



Sunnyvale

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Piu Ghosh, Principal Planner  
City of Cupertino  
10300 Torre Avenue  
Cupertino, CA 95014  
[planning@cupertino.org](mailto:planning@cupertino.org)

**Re: Comments on the Draft Environmental Impact Report for the Vallco Special Area Specific Plan Project**

Dear Ms. Ghosh,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Vallco Special Area Specific Plan (Plan) Project. This letter includes comments from multiple City of Sunnyvale Departments.

**General Comments**

1. The Plan proposes a development capacity of 600,000 square feet of commercial uses, 2.0 million square feet of office uses, 339 hotel rooms, and 800 residential dwelling units for the Vallco Special Area.

The City of Sunnyvale is concerned with the Plan's imbalance in non-residential uses (office, commercial, and hotel) vs. proposed residential units, especially in regards to recent substantial office development in the immediate area. The housing demand with the proposed non-residential development and recent office development is significant in size and warrants consideration of additional housing units to be on site. The City of Sunnyvale sees the Maximum Residential alternative as a better project in the DEIR because it includes additional residential units which may mitigate some burden on the housing market, and other environmental impacts, such as traffic and transportation and greenhouse gas emissions.

2. The City may want to consider the requirement of a Transportation Management Association (TMA) for the new development as Transportation Demand Management (TDM) requirements in this area may not be enough to make a difference in reducing single-occupancy vehicles. An association would create cohesiveness among property owners and tenants on TDM strategies.

### **Traffic and Transportation Comments**

If you have questions on the following traffic related items, please contact Lillian Tsang, Principal Transportation Engineer, Department of Public Works at [itsang@sunnyvale.ca.gov](mailto:itsang@sunnyvale.ca.gov) or (408) 730-7556.

Comments concerning the Transportation related analysis of the project are as follows:

1. When referring to Interstate 280, please change the direction from Eastbound to Southbound (global change).
2. When referring to Interstate 280, please change the direction from Westbound to Northbound (global change).
3. On page 25, last paragraph, please change “City of Santa Clara” to “City of Sunnyvale” in the following sentence: “Significant impacts at signalized City of Santa Clara intersections would occur when the addition of project traffic causes one of the following:”
4. On page 52, under VTA Next Network, please change “in mid- to late-2018” to “2019”.
5. On page 53, Table 9. This table is a summary of the “Next Network Transit Service Summary” instead of “Existing”. Under the Existing Network, Route 81 and Route 323 are still in operations. Route 523 is a future bus route.
6. Bus Route 323 and Bus Route 523 are used in different parts of the report. Please make certain the bus route number is consistently used (global change).
7. On page 67, under Trip Generation Rates, please include the edition of ITE Trip Generation Manual that was used.
8. Table 11, Vehicle Trip Generation Estimates, the references to the table notes in the table and the notes at the end do not match.
9. On page 106, Table 16, the capacity for all segments on SR 85 (both northbound and southbound directions) should be 4,400 instead of 4,600. The freeway mixed-flow segment levels of service shall be recalculated accordingly for all scenarios.
10. In the DEIR, on Page 34, Section 3.0, under Environmental Setting, it was mentioned that “year 2028 is used to evaluate background traffic impacts and year 2040 is used to evaluate cumulative traffic impacts.” In the Traffic Impact Analysis Final Draft report, Chapter 8 presented a discussion on how cumulative traffic was derived. For City of Sunnyvale, why was a growth rate only applied up to 2028 but not to year 2040



for the cumulative conditions? As indicated in the DEIR, year 2028 is used to evaluate background traffic, and year 2040 is used to evaluate cumulative traffic conditions.

11. On page 218, Table 49, the transit route descriptions are incorrect for Bus Route 53, Express Routes 101 and 182, and Rapid Bus Route 323/523.
12. On pages 219-220, Tables 50 and 51, the destination for Rapid Bus Route 323/523 is incorrect.
13. On page 221, last paragraph, change “exiting peak hour” to “existing peak hour”.
14. Page 237, under the Conclusion section, the City of Sunnyvale would like to request to increase the fees to monitor and implement traffic calming improvements and a residential parking permit program (if needed) from \$150,000 to \$250,000. Also, the City of Sunnyvale would like to clarify that the cost of data collection/data analysis/preparation of report would be on top of the fee.
15. Page 237, under the Conclusion section, the City of Sunnyvale would like to request that neighborhood traffic and parking monitoring studies were to be administrated by the City of Cupertino, and that the City of Sunnyvale would have a chance to review and comment on the baseline conditions report.

The City of Sunnyvale appreciates your consideration of the requested study scope elements described above. Please contact Amber Blizinski, Principal Planner, at (408) 730-2723 or [ablizinski@sunnyvale.ca.gov](mailto:ablizinski@sunnyvale.ca.gov) if you have any questions or concerns about items discussed in this letter.

Sincerely,

Andrew Miner  
Assistant Director  
Community Development Department

Cc: Trudi Ryan, Director, Community Development Department  
Chip Taylor, Director, Department of Public Works  
Shahid Abbas, Transportation and Traffic Manager, Department of Public Works  
Lillian Tsang, Principal Traffic Engineer, Department of Public Works