



March 30, 2021

Mayor Klein and Members of the Sunnyvale City Council
456 W Olive Ave, Sunnyvale, CA 94086
Via email: <council@sunnyvale.ca.gov>

RE: Moffett Park Specific Plan Study Session: Land Use

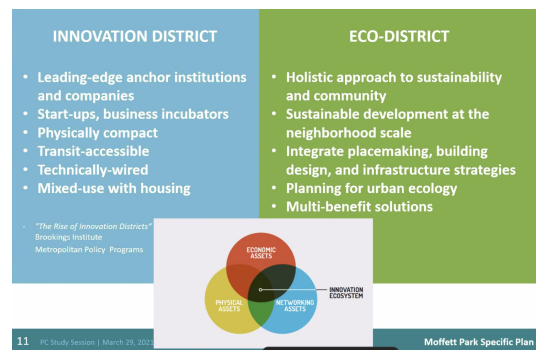
Dear Mayor Klein and Members of the Sunnyvale City Council

The Sierra Club Loma Prieta Chapter, Santa Clara Valley Audubon Society and Citizens Committee to Complete the Refuge have thousands of members in the Bay Area, all working to protect San Francisco Bay, its wildlife and its ecosystems and to enhance the biodiversity of our peninsula. Our organizations are greatly concerned with impacts of development in proximity to the Bay and its natural resources. We have engaged in the Moffett Park Specific Plan (MPSP) from the start, and our members attended all the public workshops since the process began.

We are pleased with the vision for an “Eco-Innovation District” for Moffett Park and the opportunity it presents for a transformative planning process and a future resilient, biodiverse, sustainable, innovative and livable district. **However, we now question whether the Specific Plan will enable this vision.** After attending the Planning Commission Study Session, we wish to raise the following issues for your consideration:

Definition of Eco-District: In the preliminary slides, Biodiversity is not mentioned in the definition of the Ecodistrict slide and ecology is near the bottom of the list.

Figure 1:
It is clear that the public always puts nature high on the priority list and Biodiversity ranks #2 with ped/bike

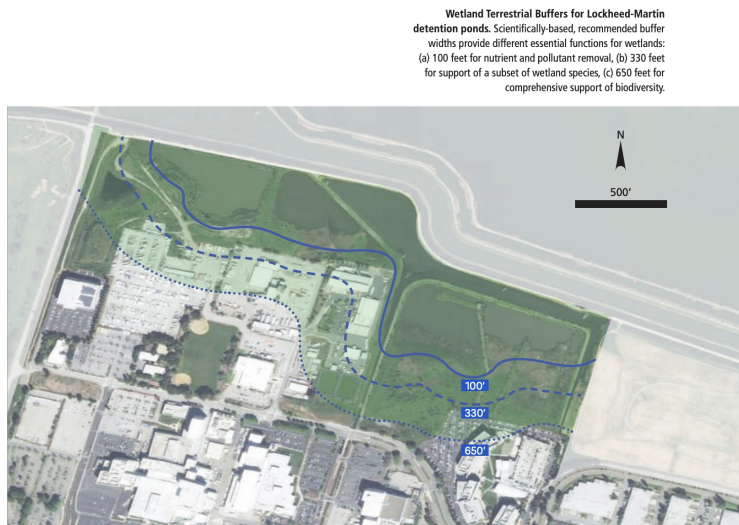


connectivity as #1.

We would therefore change the bullet “Planning for Urban Ecology” to the clearer statement “Urban Ecology and Biodiversity” and move it higher on the list to get developers’ attention. And, like all the other bullets, we should not be “planning” for it but should simply state it as a required element of an eco district.

Wetlands: We once again ask for an ecology/habitat overlay zone along the bayfront (Lockheed property) allowing transfer of development rights for a win-win scenario. *This is also included by your urban ecology consultant SFEI.*¹ This is an incentive being successfully employed in North Bayshore to move construction away from sensitive habitat areas. Housing is not compatible with wetlands because of the high water table here and vulnerability to flooding, as well as lighting at night and human activity being a deterrent to wildlife.

Figure 2: Wetland Terrestrial Buffers (Page 23 of the Moffett Park Specific Plan Urban Ecology Technical Report).



REQUEST #1: Direct Staff to ensure that the MPSP incorporates the 650’ buffers as depicted in Figure 1 The Moffett Park Specific Plan Urban Ecology Technical Report also provides guidance on how to create a true ecological district, with a distribution of ecological open space patches that are large enough, close enough, and connected enough to provide ecological and biodiversity benefits

¹ *Urban Ecology Technical Report Pg 21: Expand wetland area and create a terrestrial buffer. Wetlands are rare and unique features on the landscape that serve many essential functions, such as retaining flood water, providing habitat for wildlife, and improving water quality. Implement a habitat overlay zone or offer transferable development rights for parcels abutting the wetland to create terrestrial buffers and to protect wetland species by requiring raptor perch deterrents on building roofs and taller structures*

Urban Greening: The slides showed 3 patches of planned open space, along with the flood channels. This does not appear to allow for biodiversity to flourish or meet your consultant SFEI's minimum requirements for urban biodiversity² goal.

From Urban Ecology Technical Report section V. OPPORTUNITIES AND STRATEGIES TO ENHANCE THE ECOLOGY OF MOFFETT PARK:

Goal 1: Create green spaces that provide urban cooling, stormwater capture, immersive nature experience, and local biodiversity.

Strategy 3: Create new patches distributed throughout the district.

Recommendations:

- **Create an additional 44 acres** (minimum) of high habitat value green spaces are recommended for Moffett Park.
- To minimally support some wildlife species, (connected) patches should be **> 2 acres**. Individual patches should be **>10 acres** in order for them to serve as local hubs for biodiversity.
- Patches should be square or circular in shape, rather than long and skinny, in order to contain more core habitat and be more suitable for edge-sensitive species.
- Distributing habitat patches spaced within a half mile will allow native species to reside in and disperse across Moffett Park. This distribution of greenspace likewise ensures that parks are accessible within a short walk of all locations in Moffett Park — an outcome associated with mental and physical health benefits for people working and living in the area.
- New patches should be located, as much as possible, in relation to existing ecological assets, such as along existing and proposed corridors or adjacent to existing habitat.
- Set open space overlay zones and incentive zoning to promote the creation of coordinated patches in private land.

Open Space “Patches”: A large percentage of existing open space is in surface parking lots. From reviewing 3-4 proposed early development proposals, it appears that there will need to be **definitive guidelines on open space requirements**.

A minimum percentage of ground to be open space on each development proposal, no surface parking allowed (as in North Bayshore), and minimum size for “patches” per SFEI Urban Ecology Technical Report:

Canopy cover targets should be implemented at the block-scale, when possible, because this is the spatial scale shown to have the greatest impact on conserving biodiversity (Chong et al. 2019).

Achieving ≥40% canopy cover across the district²⁹ and ≥42% canopy cover within parks is recommended for heat island mitigation.

² *Urban Ecology Technical Report Pg 21: Wetland Terrestrial Buffers for Lockheed-Martin detention ponds. Scientifically-based, recommended buffer widths provide different essential functions for wetlands: (a) 100 feet for nutrient and pollutant removal, (b) 330 feet for support of a subset of wetland species, (c) 650 feet for comprehensive support of biodiversity*

Distribution of Open Space.
Patches of open space greater than 2 acres in size should be distributed no more than 0.5 miles apart across the landscape.

