoo.com>  
**Sent:** Friday, March 18, 2022 11:12 AM  
**To:** Jeffrey Cucinotta  
**Subject:** re El Camino Real plan  
**Categories:** El Camino Real Specific Plan Update

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

Hi Mr. Cucinotta,

7-1

I am quite worried about the proposed changes being discussed. I certainly hope that the city will take into serious consideration the privacy and light that single family homes currently enjoy for those of us who back up to an El Camino business.

My back yard is very private and it should always remain so, the value of my home would decrease if a multi story building is erected behind my wall or if any dwellings are able to see into my yard.

7-2

Can someone please tell me why you keep adding to the traffic and congestion on El Camino. Can you not find someplace else to erect housing units, how about closer to the bay and install a bus route to El Camino for any residents who don't drive.

The down town area is getting very, very crowded. We need to use some common sense when planning housing units and not put them in the busiest places.

Thank you for taking the time to read this, well I hope you did anyway.

Sandy Wright

**Response No. 7**  
**Sandy Wright**  
**March 18, 2022**

- 7-1 This comment expresses concern regarding the single-family homes located in the project area, stating that the privacy and light currently experienced by these homes would be impacted if multi-story buildings are constructed nearby. As discussed in Section 3.1, *Aesthetics*, of the EIR, the project would result in a less than significant impact relative to aesthetics (Impact 3.1.1, Standard of Significance 3). Due to the programmatic nature of this environmental document, it is unknown at this time whom the specific project proponents (developers) would be with regard to site-specific future development in the project area. However, implementation of future development projects in the project area will be subject to site-specific aesthetic analysis to ensure conformance with existing regulations. The Specific Plan, in conjunction with the El Camino Real Specific Plan Chapter (ECRSPC) of the Sunnyvale Municipal Code (SMC), includes development policies, land use regulations, design guidelines, and infrastructure improvement plans.

Development standards are indicators of firm requirements and pertain to such categories as building areas, building heights, building setbacks, residential density, parking, etc. As such, development standards are rules or measures pertaining to land uses and zoning that establish a level of quality or quantity that must be complied with or satisfied. Implementation of these measures would ensure that privacy and light experienced by single-family homes in the project area would not be adversely affected.

- 7-2 This comment expresses concern regarding additional traffic that would occur with the project, specifically along El Camino Real. The project's impacts regarding traffic and transportation are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's operational impacts relative to traffic and transportation would be less than significant. Specifically, future projects developed within the Specific Plan area would be required to implement Mitigation Measure TRA-1, below, to reduce potentially significant impacts:

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.



Subsequent development projects proposed after adoption of the Specific Plan would be required to identify potential roadway improvements to address deficiencies resulting from implementation of the project and pay a fair share contribution and/or construct needed improvements as a condition of approval. The potential improvements identified in the project's *Transportation Impact Analysis* primarily consist of the installation or reconfiguration of traffic lanes to provide for new turn lanes at multiple intersections in the Specific Plan area, and multimodal improvements that promote walking, bicycling, and transit. As such, impacts relative to traffic and transportation would be reduced to a less than significant level.

**1 of 1**  
**Comment Letter 8**  
**Denise Sils**

**Christie, David**

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**From:** Denise Sils <mail2denise@gmail.com>  
**Sent:** Saturday, March 19, 2022 2:33 PM  
**To:** Jeffrey Cucinotta  
**Subject:** Draft Environmental Impact Report for Proposed El Camino Real Specific Plan  
  
**Categories:** El Camino Real Specific Plan Update

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

Hello Mr. Cucinotta,

8-1 I understand you are the Senior Planner for the above. I read your Notice of Availability. It is very general and difficult to understand.  
Please explain in plain English the details, or provide a more detailed report so I can evaluate properly what I think about it and can give you honest feedback. I live in this area and would like to better understand.

8-2 I'm happy to have improvements to El Camino. Noise is an issue where I live. Also, I am regularly exposed to fumes from Sunnyvale VW, and sound noise. Will there be additional noise, toxins, etc. when your plans are being done and if so, what? Also, what are the good things...like where will additional housing be built, will roads be demolished and widened.

Those sorts of things. Also, how long will it take to accomplish these things and how will it impact traffic? Will there be detours during these times so car fumes, truck fumes, etc. do not impact local residents?

Thank you for providing a detailed report.

Best,

Denise Sils

1248 Valerian Ct., #4

Sunnyvale, CA 94086

408-737=3988

**Response No. 8****Denise Sils****March 19, 2022**

- 8-1 The commentor states that they are unable to understand the Notice of Availability released by the City and have requested an additional explanation regarding the project details. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 8-2 The commentor requests further information regarding the project's impacts relative to "fumes" (air quality emissions), noise and traffic, including detours.

Air Quality: The project's impacts regarding air quality are discussed in Section 3.2, *Air Quality*, of the EIR. The EIR concluded that the project would result in a significant and unavoidable impact and a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard during construction. However, future projects developed in the Specific Plan area would be required to implement mitigation measures to reduce air quality impacts to the extent feasible. Mitigation Measures AQ-1 and AQ-2, found in Impact 3.2.2 (Standard of Significance 2), and Mitigation Measures AQ-3 and AQ-4, found in Impact 3.2.5 (Standard of Significance 3) in Section 3.2, *Air Quality*, in the EIR, are applicable to the project:

**AQ-1** Prior to the issuance of grading or building permits, the City of Sunnyvale shall ensure that the Bay Area Air Quality Management District's (BAAQMD) basic construction mitigation measures from Table 8-2 of the BAAQMD 2017 CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents. These basic construction mitigation measures include the following:

- 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- 4) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- 6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the

California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- 8) A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**AQ-2** In the cases where construction projects are projected to exceed the Bay Area Air Quality Management District's air pollutant significance thresholds for NOX, PM10, and/or PM2.5, all off-road diesel-fueled equipment (e.g., rubber-tired dozers, graders, scrapers, excavators, asphalt paving equipment, cranes, and tractors) shall be at least California Air Resources Board (CARB) Tier 3 Certified or better.

**AQ-3** In the case when a subsequent project's construction is greater than five acres and is scheduled to last more than two years, the subsequent project shall be required to prepare a site-specific construction pollutant mitigation plan in consultation with the Bay Area Air Quality Management District (BAAQMD) staff prior to the issuance of grading permits. A project-specific construction-related dispersion modeling acceptable to BAAQMD shall be used to identify potential toxic air contaminant (TAC) impacts, including diesel particulate matter. If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in 1 million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule. The City shall ensure construction contracts include all identified measures and that the measures reduce the health risk below BAAQMD risk thresholds. Construction pollutant mitigation plan measures shall include, but not be limited to:

- 1) Limiting the amount of acreage to be graded in a single day.
- 2) Notification of affected sensitive receptors one week prior to commencing onsite construction so that any necessary precautions (such as rescheduling or relocation of outdoor activities) can be implemented. The written notification shall include the name and telephone number of the individual empowered to manage construction of the project. In the event that complaints are received, the individual empowered to manage construction shall respond to the complaint within 24 hours. The response shall include identification of measures being taken by the project construction contractor to reduce



construction-related air pollutants. Such a measure may include the relocation of equipment.

**AQ-4** The following measures shall be utilized in site planning and building designs to reduce TAC and particulate matter (PM) 2.5 exposure where new receptors are located within 1,000 feet of emissions sources:

- Future development that includes sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) located within 1,000 feet of Caltrain, Central Expressway, El Camino Real, Lawrence Expressway, Mathilda Avenue, Sunnyvale-Saratoga Road, US 101, State Route 237, State Route 85, and/or stationary sources shall require site-specific analysis to determine the level of health risk. This analysis shall be conducted following procedures outlined by the BAAQMD. If the site-specific analysis reveals significant exposures from all sources (i.e., health risk in terms of excess cancer risk greater than 100 in one million, acute or chronic hazards with a hazard Index greater than 10, or annual PM<sub>2.5</sub> exposures greater than 0.8 µg/m<sup>3</sup>) measures shall be employed to reduce the risk to below the threshold (e.g., electrostatic filtering systems or equivalent systems and location of vents away from TAC sources). If this is not possible, the sensitive receptors shall be relocated.
- Future nonresidential developments identified as a permitted stationary TAC source or projected to generate more than 100 heavy-duty truck trips daily will be evaluated through the CEQA process or BAAQMD permit process to ensure they do not cause a significant health risk in terms of excess cancer risk greater than 10 in one million, acute or chronic hazards with a hazard Index greater than 1.0, or annual PM<sub>2.5</sub> exposures greater than 0.3 µg/m<sup>3</sup> through source control measures.

Noise: The project's impacts regarding noise are discussed in Section 3.11, *Noise*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to noise would be less than significant. Mitigation Measure NOI-1, found in Impact 3.11.1 (Standard of Significance 1), and Mitigation Measures NOI-2 and NOI-3, found in Impact 3.11.2 (Standard of Significance 2) in Section 3.11, *Noise*, in the EIR, are applicable to the project.

**NOI-1** For projects that are subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects), project applicants shall ensure through contract specifications that construction best management practices (BMPs) will be implemented by all project contractors to reduce construction noise levels. Contract specifications shall be included in construction documents, which shall be reviewed and approved by the City Community Development Department prior to issuance of a grading or building permit (whichever is issued first). BMPs to reduce construction noise levels may include, but are not limited to, the following:

- 1) Ensure that construction equipment is properly muffled according to industry standards and is in good working condition.
- 2) Place noise-generating construction equipment and construction staging areas away from sensitive uses.
- 3) Construction activities shall occur between the hours of between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturdays, pursuant to Sunnyvale Municipal Code Chapter 16.08.
- 4) Implement noise attenuation measures, as needed, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.
- 5) Use electric air compressors and similar power tools rather than diesel equipment, where feasible.
- 6) Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes.
- 7) The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturdays). The haul route exhibit shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise.
- 8) Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party and the Community Development Department.

**NOI-2** Projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) with construction activities requiring operation of groundborne vibration generating equipment (i.e., vibratory compactor/roller, large bulldozer, caisson drilling, loaded trucks, and jackhammer) within 25 feet of a structure shall be required to prepare a project-specific vibration impact analysis to evaluate potential construction vibration impacts associated with the project, and to determine any specific vibration control mechanisms that shall be incorporated into the project's construction bid documents to reduce such impacts. Contract specifications shall be included in construction documents, which shall be reviewed and approved by the City Engineer prior to issuance of a grading permit.

**NOI-3** Projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) which require impact pile driving activities within 100 feet of buildings and/or sonic pile driving activities within 60 feet of buildings

shall implement the below measures to reduce the potential for architectural/structural damage resulting from elevated groundborne vibration levels. Contractors shall demonstrate, to the satisfaction of the City Engineer and prior to issuance of a grading permit, that pile driving activities would not exceed the California Department of Transportation (Caltrans) vibration threshold (i.e., 0.2 inch/second peak particle velocity [PPV]) prior to initiation of construction.

- Impact pile driving within 100 feet of any building shall utilize alternative installation methods, such as pile cushioning, jetting, predrilling, cast-in-place systems, and resonance-free (i.e., sonic) vibratory pile drivers.
- Sonic pile driving activities within 60 feet of any building shall utilize alternative installation methods, such as pile cushioning, jetting, predrilling, and cast-in-place systems.

Traffic/Transportation: The project's impacts regarding traffic and transportation (including discussion regarding detours) are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to traffic and transportation during both construction and operation would be less than significant. Mitigation Measure TRA-1, found in Impact 3.15.1 (Standard of Significance 1), and Mitigation Measure TRA-2, found in Impact 3.15.7 (Standard of Significance 7) in Section 3.15, *Transportation*, in the EIR, are applicable to the project.

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.

**TRA-2** Before construction or issuance of building permits, the developer or the construction contractor for the project shall prepare a temporary traffic control (TTC) plan to the satisfaction of the City Department of Public Works, Division of Transportation and Traffic and subject to review by all affected agencies. The TTC shall include all information required on the City TTC Checklist and conform to the City's TTC Guidelines. At a minimum, the plan shall include the following elements:

- provide vicinity map including all streets within the work zone properly labeled with names, posted speed limits and north arrow;
- provide existing roadway lane and bike lane configuration and sidewalks where applicable including dimensions;



- description of proposed work zone;
- description of detours and/or lane closures (pedestrians, bicyclists, vehicular);
- description of no parking zone or parking restrictions;
- provide appropriate tapers and lengths, signs, and spacing;
- provide appropriate channelization devices and spacing;
- description of buffers;
- provide work hours/work days;
- dimensions of above elements and requirements per latest CA—MUTCD Part 6 and City's SOP for bike lane closures;
- provide proposed speed limit changes if applicable;
- description of bus stops, signalized and non-signalized intersection impacted by the work;
- show plan to address pedestrians, bicycle and ADA requirement throughout the work zone per CA-MUTCD Part 6 and City's SOP for bike lane closures;
- indicate if phasing or staging is requested and duration of each;
- description of trucks including: number and size of trucks per day, expected arrival/departure times, truck circulation patterns;
- provide all staging areas on the project site;
- ensure that the contractor has obtained and read the City's TTC Guidelines and City's SOP for bike lane closures; and
- ensure traffic impacts are localized and temporary.

**Page 1 of 1**  
**Comment Letter 9**  
**James Takasugi**

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**Christie, David**

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**From:** James Takasugi <jtakasug@gmail.com>  
**Sent:** Saturday, March 19, 2022 11:32 AM  
**To:** Jeffrey Cucinotta  
**Subject:** ECRSP

**Categories:** El Camino Real Specific Plan Update

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

9-1 ECR is where commercial and residential uses mix. Where pedestrians, cyclists and auto traffic converge. Effective circulation and transportation solutions therefore are critical in maximizing safety while encouraging use of ECR. This is more critical in implementing the increased density of ECR.

9-1 The specific plan needs to address the inherent conflicting nature of automobile, cycling and pedestrian traffic. It also needs to address increasing auto traffic volume resulting from the general plan while decreasing carbon emissions.

9-1 Providing a comprehensive set of solutions is far from my capabilities, but I offer a few specific examples.

- 9-2 1. Current ECR auto traffic pattern is too dangerous for cyclists: giving preference to auto traffic in the design of lanes, street markings, signalization, etc. Yet Sunnyvale has not provided viable residential street alternatives for cyclists. Implementation of this Specific Plan must be conditioned on implementing cohesive alternate cycling paths by way of safe, connected residential streets and paths giving preference to pedestrians and cyclists paralleling ECR.
- 9-3 2. Increasing use densities on ECR must be conditioned with revamping public transportation schemes. This includes improved schedules of public transport service that makes sense. Getting from point A to B using current public transport within a reasonable amount of time and effort is a joke. Just look at any other country and how they prioritize public transportation. Steps in the right direction for the ECRSP is providing dedicated bus lanes on ECR, safe zones for bus loading, shuttle connections to CalTrain and Lightrail, connecting cycling paths with public transport nodes, etc.
- 9-4 3. Investment in EV charging infrastructure is critical to encourage, indeed enable, current desire for drivers to go EV. Where are the requirements in the ECRSP for EV charging points for residential and commercial developers?

**Response No. 9**  
**James Tagasuki**  
**March 19, 2022**

- 9-1 This comment cites a concern regarding the mixed-use nature of development associated with automobiles, bicyclists and pedestrians that could result in safety issues, as well as increased traffic and air emissions.

As stated in Section 3.15, *Transportation*, of the EIR, the El Camino Real corridor through Sunnyvale is designated as a Priority Development Area and a Transit Priority Area and the proposed intersection improvements provided in the project's *Transportation Impact Analysis* prepared by Hexagon Transportation Consultants (2020) would serve to improve access to the Sunnyvale Caltrain Station and the Lawrence Caltrain Station, improve multimodal safety, and enhance the overall transit-oriented nature of the project area. Improvements associated with enhancing bicyclist and pedestrian facilities, connectivity, and safety could include sidewalks, curb ramps, Class I shared-use paved trails, pathways, and bicycle and pedestrian crossings.

The project's impacts regarding traffic and transportation (including discussion regarding detours) are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to traffic and transportation (would be less than significant. Refer to Section 3.15, *Transportation*, and Mitigation Measures TRA-1 and TRA-2, in the EIR, for detailed discussion.

The project's impacts regarding air quality are discussed in Section 3.2, *Air Quality*, of the EIR. The EIR concluded that the project would result in a significant and unavoidable impact and a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard during construction. However, future projects developed in the Specific Plan area would be required to implement mitigation measures to reduce air quality impacts to the extent feasible. Refer to Section 3.2, *Air Quality*, and Mitigation Measures AQ-1 through AQ-4, in the EIR, for detailed discussion.

- 9-2 The commentor reiterates their concern regarding bicycle facility planning associated with the project. As stated in Response 9-1 above, the project's impacts regarding safety for bicyclists and pedestrians is discussed in Section 3.15, *Transportation*, of the EIR, and impacts were determined to be less than significant.
- 9-3 The commentor states that they would like to see improved transit services incorporated into the project. The Specific Plan establishes design standards and guidelines for enhanced transit, pedestrian, bicycle and automobile circulation specific to the Specific Plan Area. The following text from Section 2.4.4, *Circulation*, in the Project Description section of the EIR, provides the following explanation regarding this area:

*"Current infrastructure along El Camino Real favors the movement of automobiles through the corridor and does not contain many features that are safe or attractive to pedestrians and bicyclists. A complete streets approach that accommodates transit, bicycle, and pedestrian travel would require modifications to the infrastructure within the existing circulation framework and the existing street right of way. Future modifications in conjunction with implementation of the Specific Plan and the City's Active Transportation Plan would create an environment that is safe, comfortable, and appealing to users of different modes."*

In addition, as stated in Response 9-1 above, the proposed intersection improvements provided in the project's *Transportation Impact Analysis* prepared by Hexagon Transportation Consultants (2020) would serve to improve access to the Sunnyvale Caltrain Station and the Lawrence Caltrain Station, improve multimodal safety, and enhance the overall transit-oriented nature of the project area.

- 9-4 The commentor asks whether there are requirements in the Specific Plan for electric vehicle (EV) charging infrastructure. As discussed in Section 3.5, *Energy*, of the EIR, the project would include as a project design feature on-site electric vehicle charging stations in parking lots in compliance with the CALGreen Code and the City's reach code ordinance (the City's reach code ordinance [effective January 26, 2021] requires residential and nonresidential new construction to use electric appliances only, install solar panels, and include electric vehicle charging stations). This project design feature would encourage and support the use of electric vehicles by residents, workers, and visitors of the proposed project and thus reduce the petroleum fuel consumption.



**Page 1 of 1**  
**Comment Letter 10**  
**Brent Miller**

**Christie, David**

**From:** Brent Miller <brent.d.m@gmail.com>  
**Sent:** Sunday, March 20, 2022 3:05 PM  
**To:** Jeffrey Cucinotta  
**Subject:** comments on Draft EIR project no. 2014-7432  
**Categories:** El Camino Real Specific Plan Update

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

Hello Mr. Cucinotta,

I am a Sunnyvale Resident with comments on the El Camino Real Specific Plan (Sunnyvale Planning Project 2014-7432).

10-1 I have lived in Sunnyvale starting in 1982 and consider myself to have a well-informed, balanced view of the area's challenges. In particular, I use mixed methods of transportation including (from most frequent to least frequent) cycling, walking/jogging, and driving motor vehicles (passenger and multi-axle). I encourage for my family a preference of non-motored transportation within practicality.

I have two comments:

10-2 (1) Please increase the setback for buildings farther than has been allowed between Hollenbeck and Mathilda. Chick-Fil-A has proven that the setback is insufficient for any highly frequented establishment. While pedestrians' ability to access the building from the sidewalk is good, the setback is too small, creating a blind approach for drivers leaving the lot and cyclists/pedestrians on the highway. Worse yet, because of the small setback, there is no option to widen pavement for a turn lane or a bicycle lane. This location has become utterly unsafe as a transportation corridor for cyclists and pedestrians--anyone traveling this route must effectively stop at this location. Furthermore, the eastbound right-hand driving lane of El Camino Real is rendered unusable, creating hazards for drivers approaching and intending to turn right onto Mathilda or any upcoming business. There is near-uniform frustration among residents in the neighboring communities south of El Camino Real. I believe this pattern should not be repeated.

10-3 (2) The state has been removing "corner pedestrian islands" along the El Camino corridor. I would like the city to resist these changes and reverse them if possible. Removing the dedicated turn lanes with corner pedestrian islands has created much higher contention between motorists and pedestrians. A single car proceeding forward now blocks all other right-turning vehicles, and when a green light becomes available the drivers are often impatient to go, failing to recognize as they accelerate from behind the straight-proceeding vehicle that their path to turn right is now blocked by pedestrians. At this point a single right-turning vehicle blocks all forward-proceeding vehicles. Sometimes only a single vehicle succeeds in proceeding during a green cycle, worsening congestion and worsening the patience of commute drivers. Often, right-turning drivers fail to merge to their right, creating a hazardous predicament for cyclists. Furthermore, as a parent shepherding children, removal of the pedestrian islands puts me in a position of needing to watch for traffic approaching from both ahead (vehicles turning left) and behind (vehicles turning right). I don't know if the city plan has any interaction with state projects, but I mention this comment anyway because they do affect each other and the state activities are undermining the goal of cooperative mixed-mode transportation.

I hope my comments are useful. Thank you for reading.

Yours,  
 Brent Miller  
 563 Crawford Drive  
 Sunnyvale, CA 94087



**Response No. 10****Brent Miller****March 20, 2022**

- 10-1 This comment provides a general introduction. Responses to specific comments are provided below.
- 10-2 The commentor cites a concern regarding motorist, bicyclist, and pedestrian safety in the existing project area along Hollenbeck and Mathilda Streets, relative to what they believe to be an insufficient setback distance. The commentor requests that the setback distance be increased for the proposed project. As discussed in Section 2.4, *Project Characteristics*, of the EIR, the Specific Plan, in conjunction with the El Camino Real Specific Plan Chapter (ECRSPC) of the Sunnyvale Municipal Code (SMC) establishes development policies, land use regulations, design guidelines, and infrastructure improvement plans. Development standards are indicators of firm requirements and pertain to such categories as building areas, building heights, building setbacks, residential density, parking, etc. As such, development standards are rules or measures pertaining to land uses and zoning that establish a level of quality or quantity that must be complied with or satisfied. Implementation of these measures would ensure that appropriate setback distances are included in the design of site-specific future development projects in the project area.
- 10-3 This comment reiterates the commentor's safety concerns regarding motorist, bicyclist, and pedestrian safety, and in particular, the commentor requests that the City does not remove existing "pedestrian corner islands" along the El Camino Real corridor. As stated in Section 3.15, *Transportation*, of the EIR, the El Camino Real corridor through Sunnyvale is designated as a Priority Development Area and a Transit Priority Area and the proposed intersection improvements provided in the project's *Transportation Impact Analysis* prepared by Hexagon Transportation Consultants (2020) would serve to improve access to the Sunnyvale Caltrain Station and the Lawrence Caltrain Station, improve multimodal safety, and enhance the overall transit-oriented nature of the project area. Improvements associated with enhancing bicyclist and pedestrian facilities, connectivity, and safety could include sidewalks, curb ramps, Class I shared-use paved trails, pathways, and bicycle and pedestrian crossings.

