



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

Submitted September 17, 2021

Michelle King, Principal Planner
City of Sunnyvale Community Development Department
mking@sunnyvale.ca.gov



Re: Notice of Preparation of a Draft Environmental Impact Report for the Moffett Park Specific Plan

Dear Ms. King,

The Sierra Club Loma Prieta Chapter and the Citizens Committee to Complete the Refuge submit the following scoping comments on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the Moffett Park Specific Plan (MPSP).

Our organizations have a deep interest in the San Francisco Bay and its ecosystems, as well as areas near the Bay where development may impact natural resources in the region. We recognize the critical role that the MPSP will play in shaping the future of Sunnyvale, land use and natural resources along the San Francisco Bay. Because of MPSP's importance, we participated in community meetings and commented to the Planning Commission and City Council, expressing both concerns and aspirations related to the development. Please see our comments below.

Sincerely,

Gita Dev
Co-Chair, Sustainable Land Use Committee
Loma Prieta Chapter Sierra Club

Gladwyn d'Souza
Conservation Committee Chair
Loma Prieta Chapter Sierra Club

Eileen McLaughlin
Board Member
Citizens Committee to Complete the Refuge

Project Description

Please provide specific information regarding the type and size of open space areas (especially, natural open space vs. hardscape).

Range of Alternatives

Please study and include the following:

1. An ecological alternative that incorporates the recommendations delineated in the San Francisco Estuary Institute's Urban Ecology technical study¹ for Moffett Park, including (for example),
 - a. Wetland Terrestrial Buffers (page 20-21 recommends 650 feet for comprehensive support of biodiversity);
 - b. Minimum 44 additional (in addition to current conditions) acres of high habitat value eco patches and hubs with minimum sizes of 2 acres and 10 acres, respectively. (SFEI Report, p. 23). Based on the analysis provided in the SFEI Urban Ecology Report, the MPSP should identify specific areas for parks and open space;
 - c. Establish minimum thresholds for riparian widths, a minimum width of 330 feet is considered optimal for quality riparian habitat (SFEI Report p. 24); and
 - d. Minimum of 40% canopy cover across the district and $\geq 42\%$ canopy cover within parks for heat island mitigation.

Environmental Impact Categories

Biological Resources

1. The NOP states that "The MPSP area is mostly developed. The EIR will evaluate the MPSP's impact on **biological resources within and near** [emphasis added] the Moffett Park area, including sensitive habitats (including riparian habitat and wetlands) and special-status species. The MPSP's consistency with local policies and ordinances protecting biological resources will also be discussed."

Please provide analysis and mitigation of impacts to biological resources that addresses the inevitable increase in human and pet activity at Baylands Park, Bay Trail, landfill hills, levees along ponds and wetlands, levees along drainage channels and stormwater features.

2. Please evaluate up-to-date scientific information regarding the biological and environmental impacts associated with a) heat island, b) artificial light at night, and c) bird collisions. Please provide mitigations to address impacts to humans, species, and ecosystems health, and to protect migratory birds during the day and at night.

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https://static1.squarespace.com/static/5e38a3dd6f9db304821e8e5e/t/5f31716c85241e666fe0644d/1597075826087/MPSP_Ecology_20_04.pdf

Hydrology and Water Quality

1. The City's SLR videos^{2 3} outline the City's adaptation plans for addressing expected SLR impacts in Moffett Park such as diminished stormwater discharge and storage capacity, additional groundwater in the stormwater system and diminished groundwater storage capacity of the detention wetlands. The EIR should evaluate the additional and cumulative impacts on Stormwater systems, and any changes to the City's SLR adaptation plan that are needed to respond to the project's intensified development, and changes in extent of impervious and pervious surfaces and street ponding locations due to existing subsidence conditions.
2. In describing existing conditions, the EIR should describe the current sea level rise expectations and the protection that existing levees currently provide along the Lockheed wetlands.
3. Analyze groundwater levels as an existing condition and discuss how those findings impact development locations, design, and construction. In the Sunnyvale Sea Level Rise Adaptation Strategy (Sec. 2.1.5) and in the City's public workshop, Moffett Park, Climate Change. Sea Level Rise. Flooding significant areas in Moffett Park were identified where existing groundwater levels are little more than 3 feet below the surface and, in some places such as lands along the East Channel, even closer to the surface. Such conditions increase the likelihood of localized flooding during even minor storm events and are conditions that require water resistant design for underground infrastructure. It is therefore necessary to thoroughly discuss and set mitigation standards for any development at impacted locations. For areas surrounded by impacted lands but lacking groundwater data, while likely to be similar, groundwater studies should be performed as prerequisites to development.
4. Improved protection from SLR is needed for Moffett Park. At this time, such protection is not guaranteed. Sunnyvale has put substantial effort toward assessing Moffett Park's vulnerability to climate-change induced risks of sea level rise and extreme storms, with discussion of remedies such a new levee, even though a feasibility study for such levee has yet to be implemented. Mitigations could include the following actions:
 - a. Identify a percent reduction in impermeable surfaces via methods such as the creation of runoff bioswales, exposed earth for added vegetation, or new, unpaved open space,
 - b. Expanding the scope and magnitude of necessary near-term mitigations such as monitoring, repairing and/or upgrading existing stormwater systems
 - c. Providing additional capacity (for example, new wetlands) for stormwater management to capture runoff (beyond standard requirements),
 - d. Identify additional nature-based solutions to sea level rise.