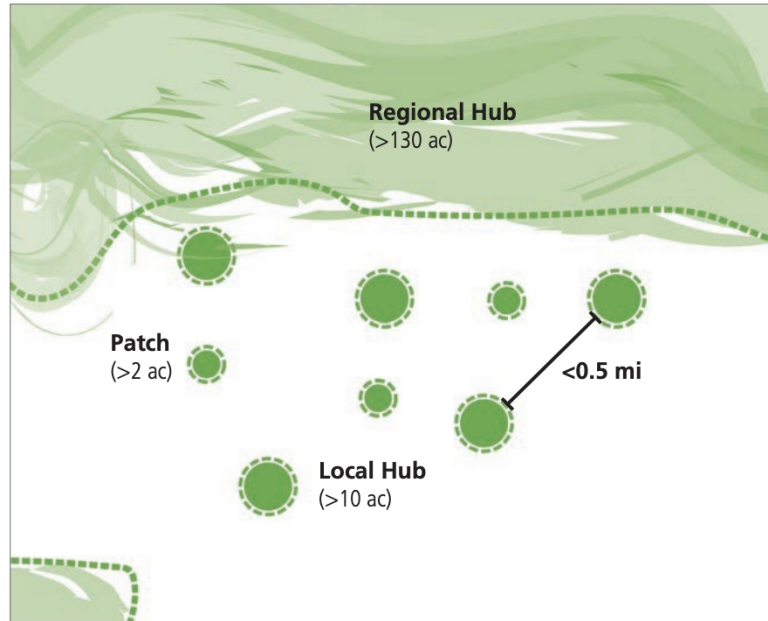


Figure 3: Distribution of Open Space (Page 24 of the Moffett Park Specific Plan Urban Ecology Technical Report).

REQUEST #2: Direct Staff to ensure that the MPSP incorporates a distribution of open space, ecology and biodiversity patches as depicted in Figure 2 from the Urban Ecology Technical Report.

Resilience: Planning Commissioners raised the issue of not having any assurance when and if an adequate protective levee will be funded and built.

The plan should include some dynamic monitoring, where entitlements are phased in based on triggers such as levee funding³, OPC sea level rise prediction changes, scheduled groundwater monitoring, flood control progress, transportation access improvements, infrastructure and utilities improvements, etc. In short, the items that make densifying this portion of Sunnyvale problematic as it stands now.

As sea levels rise, ground water also rises. This was presented in the sea level rise workshop. Not enough is known about ground water and studies have not been requested or started. It was clearly stated that rising sea levels can cause rising ground water to saturate soils. Currently, in the wetlands area to the east of the landfill, ground water is from 2' ABOVE to 2'-6' below ground level and in some areas rises and falls with the tide.

Therefore, the flood retention area needs to be a dynamic zone that can be increased if the need arises.

³ The Levee at Alviso, with similar funding partners, has come in well above planned budget and is now on hold pending further funding.

REQUEST #3: Direct Staff to direct staff to include dynamic monitoring of goals, with reporting to council, in order to keep development from getting ahead and aligned with achieving certain goals before allowing more entitlements.

We have the following additional observations:

- **Office/housing intensity:** We note a large discrepancy between Michelle King’s slide and Raimi Associates’ slide on proposed density:

Michelle King’s slide	Raimi Asso slide intensifies development targets further
1. 10m sf office & 12,000 housing units	1. 10m sf office with 16,000 housing units
2. 8m sf office & 16,000 housing units	2. 8m sf office with 20,000 housing units
3. 6 m sf office & 20,000 housing units	

Please provide guidance on what the official goal is for the maximum density for the Specific Plan

- **Mobility:** there is not much information on the issue that Council raised about how to integrate Moffett Park into Sunnyvale. Since the gateways are maxed out, is it the plan to establish a goal and then monitor the gateways and make development permits contingent on maintaining a maximum number of cars/hour as in North Bayshore, Mountain View?
- **Retail:** It appears that the area will be a “retail desert” for quite a while as demand will not be created easily. Redwood Shores had to achieve a population of 17,000 before a small strip neighborhood center was somewhat viable. Restaurants still do not survive, only fast food.
- **Housing:** Locate housing, especially ownership housing, on higher ground.

We look forward to your consideration of these issues in the study session. Thank you for the opportunity to comment on this important plan for the City of Sunnyvale.

Respectfully Submitted,

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Sustainable Land Use Committee
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