In addition, the project would not conflict with the policies concerning multimodal transportation facilities within the Specific Plan and would provide increased connectivity consistent with adopted plans and policies. Therefore, the project would not increase safety risks associated with motorists, bicyclists, and pedestrians traveling along the El Camino Real corridor, but rather, would enhance multimodal safety throughout the project area.

**Page 1 of 1**  
**Comment Letter 11**  
**Marc and Lita Ketzel**

**Christie, David**

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**From:** marc.ketzel@yahoo.com  
**Sent:** Monday, March 21, 2022 7:49 AM  
**To:** Jeffrey Cucinotta  
**Subject:** Feedback on the El Camino Specific Plan  
  
**Categories:** El Camino Real Specific Plan Update

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

Hello Jeffrey,

- 11-1 As a long time resident of Sunnyvale, my wife and I would like to provide some feedback on the ECRSP:
- 11-2 1) We support continued moderate growth and redevelopment on El Camino, but not the proposed plan as it currently is presented.
- 11-2 2) We feel the proposed plan to add a net increase of 6,900 housing units and additional commercial space is overly aggressive, and will result in a lower quality of living for SV. Traffic congestion will for sure get worse, and SV if it grows too fast will lose what makes it special in terms of being a highly live-able city.
- 11-3 3) Proposed plan will make the drought and water issues worse.
- 11-3 Thanks for the opportunity to provide feedback!
- Marc and Lita Ketzel

**Response No. 11**  
**Mark and Lita Ketzel**  
**March 21, 2022**

- 11-1 The commentors note disagreement with the project as proposed. This comment provides a general introduction. Responses to specific comments are provided below.
- 11-2 The commentors express that they believe the proposed number of residential units associated with the project (6,900 units) is too aggressive and would result in too much growth in the City. As discussed in Section 3.12, *Population and Housing*, of the EIR, the City's population was an estimated 140,081 persons in 2010 and is currently estimated to be approximately 156,503 persons, representing a population increase rate of approximately 11.7 percent between 2010 and 2020. According to the Association of Bay Area Governments (ABAG), a regional metropolitan planning organization, the City's population is forecast to increase to approximately 203,780 persons by 2035 (adding an additional 47,000 residents). This represents a 30.2 percent increase from 2020 to 2035, whereas by comparison, the County of Santa Clara overall is projected to increase at a rate of just 21.7 percent in the same time period. As such, there is a need for additional housing in the City to accommodate the additional population growth that is forecast to occur, regardless of whether the proposed project is implemented.

As discussed in Section 3.12, *Population and Housing*, of the EIR, it is speculative to determine whether all future residents of the anticipated 6,900 additional dwelling units would relocate from within or outside of the City. Thus, the analysis provided in the EIR conservatively assumes future residents would relocate from outside of the City. Based on the City's average household size of 2.69 persons per household, the anticipated 6,900 additional units would introduce up to 18,561 additional residents to the City. The anticipated population growth associated with the project represents only a 12 percent increase from the City's current population of 156,503 persons.

Furthermore, the project as proposed, in connection with the City's Land Use and Transportation Element (LUTE) of the General Plan, would accommodate anticipated future growth through a compact urban form that seeks to make efficient use of existing infrastructure and public services. Because most of Sunnyvale has been developed with urban-type uses, the project is focused on redeveloping lands currently occupied by commercial uses. Project implementation would allow for undeveloped and underutilized lands to be converted to mixed-use and residential housing that would substantially increase the City's existing housing stock. Land use designations in some areas within the project boundaries not currently designated for growth would be changed under the proposed project, in order to accommodate new anticipated development. In doing so, the project is aimed at allowing for orderly future development of adequate housing, nonresidential facilities, and public services within the corridor, as well as enhanced transportation infrastructure systems to serve the corridor, and implementing sustainable growth planning and policies for a growing population.

In consideration of the above, the EIR concluded that a less than significant impact would occur relative to population and housing.

- 11-3 The commentors cite concerns over water supply issues associated with the project and concern regarding the drought. The EIR has appropriately addressed water supply impacts as required by CEQA. As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR (Impact 3.16.1, Standard of Significance 1 and Impact 3.16.2, Standard of Significance 2), a Water Supply Assessment (WSA) was conducted to ensure that adequate water supply and reliability within the City, now and into the future, is available to serve the growth envisioned in the Specific Plan. Analysis in the WSA estimates that implementation of the Specific Plan would add approximately 600 acre-feet per year (AFY) of demand to the City's water system. The potable water demand for the project is estimated to be 967 AFY under normal conditions by the buildout year 2025. The WSA determined that the City can meet future water demands, including the demands associated with buildout of the Specific Plan, during drought years by utilizing a combination of groundwater, conservation, recycled water, and the available San Francisco Public Utilities Commission (SFPUC) and Santa Clara Valley Water District (SCVWD) contractual water supply limits. In addition, the WSA found that supplies of imported water are expected to remain relatively stable throughout the forecast period and that water conservation and increased local well production would balance the demand for water in the City.

Because the WSA found that the City has an adequate supply of water to provide water service to the project throughout 2035 under normal and drought conditions, the project would not require any new or expanded water supply facilities and the EIR found this impact to be less than significant

**Page 1 of 1**  
**Comment Letter 12**  
**George Kasthuri**

**Christie, David**

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**From:** Kasthuri George <kasthuri\_george@yahoo.com>  
**Sent:** Wednesday, March 23, 2022 10:16 AM  
**To:** Jeffrey Cucinotta  
**Subject:** Flyer to residents on 'El Camino Real Specific Plan'  
**Attachments:** Flyer.jpg

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

Hi Jeffrey,

thank you for returning my call regarding the flyer referenced in the subject.

Here's my feedback on the flyer.

12-1 It is very difficult to figure out what the flyer is all about without reading and rereading several pages. 'El Camino Real Specific Plan' (if at all this is what the project is called) has no meaning and tells nothing to an average resident. If the city needs me to read further and understand or take action, it needs to tell me more about the project in the subject line.

Here is a simple suggestion.

Please give 2 or 3 lines summary of the project itself on the top something like 'Residential & Commercial use of space between x and y around El Camino Real and amendments to zoning..' (I have attempted to summarize the 6 bullet points in the flyer and may not be accurate here)

Hope to see flyers with good summary of the subject.

Thanks  
Kasthuri



**Response No. 12**

**George Kasthuri**

**March 23, 2022**

- 12-1 The commentor states that they are unable to understand the Notice of Availability released by the City and have requested an additional explanation regarding the project details. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Page 1 of 1**  
**Comment Letter 13**  
**Rob Hurlston**

**Christie, David**

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**From:** Rob Hurlston <rhurlstn@pacbell.net>  
**Sent:** Monday, March 28, 2022 4:40 PM  
**To:** Jeffrey Cucinotta  
**Subject:** El Camino plan

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

13-1 I support the plan. We desperately need more housing in Sunnyvale and the Bay Area. Since there is almost no available empty lots we need to increase density in the right places - and this is one of them. There will be complaints about the increase in traffic on El Camino, which is true, but the traffic on the freeways coming in from outlying areas will see a reduction.

Rob Hurlston  
Sunnyvale

**Response No. 13**  
**Rob Hurlston**  
**March 28, 2022**

- 13-1 This comment provides a general statement of support for the project; no concerns or questions regarding the environmental document were included. Comment noted.



**Page 1 of 1**  
**Comment Letter 14**  
**Terry Blumenthal**

**Christie, David**

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**From:** Terry Blumenthal <terryb7879@aol.com>  
**Sent:** Thursday, March 31, 2022 11:20 AM  
**To:** Jeffrey Cucinotta  
**Subject:** El Camino Real Specific Plan  
  
**Categories:** Backup Shift Questions

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

14-1

I probably live within the study area boundary but the printing on the map is so small I can't be sure. I'm curious about the parking arrangements for the potential buildout of 8,500 residential units. Are you planning for that or are you simply going to call it "transit orientated" like you're doing with the upcoming residential units in the Murphy St./old town project? I would appreciate a response.

Thank you

Terry Blumenthal  
478 S Frances St  
94086  
408-242-9827  
terryb7879@aol.com



**Response No. 14**

**Terry Blumenthal**

**March 31, 2022**

- 14-1 The commentor cites concerns regarding parking facilities for the residential component of the proposed project. As stated in Section 3.15, *Transportation*, of the EIR, Sunnyvale Municipal Code (SMC) Chapter 10.60 sets forth the City's Transportation Demand Management (TDM) program. SMC Section 19.46 includes minimum and maximum requirements for parking spaces for new development (number and type of spaces).

Due to the programmatic nature of this environmental document, it is unknown at this time whom the specific project proponents (developers) would be with regard to site-specific future development in the project area. However, implementation of future development projects in the project area will be subject to compliance with parking requirements and would not exceed maximum parking requirements or propose higher parking requirements than what is allowed per the development standards provided in the SMC parking requirements.

**Page 1 of 1**  
**Comment Letter 15**  
**Zachary Kaufman**

**Christie, David**

---

**From:** Zachary Kaufman <zachsv@outlook.com>  
**Sent:** Thursday, March 31, 2022 4:15 PM  
**To:** Jeffrey Cucinotta  
**Subject:** Questions regarding the El Camino Specific Plan  
**Categories:** Backup Shift Questions

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

Hi Jeffrey,

15-1 The 2007 El Camino plan was a "precise plan". The current draft of the El Camino plan is a "specific plan". Why was it changed to a "specific plan" and where do the differences manifest themselves?

15-2 Looking at the zoning map on page 43 of the draft El Camino plan, I am trying to make out the boundary of Hacienda Shopping Center. I think what I am seeing are property boundaries. What is the zoning for Marie Calender's over to Maria Lane showing?

--Zach--

**Response No. 15**  
**Zachary Kaufman**  
**March 31, 2022**

- 15-1 This comment is a request for an explanation regarding why the 2007 version of the El Camino Real plan document was changed from a “precise” plan to a “specific” plan. To clarify, a specific plan contains detailed guidance for long-term development. The current plan is a precise plan, which establishes a vision and design guidelines for development and also generally highlights development opportunities. As the term “specific” plan implies, the proposed/draft plan more specifically outlines the following: refined zoning parameters for residential vs. non-residential properties; more clearly established node/segment boundaries; objective development and design standards; circulation and streetscape improvements; a plan for infrastructure improvements and implementation; etc. When the City Council considers the Specific Plan for adoption in June, they will also consider certification of an EIR, a community benefits/development incentive program, updates to sections of Title 19, *Zoning*, of the Sunnyvale Municipal Code, among other plan components.
- 15-2 This comment is a request for the zoning designation of the Marie Calendar’s located at 751 El Camino Real over to Maria Lane. Proposed zoning for the Hacienda Shopping Center, as identified in Figure 4-3 on Page 49 of the Draft ECRSP is El Camino Real – Mixed Use (ECR-MU24) and El Camino Real – Commercial (ECR-C).

**Page 1 of 5**  
**Comment Letter 16**  
**Lisa Phye, Carmel Partners**



April 7, 2022

City of Sunnyvale  
 456 W. Olive Ave  
 Sunnyvale, CA 94086

To Whom it May Concern,

16-1

Carmel Partners is a national multifamily housing developer that has developed over 40,000 apartments and currently has over 7,000 apartments in development, including a proposed project at 777 Sunnyvale Saratoga Road in the El Camino Real Specific Plan area. We wish to thank the City of Sunnyvale staff and officials for their leadership and hard work in planning for the future of the El Camino Real Specific Plan area, and want to express our feedback. The Plan does an excellent job in crafting a framework for a vibrant mixed-use area but we feel there are a couple of proposed development requirements related to commercial space and open space that are inconsistent with the housing market today and, if unchanged, would prevent realization of the vitality of the district and of greater Sunnyvale that the Plan aims to achieve.

**The proposed commercial space requirement is unrealistic for parcels that do not front El Camino Real; this commercial space will be marginal or vacant.**

16-2

The first development requirement we believe will prevent achievement of the vitality of the Specific Plan area is the commercial requirement with regard to properties that do not front onto El Camino Real. While El Camino Real is a major commercial thoroughfare, not all parcels benefit from similar levels of pedestrian, bicyclist, or automotive traffic, particularly the parcels lacking frontage on El Camino Real. Because the vitality of retail, especially big-box retail, has been waning for years due to the rise of online shopping and has been hampered even further by the COVID-19 pandemic, retail spaces require ideal circumstances if they hope to attract tenants today. We agree that commercial requirements are necessary for vibrant urban areas, however, parcels off major thoroughfares should be held to a more realistic standard as there is already an abundant supply of existing retail space on El Camino Real with easy surface parking. The existing surface-parked retail on El Camino Real will always out compete other more marginal retail. The proposed requirement for commercial space on parcels that do not front El Camino Real will result in retail that is expensive and undesirable, marginal at best, and probably vacant.

The table in Appendix A details the current vacant retail spaces in the immediate area as of April 5, 2022. There are numerous retail spaces already available, large retail spaces in developments without El Camino Real frontage and without surface parking will be hard to convince retailers to occupy. These empty retail spaces will become an eye-sore in the district, fail to generate amenities for residents, and provide no sales tax revenue for the city. We believe the Specific Plan should prioritize allocating the larger commercial requirements along El Camino Real and allow parcels without El Camino Real frontage to provide a lesser minimum required amount of commercial space, for example, a commercial space minimum of a 50' depth and for 75% of their parcel frontage. The exhibits in Exhibit A detail the differences between the current requirements and our recommended requirements.

## Page 2 of 5

## Comment Letter 16

Lisa Phyfe, Carmel Partners

16-3

**The proposed open space requirements are inconsistent with and burdensome for the desired urban character of the ECR Specific Plan area.**

Requiring 380 square feet per unit may be feasible for suburban and moderate density development intensities up to 45 dwelling units per acre, however the ECR Specific Plan is allowing for densities up to 114 dwelling units per acre when combined with the ECRSP Incentive Program and State Density Bonus Program. At these densities, 380 square feet per dwelling unit is inconsistent with typical local, regional and national standards for such housing densities, and can be substantially onerous and yield large spaces which may impede the ability to deliver the desired housing densities in an area which is well suited for high-density housing due to location to transit, employment, and neighborhood amenities. We believe open space requirements that are aligned with Sunnyvale's other specific plans will create a better balance of housing and open space and make for a more vibrant, active Specific Plan area. Below is a table comparing the open space requirements of the El Camino Real Specific Plan district to the high-density residential Lawrence Station Specific Plan and Downtown Specific Plan districts. As shown, the El Camino Real Specific Plan is requiring over 7.5 times the open space per dwelling unit than Sunnyvale's other specific plans:

	<b>El Camino Real Specific Plan</b>	<b>Lawrence Station Specific Plan</b>	<b>Downtown Specific Plan</b>
<b>Useable Open Space Requirement</b>	380 square feet per unit	50 square feet per unit	50 square feet per unit

16-4

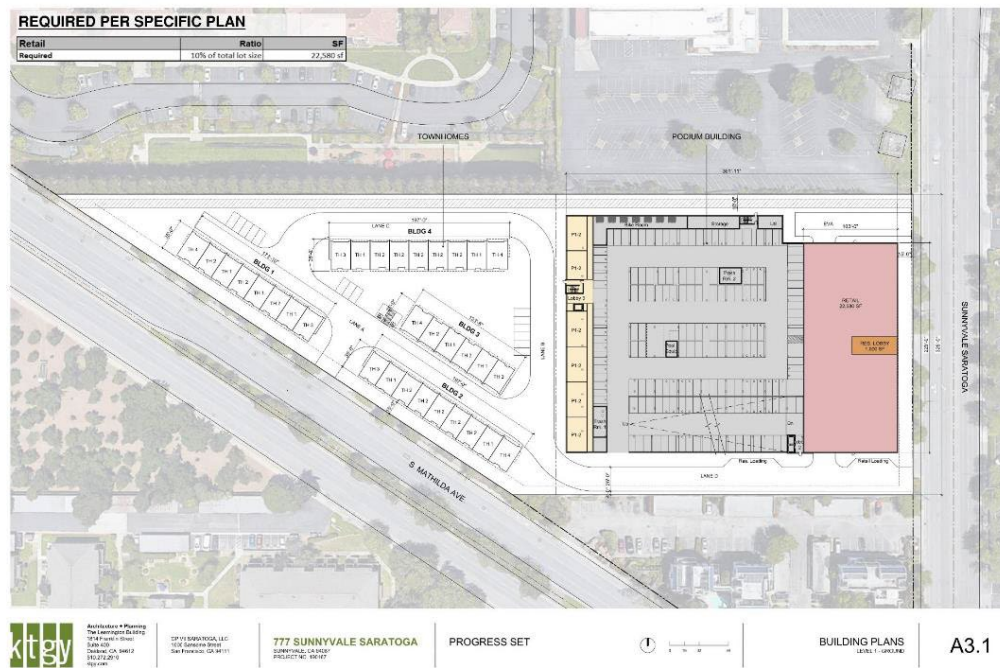
Carmel Partners believes that with these two changes, the El Camino Real Specific Plan will foster a more active and vibrant district in the future and create a more sustainable and reliable tax and revenue basis for the City of Sunnyvale. We wish to thank the city for all it's hard work and effort in drafting an impressive and well-thought-out specific plan and would welcome the chance to voice our thoughts in meetings going forward.

Sincerely,

Lisa Phyfe  
Carmel Partners

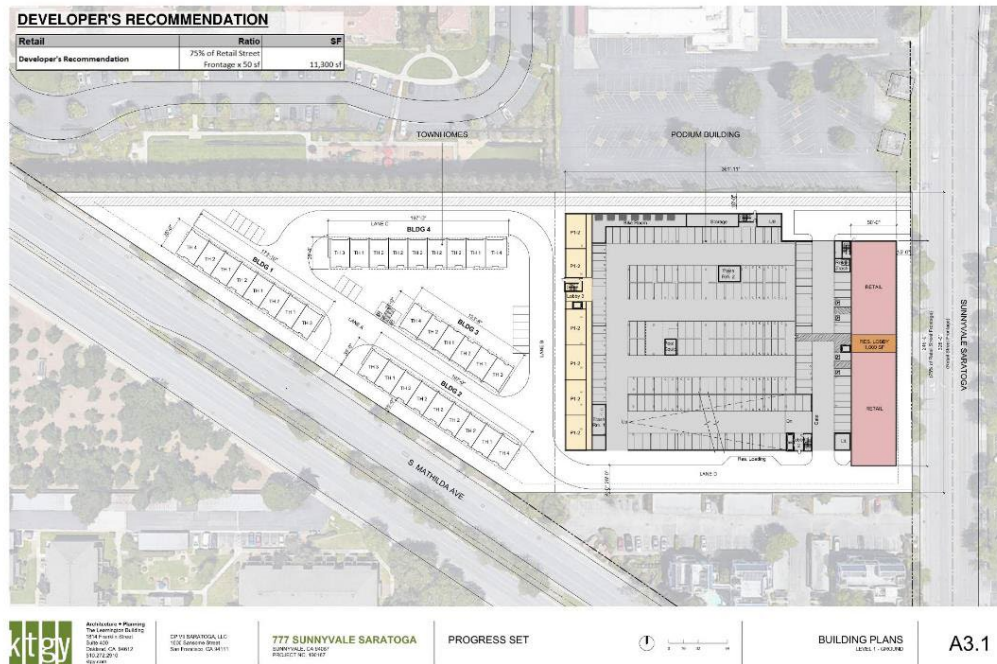
**Page 3 of 5**  
**Comment Letter 16**  
**Lisa Phyfe, Carmel Partners**

Exhibit A





**Page 4 of 5**  
**Comment Letter 16**  
**Lisa Phyfe, Carmel Partners**





**Page 5 of 5**  
**Comment Letter 16**  
**Lisa Phye, Carmel Partners**

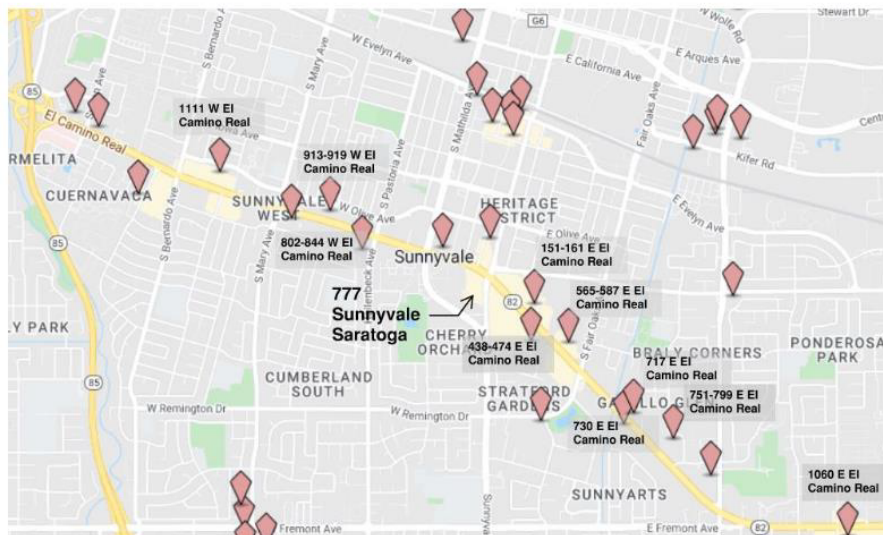
**Appendix A**

LoopNet is an online marketplace detailing properties for a variety of different commercial property types. Carmel Partners has compiled a list of retail properties which were available for lease on April 5, 2022 and has listed them in the table below and has created a map for context within the ECRSP.