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<https://static1.squarespace.com/static/5e38a3dd6f9db304821e8e5e/t/5f31a59d1658211d03f285a3/1597089186517/Engagement+Presentation++SLR.pdf>

Land Use

1. Identify existing mitigation measures for current and/or historical projects that are implemented in the Plan area and adjacent areas along the Bay and analyze potential impacts from this project on any land, water features or environmental resources that were set aside as mitigation.
2. Include references to all relevant permits and land agreements that can impact or be impacted by the MPSP that can impact or be impacted by the MPSP, particularly with regards to the Lockheed site and agreements with NASA.
3. Analyze how trips (Vehicle Miles Travelled) can be reduced by co-locating services.

Population and Housing

Study the project's impact on the city-wide and regional jobs/housing balance.

Public Services and facilities

1. The NoP states that the EIR will analyze the "potential for the MPSP to require the expansion or construction of additional facilities."
 - a. Please describe the criteria that will be used to determine the need for new or expanded facilities or services.
 - b. Please include new facilities in the Water Supply Assessment.

Recreation

1. Please analyze how the increase in resident and employee recreational activity may impact the quality and availability of nearby recreational facilities including Baylands Park, the Bay Trail, and the landfill hills, as well as levees along wetlands, as well as levees along wetlands. Public forums have emphasized the benefits of nearby open space and recreation facilities to the new Moffett Park community. Analyze the need for additional recreation facilities and parkland in the plan design within the plan area to mitigate the inevitable increased usage of existing nearby facilities.

Utilities and Service Systems

1. Please include both public and private systems within the plan area.
2. Please analyze the adequacy of existing utilities. Discuss the existing conditions of underground utilities with respect to physical condition (such as corrosion, or resistance to salt water), the connectivity of public/private utilities, and the underground capacity that could satisfy the demand for utilities.
3. Please analyze resilience and safety in light of the Public Safety Power Shutdowns and rolling blackouts related to extreme heat, including solutions such as microgrids.

Water Supply Assessment (WSA)

1. In the Water Supply Assessment, identify all water sources, and analyze the dependency on reusable water as a mix.
2. The MPSP includes both residential and commercial space. The WSA should include modern and realistic water needs for shower facilities in commercial office space in addition to the typical water consumption needs of residential units.
3. Contemporary science shows that climate change is causing an increase in the frequency and severity of droughts in California and changing precipitation patterns and

behavior. The WSA should provide realistic projections based on current understanding of the future hydrology in the region. Please analyze the specific and cumulative impacts of increased water usage. Please demonstrate that the project's total projected water supplies will meet the projected water demand associated with the proposed project, and include cumulative water demands of other large master planning efforts in Sunnyvale, such as Peery Park.

Transportation

1. Please include an analysis of construction-related traffic and activities and analyze or disclose any changes required to public transportation services resulting from the Project.
2. Please include an analysis of operational emissions from this project.
3. Please analyze how Transportation Demand Management and a traffic cap based on 1990 traffic patterns will achieve CARB goals.

Air Pollution

Please discuss the health effects of air pollution as gaseous emissions and dust particles and analyze project-specific and cumulative impacts to air pollution, considering other large projects in adjacent areas. (Related in Santa Clara, North Bayshore and East Whisman in Mountain View, Peery Park in Sunnyvale, Development in Moffett Field and more).

Hazards and Pollution

Brake and tire dust particles produced by traffic are significant contaminants, particularly measurable in stormwater runoff and in the Bay.

1. The EIR needs to analyze the increase in these contaminants through the implementation of this Specific Plan relative to the projected traffic produced by increased office and residential density.
2. Analyze the potentially increased risk of water pollution and water contamination from the implementation of the Specific Plan, as well as which contaminants could flow (directly or indirectly) into water features, wetlands, and the Bay.

Greenhouse Gas Emissions

Please address impacts from GHG reductions as they relate to state policies. AB32 was updated with SB32⁴ and requires a 40% reduction in 1990 ghg by 2030. The latest IPCC report⁵ says the fastest way to get there is by eliminating natural gas and air pollution. See D2.2 "Scenarios with targeted reductions of air pollutant emissions led to more rapid improvements in air quality within years compared to reductions in GHG emissions only" and D.1 **"Strong, rapid and sustained reductions in CH4 emissions would also limit the warming effect resulting from declining aerosol pollution and would improve air quality."**

⁴ https://en.wikipedia.org/wiki/California_Senate_Bill_32

⁵ https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf