



Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties

October 5, 2016

Jeff Henderson, Project Planner  
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P.O. Box 3707  
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**RE: Comments on Draft LUTE and Draft EIR – City of Sunnyvale**

Dear Mr. Henderson,

Thank you for providing the opportunity to the Sierra Club Loma Prieta Chapter to comment on City of Sunnyvale – Draft Land Use Transportation Element - Draft Environmental Impact report (DEIR).

Sierra Club is in support of the objectives of the DEIR, such as, creating complete community, neighborhood and transit-oriented place making, multi-modal transportation, diverse housing, all of which focus on creating places to live that are sustainable and less dependent on automobiles.

We are happy to see the emphasis on “Vehicle Miles Traveled” in the Draft LUTE. However, stronger TDM measures and transportation policies are needed to combat significant and unavoidable environmental impacts.

We have reviewed the Horizon 2035 LUTE DEIR, attended the study session and have the following observations. The Draft LUTE DEIR needs to address the following issues

- :Balance the Jobs/Housing Ratio to no greater than 1.5:1.
- Clarify the minimum housing density within the proposed village centers needed to support the proposed retail spaces and create a vibrant community.
- Include stronger affordable housing policies.
- Include stronger TDM measures and transportation policies to reduce significant and unavoidable traffic impacts at intersections and freeway segments within the city by 2035.

We hope that our comments will encourage the City to re-evaluate the Draft EIR to bring it in line with the goals and objectives of the Draft LUTE.

## 1. Land Use

The Draft LUTE (p.2.0-17, Table 2.0-3) includes nine specific and area plans, with land use types as Transit mixed use, Corridor mixed use, Industrial, etc. However, it is to be noted that the residential space earmarked in all these plans is minimal as compared to the non-residential space, especially, along El Camino Real, in Peery Park and around Lawrence Station.

According to Table 3.1-1, *Acreages of land uses in Sunnyvale(2011)*, high density and very high density residential area accounts for only 6% (420 acres) of the total residential area in the city. Thus, to abide by the goals of LUTE, additional selected sites (near public transit and major thoroughfares) need to be rezoned to higher density mixed use by 2035.

**Recommendation** We recommend that Draft LUTE DEIR include the following:

***a. Increase high density and very high density compact residential and mixed-use neighborhoods near transit stations, transit corridors and proposed village centers so that the residential space can be further increased within the city.***

b. The concept of “Village Centers” is impressive. However, they should be specifically located in the plan with description of what they include and how it all works together to create retail-housing density balance<sup>1</sup>.

c. We suggest that the proposed Village Centers should be located close to public transit facilities, like along existing bus line routes with 15 minutes or less frequency schedules.

## 2. Population, Housing and Employment

According to the DEIR, (p.3.2-5, Table 3.2-5 *Demographic comparison – 2014 to 2035*), a total of **72,000 Housing units and 124,410 jobs** are projected by Horizon 2035. This indicates that there will not be enough housing units to serve the number of jobs created by 2035.

A total of 124,410 jobs, as projected in LUTE Horizon 2035 implies **82,940 units needed** for balance. The ideal balance is 1.5 jobs per household or less.

The current ratio (existing conditions of General Plan) of 1.44 is close to ideal, however, the future ratio of 1.73 is out of balance. This is in direct conflict with General Plan Policy and should not be entertained.

We appreciate the variety of housing typologies included in the Draft LUTE’s Policy 104 but note that the proposed jobs/housing ratio would further worsen the affordable housing scenario in the city.

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<sup>1</sup> See Mountain View El Camino Real Specific Plan for a fairly good example of defining Village Centers including details of massing, heights, sidewalk widths, increased setbacks, etc.

## Recommendation

a. Increase high density and very high density compact residential and mixed-use neighborhoods near transit stations, transit corridors and proposed village centers so that residential units can be further increased within the city.

b. Minimum allowable housing density ensures more units: Increase incentives for more smaller market rate units that are automatically more affordable. To this end, include minimum required housing density as well as density maximums, in order to ensure development of more units.

c.

We believe that the proportion of affordable housing needs to be increased. This section should be revised to mandate a minimum percentage of affordable housing units, to be achieved by the use of a robust set of tools. **We recommend a minimum of 15% - 20% consistent with other cities in the area.**

d. We recommend that the LUTE specify that affordable housing should be located within a half-mile radius of major transit stops as people living in these units are the most likely to use public transit. This can further reduce parking demand, lowering parking requirements, and in turn, making space for adding more housing units.

## 3. Transportation and Circulation

The Draft LUTE will increase the traffic considerably within the city due to increase in internal – internal trips, which would adversely impact transit travel times (Impact 3.4.2). Also, there would be significant traffic operational impacts to intersections and freeway segments (Impact 3.4.7) as compared to existing conditions, thereby degrading the air quality, greenhouse gas (GHG) levels, and noise levels.

Year 2035 Vehicle Miles traveled for Sunnyvale under the current General Plan is projected to be 2,804,752 miles and 12.30 miles per capita. As per Draft LUTE-DEIR, VMT is calculated as 12.00 miles per capita, which is higher than the VMT per capita set forth in the City's Climate Action Plan (11.62 miles). A strong TDM program needs to be implemented to lessen the number of trips.

### Recommendations

#### **a. TDM Strategies**

TDM Strategies should be adopted with focus on providing free shuttle service, car pool programs, and adequate bicycle sharing and storage facilities along high density transit corridors like El Camino Real Corridor.

Also, the city should require that all proposed developments or projects under Draft LUTE include mandatory TDM plans with clear trip reduction and management goals and requirements for active monitoring and reporting of progress over time. There is need for the formation of a **transportation management association** to coordinate TDM programs, monitor and report on traffic performance, and guide place-making improvements.

## **b. Reduced Parking**

One of the most effective strategies to reduce auto trips is **reduced parking ratios for proposed developments, along with car-share and transit passes and a Residential Permit Parking Program**<sup>2</sup> to protect surrounding neighborhoods from overflow parking, when appropriate. Parking ratios for proposed village mixed-use and transit-oriented development should be made no more than 1 space per housing units maximum for all unit types, 3 spaces per 1,000 SF maximum for retail, and 5 spaces per 1,000 SF maximum per restaurant.

The DEIR should also include mitigation that requires **mandatory "unbundled" parking for all residential parking and paid parking for all commercial employee parking as well as retail parking**. This has been proven to reduce VMT.

## **c. Pedestrian and Bicycle Facilities**

Adequately wide, attractive and safe pedestrian sidewalks need to be required and implemented in sections of industrial areas in the Peery Park, Moffett Park, and Lawrence Station areas, in order to demonstrate a commitment to "pedestrians first" priority and develop mode shift by encouraging walking.

Well connected, safe and, where possible, separated Class 1 bike paths need to be included. A master plan that mandates Class 1, 2 and 3 bike paths as well as, specifically, a "Safe Routes to Schools" plan should be included in the LUTE in order to encourage mode shift to reduce VMT by auto.

## **d. Provision of Additional Bus routes**

As per Draft LUTE, most of the bus routes run generally in the north-south direction, connecting the neighborhoods south of El Camino Real with the employment areas in the northern part of Sunnyvale.

However, to reduce the impacts of increased traffic, Draft LUTE needs to emphasize increasing support for increased bus services along the east-west direction, and locate transit villages along frequent bus lines, including bus lines that may become more frequent as a result of the VTA Next Network program.

Fortunately, according to early documents from VTA's Next Network reworking of the bus network, key North South routes such as Route 56 would likely increase in frequency, if VTA chooses a strategy to increase ridership.

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<sup>2</sup> In a recent example, San Mateo has had considerable problems reducing parking in its Transit Oriented District because they have not installed RPP as a programmatic feature of TOD. <http://www.smdailyjournal.com/articles/news/2016-09-29/hillsdale-terrace-proposal-elicits-housingdebate-meeting-contrasts-the-concerns-of-neighbors-affordability-advocates/1776425169047.html> : The potential impacts of overflow parking, traffic, schools and aesthetics frequently prompt neighbors to voice concerns — as was the case Tuesday when dozens of neighbors and members of a group called Livable San Mateo spoke in opposition to the Hillsdale Terrace proposal.

#### 4. Air Quality

The land use activities associated with implementation of the proposed projects would result in greater vehicle miles traveled as compared to the projected population increase. (p.ES-2, Impact 3.5.2). Therefore, consistent with BAAQMD guidance, the Draft LUTE would result in an air quality violation. Also, short-term construction emissions could violate or substantially contribute to a violation of federal and state standards (Impact 3.5.3) <sup>3</sup>.

#### Recommendations

a. **Draft LUTE and DEIR should emphasize reducing Vehicle Miles Traveled (VMT) by introducing measures such as elimination of free parking. Also, transportation policies should mandate provision of pedestrian or bicycle access to specific and area plans along with convenient transit stops to reach the sites.**

b. Draft LUTE should incorporate policies to promote vehicle efficiency and reduced GHG emissions as it can play a vital role in reducing GHG emissions. As an example, require electric car recharging stations for a minimum of 20% of parking spaces.

c. As stated in DEIR, the impacts on sensitive receptors, such as schools or hospitals, are of particular concern. Table 3.5-5(p.3.5-11) summarizes recommendations on siting new sensitive land uses near air pollutant sources. However, the recommendations are just advisory, not mandatory, and not site-specific and hence may not be effective for reduction in emissions.

#### 5. Noise

The local community noise source ranges from 55 to 74 dBA Ldn (p.3.6-13, Table 3.3). However, specific sites, such as, Evelyn Avenue, Lawrence Expressway and Tasman Drive show higher noise levels. Also, the average noise levels along city roadways, ranges from 56 to 70 dBA Ldn (p.3.6-14, TABLE 3.6-4) with specific sites, such as, Evelyn Avenue and S. Wolfe Road showing higher noise levels.

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<sup>3</sup> As per DEIR, new mitigation policy policies shall be introduced, which would mitigate most construction emissions from development under the LUTE by dust control and construction equipment emission control. One of the policies states that, in cases where construction projects are projected to exceed the Bay Area Air Quality Management District's(BAAQMD) 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, tractors) shall be at least California Air Resources Board (CARB) Tier 3 Certified or better.

The other policy states that prior to the issuance of grading or building permits, the City of Sunnyvale shall ensure that the BAAQMD's basic construction mitigation measures from BAAQMD 2011 CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents. However, it is to be noted that the extent of construction that may occur at any specific period of time is currently unknown and it is not specified who is responsible for testing to ensure compliance. Therefore it is not known whether the above mitigation policies would fully mitigate the temporary impact below BAAQMD thresholds.

Noise levels in the above specified areas currently range from 59.4 to 77.4 dBA Ldn and are expected to range from 60.5 to 77.8 dBA Ldn by 2035. As per Draft LUTE DEIR, there is substantial Increase in ambient noise levels (Impact 3.6.2). Hence, site-specific noise attenuation measures need to be strictly implemented to avoid the long term effects.

### **Recommendations**

a. The California Building Code requires that a report shall be submitted if exterior noise levels, where building is located, exceed 60 dBA. Currently, noise level at specific sites as mentioned above, is between 70-75 dBA. Hence, we recommend that the city use noise reducing materials such as rubberized asphalt as a pavement material<sup>4</sup> on new streets and on old streets, when they are upgraded to reduce noise.

b. City noise, mainly traffic (and construction) noise cause stress on humans affecting their health<sup>5</sup>. Songbirds living in urban areas too are adversely affected by noise levels<sup>6</sup>.

c. As per Table 3.6-10, p.3.6-37, with predicted increase in traffic noise levels by 2035, the roadway segments, Remington Avenue and Hollenbeck Avenue show higher noise levels, affecting nearby residential & commercial land uses. Site-specific noise attenuation measures need to be strictly implemented to avoid the long term effects.

d. Proposed Village Centers, to be located along major transit corridors should abide by the City of Sunnyvale maximum permissible noise criteria for determination of land use compatibility (p.3.6-26, Table 3.6-7).It is recommended that proposed new land uses must not be sited in a location where it would be exposed to exterior and interior noise above the maximum levels specified, unless adequate noise reduction measures have been incorporated to reduce noise to acceptable levels.

## **6. Public Services**

**Parks:** Implementation of the Draft LUTE, along with anticipated future development throughout the region would increase the use of existing parks and require additional parks and recreational facilities. About 770 acres, over 7 percent of the area within Sunnyvale's incorporated city limits, is devoted to park and recreation facilities owned or maintained by the City for public use. At 5.2 acres per 1,000 residents (based on a 2016 population of 148,372), Sunnyvale falls within that guideline.

<sup>4</sup> [Report on Status of Rubberized Asphalt Traffic Noise Reduction](#): The conclusions of the 6-year study, in Sacramento, California, indicate that the use of rubberized asphalt on Alta Arden Expressway resulted in a 60% reduction in traffic noise energy, and a clearly perceptible decrease in traffic noise. This traffic noise attenuation from rubberized paving is similar to the results documented in several non-related studies conducted in recent years at other locations, both nationally and internationally

<sup>5</sup> The combined toll of occupational, recreational and environmental noise exposure poses a serious public health threat going far beyond hearing damage, according to an international team of researchers. Many articles on the subject describe these effects. As an example in [Science Daily 2013](#)

<sup>6</sup> Numerous studies have indicated the adverse effect of elevated city noise on the ability of songbirds to learn their normal songs. <http://voices.nationalgeographic.com/2013/03/14/scientists-link-urban-noise-to-decline-in-city-songbirds/>

However, development in the city that currently places demand on Sunnyvale's parks and recreation facilities, or is expected to place demand on them in the future, could contribute to cumulative impacts (p.4.0-19, Impact 4.4.2). Policy 70 of Draft LUTE ensures that the planned availability of open space both in the city and the region is adequate. However, the policy is quite weak as it does not define and mandate minimum open space standards for residential uses, mixed-use developments, business developments, and village centers.

**Recommendation:**

LUTE should define and mandate minimum open space standards for residential uses, mixed-use developments, business developments, and village centers.

LUTE should require usable open space within walking distance of high density residential areas to ensure access to recreational open space for residents in compact housing.

## 7. Cultural Resources

Implementation of the Draft LUTE could indirectly result in impacts on historic structures (Impacts 3.10.1 and 3.10.3) and could result in significant cumulative impacts to cultural resources in Santa Clara County.

The Draft LUTE would avoid significant archaeological impacts through implementation of Draft LUTE Policy 10, Action 6 that requires work stoppage during construction of subsequent projects if archaeological or paleontological resources are discovered.

However, residents are attached to the character of their city and it is recommended that city should draft stronger design guidelines in preserving some unique neighborhoods regardless of historic status.

### **Implement Alternative 2, which emphasizes reducing Jobs/Housing Ratio.**

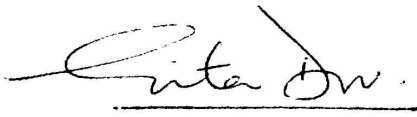
Given the significant impacts caused due to imbalance in the jobs/housing ratio, increase in traffic, degraded air quality and increase in ambient noise levels, Draft LUTE DEIR needs to implement Alternative 2, which emphasizes reducing Jobs/Housing Ratio.

- As per Alternative 2, residential development potential of the Draft LUTE would be increased and the employment potential of the Draft LUTE would be reduced in order to achieve a jobs/housing ratio of approximately 1.49.
- **Alternative 2 would increase the number of housing units by 60 percent** in all areas of growth. - In Downtown, Industrial to Residential (ITR) sites, planned mixed-use areas, El Camino Real, and other areas.
- Hence, this will indirectly **help in creating compact, mixed-use and high density developments near transit** stations and corridors, thus, creating sustainable communities which are less dependent on automobiles.

- However, this alternative would still result in significant traffic operation impacts in year 2035 Hence, **stronger TDM policies should be implemented and monitored** to reduce impact on transit travel times, traffic and air quality.

We submit the above comments with the expectation that our suggestions will be considered in improving the Draft LUTE and DEIR. We believe the changes will result in reduced environmental impacts and we hope that together we all can create a robust plan that will improve the quality of life and welfare of the residents of City of Sunnyvale.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gita Dev", written over a horizontal line.

Gita Dev, Co-Chair

Sustainable Land Use Committee,

Sierra Club Loma Prieta

CC Mike Ferreira, Chair Executive Committee, Sierra Club Loma Prieta

James Eggers, Executive Director, Sierra Club Loma Prieta