LoopNet Listings as of April 5, 2022:

Address	# Vacant Suites	Vacant Square Footage	Parking Accommodations
751-799 E El Camino Real	15	25,504	Surface
1060 E El Camino Real	4	13,535	Surface
802-844 W El Camino Real	2	13,045	Surface
1111 W El Camino Real	5	6,435	Surface
717 E El Camino Real	1	3,114	Surface
151-161 E El Camino Real	1	3,000	Surface
438-474 E El Camino Real	1	2,038	Surface
913-919 W El Camino Real	1	1,384	Surface
565-587 E El Camino Real	1	1,170	Surface
730 E El Camino Real	1	1,152	Surface

LoopNet Listings Map:



**Response No. 16**

**Lisa Phyfe, Carmel Partners**

**April 7, 2022**

- 16-1 This comment provides a general introduction. Responses to specific comments are provided below.
- 16-2 The commentor cites a concern regarding the commercial land use component of the project, stating that the proposed commercial space requirement is unrealistic for parcels that do not front El Camino Real and that this commercial space will be marginal or vacant. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 16-3 The commenter feels that the proposed open space requirements are inconsistent with and burdensome for the desired urban character of the project area and that the open space requirements should be more aligned with those of the City's other specific plans including the Lawrence Station Specific Plan and Downtown Specific Plan. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 16-4 This comment provides a closing statement and expresses thanks to the City for the planning work involved in this project. Comment noted.

Page 1 of 1

Comment Letter 17

Jon Cowan, Senior Director of Government Relations, El Camino Health



Hospital Campuses

2500 Grant Road  
Mountain View, CA 94040  
650-940-7000

815 Pollard Road  
Los Gatos, CA 95032  
408-378-6131

elcaminohealth.org

April 11, 2022

City of Sunnyvale  
Community Development Department / Planning Division  
456 W. Olive Avenue  
Sunnyvale, CA 94086

**RE: Comment on Draft El Camino Real Specific Plan and Draft Sunnyvale Municipal Code Chapter 19.36 - 1027 W El Camino Real Inpatient Rehabilitation Facility**

On behalf of El Camino Health, we offer the following comments on the Draft El Camino Real Specific Plan. Specifically, our comments relate to the Draft Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts."

We are requesting that section 12 of Table 19.36.070B be updated to include the rest home/convalescent hospital use designation, also referred to as a rehabilitation hospital, as an auxiliary use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning. This type of use can successfully integrate with the City's vision of housing and retail space along El Camino Real.

17-1

The rehabilitation hospital use provides much needed inpatient rehabilitation services for the community. The hospital provides a place where patients can recover from stroke, neurological disorders, orthopedic injuries, and other injuries with the goal of getting them back to their normal lives as quickly as possible. This type of facility allows patients to learn how to speak again after a stroke, strengthen muscles after a broken hip, and regain use of important motor skills, such as cooking and driving. We are looking to bring a state-of-the-art facility offering these critical healthcare services closer to where our patients are – here in Sunnyvale.

El Camino Health opened its doors in 1961 with a mission to heal, relieve suffering and advance wellness in our community. Today, our nationally recognized doctors and care teams remain here for what we have always been here for, delivering the healthcare that our patients and community need. Beyond these healthcare services, El Camino Health and Healthcare District's \$11.3 million annual grant funding fosters collaborative partnerships with local community organizations addressing the health needs of underserved and vulnerable community members.

We aim to partner with the City of Sunnyvale to develop a project that will have a positive impact on the El Camino Real Corridor and be an important healthcare benefit for the Sunnyvale community.

Thank you for your consideration

Sincerely,



Jon Cowan  
Senior Director of Government Relations  
& Community Partnerships



A.J. Reall  
Senior Director of Strategy

**Response No. 17**

**Jon Cowan, Senior Director of Government Relations, El Camino Health**

**April 11, 2022**

- 17-1 This comment relates to the Draft Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts". The commentor requests that section 12 of Table 19.36.070B be updated to include the rest home/convalescent hospital use designation, also referred to as a rehabilitation hospital, as an auxiliary use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning. The commentor concludes the letter with a brief background on El Camino Health.

This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Page 1 of 1**

**Comment Letter 18**

**Jacob Foraker, President, Handley Management Corporation**



HANDLEY MANAGEMENT CORPORATION

April 14, 2022

Sunnyvale City Council  
c/o Mr. Jeffrey Cucinotta, AICP, Senior Planner  
Department of Community Development, Planning Division  
456 West Olive Avenue, Sunnyvale, CA 94088-3707

RE: 1281-1289 and 1297 West El Camino Real, Sunnyvale, CA and El Camino Real Specific Plan (ECRSP)

Honorable Mayor, Vice Mayor and Members of the Sunnyvale City Council:

Handley Management Corporation is the Manager of the ownership entities for the above-referenced properties situated in the Western Node of the El Camino Real Specific Plan Area. We understand that the City is considering a zoning revision for the ECRSP which would limit the future use of these properties to commercial uses.

18-1

As these 60-year-old buildings are in a gateway location to the City of Sunnyvale, we respectfully request that you consider a more flexible zoning designation in the Western Node to increase the likelihood that these properties will be redeveloped in the near term and give prospective buyers more options for redevelopment.

Sincerely,

Handley Management Corporation

Jacob Foraker  
President

625 Ellis Street, Suite 101 Mountain View, California 94043 650.321.3040

**Response No. 18**

**Jacob Foraker, President, Handley Management Corporation**

**April 14, 2022**

- 18-1 This comment provides a general introduction and states a concern regarding the Specific Plan document. The commentor requests that the City consider a more flexible zoning designation in the Western Node to increase the likelihood that these properties will be redeveloped in the near term and give prospective buyers more options for redevelopment. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Page 1 of 1**  
**Comment Letter 19**  
**Jiarong Qian, Resident**

**From:** [Kei Chain](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** Comments on ECRSP  
**Date:** Friday, April 15, 2022 9:37:32 PM

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

19-1

To whom it may concern,

I am a resident who moved to El Camino area at the start of this year. I have some concerns about ECRSP, especially the first item: the buildout of new residential units.

I have not experienced the non-COVID traffic in Sunnyvale yet, but according to many colleagues of mine, the traffic has been bad back in normal times. By introducing more residential units, I am afraid it would make the traffic worse in this area.

I hope my comments have some value.

Best regards,

Jiarong Qian

**Response No. 19**  
**Jiarong Qian, Resident**  
**April 15, 2022**

- 19-1 This comment expresses concern regarding additional traffic that would occur with the project. The EIR has appropriately addressed transportation impacts as required by CEQA. The project's impacts regarding traffic and transportation are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to traffic and transportation would be less than significant. Specifically, future projects developed within the Specific Plan area would be required to implement Mitigation Measure TRA-1, below, to reduce potentially significant impacts:

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.

Subsequent development projects proposed after adoption of the Specific Plan would be required to identify potential roadway improvements to address deficiencies resulting from implementation of the project and pay a fair share contribution and/or construct needed improvements as a condition of approval. The potential improvements identified in the project's *Transportation Impact Analysis* primarily consist of the installation or reconfiguration of traffic lanes to provide for new turn lanes at multiple intersections in the Specific Plan area, and multimodal improvements that promote walking, bicycling, and transit. As such, impacts relative to traffic and transportation would be reduced to a less than significant level.



## Page 1 of 1

## Comment Letter 20

Lisa Van Valkenburgh, Resident

**From:** [Lisa Van Valkenburgh](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** Proposed ECRSP  
**Date:** Monday, April 18, 2022 10:16:49 AM

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

Dear Mr. Cucinotta,

20-1 I am opposed to the ECRSP plan. Although the aesthetic value of the project appeals to me, there are too many detriments to the plan.

20-2 Firstly, parking and access to the businesses would be difficult, especially for the disabled. the Statement "The city of Sunnyvale will make **reasonable** efforts to accommodate persons with qualified disabilities" is not good enough. There should be no question that persons with disabilities should have completely **equal access** to businesses along El Camino.

20-3 Secondly, all the proposed new buildings for residences, office commercial, and retail commercial will impact our water supply, which is already seriously insufficient.

20-4 Thirdly, how on earth many more hotels does Sunnyvale need? Most of the newly-built ones are truly ugly - no consideration for aesthetics went into their designs. I have lived in Sunnyvale for 46 years, and I can hardly recognize it anymore. Big, ugly, multi-story boxes everywhere! The city has zero charm, but that doesn't seem to matter to the decision makers. The only consideration in approving all these buildings is the revenue that they will bring in. That is really egregious!

20-5 Please consider all of the above in your decision and reject the proposal.

Thank you,  
Lisa Van Valkenburgh  
(408) 737-8903

**Response No. 20****Lisa Van Valkenburgh, Resident****April 18, 2022**

20-1 This comment expresses general disagreement with the project. Comment noted.

20-2 The commentor feels that the project does not do enough relative to parking and access to accommodate persons with disabilities and that the City's statement that it would, "make reasonable efforts to accommodate persons with qualified disabilities" is insufficient in ensuring that persons with disabilities would have equal access to businesses in the project area. As discussed in Section 3.15, *Transportation*, of the EIR, the Specific Plan has identified various policies to improve pedestrian and bicycle facilities within the area. Specifically, Policy Circ-2 (Further develop El Camino Real as a Complete Street) states that, in making decisions regarding El Camino Real, the needs of more vulnerable road users such as children, seniors, and people with disabilities will be prioritized.

Development standards are indicators of firm requirements and pertain to such categories as access and parking, including the provision of Americans With Disabilities Act (ADA) compliant access and parking facilities. As such, development standards are rules or measures pertaining to land uses and zoning that establish a level of quality or quantity that must be complied with or satisfied. Implementation of these measures would ensure that ADA-compliant features are included in the design of site-specific future development projects in the project area.

20-3 The commentor cites a concern regarding the project's impacts to water supply. The EIR has appropriately addressed water supply impacts as required by CEQA. As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR (Impact 3.16.1, Standard of Significance 1 and Impact 3.16.2, Standard of Significance 2), a Water Supply Assessment (WSA) was conducted to ensure that adequate water supply and reliability within the City, now and into the future, is available to serve the growth envisioned in the Specific Plan. Analysis in the WSA estimates that implementation of the Specific Plan would add approximately 600 acre-feet per year (AFY) of demand to the City's water system. The potable water demand for the project is estimated to be 967 AFY under normal conditions by the buildout year 2025. The WSA determined that the City can meet future water demands, including the demands associated with buildout of the Specific Plan, during drought years by utilizing a combination of groundwater, conservation, recycled water, and the available San Francisco Public Utilities Commission (SFPUC) and Santa Clara Valley Water District (SCVWD) contractual water supply limits. In addition, the WSA found that supplies of imported water are expected to remain relatively stable throughout the forecast period and that water conservation and increased local well production would balance the demand for water in the City.

Because the WSA found that the City has an adequate supply of water to provide water service to the project throughout 2035 under normal and drought conditions, the project



would not require any new or expanded water supply facilities and the EIR found this impact to be less than significant.

- 20-4 The commentor opines that there are too many existing hotels in the City and that they are not aesthetically pleasing. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 20-5 This comment provides a general closing statement requesting that the City reject the project. Comment noted.

**Page 1 of 1**  
**Comment Letter 21**  
**Lisa Van Valkenburgh, Resident**

**From:** [Lisa Van Valkenburgh](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** Re: Proposed ECRSP  
**Date:** Wednesday, April 20, 2022 3:30:38 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image002.png](#)  
[image004.png](#)

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

21-1

Thank you, Jeffrey. I forgot to add something more in my opinions that I feel is also very important, and that is the impact the proposal will have on traffic. The traffic is already pretty bad and so to reduce the number of lanes will add significantly to the problem.

Can you please include this comment as well? I would appreciate it.

Sincerely,  
Lisa

On Wednesday, April 20, 2022, 12:04:39 PM PDT, Jeffrey Cucinotta <[jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov)> wrote:

Hi, Lisa.

Thank you for providing your written comments in response to the Notice of Availability (NOA) for the El Camino Real Specific Plan (ECRSP).

I have forwarded your message on to our EIR consultant, who will ensure your comment will be part of the final EIR record.

Thanks.



**JEFFREY CUCINOTTA, AICP**

**Senior Planner**

Community Development Department/Planning Division

[jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov)

Follow us on:

408-730-7424



[Sunnyvale.ca.gov](http://Sunnyvale.ca.gov)

**Response No. 21****Lisa Van Valkenburgh, Resident****April 20, 2022**

21-1 This letter is an additional comment sent by this resident and expresses concern regarding additional traffic that would occur with the project. The project's impacts regarding traffic and transportation are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to traffic and transportation would be less than significant. Specifically, future projects developed within the Specific Plan area would be required to implement Mitigation Measure TRA-1, below, to reduce potentially significant impacts:

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.

Subsequent development projects proposed after adoption of the Specific Plan would be required to identify potential roadway improvements to address deficiencies resulting from implementation of the project and pay a fair share contribution and/or construct needed improvements as a condition of approval. The potential improvements identified in the project's *Transportation Impact Analysis* primarily consist of the installation or reconfiguration of traffic lanes to provide for new turn lanes at multiple intersections in the Specific Plan area, and multimodal improvements that promote walking, bicycling, and transit. As such, impacts relative to traffic and transportation would be reduced to a less than significant level.

**Page 1 of 2**  
**Comment Letter 22**  
**Ari Feinsmith, Bike Sunnyvale**

**From:** [Lillian Tsang](#)  
**To:** [Jeffrey Cucinotta](#)  
**Cc:** [Thinh Le](#)  
**Subject:** FW: ECR SP Bicycle suggestions  
**Date:** Wednesday, April 20, 2022 6:12:35 PM  
**Attachments:** [03-16-22\\_18.22.15.png](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

FYI, message sent to BPAC Answerpoint.



**Lillian Tsang, PE**  
**Principal Transportation Engineer**  
 Department of Public Works

Phone: 408-730-7556

Email: [lsang@sunnyvale.ca.gov](mailto:lsang@sunnyvale.ca.gov)

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[Sunnyvale.ca.gov](http://Sunnyvale.ca.gov)

**From:** Ari Feinsmith <ari.feinsmith@gmail.com>  
**Sent:** Wednesday, April 20, 2022 11:26 AM  
**To:** BPAC AP <BPAC@sunnyvale.ca.gov>  
**Subject:** ECR SP Bicycle suggestions

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

Hi Sunnyvale BPAC,

Before your meeting tomorrow, I want to offer my thoughts and suggestions about the ECR Specific Plan:

1) **Increase the density bonus for Caltrain Go Passes to 6 density points** in the ECR [Community Benefits/Incentive Program](#) (see attached). I created a [model](#)\* comparing how much it would cost developers to give out VTA Smart Passes compared to the cost of giving out Caltrain Go Passes. Basically, even though Caltrain Go Passes give double the density bonus points (+4 dwelling units/acre) compared to VTA Smart Passes (+2), they cost about 4 times as much per participant (\$342 vs \$82.75-\$90).

Since ECR is served more by VTA buses than Caltrain, it makes sense to prioritize VTA Smart Passes by making them more profitable for developers. However, I am worried that the Caltrain Go Passes incentive is too low to even be considered by developers, especially for smaller parcels. This is why I suggest increasing the incentive to +6 points.

22-1

## Page 2 of 2

## Comment Letter 22

## Ari Feinsmith, Bike Sunnyvale

22-2

2) **Increase the maximum number of incentive points for the Transportation Category to at least 8 points** (or 10 points if the Caltrains Pass incentive is increased to 6 points). To get people out of cars, they need cheap transit and convenient bike/ped facilities for the last mile leg of trips. Transit passes incentives and bicycle/ped infrastructure incentives go hand and hand together, and should not be pitted against each other.

22-3

3) My understanding is that when developers redevelop or renovate a parcel, they will have to build bicycle facilities on their street frontage (or pay the city to do it later). As these start to happen, the city will look for funding to fill in the gaps in the bike lanes along ECR. However, the section about bicycle network policies in the [ECR SP Draft](#) (pg 75) does not explicitly state that. I'd like to see language in one of the **BN-P policies that states something like "Look for funding sources to install Class IV separated bikeways one El Camino Real."**

22-4

4) I am worried it will be a long time until we have continuous protected bike lanes on ECR. Given that money is often the limiting factor in these sorts of projects, I encourage you to **investigate getting ECR Transportation Impact Fees (TIF) to go towards building the Class IV bike lanes ECR.** The goal of the ECR [Appendix D - Transportation Impact Analysis](#) is to list all of the current TIF projects needed to reduce new congestion caused by new development. All of these projects are primarily about reducing vehicle trip times. However, we all know that building more protected bike lanes on ECR would lead to a significant mode shift, and therefore taking cars off the road and reducing traffic.

I hope this is helpful.

Ari Feinsmith

Team Leader of [Bike Sunnyvale](#), SVBC

\*If you click on [this link](#), you will get a graph I made, where the x-axis is the number of units and the y-axis is the cost to the developer. I assumed that every additional dwelling unit built will bring in \$150,000 in profit to the developer. Red line = Caltrain Go Pass total cost, Blue line = VTA Low Income Smart Pass total cost, Blue Dashed = VTA market rate total cost. Even if you change the assumed number of participants per unit (p) or the acres of the development (a), it is always twice as profitable to give out VTA Smart Passes.



**Response No. 22****Ari Feinsmith, Bike Sunnyvale****April 20, 2022**

- 22-1 This comment is a suggestion relative to the provisions of the Specific Plan to increase the density bonus for Caltrain Go Passes to 6 density points in the ECR Community Benefits/Incentive Program because the commentor is concerned that the Caltrain Go Passes incentive is too low to even be considered by developers, especially for smaller parcels. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 22-2 This comment is a suggestion relative to the provisions of the Specific Plan to increase the maximum number of incentive points for the Transportation Category to at least 8 points because they feel that people need cheap transit and convenient bike/ped facilities for the last mile leg of trips in order to incentivize reducing car trips. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 22-3 This comment is a suggestion relative to the provisions of the Specific Plan. The commentor states they would like to see language in the section about bicycle network policies in the Specific Plan document (pg. 75) in one of the BN-P policies that states something to the effect of "Look for funding sources to install Class IV separated bikeways one El Camino Real." This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 22-4 This comment is a suggestion for the City to investigate getting Transportation Impact Fees (TIF) to go towards building the Class IV bike lanes as part of the project. As discussed in the Regulatory Setting discussion in Section 3.15, *Transportation*, of the EIR, new development associated with the project is subject to payment of Transportation impact Fees (TIFs) to fund major transportation projects, including bicycle and pedestrian improvements necessary to support land use plans.



**Page 1 of 1**  
**Comment Letter 23**  
**Josh Rupert, Hunter Properties**

**From:** [Josh Rupert](#)  
**To:** [Jeffrey Cucinotta](#)  
**Cc:** [Nivya Sannareddy](#); [Curtis Leigh](#)  
**Subject:** RE: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents  
**Date:** Thursday, April 21, 2022 12:07:38 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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

23-1

Jeffrey – Thanks for providing us the details to review prior to the meeting on Monday with the Planning Commission. We have been reviewing the SP documents and the zoning, and we have a couple of concerns that I wanted to make you aware of which I've outlined below. I know the goal is to maximize residential where able, and a couple of these will make it difficult for us to do that if taken in their current language. I look forward to seeing you on Monday and please let me know if you have any questions or concerns.

Thanks,  
 Josh

23-2

1. Open Space Requirements – Per SMC 19.36.140 we are required to have 380SF/unit. If we're maximizing our acreage by the full density (54+20du/acre) then we would need to provide 8.88 acres of open space on our 13.75 acres. This feels like it's counterintuitive to the goal of maximizing residential, so I suspect there's either a variance or something else we can apply to reduce this to a more achievable number.

23-3

2. Commercial Requirements – Per SMC 19.36.100 for lots greater than 400K SF we need to provide 60KSF of retail. To put that in perspective, our Sprouts, Wells Fargo and little shops building that includes the BBQ restaurant combined are only 50K, so we would need to add 10K more to that number to meet the requirement. We're looking at ways to line retail along ECR, but to create leasable spaces we can't have depths greater than 50', so it will be difficult to get to this number.

**From:** Jeffrey Cucinotta <[JCucinotta@sunnyvale.ca.gov](mailto:JCucinotta@sunnyvale.ca.gov)>  
**Sent:** Monday, March 14, 2022 5:43 PM  
**To:** Josh Rupert <[Josh@hunterproperties.com](mailto:Josh@hunterproperties.com)>  
**Subject:** RE: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents

Hi, Josh,

Yes that is 54.

Thanks.



**JEFFREY CUCINOTTA, AICP**

**Senior Planner**

Community Development Department/Planning Division  
[jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov)  
 408-730-7424

**Response No. 23**  
**Josh Rupert, Hunter Properties**  
**April 21, 2022**

- 23-1 This comment provides a general introduction. Responses to specific comments are provided below.
- 23-2 The commentor expresses concern regarding the open space requirements of the project. They further explain that per SMC 19.36.140, there is a requirement to have 380 SF/unit, however, if developers are maximizing their acreage by the full density (54+20 du/acre), then they would need to provide 8.88 acres of open space on their 13.75 acres. The commentor feels that this requirement is counterintuitive to the goal of maximizing residential, and requests to know whether there's either a variance or something else they can apply to reduce this to a more achievable number.

This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

- 23-3 The commentor expresses concern regarding the commercial requirements of the project. They further explain that per SMC 19.36.100, for lots greater than 400,000 SF, they need to provide 60,000 SF of retail. The commentor states that as a developer, they're looking at ways to line retail along ECR, but to create leasable spaces, they can't have depths greater than 50 feet, so it will be difficult to get to this number.

This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

## Page 1 of 3

## Comment Letter 24

Mark Leong, District Branch Chief, California Department of Transportation District 4

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California 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](http://www.dot.ca.gov)



April 22, 2022

SCH #: 2017102082  
GTS #: 04-SCL-2021-01032  
GTS ID: 24443  
Co/Rt/Pm: SCL/82/16.6

Jeffrey Cucinotta, Senior Planner  
City of Sunnyvale  
456 West Olive Avenue  
Sunnyvale, CA 94088

**Re: El Camino Real Specific Plan, City of Sunnyvale Draft Environmental Impact Report (DEIR)**

Dear Jeffrey Cucinotta:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Sunnyvale's El Camino Real Specific Plan. 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 March 2022 DEIR.

24-1

**Project Understanding**

The El Camino Real Specific Plan (State Route (SR)-82) has been drafted with the goal of enabling the transition of the corridor to a vibrant, mixed-use area with improved streetscapes and safer environments for walking, bicycling, and other modes of transportation. The Specific Plan establishes new land use designations that promote additional housing within the corridor while maintaining existing commercial uses and providing opportunities for additional commercial development. The Specific Plan includes a comprehensive strategy to address land use, economic vitality, urban design, and multimodal connectivity.

24-2

**Travel Demand Analysis**

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the IS/MND/DEIR, this project is found to have significant VMT impacts. Caltrans commends the Lead Agency in developing the Transportation Demand Management (TDM) Plan to reduce VMT impacts, therefore working towards meeting the State's

"Provide a safe and reliable transportation network that serves all people and respects the environment"

## Page 2 of 3

## Comment Letter 24

## Mark Leong, District Branch Chief, California Department of Transportation District 4

Jeffrey Cucinotta, Senior Planner  
April 22, 2022  
Page 2

24-2

goal of a 15-percent reduction. The proposed measures identified in the TDM plan should be documented with annual monitoring reports to demonstrate effectiveness.

#### Multimodal Improvements

24-3

*Section 1.2.1 Notice of Preparation of Environmental Impact Report, Additional Comments.* Please remove the following statement, "Caltrans also asked for the lane configuration along the El Camino Real corridor to include a dedicated bus lane." Caltrans' December 17, 2017 Notice of Preparation response letter referred to studying VMT impacts from the mixed flow design and dedicated lane proposals developed by the Santa Clara Valley Transportation Authority for SR-82. Caltrans does support improvements to multimodal travel on the State Transportation Network (STN). Caltrans has been coordinating with several cities along the corridor that are proposing to remove parking to install dedicated bike lanes. Additionally, please ensure the DIER clearly states that bikes are permitted on SR-82.

24-4

#### Proposed Traffic Signal

*Appendix D, Traffic Impact Analysis, Figure 18.* A new traffic signal is proposed as potential mitigation at the intersection of SR-82 and Fremont Avenue. If warranted, signal warrants should be provided per the California Manual on Uniform Traffic Control Devices.

24-5

#### Construction-Related Impacts

Potential impacts to Caltrans' Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires 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.

24-6

#### Utilities

Any utilities that are proposed, moved or modified within Caltrans' ROW shall be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltrans-issued encroachment permit.

24-7

#### 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.

"Provide a safe and reliable transportation network that serves all people and respects the environment"



**Page 3 of 3****Comment Letter 24****Mark Leong, District Branch Chief, California Department of Transportation District 4**

Jeffrey Cucinotta, Senior Planner  
April 22, 2022  
Page 3

**24-8** **Encroachment Permit**  
Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2022. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

**24-9** Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



MARK LEONG  
District Branch Chief  
Local Development Review

c: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**Response No. 24****Mark Leong, District Branch Chief, California Department of Transportation District 4****April 22, 2022**

- 24-1 This comment includes introductory language for the comment letter and provides a brief project description. This comment does not identify a specific issue or comment specifically related to the Draft EIR's environmental analysis, and no response is required.
- 24-2 The comment summarizes the projects travel demand analysis and states that the project's vehicle miles travelled (VMT) analysis and significance determination is consistent with the Office of Planning and Research (OPR) Technical Advisory. The commenter incorrectly states that the project would result in significant VMT impacts. As discussed in Draft EIR Section 3.15, *Transportation*, the project would result in less than significant VMT impacts with implementation of Mitigation Measure TRA-1. Mitigation Measure TRA-1 requires that in the event that a proposed development does not meet the floor area ratio and/or dwelling unit per acre requirements outlined in Council Policy 1.2.8, the project will be required to prepare a project specific VMT analyses to confirm that the proposed development would not result in a potential increase in VMT. No changes are necessary nor required in this regard.
- 24-3 The commenter requests that Draft EIR Section 1.2.1, Notice of Preparation of Environmental Impact Report is revised to remove "Caltrans also asked for the lane configuration along the El Camino Real Corridor to Include a dedicated bus lane." The City of Sunnyvale agrees to the change and Draft EIR Section 1.2.1 has been revised as follows:

Draft EIR Page 1-5

Caltrans recommended that the City use its guidelines and manuals in planning and design considerations for the project. Caltrans requests that a travel demand analysis be performed and submitted to the agency for review. The analysis should include a multimodal approach with VMT metrics. It should also include mitigation measures related to an increase in VMT as the result of the project, as well as evaluation of the project's primary and secondary effects on pedestrians, bicycles, and transit facilities. ~~Caltrans also asked for the lane configuration along the El Camino Real corridor to include a dedicated bus lane (see Section 3.15, Transportation).~~

The commenter also requests that the Draft EIR clearly states that bikes are permitted on SR-82 (El Camino Real). The Draft EIR states that bikes are permitted on SR-82. As discussed on Draft EIR page 3.15-1, the "Specific Plan area contains bike lanes and bike routes that provide adequate connection for bicycles travelling in the north-south direction. Along El Camino Real, bike lanes are present along only a short segment between Fair Oaks Avenue and Sunnyvale Avenue. On other segments of El Camino Real,

bicycles have to travel in the curb lanes.” No changes are necessary nor required in this regard.

- 24-4 The commenter notes that signal warrants should be provided per the *California Manual on Uniform Traffic Control Devices* for the new traffic signal included as potential mitigation at the intersection of SR-82 and Fremont Avenue. This comment is acknowledged and, given that the comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR’s environmental analysis, no further response is required. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 24-5 The commenter states that the project’s temporary impacts to Caltrans’ Right-of-Way (ROW) from project-related temporary access points should be analyzed and that mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the state transportation network (STN). The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. The City acknowledges that future site-specific development accommodated by the El Camino Real Specific Plan would be required to address construction-related impacts to Caltrans ROW and determine whether a transportation permit and/or TMP is required to reduce impacts to the STN.
- 24-6 The commenter states that any utilities that are proposed, moved, or modified within Caltrans’ ROW be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltrans issued encroachment permit. As discussed, the project involves land use updates within the El Camino Real Specific Plan area and no specific development projects are currently proposed. The City acknowledges that future developments accommodated under the proposed project would be required to address impacts to utilities within Caltrans ROW, as applicable.
- 24-7 The commenter states that any Caltrans facilities impacted by the project must meet American Disabilities Act (ADA) Standards after project completion and must maintain bicycle and pedestrian access during construction. As discussed, the project involves land use updates within the El Camino Real Specific Plan area and no specific development projects are currently proposed. The City acknowledges that future developments accommodated under the proposed project would be required to maintain ADA Standards after project construction as well as bicycle and pedestrian access during construction.



- 24-8 The commenter states that any work proposed in the vicinity of the State right-of-way would require an encroachment permit and provides additional details regarding encroachment permit requirements and procedures. This comment is acknowledged and, given that the comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis, no further response is required. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 24-9 The commenter concludes the letter by providing staff contact information for questions. This comment is acknowledged; it does not raise an environmental issue. As such, no further response is necessary.



## Page 1 of 1

## Comment Letter 25

Mark Toothacre, President, PMB



April 22, 2022

City of Sunnyvale  
Community Development Department / Planning Division  
456 W. Olive Avenue  
Sunnyvale, CA 94086

**RE: Comment on Draft El Camino Real Specific Plan and Draft Sunnyvale Municipal Code Chapter 19.36 - 1027 W El Camino Real**

25-1

On behalf of PMB, we offer the following comments on the Draft El Camino Real Specific Plan. Specifically, our comments relate to the Draft Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts" and Table 19.36.100 "Minimum Ground Floor Commercial Area Requirements for Mixed-Use Development."

25-2

1. We are requesting that section 11 of Table 19.36.070B be updated to include the residential care facility, 6 or greater residents use designation as a use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning to conditionally permit an independent living, assisted living, and memory care senior housing project. This type of use can successfully integrate with the City's vision of housing and retail space along El Camino Real.

25-3

2. We are requesting that Table 19.36.100 be updated to say, "Minimum Required Commercial Area, whichever is lesser" instead of "whichever is greater." The greater ground floor retail requirement is especially challenging for a site like 1027 W El Camino Real, which is a flag lot and has limited frontage on El Camino Real. The ground floor retail is complementary to the project and important to the goals of the Specific Plan, however, it is important to program a feasible square footage of ground floor commercial for financing and leasing purposes.

25-4

With an aging population, senior housing is an important use to ensure that residents can remain in their community as they age. The different levels of acuity and housing types (independent living, assisted living, memory care) allow for residents to age in place and receive quality care in their homes. We are looking to bring a high-quality senior housing project to the community, so Sunnyvale residents have a variety of housing options as they begin to require assistance.

We aim to partner with the City of Sunnyvale to develop a project that will have a positive impact on the El Camino Real Corridor and be an important housing & healthcare benefit for the Sunnyvale community.

Thank you for your consideration.

Sincerely,



Mark Toothacre  
President | Partner  
PMB



Nolan Weinberg  
VP Development  
PMB

**Response No. 25****Mark Toothacre, President, PMB****April 22, 2022**

25-1 This comment provides a general introduction and a statement that their comments are relative to Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts" and Table 19.36.100 "Minimum Ground Floor Commercial Area Requirements for Mixed-Use Development." Responses to specific comments are provided below.

25-2 The commentor requests that section 11 of Table 19.36.070B be updated to include the residential care facility, 6 or greater residents use designation as a use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning to conditionally permit an independent living, assisted living, and memory care senior housing project.

This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

25-3 The commentor requests that Table 19.36.100 be updated to say, "Minimum Required Commercial Area, whichever is lesser" instead of "whichever is greater." The greater ground floor retail requirement is especially challenging for a site like 1027 W El Camino Real, which is a flag lot and has limited frontage on El Camino Real. The ground floor retail is complementary to the project and important to the goals of the Specific Plan, however, it is important to program a feasible square footage of ground floor commercial for financing and leasing purposes.

This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

25-4 This comment provides a closing statement and expresses concerns regarding senior housing and the need for different levels of acuity and housing types (independent living, assisted living, memory care) to allow residents to age in place and receive quality care in their homes. Comment noted.

**Page 1 of 3**

**Comment Letter 26**

**Brian McAloon, Project Manager, Department of Toxic Substances Control**



**Sent Via Electronic Mail**

April 22, 2022

Mr. Jeffrey Cucinotta  
Senior Planner  
Department of Community Development, Planning Division  
City of Sunnyvale  
456 West Olive Avenue  
Sunnyvale, CA 94088  
[JCucinotta@sunnyvale.ca.gov](mailto:JCucinotta@sunnyvale.ca.gov)

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE PROPOSED EL CAMINO REAL SPECIFIC PLAN– DATED MARCH 2022  
(STATE CLEARINGHOUSE NUMBER: 2017102082)

Dear Mr. Cucinotta:

The Department of Toxic Substances Control (DTSC) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) for the proposed El Camino Real Specific Plan (ECRSP) (Project) in Sunnyvale, California. The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

26-1

DTSC has review comments on the Hazards and Hazardous Materials section of the document, *El Camino Real Specific Plan Draft Environmental Impact Report* (DEIR), dated March 2022 and prepared by Michael Baker International, Inc. for the City of Sunnyvale. DTSC notes that Mitigation Measure HAZ-1 presented in Section 3.8.3 *Impacts and Mitigation Measures* addresses Impact 3.8.4 which relates to sites found on the listing compiled in accordance with California Government Code Section 65962.5, commonly known as the Cortese List. Not all sites impacted by hazardous waste or hazardous materials will be found on the Cortese List. DTSC recommends that the Hazards and Hazardous Materials section of the DEIR address actions to be

## Page 2 of 3

## Comment Letter 26

**Brian McAloon, Project Manager, Department of Toxic Substances Control**

Mr. Jeffrey Cucinotta  
April 22, 2022  
Page 2

- 26-1 taken for any sites impacted by hazardous waste or hazardous materials, not just those found on the Cortese List.
- DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the DEIR:
- 26-2 1. The DEIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The DEIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
- 26-3 2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the DEIR.
- 26-4 3. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#).
- 26-5 4. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to [DTSC's 2001 Information Advisory Clean Imported Fill Material](#).



**Page 3 of 3**

**Comment Letter 26**

**Brian McAloon, Project Manager, Department of Toxic Substances Control**

Mr. Jeffrey Cucinotta  
April 22, 2022  
Page 3

26-6

5. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the DEIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\)](#).

26-7

DTSC appreciates the opportunity to comment on the DEIR. Should you need any assistance with an environmental investigation, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3582 or via email at [Brian.McAloon@dtsc.ca.gov](mailto:Brian.McAloon@dtsc.ca.gov).

Sincerely,



Brian McAloon  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

**Response No. 26****Brian McAloon, Project Manager, Department of Toxic Substances Control****April 22, 2022**

- 26-1 The commenter recommends that the Hazards and Hazardous Materials section of the Draft EIR address actions to be taken for any sites impacted by hazardous waste or hazardous materials, not just those found on the Cortese List. In addition to a discussion on sites compiled pursuant to Government Code Section 65962.5, Draft EIR Section 3.8, *Hazardous and Hazardous Materials*, includes an analysis of the transportation, use, and disposal of hazardous materials; accidental release and exposure to hazardous materials; release and exposure to hazardous materials within the vicinity of a school site. As discussed in Draft EIR Section 3.8, future implementing projects would require site-specific testing for hazardous materials (regardless of whether those sites are listed pursuant to Government Code Section 65962.5), along with a certified Phase I Environmental Site Assessment (ESA), to determine the presence of toxic substances. A Phase II ESA may also be required depending on the results of the Phase I ESA. Additionally, future implementing projects would be required to comply with federal, State, and local policies regarding the handling and disposal of hazardous materials. Draft EIR Mitigation Measure HAZ-1 would be applicable to all applications for new development or redevelopment within the El Camino Real Specific Plan project boundary, regardless of whether the implementing project is located on a site that is listed pursuant to Government Code Section 65962.5. No changes are necessary nor required in this regard.
- 26-2 The commenter recommends that the Draft EIR is revised to acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The commenter requests that the Draft EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight. The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. The City acknowledges that future site-specific development accommodated by the El Camino Real Specific Plan would be required to address the potential for historic or future activities on or near the site-specific development to result in the release of hazardous wastes/substances on the project site as part of the site-specific Phase I analysis (Draft EIR Mitigation Measure HAZ-1). If determined necessary by the Phase I ESA, Mitigation Measure HAZ-1 would require that a Phase II ESA is conducted to determine the nature and extent of the contamination, and the potential threat to public health and/or the environment. No changes are necessary nor required in this regard.



- 26-3 The commenter recommends the Draft EIR is revised to address aerially deposited lead (ADL) contaminated soils and recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the Draft EIR. The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. The City acknowledges that future site-specific development accommodated by the El Camino Real Specific Plan would be required to address the potential for ADL contaminated soils as part of the site-specific Phase I analysis (Draft EIR Mitigation Measure HAZ-1). If determined necessary by the Phase I ESA, Mitigation Measure HAZ-1 would require that a Phase II ESA is conducted to determine the nature and extent of the ADL contamination. No changes are necessary nor required in this regard.
- 26-4 The commenter states that surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk if buildings or other structures are to be demolished on any project sites included in the proposed project. The commenter also states that removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers*. The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. As discussed on Draft EIR page 3.8-14, demolition activities within the plan area would be required to comply with Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, *Asbestos Demolition, Renovation and Manufacturing*, which requires removal of asbestos-containing materials prior to demolition in accordance with safety standards to ensure worker and public safety and compliance with Cal/OSHA regulations.

In addition, the removal or renovation of structures with lead-based paint or those that may have polychlorinated biphenyl (PCB) containing equipment would also be required to comply with applicable laws and regulations to minimize the potential for accidental release to the environment or improper disposal or transport. Specifically, in accordance with City of Sunnyvale's PCB regulations for demolitions, future projects would be required to implement management protocols to ensure PCBs are not discharged during demolition of applicable structures via vehicle track-out, airborne releases, soil erosion, or stormwater runoff.

It is also noted that future site-specific development accommodated by the El Camino Real Specific Plan would be required to address the potential for hazardous materials, including lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk if buildings or other structures are to be demolished as



part of the site-specific Phase I analysis (Draft EIR Mitigation Measure HAZ-1). If these materials are identified as part of the Phase I analysis, compliance with applicable hazardous materials regulations at the federal, State, and local levels would reduce impacts to less than significant levels. No changes are necessary nor required in this regard.

- 26-5 The commenter states that proper sampling should be conducted to ensure that the imported soil is free of contamination for any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas. This comment is acknowledged. The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, the soil and backfill impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. No changes are necessary nor required in this regard.
- 26-6 The commenter requests the Draft EIR discuss organochlorinated pesticides for any sites included as part of the proposed project have been used for agricultural, weed abatement, or related activities. Past agricultural uses have occurred onsite and may have resulted in pesticide contamination as a result. However, as discussed in Draft EIR Section 4.1, *Agriculture and Forestry Uses*, no lands within the Specific Plan Area are currently used for any type of agricultural use, nor are any such lands zoned for agriculture. To address the potential for release of organochlorinated pesticides on sites that have historically been used for agricultural purposes, a site-specific Phase I ESA would be prepared for individual development projects (Draft EIR Mitigation Measure HAZ-1). If determined necessary by the Phase I ESA, Mitigation Measure HAZ-1 would require that a Phase II ESA is conducted to determine the nature and extent of the contamination, and the potential threat to public health and/or the environment. No changes are necessary nor required in this regard.
- 26-7 The commenter concludes the letter by providing staff contact information for questions. This comment is acknowledged; it does not raise an environmental issue. As such, no further response is necessary.



**Page 1 of 1**  
**Comment Letter 27**  
**Sunnyvale Resident**

**Subject:** Draft EIR for the proposed ECRSP views and comments  
**Date:** Sunday, April 24, 2022 6:54:34 PM

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

Hello,

27-1

I am writing this e-mail to express my views in response to the Draft EIR for the proposed El Camino Real Specific Plan. My family has lived in Sunnyvale for 55 years. Currently, three generations live in Sunnyvale, all within one mile of El Camino Real. A lot has changed in the last 55 years. When we moved here, density referred to the number of trees in the orchards, not the number of people living per square foot of housing. Sunnyvale has changed in the last several years and I would not say it has changed for the better. I would like to voice my opinion on several of the identified potential environmental impacts and in particular challenge the last sentence that implies most impacts would be mitigated to less than significant levels.

27-2

- Aesthetics – I have not been impressed by the aesthetics of the recent construction in Sunnyvale. The Cherry Orchard mixed use housing/retail complex is an excellent example of a project that is aesthetically pleasing. More recent hotel and apartment structures can best be described as boxes. The AC Hotel on the corner of Fair Oaks and El Camino is good example of ugly architecture that was supposed to be designed to appeal to Millennials, yet my grandson calls it the prison and I must say I agree. Why does Sunnyvale continue to approve these ugly boxy structures?

27-3

- Air Quality – It is hard to believe that the only effect on air quality will occur during construction. The addition of 8,500 residential units and 3,980,000 commercial units will lead to increased traffic and air pollution long after construction has been completed. Ditto to Greenhouse Gas Emissions.

27-4

- Hydrology and Water Quality – Please explain how 8,500 more residents in Sunnyvale would not be a significant impact to the water supply? People are regularly counseled to live within their means, but in California, our elected officials refuse to ensure that water and power are sufficient before approving building additional residences and businesses. Over the last 30-40 years Californians such as myself have replaced toilets, shower heads, installed efficient washers and dishwashers and regularly been forced to watch our hard-earned investments in landscaping die because of droughts and water conservation requirements. My son-in-law just planted his drought tolerant flowers in the front yard. He made the wooden tulips in the late 1980's during a previous drought and 35 years later, he is still having to "plant" them. If people have to live within their means, so should the state and local governments. As horrible as COVID has been, it has shown us that many people can successfully work remotely and even more productively. Now Google and Apple are requiring employees to return to the office three days per week. If Sunnyvale required companies to maximum remote work, the needs for additional housing and commercial properties and its impact would be reduced.

27-5

- Transportation – Have you ever tried to drive down El Camino in the late afternoon? How do you think it will be with 8,500 more residents living on it? This street cannot handle more traffic. Let's face it, people will not get out of their cars to use the bus system.

27-6

- Utilities – Just like water, the state of California has not increased its power generation capacity. The threat of power brown/black outs has become a regular occurrence that will only become worse when the proposed 8,500 houses are built and more people purchase electric cars.

27-8

I hope you will consider the points I have made and reject the El Camino Real Specific Plan on the grounds that it will cause severe environmental impact as I have outlined.

Sincerely,

A long time Sunnyvale Resident

**Response No. 27**  
**Sunnyvale Resident**  
**April 24, 2022**

- 27-1 The commentor notes disagreement with the project and the environmental impact determinations in the EIR. This comment provides a general introduction. Responses to specific comments are provided below.
- 27-2 The commentor opines that recent new development, of hotels and apartments in particular, is not aesthetically pleasing.

The EIR has appropriately addressed aesthetic impacts as required by CEQA, provided in Impact 3.1.1, Standard of Significance 3. No mitigation is required. As discussed in Section 3.1, *Aesthetics*, of the EIR, the project would result in a less than significant impact relative to aesthetics. Due to the programmatic nature of this environmental document, it is unknown at this time whom the specific project proponents (developers) would be with regard to site-specific future development in the project area. However, implementation of future development projects in the project area will be subject to site-specific aesthetic analysis to ensure conformance with existing regulations. The Specific Plan, in conjunction with the El Camino Real Specific Plan Chapter (ECRSPC) of the Sunnyvale Municipal Code (SMC), includes development policies, land use regulations, design guidelines, and infrastructure improvement plans.

- 27-3 The commentor disagrees that impacts relative to air quality would be less than significant.

The EIR has appropriately addressed air quality impacts as required by CEQA. The project's impacts regarding air quality are discussed in Section 3.2, *Air Quality*, of the EIR. The EIR concluded that the project would result in a significant and unavoidable impact and a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard during construction. However, future projects developed in the Specific Plan area would be required to implement mitigation measures to reduce air quality impacts to the extent feasible. Mitigation Measures AQ-1 and AQ-2, found in Impact 3.2.2 (Standard of Significance 2), and Mitigation Measures AQ-3 and AQ-4, found in Impact 3.2.5 (Standard of Significance 3) in Section 3.2, *Air Quality*, in the EIR, are applicable to the project:

**AQ-1** Prior to the issuance of grading or building permits, the City of Sunnyvale shall ensure that the Bay Area Air Quality Management District's (BAAQMD) basic construction mitigation measures from Table 8-2 of the BAAQMD 2017 CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents. These basic construction mitigation measures include the following:

- 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- 4) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- 6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- 8) A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**AQ-2** In the cases where construction projects are projected to exceed the Bay Area Air Quality Management District's air pollutant significance thresholds for NOX, PM10, and/or PM2.5, all off-road diesel-fueled equipment (e.g., rubber-tired dozers, graders, scrapers, excavators, asphalt paving equipment, cranes, and tractors) shall be at least California Air Resources Board (CARB) Tier 3 Certified or better.

**AQ-3** In the case when a subsequent project's construction is greater than five acres and is scheduled to last more than two years, the subsequent project shall be required to prepare a site-specific construction pollutant mitigation plan in consultation with the Bay Area Air Quality Management District (BAAQMD) staff prior to the issuance of grading permits. A project-specific construction-related dispersion modeling acceptable to BAAQMD shall be used to identify potential toxic air contaminant (TAC) impacts, including diesel particulate matter. If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in 1 million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information such as the distance to the nearest sensitive receptors,

project site plan details, and construction schedule. The City shall ensure construction contracts include all identified measures and that the measures reduce the health risk below BAAQMD risk thresholds. Construction pollutant mitigation plan measures shall include, but not be limited to:

- 1) Limiting the amount of acreage to be graded in a single day.
- 2) Notification of affected sensitive receptors one week prior to commencing onsite construction so that any necessary precautions (such as rescheduling or relocation of outdoor activities) can be implemented. The written notification shall include the name and telephone number of the individual empowered to manage construction of the project. In the event that complaints are received, the individual empowered to manage construction shall respond to the complaint within 24 hours. The response shall include identification of measures being taken by the project construction contractor to reduce construction-related air pollutants. Such a measure may include the relocation of equipment.

**AQ-4** The following measures shall be utilized in site planning and building designs to reduce TAC and particulate matter (PM) 2.5 exposure where new receptors are located within 1,000 feet of emissions sources:

- Future development that includes sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) located within 1,000 feet of Caltrain, Central Expressway, El Camino Real, Lawrence Expressway, Mathilda Avenue, Sunnyvale-Saratoga Road, US 101, State Route 237, State Route 85, and/or stationary sources shall require site-specific analysis to determine the level of health risk. This analysis shall be conducted following procedures outlined by the BAAQMD. If the site-specific analysis reveals significant exposures from all sources (i.e., health risk in terms of excess cancer risk greater than 100 in one million, acute or chronic hazards with a hazard Index greater than 10, or annual PM<sub>2.5</sub> exposures greater than 0.8 µg/m<sup>3</sup>) measures shall be employed to reduce the risk to below the threshold (e.g., electrostatic filtering systems or equivalent systems and location of vents away from TAC sources). If this is not possible, the sensitive receptors shall be relocated.
- Future nonresidential developments identified as a permitted stationary TAC source or projected to generate more than 100 heavy-duty truck trips daily will be evaluated through the CEQA process or BAAQMD permit process to ensure they do not cause a significant health risk in terms of excess cancer risk greater than 10 in one million, acute or chronic hazards with a hazard Index greater than 1.0, or annual PM<sub>2.5</sub> exposures greater than 0.3 µg/m<sup>3</sup> through source control measures.



- 27-4 The commentor disagrees that impacts relative to water supply would be less than significant.

The EIR has appropriately addressed water supply impacts as required by CEQA. As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR (Impact 3.16.1, Standard of Significance 1 and Impact 3.16.2, Standard of Significance 2), a Water Supply Assessment (WSA) was conducted to ensure that adequate water supply and reliability within the City, now and into the future, is available to serve the growth envisioned in the Specific Plan. Analysis in the WSA estimates that implementation of the Specific Plan would add approximately 600 acre-feet per year (AFY) of demand to the City's water system. The potable water demand for the project is estimated to be 967 AFY under normal conditions by the buildout year 2025. The WSA determined that the City can meet future water demands, including the demands associated with buildout of the Specific Plan, during drought years by utilizing a combination of groundwater, conservation, recycled water, and the available San Francisco Public Utilities Commission (SFPUC) and Santa Clara Valley Water District (SCVWD) contractual water supply limits. In addition, the WSA found that supplies of imported water are expected to remain relatively stable throughout the forecast period and that water conservation and increased local well production would balance the demand for water in the City.

Because the WSA found that the City has an adequate supply of water to provide water service to the project throughout 2035 under normal and drought conditions, the project would not require any new or expanded water supply facilities and the EIR found this impact to be less than significant.

- 27-5 The commentor disagrees that impacts relative to transportation would be less than significant.

The EIR has appropriately addressed traffic/transportation impacts as required by CEQA. The project's impacts regarding traffic/transportation are discussed in Section 3.15, *Transportation*, of the EIR. The EIR concluded that, with implementation of mitigation, the project's impacts relative to traffic and transportation during both construction and operation would be less than significant. Mitigation Measure TRA-1, found in Impact 3.15.1 (Standard of Significance 1), and Mitigation Measure TRA-2, found in Impact 3.15.7 (Standard of Significance 7) in Section 3.15, *Transportation*, in the EIR, are applicable to the project.

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific

vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.

**TRA-2** Before construction or issuance of building permits, the developer or the construction contractor for the project shall prepare a temporary traffic control (TTC) plan to the satisfaction of the City Department of Public Works, Division of Transportation and Traffic and subject to review by all affected agencies. The TTC shall include all information required on the City TTC Checklist and conform to the City's TTC Guidelines. At a minimum, the plan shall include the following elements:

- provide vicinity map including all streets within the work zone properly labeled with names, posted speed limits and north arrow;
- provide existing roadway lane and bike lane configuration and sidewalks where applicable including dimensions;
- description of proposed work zone;
- description of detours and/or lane closures (pedestrians, bicyclists, vehicular);
- description of no parking zone or parking restrictions;
- provide appropriate tapers and lengths, signs, and spacing;
- provide appropriate channelization devices and spacing;
- description of buffers;
- provide work hours/work days;
- dimensions of above elements and requirements per latest CA—MUTCD Part 6 and City's SOP for bike lane closures;
- provide proposed speed limit changes if applicable;
- description of bus stops, signalized and non-signalized intersection impacted by the work;
- show plan to address pedestrians, bicycle and ADA requirement throughout the work zone per CA-MUTCD Part 6 and City's SOP for bike lane closures;
- indicate if phasing or staging is requested and duration of each;
- description of trucks including: number and size of trucks per day, expected arrival/departure times, truck circulation patterns;
- provide all staging areas on the project site;
- ensure that the contractor has obtained and read the City's TTC Guidelines and City's SOP for bike lane closures; and ensure traffic impacts are localized and temporary.

27-6 The commentator disagrees that impacts relative to electricity demands would be less than significant.



The EIR has appropriately addressed utility impacts as required by CEQA. As discussed in Section 3.16, *Utilities/Service Systems*, the project would have a less than significant impact relative to electricity demands and no mitigation is required. The site is already connected to PG&E's electrical lines. In addition, the assessment for future services expansion, and associated environmental impacts, cannot be identified at this time because that evaluation requires future speculation under unknown circumstances, such as timing and location. All future electrical services expansion would require City discretionary review and/or environmental review under CEQA, as appropriate. With the implementation of City policies, regulations, and standards for new development, including the payment of development fees, project implementation is not anticipated to require or result in the relocation or construction of new or expanded facilities for utility or service provision, the construction or relocation of which could cause significant environmental effects.

- 27-7 This comment provides a general closing statement requesting that the City reject the project. Comment noted.

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## Comment Letter 28

Brent Pearce, Transportation Planner, Santa Clara Valley Transportation Authority



April 25, 2022

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

Attn: Jeffrey Cucinotta  
Via Email: [jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov)

Subject: El Camino Real Specific Plan Draft Environmental Impact Report

Dear Jeffrey,

28-1

Thank you very much for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the El Camino Real Specific Plan. VTA appreciates the ongoing coordination between the City of Sunnyvale and VTA staff. VTA's comments are below.

28-2

General

VTA supports the City for its overall approach in the El Camino Specific Plan. We support the proposed intensification of land uses throughout the plan area. Intensifying land use density within these areas further supports transit use. When complemented by housing at a range of affordability levels, enhanced mobility choices, first-last mile connections, and other community services and amenities, places can become safe and equitable Transit-Oriented Communities.

28-3

Equity

VTA is committed to examining the collective role of government in advancing equity, acknowledging historical inequities, working in partnership with our communities and continuously building common understandings in order to recognize the true impact – including the benefits and burdens – of our work. VTA would like to deepen our City-VTA partnership to ensure that we move toward equitable outcomes throughout Sunnyvale by holding regular Coordination Meetings and project-specific meetings when warranted.

28-4

Intersection Mitigations

The transportation analysis accompanying the DEIR identifies LOS/operational impacts at several intersections along El Camino Real and proposes capacity-increasing measures to address these such as the addition of turn lanes, sometimes through the removal or narrowing of existing median islands. VTA recommends that the City avoid including capacity-increasing changes to these intersections, considering the potentially harmful effects that crossing additional lanes of traffic and narrowing median islands can have on pedestrians, bicyclists, and transit riders along this important thoroughfare.

VTA recommends instead identifying stronger measures to reduce trip generation and Vehicle Miles Traveled (VMT) from the new development called for in the Specific Plan. VTA also encourages the City to designate El Camino Real within Sunnyvale as an Infill Opportunity

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San Jose, CA 95134-1927

Administration 408-321-5555  
Customer Service 408-321-2300

Solutions that move you



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## Comment Letter 28

Brent Pearce, Transportation Planner, Santa Clara Valley Transportation Authority

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28-4

Zone (IOZ) as allowed by State Congestion Management Program law; designating this corridor as an IOZ would remove the requirement for the City to maintain the CMP Auto LOS standard at the CMP intersections within the IOZ, which would help balance mobility goals with other important goals such as infill development, pedestrian and bicycle safety, and reduction of VMT.

Transit Operations

As the El Camino Specific Plan further develops, close coordination with VTA to review service patterns, bus stop design and placement will be needed with discussions occurring early during implementation. VTA prefers the use of in-lane bus stops where short dwell times can be expected along El Camino Real. In-lane stopping allows for more reliable and frequent service to maintain operational speeds.

28-5

Whenever possible, locate bus stops after a driveway to prevent conflicts with vehicles going around a stopped bus to enter a driveway. Any midblock bus stops would be a good candidate to be co-located with enhanced midblock pedestrian crossings. Bus stops along a protected bike lane should have a bus boarding island to minimize bike/bus conflicts.

Street furniture placement, tree canopies, awnings, bus shelters, signs, and other items close to the curb should be placed far enough away to prevent colliding with any part of the bus as it pulls up to the curb.

Deliveries and truck routes for the auto dealerships should be designated to prevent car carriers from loading/unloading on nearby bus stops or on bike lanes.

Please note that all the signalized intersections along El Camino Real within the City of Sunnyvale are equipped with transit signal priority (TSP) equipment for VTA's Rapid 522 bus service, excluding Wolfe Road/El Camino Real and Fair Oaks Avenue/El Camino Real intersections. If the project proponent is required to modify any of these signalized intersections, the TSP equipment must always remain operational. If the TSP equipment needs to be replaced, the equipment should be replaced for a similar or equivalent device from EMTRAC Systems.

28-6

Transit Delay Analysis

The DEIR identifies that transit travel times could increase under Cumulative 2035 conditions by one to seven minutes from existing conditions. The document also identifies that this is a **less than significant impact** under CEQA. This potential impact is considered significant to VTA and would need to be offset by FAST Transit policies or projects, which the DEIR says it supports. Additional travel times for transit riders is a significant equity concern for users that may not have other options available to them. Recently, the Town of Los Gatos General Plan DEIR disclosed a significant impact to transit due to congestions impacts on transit travel times. VTA is now working closely with the Town to identify long range multi-modal improvements to help offset these impacts.

28-7

Citywide Deficiency Plan

The DEIR and included appendices does not mention Sunnyvale's Citywide Deficiency Plan.

**Page 3 of 3****Comment Letter 28****Brent Pearce, Transportation Planner, Santa Clara Valley Transportation Authority**

City of Sunnyvale  
April 25, 2022  
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28-7

originally approved in 2004. If the proposed intersection modifications (see above) are being considered to meet CMP standards, VTA recommends updating the Deificiency Plan, now referred to as a Multi-Modal Plan, with new added multi-modal pedestrian, bicycle, and transit offsetting measures. If the mitigations are proposed to meet City LOS standards, VTA still recommends considering other alternatives to help reduce trip generations and VMT throughout the city. The final DEIR should include language that describes how the El Camino Specific Plan considers the Citywide Deificiency Plan or how it intends to modify it in the future.

28-8

Consistency

Page 3: Sylvan Avenue & El Camino Real is noted as a CMP intersection. But in the other sections of the document, it is not specified as a CMP intersection. Please edit for consistency.

VTA looks forward to continuing and improving our coordinated planning efforts with the City of Sunnyvale that contribute toward a sustainable future for our county. Thank you again for the opportunity to review this DEIR. If you have any questions, please contact me at [brent.pearse@vta.org](mailto:brent.pearse@vta.org).

Sincerely,



Digitally signed by Brent Pearce  
DN: cn=Brent Pearce, o=Santa Clara  
Valley Transportation Authority,  
ou=Planning and Programming,  
email=brent.pearse@vta.org, c=US  
Date: 2022.04.25 16:47:44 -0700

Brent Pearce  
Transportation Planner

SU1708

**Response No. 28****Brent Pearce, Transportation Planner, Santa Clara Valley Transportation Authority****April 25, 2022**

- 28-1 This comment serves as an introduction. Responses to specific comments are provided below.
- 28-2 The commenter expresses support of the City's overall approach for the El Camino Real Specific Plan. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Thus, no further response is required. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 28-3 The commenter states its commitment to the collective role of government in advancing equity, and requests regular Coordination Meetings and project-specific meetings with the City of Sunnyvale when warranted to ensure equitable outcomes. This comment is acknowledged. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Thus, no further response is required. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 28-4 The commenter recommends the City avoid inclusion of capacity-increasing changes to intersections along El Camino Real to address LOS/operational impacts. Instead, the commenter recommends stronger measures to reduce trip generation and vehicle miles travelled (VMT) from the new development called for in the Specific Plan. The commenter also encourages the City to designate El Camino Real as an Infill Opportunity Zone as allowed by the State Congestion Management Program (CMP) law, which would remove the requirement for the City to maintain the CMP Auto LOS standard at CMP intersections within the IOZ.

As discussed in Draft EIR Section 3.15, *Transportation*, the Sunnyvale City Council adopted Council Policy 1.2.8, "Transportation Analysis Policy," on June 30, 2020; thus, establishing VMT as the primary threshold of significance for analysis of transportation impacts under CEQA. This policy is designed to provide guidance in the preparation of transportation analysis for land use and transportation projects as part of the environmental review process to comply with CEQA.

Council Policy 1.2.8 requires that all projects evaluate and disclose transportation-related environmental impacts using VMT as the primary metric, as required by CEQA. Additionally, the policy establishes Level of Service (LOS) as an operational measurement of intersection efficiency and all land use and transportation projects may be required to

perform operational evaluations. However, because a project's effect on automobile delay no longer constitutes a significant impact under CEQA, LOS was not analyzed in the Draft EIR; refer to Draft EIR Section 3.15.

In addition, in accordance with the Office of Planning and Research's (OPR) *Technical Advisory on Evaluating Transportation Impacts Under CEQA*, "Projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include:

- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes."

Therefore, no changes are necessary nor required in this regard.

28-5 The commenter identifies several transit operation design features to consider as the El Camino Real Specific Plan is built out. The Draft EIR is a programmatic analysis of proposed land use updates to the El Camino Real Specific Plan area; therefore, impacts of specific developments within the El Camino Real Specific Plan area accommodated by the proposed project is unknown and speculative at this point. The City will continue to notify the Santa Clara Valley Transportation Authority (SCVTA) of site-specific development projects such that site-specific transit operation design features can be identified. No changes are necessary nor required in this regard.

28-6 The commenter opines that the Draft EIR's conclusion that transit travel times could increase under the Cumulative 2035 conditions by one to seven minutes from existing conditions would result in a significant impact to SCVTA rather than a less than significant impact. The commenter continues by saying this impact would need to be offset by FAST Transit policies or projects, which the Draft EIR says it supports.

Impacts relative to transit are discussed on Page 70 under "ECRCSP Impact to Transit Travel Time" of the *Transportation Impact Analysis* (TIA), prepared by Hexagon Transportation Consultants (2020) (included as Appendix D of the EIR). As discussed in the TIA, the VTA does not have an established criteria to determine impacts to transit services and the transit impact analysis presented in the TIA is for information purposes only. As such, there is no basis for a finding of significant impacts to transit under this CEQA threshold (i.e., conflict with a program, plan, ordinance, or policy addressing transit facilities). In addition, the project does not propose site-specific development, and future development resulting from project implementation would be required to conduct site-specific transportation impact analyses, including potential impacts to transit facilities.

28-7 The commenter states that the Draft EIR and its appendices do not mention the Sunnyvale Citywide Deficiency Plan and that the Draft EIR should be revised to mention the Plan if intersection modifications are being considered to meet CMP standards. As discussed in



Response to Comment 28-4, because a project's effect on automobile delay no longer constitutes a significant impact under CEQA, LOS and the project's impacts to CMP intersections was not analyzed in the Draft EIR; refer to Draft EIR Section 3.15. No changes are necessary nor required in this regard.

- 28-8 The commenter requests the Traffic Impact Analysis is revised to identify Sylvan Avenue and El Camino Real as a CMP intersection throughout the document for consistency. However, this intersection is not a CMP intersection. Page 3 of Appendix D, *Transportation Impact Analysis* has been revised to clarify that Sylvan Avenue and El Camino Real is not a CMP intersection. Refer to Attachment 1, Revised Transportation Impact Analysis. In addition, as discussed in Response to Comment 28-4, because a project's effect on automobile delay no longer constitutes a significant impact under CEQA, LOS and the project's impacts to CMP intersections was not analyzed in the Draft EIR; refer to Draft EIR Section 3.15. No changes are necessary nor required in this regard.

**Page 1 of 2**  
**Comment Letter 29**  
**Zachary Kaufman, Resident**

**From:** [zachsv@outlook.com](mailto:zachsv@outlook.com)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** SIGNIFICANT SPELLING ERROR FIXED: Additional El Camino Questions and Comments  
**Date:** Monday, April 25, 2022 8:01:22 PM

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

SIGNIFICANT SPELLING ERROR FIXED--spell checking replaced "anti" with "ant" in [B]. I fixed it below. Now it reads "anti displacement" as originally intended.

Additional El Camino Questions and Comments:

- 29-1 E.I.R.:  
 [A]  
 Perhaps I overlooked it... What are the underlying assumptions of the Hexagon traffic analysis? For instance, did they assuming some level of mode shift to alternative transportation?
- 29-2 [B]  
 C.E.Q.A. requires the examination of greenhouse gas omissions. Yet what isn't examined in the E.I.R., is the increased omissions from new longer trips needed to make up for lost stores and services. For instance, the lands under Michaels and Dollar Tree are to be rezoned for redevelopment. The nearest Michael's is in Cupertino. The nearest Dollar Tree is in Santa Clara. On page 1-6 of the E.I.R., it states, "ways in which the significant effects of the proposed project might be avoided or mitigated", yet identifying the impact wasn't performed and no anti displacement strategy was set forth for the new development. Simply allocating floor space for retail in new buildings is not an anti displacement strategy. What goes in might not be reflective of what was there pre-redevelopment. Consequently, people may find themselves compelled to drive significantly more, exacerbating traffic and greenhouse gas emissions which the analysis is wanting on.
- 29-3 [C]  
 Perhaps I am overlooking it... On page 3.7-17, a "December 14, 2020" Hexagon e-mail was explicatedly cited. I don't recall seeing it.
- 29-4 [D]  
 Page 1-2, Under 1.2.2 Scoping Results header, "The City received 17 comment letters on the Notice of Preparation for the project's Draft EIR. A copy of each letter is included in Appendix A." They all don't seem to be there.

**Page 2 of 2**

**Comment Letter 29**

**Zachary Kaufman, Resident**

29-5

[E]

As El Camino becomes more congested, in part because of the project, traffic may find it faster to route around El Camino Real onto neighborhood side streets such as Henderson, Iris, and Old San Francisco to avoid stretches of El Camino. Or another example; Wolfe to Gary to Gail to Linden to Maria to El Camino to dodge the El Camino/Wolfe intersection. Is congestion avoidance part of the analysis beyond just some percentage growth in counts? I believe the Henderson/El Camino intersection had some projections.

29-6

Specific Plan:

[1]

Are the landscaping standards somewhere else? I didn't find much dealing with standards apart from 35 foot tree spacing. Singapore is trying to recover from earlier poor planning. They have a program called LUSH (Landscaping for Urban Spaces and High-Rises). A pavement sea with and the occasional hole with a tree popping out is poor design is some people's minds.

--Zach--



**Response No. 29****Zachary Kaufman, Resident****April 25, 2022**

29-1 The commentor requests to know the assumptions upon which the traffic analysis for the project was prepared. As shown on Page v of the Table of Contents of the EIR, the *Transportation Impact Analysis (TIA)*, prepared by Hexagon Transportation Consultants (2020), was included as Appendix D of the EIR. The methodology for the traffic analysis is presented on pp. 5 through 8 of the TIA. There is no inclusion of a mode shift analysis in the TIA.

29-2 The commentor opines that a sufficient greenhouse gas emissions analysis was not conducted for the EIR and feels that the GHG emissions analysis provided is inaccurate because of business displacement resulting in longer vehicle trips. However, as discussed in Section 2.0, *Project Description*, of the EIR, the Specific Plan establishes new land use designations that promote additional housing within the corridor while maintaining existing commercial uses and providing opportunities for additional commercial development. As such, there would not be business displacement resulting in longer vehicle trips.

The EIR has appropriately addressed greenhouse gas (GHG) emissions impacts as required by CEQA. The project's impacts regarding GHG emissions are discussed in Section 3.7, *Greenhouse Gases*, of the EIR. The EIR concluded that the project would have a less than significant impact relative to GHG emissions and no mitigation is required. As discussed in Impact 3.7.3 (Standard of Significance 2), no single project is large enough to result in a measurable increase in global concentrations of GHG emissions. Therefore, project-generated GHG emissions identified under Impact 3.7.1—which determined that implementation of the proposed Specific Plan would result in a net increase of 17,991.26 metric tons carbon dioxide equivalent (MTCO<sub>2</sub>e) per year—are not project-specific impacts to global climate change, but rather the proposed project's contribution to this cumulative impact. Notwithstanding, as discussed under Impact 3.7.1, project-generated GHG emissions would be in-line with the State's long-term climate stabilization goals identified under Executive Order S-03-05. Additional detailed GHG emissions analysis data is also provided in Appendix B, *Air Quality/Greenhouse Gas Emissions/Energy Data*, of the EIR.

29-3 The commentor is asking whether the email from Hexagon Transportation Consultants dated December 14, 2020, cited on p. 3.7-17 of the EIR, that confirms a trip generation figure of 13,845 daily trips when compared to existing conditions, was provided in the EIR. This particular email correspondence between Hexagon Transportation Consultants and the City was not made publicly available, but rather, referenced in the EIR. A copy of the email is available upon request by contacting Jeffrey Cucinotta, Senior Planner, at [jcucinotta@sunnyvale.ca.gov](mailto:jcucinotta@sunnyvale.ca.gov) (preferred) or (408) 730-7424.





29-4 The commentor states that not all 17 of the comment letters referenced on p. 1-2 of Section 1.0, *Introduction*, of the EIR, appear in Appendix A of the EIR. The number of comment letters received on the Notice of Preparation should read 14, not 17; a list of the 14 respondents is provided below. This has been corrected in the Final EIR.

- 1) Janet M. Laurain, Adams Broadwell Joseph & Cardozo
- 2) California Department of Transportation, District 4
- 3) City of Santa Clara
- 4) County of Santa Clara, Roads/Airports Dept.
- 5) Andy Gonazales, resident
- 6) Stan Hendryx, resident
- 7) Barbara Holden, resident
- 8) John and Betty Licking, residents
- 9) State Water Resources Control Board
- 10) Gary Guiffre, resident
- 11) ML Stefan, resident
- 12) John O'Rourke, resident
- 13) Santa Clara Valley Transportation Authority
- 14) Karen Wang, resident

29-5 This comment expresses concern regarding additional traffic that would occur with the project. The project's impacts regarding traffic and transportation are discussed in Section 3.15, *Transportation*, of the EIR. In addition, the methodology for the traffic analysis is presented on pp. 5 through 8 of the TIA. The EIR concluded that, with implementation of mitigation, the project's operational impacts relative to traffic and transportation would be less than significant. Specifically, future projects developed within the Specific Plan area would be required to implement Mitigation Measure TRA-1, below, to reduce potentially significant impacts:

**TRA-1** Prior to Planning Permit Completeness, the City of Sunnyvale shall review site-specific development within the El Camino Real Specific Plan area for consistency with the floor area ratio and/or dwelling units per acre requirements specified in the City's Transportation Analysis Policy (referred to as "Council Policy 1.2.8"). In the event that a proposed development does not meet the floor area ratio and/or dwelling units per acre requirements or the required threshold specified in Council Policy 1.2.8, a project-specific vehicle miles traveled (VMT) analysis shall be conducted to evaluate and disclose transportation-related environmental impacts and identify measures to avoid and minimize VMT impacts. If the VMT analysis determines the potential for an increase in VMT that cannot be mitigated, a subsequent environmental analysis shall be prepared.

Subsequent development projects proposed after adoption of the Specific Plan would be required to identify potential roadway improvements to address deficiencies resulting



from implementation of the project and pay a fair share contribution and/or construct needed improvements as a condition of approval. The potential improvements identified in the project's *Transportation Impact Analysis* primarily consist of the installation or reconfiguration of traffic lanes to provide for new turn lanes at multiple intersections in the Specific Plan area, and multimodal improvements that promote walking, bicycling, and transit. As such, impacts relative to traffic and transportation would be reduced to a less than significant level.

- 29-6 The commentor requests information regarding landscaping requirements for the project. As discussed in Section 3.1, *Aesthetics*, of the EIR, the project would result in a less than significant impact relative to aesthetics (Impact 3.1.1, Standard of Significance 3). The Land Use and Development Standards—including landscaping standards—included in Chapter 4 of the Specific Plan, in conjunction with the ECRSPC of the SMC, applies to all new development. In addition, Specific Plan Chapter 5 (Urban Design Guidelines) provides guidance on landscaping for future developers of the project area and specifically addresses general principles for establishing high quality landscaped areas through use of plant material and paving. Therefore, the project was found to be consistent with the applicable General Plan Scenic Quality Policies of the General Plan (including those relative to landscaping in particular) as outlined in Table 3.1-1, *General Plan Scenic Quality Policies Consistency Analysis*, of the EIR.

**Page 1 of 1**

**Comment Letter 30**

**Mike Serrone, Livable Sunnyvale Board and the Livable Sunnyvale ECR Specific Plan Committee**

**From:** [Mike Serrone](#)  
**To:** [Council AnswerPoint](#); [PlanningCommission AP](#); [Amber Blizinski](#); [Jeffrey Cucinotta](#); [Kent Steffens](#)  
**Subject:** RE: El Camino Real Specific Plan and DEIR  
**Date:** Monday, April 25, 2022 12:15:01 AM

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TO:

City Council  
Planning Commission  
Kent Steffens, City Manager  
Amber Blizinski, Principal Planner  
Jeff Cucinotta, Senior Planner

RE: El Camino Real Specific Plan and DEIR

The Livable Sunnyvale Board and the Livable Sunnyvale El Camino Real Specific Plan Committee commend City Staff for the excellent work on the El Camino Real Specific Plan and DEIR. These documents have taken some time and are urgently needed so that many pending projects along ECR can proceed.

Staff has done an excellent job, incorporating many changes to State law into these documents without changing the intent of the plan. There is still an emphasis on adding badly needed housing units while preserving or expanding retail on this important corridor.

We ask the Planning Commission and the City Council to quickly approve both the ECR Specific Plan and DEIR.

Respectfully,

Mike Serrone on behalf of the Livable Sunnyvale Board and the Livable Sunnyvale ECR Specific Plan Committee

30-1



**Response No. 30**

**Mike Serrone, Livable Sunnyvale Board and the Livable Sunnyvale ECR Specific Plan Committee**

**April 25, 2022**

- 30-1 This comment provides a general statement of support for the project; no concerns or questions regarding the environmental document were included. Comment noted.

**Page 1 of 1**  
**Comment Letter 31**  
**Reza Fardid, Resident**

**From:** [Reza Fardid](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** ECRSP EIR Comments  
**Date:** Monday, April 25, 2022 6:15:40 PM

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

Jeffrey Cucinotta, Senior City Planner

Dear Mr. Cucinotta,

- 31-1 As a 22-year resident of Sunnyvale, who has commuted to/from work in 5 different cities in Santa Clara county and beyond (Menlo Park), I have major concerns about the proposed ECRSP and its Environmental Impacts
- 31-2 1. The population of Sunnyvale has grown about 14% since 2010  
<https://www.populationu.com/cities/sunnyvale-ca-population>  
 Buildout of dense residential dwellings will accelerate this population growth.
- 31-3 2. Public Transportation is proven to be insufficient to meet the commute needs of a growing population, including transit traffic from neighboring cities;
- 31-4 3. The East-West and North-South roads, corridors and Expressways running through Sunnyvale have NO room for expansion, leading to inevitable congestion, post-pandemic;
- 31-5 4. State-wide drought conditions have severely affected water resources, which conservation alone cannot compensate for, considering the high likelihood of continued drought.
- 31-6 Has the city assessed and/or estimated the impact of 1. on 2-4 by way of traffic projections and water resource availability studies?  
 I am opposed to the ECRSP proposal as it stands, since it will degrade quality of life and increase cost of living for Sunnyvale residents, considering constraints that city planning alone is unlikely to overcome.

Best Regards,  
 Reza Fardid  
 185 Cumulus Avenue  
 (408) 636-6325

**Response No. 31**  
**Reza Fardid, Resident**  
**April 25, 2022**

31-1 This comment provides a general introduction and a statement that the commentor has concerns about the project. Responses to specific comments are provided below.

31-2 The commentor expresses concern regarding growth inducement as a result of the project. As discussed in Section 3.12, *Population and Housing*, of the EIR, the project would result in a less than significant impact relative to growth (Impact 3.12.1, Standard of Significance 1). The project estimates that total buildout of the Specific Plan Area through the year 2035 would accommodate approximately 8,500 residential units and 3,980,000 square feet of commercial floor area, which would serve as net increases of approximately 6,900 residential units and 730,000 square feet of commercial floor area above existing conditions. However, no demolition or development activities are proposed as part of the project and existing on-site uses would remain until future redevelopment is proposed at a later date.

It is speculative to determine whether all future residents of the anticipated 6,900 additional dwelling units would relocate from within or outside of the City. Thus, this analysis conservatively assumes future residents would relocate from outside of the City. Based on the City's average household size of 2.69, the anticipated 6,900 additional units would introduce up to 18,561 additional residents to the City. The anticipated population growth associated with the project represents only a 12-percent increase from the City's current population of 156,503 persons.

However, the proposed project's development potential would not exceed population estimates or growth forecasts for dwelling units for 2035. Therefore, the EIR determined that the project would not result in substantial unplanned population growth.

31-3 The commentor opines that public transportation is insufficient for commuters' needs. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

31-4 The commentor feels that the existing roadways within the City are not suitable for expansion. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIRs environmental analysis under CEQA. However, the commentor may refer to pp. 3-95 through 3-100 of the City's General Plan Land Use and Transportation Element (LUTE) to view the General Plan Roadway Classification Map (Figure 3-12 of the General Plan LUTE), and for a discussion regarding roadways classifications and rights-of-way for the various roadway types.

- 31-5 The commentor raises a concern regarding the drought and water resources. The EIR has appropriately addressed water supply impacts as required by CEQA. As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR (Impact 3.16.1, Standard of Significance 1 and Impact 3.16.2, Standard of Significance 2), a Water Supply Assessment (WSA) was conducted to ensure that adequate water supply and reliability within the City, now and into the future, is available to serve the growth envisioned in the Specific Plan. Analysis in the WSA estimates that implementation of the Specific Plan would add approximately 600 acre-feet per year (AFY) of demand to the City's water system. The potable water demand for the project is estimated to be 967 AFY under normal conditions by the buildout year 2025. The WSA determined that the City can meet future water demands, including the demands associated with buildout of the Specific Plan, during drought years by utilizing a combination of groundwater, conservation, recycled water, and the available San Francisco Public Utilities Commission (SFPUC) and Santa Clara Valley Water District (SCVWD) contractual water supply limits. In addition, the WSA found that supplies of imported water are expected to remain relatively stable throughout the forecast period and that water conservation and increased local well production would balance the demand for water in the City.

Because the WSA found that the City has an adequate supply of water to provide water service to the project throughout 2035 under normal and drought conditions, the project would not require any new or expanded water supply facilities and the EIR found this impact to be less than significant.

- 31-6 The commentor requests to know whether studies were conducted for traffic and water resources. Further, the commentor adds that they are opposed to the project.

As discussed in Section 3.15, *Transportation*, of the EIR, a *Transportation Impact Analysis* (TIA) was prepared for the project by Hexagon Transportation Consultants (2020) and was included as Appendix D of the EIR. The conclusions of the TIA are discussed in detail in Section 3.15, *Transportation*, of the EIR. Impacts relative to traffic were found to be less than significant with mitigation incorporated.

As discussed in Section 3.16, *Utilities and Service Systems*, of the EIR, a *Water Supply Assessment* (WSA) was prepared for the project by Michael Baker International (2019) and was included as Appendix E of the EIR. The conclusions of the WSA are discussed in detail in Section 3.16, *Utilities and Service Systems*. As discussed in Response 31-5 above, impacts relative to water supply were found to be less than significant.



## Page 1 of 4

## Comment Letter 32

## Ari Feinsmith and John Cordes, Bike Sunnyvale

**From:** [Ari Feinsmith](#)  
**To:** [Jeffrey Cucinotta](#)  
**Cc:** [SVBC Sunnyvale Team](#); [Kenneth Rosales](#); [ekaminoreal@bikesiliconvalley.org](mailto:ekaminoreal@bikesiliconvalley.org)  
**Subject:** ECRSP Comment Letter - Bike Sunnyvale  
**Date:** Monday, April 25, 2022 11:55:07 PM

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

Dear Mr. Cucinotta,

We are writing to you on behalf of Bike Sunnyvale, the local chapter of the Silicon Valley Bicycle Coalition. We are a group of over 150 local residents and neighbors who share a common passion and focus on making it safer and more convenient to walk, bike, and take other modes of active transportation in Sunnyvale.

We are taking this opportunity to comment on the draft El Camino Real Specific Plan before it is finalized. First, we congratulate the city staff on a well-written draft plan.

32-1 In general, we are very supportive of the draft El Camino Real Specific Plan. Its adoption and implementation will make Sunnyvale a better community in line with our goals. We are happy to see the draft plan supports making many changes to make the El Camino Real plan area more walking, bicycle riding, and public transit-friendly while also making it a more pleasant place to live, shop, and visit. We are very supportive of the Bicycle Network goals outlined in the plan (BN-Gx, BN-Px, PP-Gx). We support the shared mobility policies as outlined in SM-Px and the three midblock crossings to ECR as shown in Figure 6-5: Recommended Mid-Block Crossings.

Here are specific items we would like to see improved.

32-2 1) Please **add a mid-block crossing on ECR between Hollenbeck ave and Mary ave** to the Specific Plan for consideration. This block is approximately 0.4 miles long, so residents would greatly benefit from being able to cross mid-block.

2) SD-P2 currently states: "Consider phasing out and removal of all on-street parking along El Camino Real by 2032."

32-3 We think the SD-P2 should state the intended goal as listed in the 2020 Active Transportation Plan instead of simply stating to 'consider' it. **SD-P2 should be strengthened** by rewording and adding specific deadlines: "The majority (over 80%) of on-street parking shall be removed by 2028 and all on-street parking along El Camino Real should be removed by 2032."

3) We want to see the city develop a plan for **implementing the class IV protected bikeways along ECR in a more timely and comprehensive manner**. Currently, the plan depends on waiting for each property to redevelop, then having the city look for funding to fill in the gaps.

32-4 We propose that the City of Sunnyvale use its stellar credit rating to take out infrastructure loans to implement the protected bikeways on ECR all at once in places where there are not too many driveways. Afterwards when a parcel is redeveloped, the developer would reimburse the city with however much it cost the city to build the protected bikeways on their street frontage. This program would not be applicable to developments happening before the city's 'all out once' bike lane is built out, meaning developers in the short term would still have to install protected bike



## Page 2 of 4

## Comment Letter 32

## Ari Feinsmith and John Cordes, Bike Sunnyvale

32-4 lanes as they redevelop, as stated in the current draft.

4) In Appendix A of the ECR SP draft, we request the following changes that will **make these intersections safer for everyone**.

32-5 On Knickerbocker, Grape, Maria, Norman, Poplar, Henderson, Sycamore, Helen: add the removal of the on-street parking within 50' of the ECR intersection to improve visibility.

Add changes to Helen and Sycamore Terrace to make them Class III or Class IIIB facilities instead of N/A.

5) In the COMMUNITY BENEFITS/INCENTIVES PROGRAM - DRAFT, there need to be stronger incentives for active transportation.

Transportation	Public Bicycle/Pedestrian Pathways with Signage, Privately Owned Publicly Accessible		2	6
	Annual Transit Passes for Residents of Rental-Only Residential Projects	Caltrain	4	
		VTA	2	

32-6 The 'Public Bicycle/Pedestrian Pathways with Signage, Privately Owned Publicly Accessible' incentive is great. However, parcels on ECR have a variety of shapes, including some that are long and skinny. Therefore, **this incentive should be a function of the length of the path, not just a flat rate**. We propose that the developer should get 1 incentive point for the first \_X\_ linear ft, then an additional incentive point for every \_Y\_ linear ft. The exact numbers should be determined by the planning department. The benefit of this is that it incentivizes parcels that have to make a larger path to do so.

- Developers are unlikely to participate in giving out transit passes for 10 years because there is a lot of uncertainty about what could happen over 10 years after the project is completed. We propose **lowering the requirement to 5 years for VTA Smartpasses and Caltrain Go Passes**. Additionally, Caltrain passes cost 4 times as much as VTA Smartpasses, so if you want them to be equally appealing, you should increase the Caltrain Go Pass to 8 incentive points.
- The maximum points that can be earned from transportation-related incentives should not be a limiting factor for developers. Transit passes and bicycle/pedestrian infrastructure go hand and hand together. These incentives should not be pitted against each other.
- We would like to see "Bicycle Parking, Publicly Accessible: At least 20% more Class I spaces and 10 more Class II spaces beyond minimum requirement" increased to 2 points from 1 point.

32-7 6) There needs to be higher bicycle parking requirements. The current requirements for residential developments are:

## Page 3 of 4

## Comment Letter 32

## Ari Feinsmith and John Cordes, Bike Sunnyvale

Table 19.36.130B

## Unassigned Bicycle Parking Requirements

	Class II	Class I
<b>Residential Uses <sup>[1]</sup></b>		
General	1 space per 15 units	1 space per 4 units
Low-income housing	1 space per 15 units	1 space per 3 units
Senior housing	1 space per 15 units	1 space per 20 units

<sup>[1]</sup> Minimum of 4 unassigned Class I bicycle parking spaces shall be provided for each residential development.

Everyone living along ECR should be able to use a bicycle for frequent local trips. Lugging a bicycle up multiple flights of stairs to one's home is not an acceptable method to provide secure parking. Therefore, we suggest changing the bicycle Class I parking requirements to 1 Class I space per 1 bedroom for General and Low-income housing. For Senior housing, it should be at least 1 space per unit. This matches the [VTA Bicycle Technical Guidelines](#) and 'Best' values as listed in the Silicon Valley Bicycle Coalition's [Bicycle Friendly Development Guidelines](#) (see below). We encourage you to adopt the 'Best' values for the other bicycle parking criteria, as listed below.

Criteria	Residential, Commercial or Retail	Metrics	Not recommended	Good	Better	Best
<b>Bike storage and parking (continued)</b>						
<b>Residential: Tenant/Resident secure bike parking (Class 1)</b>	Residential	Long-term bike parking spaces per bedroom		Meets city's building code/parking requirements.	Association of Pedestrian and Bicycle Professionals (APBP) guidelines: [5] bike space per bedroom or [1-4 bike spaces] per [4] homes	1 bike space per bedroom or more
<b>Residential: Guest parking (Class 2)</b>	Residential	Short-term bike parking spaces per bedroom	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [.05 bike space] per bedroom or [1 bike space] per [20] homes	1 bike space per 10 homes or more
<b>Commercial: Tenant/employee secure bike parking (Class 1)</b>	Commercial	Long-term bike parking spaces per square feet		Meets city's building code/parking requirements.	APBP: [1-1.5 bike spaces] per [10,000] sq.ft. of floor area.	1 bike space per 5,000 sq ft or better
<b>Commercial: Guest parking (Class 2)</b>	Commercial	Short-term bike parking spaces per square feet	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [1 bike space] per each [20,000] sq.ft. of floor area.	1 bike space per 10,000 sq ft or better
<b>Retail: Tenant/employee secure bike parking (Class 1)</b>	Retail	Long-term bike parking spaces per square feet		Meets city's building code/parking requirements.	APBP: [1 bike space] per [10,000-12,000] sq.ft. of floor area	1 bike space per 5,000 sq ft or better
<b>Retail: Guest parking (Class 2)</b>	Retail	Short-term bike parking spaces per square feet	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [1 bike space] per each [5,000] sq.ft. of floor area.	1 bike space per 2,500 sq ft or better
<b>Alternative bike storage</b>	All	Cargo, family, recumbent bikes space	No bike parking provided that would accommodate oversized bicycles.			At least one Class 1 bike parking space for oversized bicycles per every twenty Class 1 bike parking spaces.
	All	Electric bike (e-bikes) space with charging stations	No charging stations for e-bikes.			At least one Class 1 bike parking space with charging station per every fifty Class 1 bike parking spaces.

7) Appendix D of the ECR SP has a list of projects to address congestion caused by future development on ECR. We are particularly concerned about the project planned for Fair Oaks & ECR (intersection #8, pg xii), which will widen ECR to add second left turn lanes, increasing exposure time for peds and bikes crossing the street to save cars an average of just 5 seconds during AM rush hour. We should not be increasing exposure to peds and bikes crossing the street just so cars can go faster. That will make our city less walkable and bikeable, which goes against

**Page 4 of 4**

**Comment Letter 32**

**Ari Feinsmith and John Cordes, Bike Sunnyvale**

32-8

our city goals of reducing emissions, reducing VMT, and making active transportation more appealing for all. Please reevaluate or cancel this project.

32-9

Thank you for this opportunity to comment on the draft El Camino Real Specific Plan. Please let us know if you have any questions about our input. We would be more than happy to meet with anyone who has questions.

Sincerely,

Ari Feinsmith & John Cordes on behalf of [Bike Sunnyvale](#), SVBC

**Response No. 32****Ari Feinsmith and John Cordes, Bike Sunnyvale****April 25, 2022**

- 32-1 This comment provides an introduction and also expresses thanks to the City for the planning work involved in this project and commends the proposed goals of the project. The commentor expresses support for increased pedestrian and bicycle friendly policy, and also expresses support for shared mobility strategies outlined in the plan. Responses to specific comments are provided below.
- 32-2 The commentor asks for a midblock crossing between Hollenbeck Avenue and Mary Avenue. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-3 The commentor states that the language of policy SD-P2 should be strengthened by adding specific deadlines pursuant to the removal of on-street parking. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-4 The commentor states the City should pursue Class IV protected bicycle facilities, and take out infrastructure loans to achieve this. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-5 The commentor requests the removal of on-street parking within 50 feet of El Camino Real along specific roadways, as well as requests Class III bikeways on Helen and Sycamore Avenues. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-6 The commentor states there should be stronger incentives for active transportation in in the Draft Community Benefits/Incentive Program. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is



warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

- 32-7 The commentor requests higher bicycle requirements. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-8 The commentor expresses concern regarding specific projects listed in Appendix D of the ECSRP, with particular concern reserved for a widening project along El Camino Real and Fair Oaks. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 32-9 This comment provides a closing statement and reiterates thanks to the City for the planning work involved in this project. Comment noted.



## Page 1 of 5

## Comment Letter 33

Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home



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## TRANSMITTED VIA EMAIL

April 25, 2022

Jeffrey Cucinotta

City of Sunnyvale, Department of Community Development, Planning Division  
Attn: Jeffrey Cucinotta, Senior Planner  
456 West Olive Avenue  
Sunnyvale CA 94088-3707

Dear Mr. Cucinotta,

On behalf of Silicon Valley at Home, we write to you today on the Draft El Camino Real Specific Plan (ECRSP). We commend the City of Sunnyvale's forward thinking vision on transforming this corridor to one that is vibrant, prosperous, accessible, and sustainable while aiming to preserve its current businesses and residential tenants. We think the ECRSP is heading in the right direction with its priorities and we would like to reinforce and supplement those ideas. We would also like to thank staff for their work developing this comprehensive plan that has faced years of unfortunate and uncontrollable delays, including the COVID-19 pandemic and staff turnover.

The ECRSP lays out a vision and guiding principles that serve as the bedrock of the entire plan. We are pleased that they focus on providing "significant new residential options", including a "full range of affordable and marketrate housing," and preventing "displacement of existing residents is a high priority". We commend these goals and want to ensure that we achieve them. Our comments and recommendations are targeted towards helping the City realize this vision and guiding principles.

**The ECRSP provides the opportunity to help meet city-wide housing needs.** As of January 2021, new anticipated jobs outnumbered the amount of housing units in Sunnyvale, [just under 8 to 1](#). Although Sunnyvale has flourished in job creation, it has lagged in the production of affordable housing to keep up. As of December 2020, Sunnyvale met 8% of its RHNA targets for Very Low-Income units, 7% for Low Income, 30% Above Moderate Income, and 145% of its Above Moderate-Income targets for the current Regional Housing Needs Allocation cycle. It is vital that the ECRSP include a discussion on the pending sixth Housing Element cycle's requirements along with other key regional transportation funding opportunities, such as the One Bay Area Grant through the Metropolitan Transportation Commission's (MTC) Transit Oriented Communities (TOC) Policy.

**We also believe the ECRSP can go further to meet Sunnyvale's housing needs by maximizing the Community Benefits and Incentives Program, reasonably increasing its densities, strengthening its housing policies, and taking advantage of the Affordable Housing and Anti-Displacement Strategy. Please find our detailed recommendations below:**

33-1

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## Comment Letter 33

Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home

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## I. Explicitly Connect ECRSP to the Sixth Cycle Housing Element Update

Given the timing of the ECRSP's adoption, there is a clear link between the Plan's housing goals and the City's creation of a compliant Housing Element. We highly recommend that the sixth cycle Housing Element (hereon as the Housing Element Update) be included and discussed in the ECRSP given that Housing Element Update's rules are stringent, and, for the first time, include accountability mechanisms from the California Department of Housing and Community Development (HCD).

## Preliminary Sites Inventory

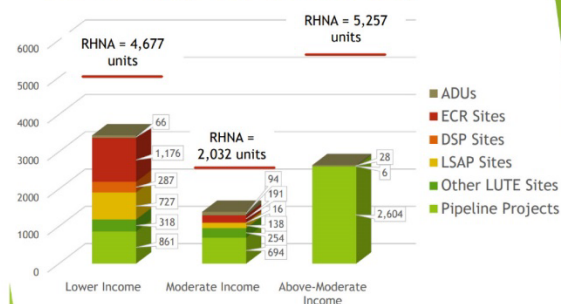


Figure 1 City of Sunnyvale's Housing Element preliminary sites inventory from 1/25/2022.

33-2 The City of Sunnyvale's RHNA target is to build 11,966 new units by 2031 including 6,709 units in the Moderate-Income and Lower-Income categories. At a January 25<sup>th</sup>, 2022 City Council Study Session on the Housing Element, the Housing Department gave a [presentation that included the City's preliminary draft sites inventory](#), which assigned the ECRSP area with building approximately 1,367 Below Market Rate (BMR), 1,176 Lower Income, and 191 Moderate-Income units within the eight-and-a-half-year period (Figure 1). The ECRSP would account for roughly 20% of the entire city's RHNA targets for Moderate-Income and Lower-Income units that would need to be built within an eight-and-a-half-year cycle. The Housing Element Update is highly dependent on the consistency of the ECRSP with the Housing Element Update, along with the success of the ECRSP's implementation.

Therefore, the ECRSP should include a section that discusses its connection and reflection of the Housing Element Update and generally express that it will conform to its new rules, the pending site inventory, and its policies and programs.

## II. Strengthen Community Benefits and Incentive Program, Increase Densities, Consider Varying Funding Sources, and Maximize Housing with Commercial Space

33-3 Considering the goal of achieving 1,367 BMR units by 2031, roughly 161 units per year, within the ECRSP area raises the question of whether the proposed incentives program is enough to reach the upcoming RHNA targets, let alone the LUTE targets. **We recommend that the City of Sunnyvale conduct a study that analyzes and helps track likely build-out scenarios, including the minimum and maximum number of units the ECRSP would have with all of its programs and policies (e.g. Housing Mitigation Fees, Direct Public Investments, etc.) for development implementation.** This study would not need to be completed before the adoption of the ECRSP but we recommend that it be an implementation tool to be completed at the start of the planning period (e.g. within the first year of adoption) so that the City can ensure the ECRSP is on-track with its RHNA and LUTE targets for the plan area. This would allow for the ECRSP to accurately pivot as needed throughout the 20-30 year planning period in order to meet its vision for housing.

The Community Benefits and Incentive Program (as it currently stands would grant additional density points if developers build over 15% Very-Low-Income units. The proposed Program, however, is less enticing to developers than the State Density Bonus Law, which allows more flexibility in the variety of affordable units. The focus on the

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## Comment Letter 33

## Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home

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Very-Low-Income category alone also undermines Housing Element Update goals for the Plan area. **Therefore, we recommend that a variety of options for incentive points be allowed for mixes of Extremely Low, Very-Low, and Low-Income units. The deeper the affordability mix a developer plans to build, the more incentive points a developer would be given. We also suggest that the City explore reasonable increases of density points for affordable housing in a way that allows for developers to recover their costs through increased densities/market-rate units so that the program becomes viable.**

We also believe there are some missed opportunities in the ECR-MU24, ECR-MU28, R-3 and R-4 zoned sites at each of the nodes. These sites should be opportunity areas to maximize feasible residential density. The current densities of 24 DU/AC and 36 DU/AC under R-3 and R-4, for example, seem much too low since this is an opportunity for the City to rezone these areas for higher densities. [A regionally adaptable study presented by the City of Santa Clara for their Downtown Precise Plan](#) (see page 25) showed that developers would “maybe” consider residential condominiums feasibly developable at 50 or 60 DU/AC, with a definite “yes” at 70 DU/AC. Residential apartments were considered a “maybe” feasible to developers at 60 or 70 DU/AC, with a “yes” at 80 DU/AC. Even with density bonuses, densities that are too low will not be competitive enough to include affordable housing. Moreover, developers we have been in contact with have expressed a preference of residential projects over mixed-use developments. We are aware of the need to retain and encourage commercial development but where there are opportunities to increase residential units to support those commercial uses, we should take advantage of them. Even if the likelihood of redevelopment in these areas are currently low, our intentions of achieving residential development by increasing allowable densities can be shaped and influenced now. A higher residential population along the ECR corridor increases the feasibility of retail continuing to survive and could make it more feasible to include commercial space as part of mixed-use developments as well.

The Metropolitan Transportation Commission will be approving a [Transit-Oriented Communities Policy \(TOC Policy\)](#) in late July that will likely include minimum densities for cities to set in future growth and high-quality transit areas, like the ECRSP area, in order to acquire transportation funding. The TOC Policy currently has minimum densities set at 35 DU/AC for stops with frequent bus services (headways that are at least 15 minutes or below) of which the ECRP area likely falls under. The City of Sunnyvale should take this opportunity to further increase densities to be better aligned with the way TOC development is proceeding across the Bay Area.

The Housing Element Update also requires cities to provide minimum densities of 30 DU/AC for Lower-Income residential projects, along with a minimum of 50-150 units for each project in order to reach financial feasibility for state or federal resources. Given that the ECRSP will provide projects that feed into the Housing Element Update’s state inventory, those projects will be required to fit under specific rules under the state, which again, make them both inextricably linked.

**Therefore, we recommend that the City of Sunnyvale make at a minimum the following reasonable density increases at this stage of the planning process:**

- ECR-MU24, ECR-MU28, and R-3 densities to at least somewhere between 30 DU/AC and 35 DU/AC;
- ECR-MU33 to at least 35 DU/AC; and
- R-4 to at least 42 DU/AC

Lastly, the Municipal Code Section 19.36.100 edits for minimum ground floor commercial area in mixed-use development did not account for odd-shaped parcels. **We recommend that the required amount of commercial area be consistent with the shape of a parcel to maximize its use, ground-floor activation, and housing units.** There is no

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## Comment Letter 33

## Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home

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Re: Subject  
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one size fits all amount of retail for each parcel but this is another opportunity where the number of housing units could be increased.

### III. Improve ECRSP Housing Policies and Incorporate the 2020 Housing Strategy and Affordable Housing and Anti-displacement Strategy

Our overall recommendations on the ECRSP's housing policies are that they be more specific, robust, accountable, and actionable. Other plans in neighboring cities have taken stronger approaches, such as the City of San José's most recently adopted [North 1<sup>st</sup> Street Urban Village Plan](#) which include not only policies but goals, standards, guidelines, and action items. Below are specific recommendations we have for policies we believe can be strengthened or can be potentially included as an additional policy:

- LU-P9 calls for incentivizing density bonuses to promote development of affordable housing. **We believe the City of Sunnyvale can go beyond being a spectator of development along the ECRP corridor and craft a policy that actively encourages developers to build 100% deed-restricted affordable housing projects so that we can meet required RHNA targets for Lower-Income and Moderate-Income housing units.**
- LU-P10 ensures that relocation commitments are provided to avoid displacement of residents from new development. We are not entirely sure how the City plans to do this without any details of City guidelines, standards, or actionable steps be taken to ensure it. The City of Sunnyvale adopted a cutting-edge [Housing Strategy in 2020](#) that could provide some additional ideas. Moreover, there are some viable policies in the 2016 consultant-prepared Affordable Housing and Anti-Displacement Strategy document that could be considered, including a one-for-one replacement requirement or a rehabilitation assistance program. **We highly recommend that the ECRSP process consider how it can help advance the components of the City's 2020 Housing Strategy. We also recommend that the ECRSP process explore the aforementioned policies included in the consultant-prepared 2016 Affordable Housing and Anti-Displacement Strategy.**
- LU-P11 encourages a diverse housing mix, such as ownership, rental, affordable, and senior housing. We would like to know how the City will implement this policy, while ensuring ECRSP meets its Lower-Income and Moderate-Income housing targets. **We encourage the City to more explicitly pursue policies as part of the ECRSP area to create Permanent Supportive Housing and housing for people with intellectual and developmental disabilities, for example.**
- LU-P16 includes a No Net Loss policy for commercial square footage when parcels are redeveloped with new buildings and uses. **We recommend that the City of Sunnyvale additionally explore options in relocating potentially displaced businesses within the ECRSP area. Separately, we believe another policy should be made to provide No Net Loss of residents as outlined in the 2016 Strategy and currently under SB 330, except without a sunset date.**
- **We recommend the City further explore how housing streamlining laws will help meet the City's goals and consider providing additional streamlining to affordable housing developments in the plan area if it would help increase affordable housing production.**

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**Page 5 of 5**

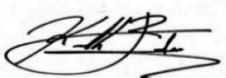
**Comment Letter 33**

**Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home**

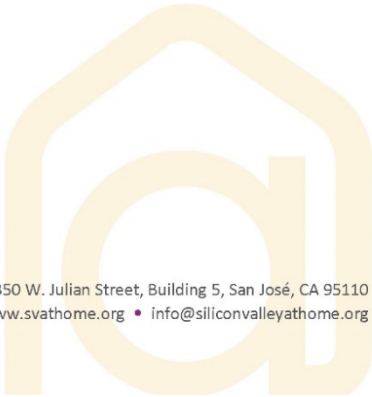
Date  
Re: Subject  
Page 5 of 5

We recognize and support staff's hard work in developing the ECRSP over all these years and we are excited about its direction. As the ECRSP moves toward a motion of approval, we think that it can be strengthened to meet Sunnyvale's housing needs. SV@Home looks forward to continuing to work closely with Staff, City Council, and the community to ensure that the ECRSP reflects its multi-generational housing vision of providing diverse housing options and protecting existing residents.

33-5 Sincerely,



Kenneth Rosales  
Planning Senior Associate



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**Response No. 33****Kenneth Rosales, Planning Senior Associate, Silicon Valley at Home****April 25, 2022**

- 33-1 This comment provides an introduction and also expresses thanks to the City for the planning work involved in this project and commends the proposed goals of the project. This comment also includes a general discussion regarding housing statistics in the City relative to Regional Housing Needs Assessment (RHNA) targets. The commentor also states that they believe the ECRSP can go further to meet Sunnyvale's housing needs by maximizing the Community Benefits and Incentives Program, reasonably increasing its densities, strengthening its housing policies, and taking advantage of the Affordable Housing and Anti-Displacement Strategy. Responses to specific comments are provided below.
- 33-2 The commentor requests that the City explicitly connect the project to the Sixth Cycle (2023 – 2031) Housing Element Update. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIRs environmental analysis under CEQA. However, the Sixth Cycle Housing Element Update is still in draft form and has not yet been approved by the California Department of Housing and Community Development (HCD) agency. Therefore, the City is unable to reference it in the Specific Plan or EIR at this time.
- 33-3 The commentor requests that the City conduct a study that analyzes and helps track likely build-out scenarios, including the minimum and maximum number of units the ECRSP would have with all of its programs and policies (e.g. Housing Mitigation Fees, Direct Public Investments, etc.) for development. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 33-4 The commentor opines that the Specific Plan's housing policies be revised to be more specific, robust, accountable, and actionable, and provides several recommendations regarding specific policies. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 33-5 This comment provides a closing statement and reiterates thanks to the City for the planning work involved in this project. Comment noted.

**Page 1 of 2**  
**Comment Letter 34**  
**Ari Feinsmith, Bike Sunnyvale**

**From:** [Ari Feinsmith](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** ECR SP suggestions from a developer  
**Date:** Monday, April 25, 2022 11:59:29 PM  
**Attachments:** [Commercial Pages from SMC Chapter 19.36 - DRAFT - notes.pdf](#)

---

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

Hi Jeffery,

34-1 I A developer mentioned to me one of the challenges with the ECR SP draft about commercial requirements. I thought you might want to know about it. See below and attached.

Quote:

34-2 I The two issues are:

- Retail experts have been very clear with us that this space will not be leasable; we will be building commercial space and parking that will be dark
- There is a limited amount of land area and building volume on any property; building commercial takes up a fixed volume that could otherwise be used for residential

-Ari

## Page 2 of 2

## Comment Letter 34

## Ari Feinsmith, Bike Sunnyvale

Challenges: 1) properties with limited frontage must provide 10% regardless of retail depth; this means for a site like 777 Sunnyvale, the commercial needs to be over 100' deep to achieve the required area; retail experts have told us this space will be vacant

2) this area is area that would otherwise be used for residential area

**19.36.100. Minimum ground floor commercial area in mixed-use development.**

- (a) Each mixed-use development (including both office and residential mixed-use developments) shall be subject to devoting a portion of the ground floor area to a commercial use.
- (b) The minimum ground floor commercial area requirements for mixed-use developments are listed in Table 19.36.100.

**Table 19.36.100**  
**Minimum Ground Floor Commercial Area Requirements for Mixed-Use Development**

Lot Size	Minimum Required Commercial Area, whichever is greater <sup>[1] [2]</sup>	
≤ 50,000 sq. ft.	7,000 sq. ft.	
50,001-100,000 sq. ft.	10,000 sq. ft.	75% of El Camino Real frontage length x 50
100,001-150,000 sq. ft.	20,000 sq. ft.	
150,001-200,000 sq. ft.	30,000 sq. ft.	
200,001-300,000 sq. ft.	40,000 sq. ft.	
300,001-400,000 sq. ft.	50,000 sq. ft.	
≥ 400,000 sq. ft.	60,000 sq. ft.	

lot frontage  
(this calculation makes sense to us, however this does not govern sites that are long and narrow)

<sup>[1]</sup> If the floor area values/calculations presented above yield a value that is over 20% of the lot size, a commercial area capped at 20% of the lot size shall also be permitted.

<sup>[2]</sup> If a property has no frontage along El Camino Real, a commercial area capped at 10% of the lot size shall also be permitted.

**19.36.110. Development requirements.**

- (a) Development requirements for commercial development are listed in Table 19.36.110.

**Table 19.36.110**  
**Development Requirements for Commercial Development**

Standard	Requirement
Maximum Building Height	Node Properties: 75 feet Segment Properties: 55 feet
Maximum Lot Coverage	60%
Minimum Front Yard Setback	15 feet

- (b) Development requirements for mixed-use development are listed in Table 19.36.110 and depicted in Figures 19.36.110A through 19.36.110C, as identified by the numbered/lettered standards that are associated with the table and figures.

**Response No. 34**

**Ari Feinsmith, Bike Sunnyvale**

**April 25, 2022**

- 34-1 The comment states that a developer has identified an issue with the ECRSP with regard to commercial minimums. Responses to specific comments are provided below.
- 34-2 The commentor states the commercial requirements are not feasible and would not be leased out. The commentor also mentions that such space could instead be utilized for residential purposes. This comment is relative to the Specific Plan and not the EIR. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 34-3 The commentor explains challenges with the minimum commercial sizes, especially with regard to large lots such as 777 Sunnyvale. The commentor also expresses confusion over the lot frontage calculations. This comment is relative to the Specific Plan and not the EIR. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)



## Page 1 of 4

## Comment Letter 35

Alison Warner, Senior Vice President, Balboa Retail Partners



## VIA ELECTRONIC MAIL

April 25, 2022

Chair Daniel Howard  
And Members of the Planning Commission  
City of Sunnyvale  
456 W. Olive Avenue  
Sunnyvale, CA94086

## RE: Balboa Retail Partners—El Camino Real Specific Plan Comments

Dear Chair Howard and Members of the Planning Commission:

35-1

We are writing on behalf of Balboa Retail Partners (“Balboa”), a real estate investment company with over 5.8 million square feet of retail assets and expert experience in the re-leasing, re-developing, and re-positioning of underutilized retail sites across the country. Balboa owns three properties on El Camino Real in Sunnyvale, CA (“City”)—Bell Plaza Center at 1040 El Camino Real, Hacienda Center at 789 El Camino Real, and Cala Center at 1111 El Camino Real (collectively, the “Properties”). We have been following and participating in the El Camino Real Specific Plan (“ECRSP”) update with great interest for the past couple years as the update has substantial consequences for the future viability of our three sites. Accordingly, we offer the following observations about the draft ECRSP and respectfully request proposed changes outlined below which better achieve the community’s goals for retail in the ECRSP

I. Draft ECRSP

The community engagement process for the ECRSP concluded with the following Vision Statement: “The El Camino Real Specific Plan will support and enhance community-serving retail and provide significant new residential options while advancing sustainability and improving transportation safety and mobility choices.” (ECRSP, p.17.) In parallel with the City’s efforts, Balboa has been thoughtfully exploring its re-positioning options for the Properties as potential mixed-use sites and we have waited patiently for the City to adopt its reimagining of the El Camino Real corridor before advancing any plans.

35-2

In order to address the dramatically changing retail environment, Balboa has critically evaluated redevelopment plans that would provide a retail facelift to better activate and preserve existing retail uses, while attracting successful, new retail tenants—all supported by replacing obsolete retail spaces with high density housing.

Now, after years of process, the most recent draft of the ECRSP released in 2022 has **drastically reduced density** and residential opportunities along portions of the corridor—including two Balboa properties—in an attempt to support commercial uses and help them thrive. While Balboa has the same goals with respect to preserving commercial uses, the draft ECRSP creates **problematic roadblocks** that make it difficult—if not impossible—for Balboa to

## Page 2 of 4

## Comment Letter 35

Alison Warner, Senior Vice President, Balboa Retail Partners



redevelop the Properties to re-invigorate the retail and boost much-needed housing production in the City. For example, the 2022 draft zoning standards restrict residential uses and the applicable densities to specific portions of a site, which effectively cuts the allowable residential density in half from prior iterations of the ECRSP. Moreover, the density per acre has been reduced by 30% from the 2017 City Council Preferred Alternative ("2017 Alternative"), rendering the overall 2022 proposed density less than half of that proposed in the 2017 Alternative, even with the City's incentive program and State Density Bonus Law applicable to the Properties.

As you are well aware, the State of California is in the midst of an **unprecedented housing crisis**; therefore, residential density can and should be elevated to meet housing targets and it does not have to be at the expense of enhanced retail opportunities. The goals of housing production and robust retail should not be mutually exclusive—yet the ECRSP, as drafted, creates **unintended consequences** that threaten the viability of both of these goals.

We offer the following analysis of the Hacienda Center to illustrate some misguided elements of the draft ECRSP.

35-2

DENSITY CALCULATION COMPARISON - CENTER SEGMENT				
	Existing (2007)	2017 Staff Rec	2020 Staff Rec	2022 Proposed ECRSP
Hacienda Site Area	10.56 ac	10.56 ac	10.56 ac	10.56 ac
Hacienda - Applicable Site Area	10.56 ac	10.56 ac	10.56 ac	5.30 ac
Base Density <sup>(1)</sup>	40 du/ac	36 du/ac	24 du/ac	24 du/ac
Max City's Green Building Program Bonus <sup>(2)</sup>	n/a	n/a	n/a	1 du/ac
Max ECRSP Incentive Program <sup>(3)</sup>	n/a	n/a	n/a	6 du/ac
State Density Bonus Program - 20% <sup>(4)</sup>	8 du/ac	7 du/ac	5 du/ac	6 du/ac
Max Total Density	48 du/ac	43 du/ac	29 du/ac	37 du/ac
Total Units - Base Density <sup>(1)</sup>	425 units	380 units	253 units	127 units
Total Units - City Bonus <sup>(2)(3)</sup>	n/a	n/a	n/a	38 units
Total Units - State Bonus <sup>(4)</sup>	85 units	76 units	51 units	33 units
Max Total Units - Hacienda Only	510 units	456 units	304 units	198 units
Effective Density per Total Property	48 du/ac	43 du/ac	29 du/ac	19 du/ac

**Notes:**

(1). There is no Base Density requirement under current zoning and 2007 ECR Precise Plan; for the Existing (2007) scenario, total units was determined based on the current form-based zoning code applied to a project on ~5.30 acres (the proposed Applicable Site Area). The "Base Density" is calculated after application of SDBL.

(2). City's Green Building Program Bonus = 5% of Base Density.

(3). ECRSP Incentive Program Max Bonus varies from 6 to 20 additional density points. Max bonus density points assumed.

(4). Assumes 20% density bonus per SDBL.

As you can see, the base density for the Hacienda Center shifts from 40 du/acre in the current 2007 zoning to 36 du/acre in the 2017 Alternative and then down to 24 du/acre in 2020 and 2022. This surprising decrease becomes alarming in the current draft ECRSP because of the reduction in the applicable site area for the density calculation. This decrease causes the base density to go from 510 units under the existing zoning to 189 units in 2022, because of new



## Page 3 of 4

## Comment Letter 35

Alison Warner, Senior Vice President, Balboa Retail Partners



35-2

arbitrary restrictions to residential area that ostensibly seek to “protect” existing retail. This new proposed zoning now would allow for a low-density townhome project on half of a site, which eliminates the opportunity for housing-over-retail (or vertical) mixed use. Thus, the consequences of this density and area reduction are two-fold—it impedes the opportunities to consolidate and re-invigorate retail uses, while making options for creating **multi-family residential financially infeasible**. In other words, it completely undermines the vision set forth for the ECRSP update by ignoring the important sustainability and affordability goals of the City that could be accomplished with more holistic planning.

## II. Balboa Request

We strongly support keeping existing retail at our Properties and helping tenants thrive and have no intentions of converting any of the Properties to exclusively residential use. To that end, we do not quarrel with the concept of restricting residential uses to a portion of our sites, but we need the flexibility to determine the best location for the development area on each site based on the relative success of existing retail. Additionally, higher density is required to make a mixed-use project actually pencil and allow the remaining commercial redevelopment to flourish.

Accordingly, we request the following changes to the draft ECRSP:

35-3

- Retain the proposed zoning densities (with the incentives) but apply them to the entire sites for purposes of base density calculations;
- Restrict residential development to a maximum land area percentage of the Properties, such as 40% of a site, to ensure both viable retail and residential;
- Allow commercial zoning to remain applicable to a whole site until residential uses are proposed;
- Allow more flexibility with commercial uses within the Mixed-Use zoning, such as retaining drive-throughs for more specific retail purposes (i.e. pharmacy).

From a big picture standpoint, we believe the City should look at our Properties and other large commercial sites with obsolete retail space as unique, exciting opportunity sites that can achieve **high density housing and more activated retail**. Therefore, we respectfully request that the Planning Commission consider a residential “overlay” for our three Properties that could essentially “float” over the sites and provide the flexibility necessary to create a **smart ecosystem between new mixed-uses and existing retail**. This approach would help further the City’s vision by allowing retail to evolve with the market, while providing meaningful and viable options for higher density residential that the City and the State desperately need.

**Page 4 of 4**

**Comment Letter 35**

**Alison Warner, Senior Vice President, Balboa Retail Partners**



We believe the foregoing optionality aligns with the City's goals for the ECRSP and does not in any way threaten the viability of retail revenue along the corridor. Thank you for your consideration.

Sincerely,



Alison Warner  
Senior Vice President  
Balboa Retail Partners

35-4

cc: Trudi Ryan, Director of Community Development  
Shaunn Mendrin, Assistant Director of Community Development  
Jeffrey Cucinotta, Senior Planner  
Joe Fahey, Principal, Balboa Retail Partners  
Jennifer Renk, Partner, Sheppard Mullin  
Cynthia James, Noble James

**Response No. 35****Alison Warner, Senior Vice President, Balboa Retail Partners****April 25, 2022**

35-1 This comment provides a general introduction of the commentor's company (Balboa Retail Partners) as owners of three retail business properties on El Camino Real. Responses to specific comments are provided below.

35-2 The commentor cites concerns regarding the project's drastically reduced density and residential opportunities along portions of the corridor—including two Balboa properties—in an attempt to support commercial uses and help them thrive. The commentor states that the project as proposed creates problematic roadblocks that make it difficult—if not impossible—for the commentor's businesses to redevelop the Properties to re-invigorate the retail and boost much-needed housing production in the City. For example, the 2022 draft zoning standards restrict residential uses and the applicable densities to specific portions of a site, which effectively cuts the allowable residential density in half from prior iterations of the ECRSP. The commentor further states that it impedes the opportunities to consolidate and re-invigorate retail uses, while making options for creating multi-family residential financially infeasible.

This comment is relative to the Specific Plan and not the EIR. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

35-3 The commentor requests the following changes to the Specific Plan:

- Retain the proposed zoning densities (with the incentives) but apply them to the entire sites for purposes of base density calculations;
- Restrict residential development to a maximum land area percentage of the properties, such as 40% of a site, to ensure both viable retail and residential;
- Allow commercial zoning to remain applicable to a whole site until residential uses are proposed;
- Allow more flexibility with commercial uses within the Mixed-Use zoning, such as retaining drive-throughs for more specific retail purposes (i.e. pharmacy).

This comment is relative to the Specific Plan and not the EIR. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)



- 35-4 This comment provides a general closing statement and thanks the City for their consideration. Comment noted.

**Page 1 of 2**  
**Comment Letter 36**  
**Ed Gocka, Resident**

**From:** [Ed Gocka](#)  
**To:** [Jeffrey Cucinotta](#)  
**Subject:** ECR Specific Plan DEIR Comment  
**Date:** Tuesday, April 26, 2022 4:50:49 PM

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

April 26, 2022

Mr. Jeffrey Cucinotta  
Senior Planner  
Sunnyvale, CA

Dear Mr. Cucinotta,

36-1

First, I will start out with a comment: As a participant in the public outreach programs for ECRSP from 2015-2017, I am very frustrated with the changes made to option Alternative R Plus, as selected by the City Council in August 2017, when compared against what is proposed in the DEIR. It took a lot of time to get to the August 2017 consensus, and, even though it was not exactly what I personally wanted, I could live with it. Given the proposed changes, I feel that I wasted a lot of time from 2015-2017 participating in the public outreach.

36-2

Regarding the changes since 2017, made to the East Segment of El Camino, east of Henderson Ave (south-side): I don't understand why property zoned for Commercial has been converted to Mixed-Use. Ostensibly, the changes are being driven by new state laws, but I don't see how the new state laws would drive these specific changes. The Commercial zonings on El Camino are very important, because the city does not have much of it, so it serves the entire city, plus surrounding cities. If the Commercial zoning is converted to Mixed-Use zoning, it cannot easily be changed back to Commercial zoning, which makes the changes more or less permanent. Even though Commercial land use has struggled recently, that can easily change, especially with the population influx to the region. Keeping the Commercial zoning, and then revisiting the zoning in 10 years would be a more prudent approach.

36-3

I also believe that the Commercial component of the Mixed-Use developments will mostly serve the residential portion, which is fine for most Mixed-Use developments, but not when replacing Commercial zoning on El Camino that is a regional destination.

36-4

Regarding the Mixed-Use developments, I want to see a maximum building height and

**Page 2 of 2**  
**Comment Letter 36**  
**Ed Gocka, Resident**

36-4

maximum # of units/acre, if all of the bonuses are realized. Reading the DEIR, I don't get a sense of what the possibilities are in terms of height or density. Without this information, it is difficult to reason what the proposed Mixed-Use developments might look like against the adjacent single family home neighborhoods.

Thank you,

Ed Gocka

Sunnyvale resident

**Response No. 36**  
**Ed Gocka, Resident**  
**April 25, 2022**

- 36-1 The commentor expresses frustration at the progression of the Specific Plan public outreach process from 2017 to the present. Responses to specific comments are provided below.
- 36-2 The commentor feels that the change of land use from the 2017 project to the current proposed project, from commercial to mixed use, is not a good idea. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. However, Section 5.0, *Alternatives*, of the EIR, discusses in detail the reasons that the other project alternatives (including Alternatives 1, C, M, and R) were rejected for consideration. Specifically, these alternatives were found to be environmentally inferior to the proposed project and were therefore, rejected.
- 36-3 The commentor reiterates their concern regarding the land use change from commercial to mixed use, stating that the commercial component of the mixed-use developments will mostly serve the residential portion, which is fine for most mixed-use developments, but not when replacing commercial zoning on El Camino that is a regional destination. This comment does not identify a specific concern with the adequacy of the EIR or raise an issue or comment specifically related to the EIR's environmental analysis under CEQA. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- 36-4 The commentor requests to know the maximum building height and densities in the project area. Due to the programmatic nature of this environmental document, it is unknown at this time whom the specific project proponents (developers) would be with regard to site-specific future development in the project area. However, implementation of future development projects in the project area will be subject to site-specific analysis to ensure conformance with existing regulations, including for height and density. The Specific Plan, in conjunction with the El Camino Real Specific Plan Chapter (ECRSPC) of the Sunnyvale Municipal Code (SMC), includes development policies, land use regulations, design guidelines, and infrastructure improvement plans.

Development standards are indicators of firm requirements and pertain to such categories as building areas, building heights, building setbacks, residential density, parking, etc. As such, development standards are rules or measures pertaining to land uses and zoning that establish a level of quality or quantity that must be complied with or satisfied. Implementation of these measures would ensure that future development projects adhere to existing regulations and standards developed for the project area.



## 4.0 Draft EIR Text Revisions

This section contains revisions to the text of the Specific Plan Project Draft EIR dated March 2022. As provided in CEQA Guidelines Section 15088(d), responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter of these two guidelines and provides changes as a result of clarifications to, and comments received on, the Draft EIR. It includes minor revisions to the Draft EIR resulting from minor corrections or updates to Draft EIR information, including minor revisions made in response to several public comments submitted on the Draft EIR.

The following revisions are hereby made to the text of the Draft EIR. These changes do not add significant new information to the Final EIR that would require Draft EIR recirculation under State CEQA Guidelines Section 15088.5. For example, they do not disclose or suggest new or substantially more severe significant environmental impacts of the proposed project, nor do they disclose a new feasible mitigation measure or alternative considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

### Table of Contents

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3.14 <del>Hydrology and Water Quality</del> <u>Recreation</u> .....	3.14-1
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### Introduction

*Page 1-2:*

The City received ~~17~~ 14 comment letters on the Notice of Preparation for the project's Draft EIR. A copy of each letter is included in Appendix A.

*Page 1-5:*

Caltrans recommended that the City use its guidelines and manuals in planning and design considerations for the project. Caltrans requests that a travel demand analysis be performed and submitted to the agency for review. The analysis should include a multimodal approach with VMT metrics. It should also include mitigation measures related to an increase in VMT as the result of the project, as well as evaluation of the project's primary and secondary effects on pedestrians, bicycles, and transit facilities. ~~Caltrans also asked for the lane configuration along the El Camino Real corridor to include a dedicated bus lane (see Section 3.15, Transportation).~~

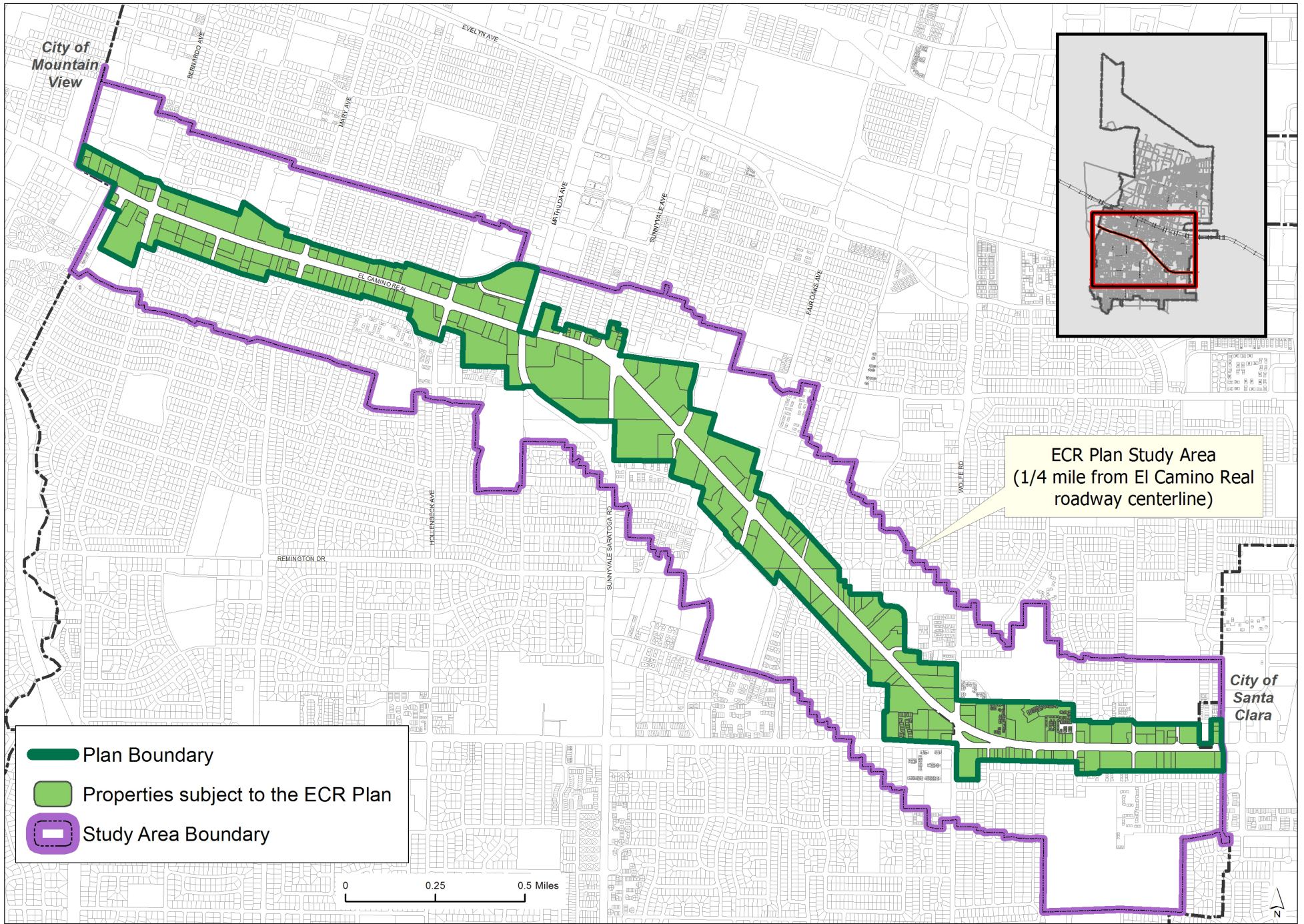
### Project Description

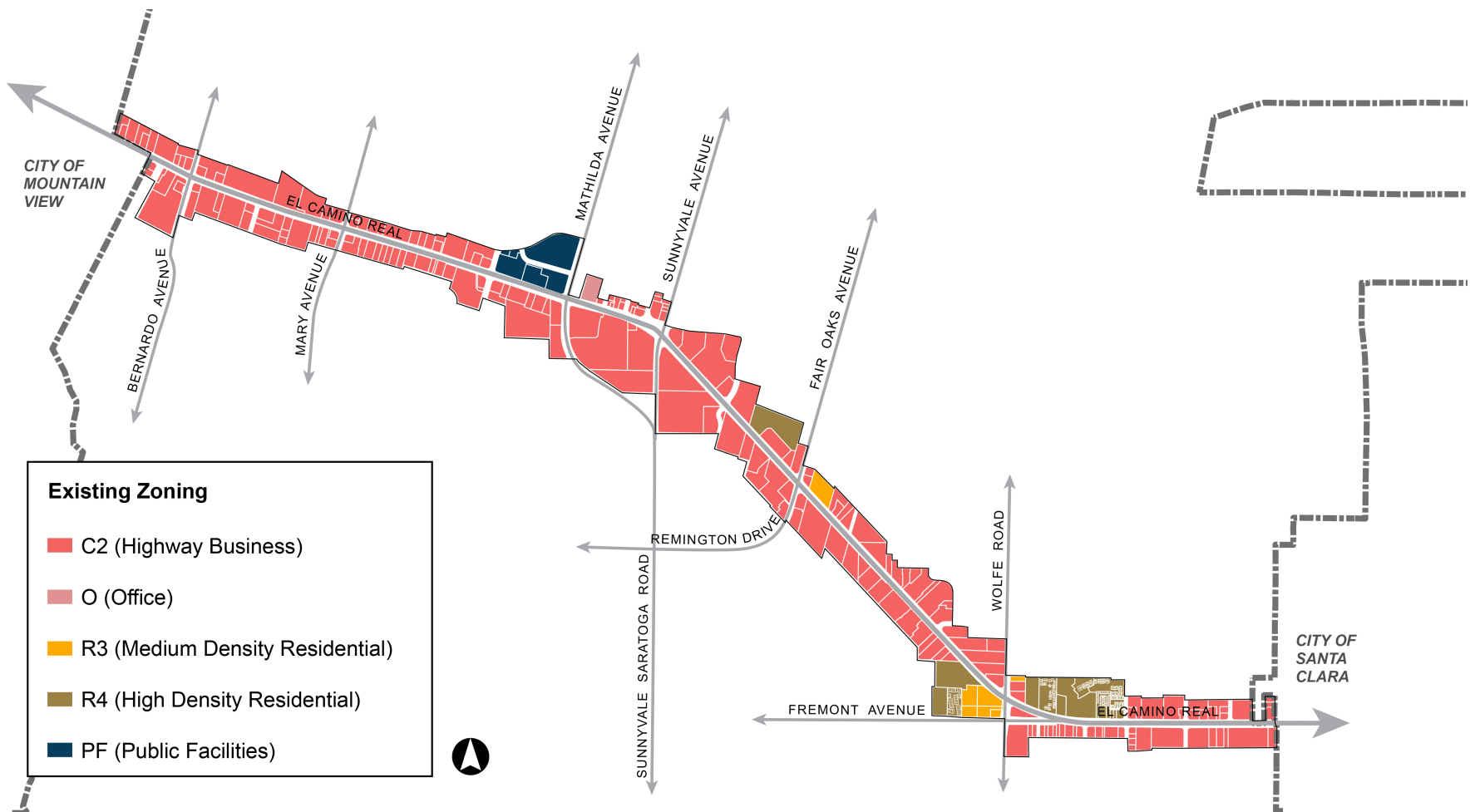
*Page 2-17:*

**Exhibit 2-2, Local Vicinity Map/Specific Plan Area**, has been updated at a higher resolution.

*Page 2-19:*

**Exhibit 2-3, Existing Zoning Map,** has been updated to show the two multi-family residential properties adjacent and to the west of Butcher's corner.





## Section 3-16 Utilities

Page 3.16-31:

Because wastewater services are provided by the City, the cumulative setting for wastewater services includes full buildout of Sunnyvale, which is expected to occur in 2035. It also includes the Rancho Rinconada area in Cupertino and a portion of Moffett Field/NASA Ames.

As identified under the Existing Setting subsection, additional wastewater treatment and infrastructure capacity improvements would be needed to serve future development in the City. Implementation of the Specific Plan would increase the allowable development potential within the project area. An increase in housing units and non-residential development would equate to an increase in wastewater that would be conveyed to City facilities for treatment. The projected wastewater flows for the WPCP in 2035 is 19.5 mgd of average dry weather flow (ADWF) (City of Sunnyvale 2019). Projected flows were based on historic and existing flow data and population and growth assumptions in the City's LUTE. The WPCP's future planned, permitted capacity (19.5 mgd of ADWF) is equivalent to the projected 2035 ADWF (19.5 mgd). Therefore, there would not be sufficient planned capacity at the WPCP to treat wastewater for existing and planned development, plus the buildout of the Specific Plan.

Since the approval of the City's LUTE in 2017, multiple large-scale planning projects have been adopted or are in-process, including the Lawrence Station Area Plan, Moffett Park Specific Plan, the Downtown Specific Plan, and the El Camino Real Specific Plan. Each of these plans change the makeup of the City's land uses, and as such changes the amount of anticipated future capacity required at the City's WPCP. In response to these planning efforts, the City has identified the need for potential increased long-term capacity at the WPCP. As of the preparation of this EIR, the City is evaluating the amount of capacity needed, given approved and in-process land use planning efforts. Ultimately, the City will be updating the WPCP Master Plan in the near future to include sufficient treatment capacity for existing and planned development and additional growth, and subsequent environmental review for the WPCP Master Plan update shall be completed by the City at that time. The specific design and improvements needed are unknown at this time. Therefore, it is speculative to evaluate the environmental impacts of those undetermined improvements at this time. Thus, the project's contribution to this impact would be **cumulatively considerable and significant and unavoidable**.

## Appendix D

Page 3 of Appendix D, *Transportation Impact Analysis* has been revised to clarify that Sylvan Avenue and El Camino Real is not a CMP intersection. Refer to Attachment 1, Revised Transportation Impact Analysis.

## Appendix E

The 'DRAFT' watermark has been removed from the title page of Appendix E, *Water Supply Assessment*. Refer to Attachment 2, Revised Water Supply Assessment.

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**City of Sunnyvale**  
Community Development Department  
456 West Olive Avenue  
Sunnyvale, CA 94088-3707  
Contact: Jeffrey Cucinotta, AICP, Senior Planner



**Michael Baker International, Inc.**

**Michael Baker**

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