



NOTICE OF PREPARATION
DRAFT ENVIRONMENTAL IMPACT REPORT
For the Google Caribbean Campus Project
May 1, 2019

To: Interested Parties

Subject: Notice of Preparation of a Draft Focused Environmental Impact Report for the Google Caribbean Campus Project

Lead Agency: City of Sunnyvale
Community Development Department
456 W. Olive Avenue
Sunnyvale, CA 94086
Contact: Ryan Kuchenig, (408) 730-7431
rkuchenig@sunnyvale.ca.gov

NOTICE IS HEREBY GIVEN THAT the City of Sunnyvale, as Lead Agency under the California Environmental Quality Act (CEQA), has prepared a Notice of Preparation (NOP) for a Draft Focused Environmental Impact Report (EIR) pursuant to CEQA Guidelines Section 15162 and 15183 for the proposed Google Caribbean Campus Project. The NOP includes a project description and an overview of the potential impacts that will be addressed in the Focused EIR.

Project Title: Google Caribbean Campus Project

The purpose of this notice is: (1) to serve as the Notice of Preparation to potential Responsible Agencies, agencies involved in funding or approving the project, and Trustee Agencies responsible for natural resources affected by the project, pursuant to Section 15082 of the CEQA Guidelines; and (2) to advise and solicit comments and suggestions regarding the preparation of the Focused EIR, environmental issues to be addressed in the Focused EIR, and any related issues, from interested parties in addition to those noted above, including interested or affected members of the public. The City of Sunnyvale requests that any potential Responsible or Trustee Agency responding to this notice do so in a manner consistent with CEQA Guidelines Section 15082(b).

30-Day NOP Review Period: In accordance with CEQA, should your agency have any comments, it is requested to provide a written response to this NOP within the 30-day NOP review period between May 1, 2019 and May 31, 2019. Written comments must be received at the address below no later than 4:00 PM on May 31, 2019. Please indicate a contact person in your response and send it to the following contact:

Ryan Kuchenig, Senior Planner
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

Telephone: (408) 730-7431
rkuchenig@sunnyvale.ca.gov

Public Scoping Meeting: The City of Sunnyvale will hold a Scoping Meeting on May 22, 2019 at 6:30 to 8:00 PM, at the City Council Chambers located at 456 West Olive Avenue, Sunnyvale, California 94086 to: 1) inform the public and interested agencies about the proposed project; and 2) solicit public comment on the scope of the environmental issues to be addressed in the EIR.

Project Location: The project area is located within the northern portion of the City of Sunnyvale within the Moffett Park Specific Plan area. The proposed project would occur on 10 existing parcels and result in the construction of two new mid-rise buildings at two new addresses: one at 100 West Caribbean Drive and the second at 200 West Caribbean Drive. The project site is bound by West Caribbean Drive on the north, and lies between Mathilda Avenue on the west, Borregas Avenue on the east, and is bisected north to south by the Santa Clara Valley Water District's (SCVWD) West Channel. Please refer to **Figure 1: Regional Location Map** and **Figure 2: Vicinity Map**.

Project Description: The project proposes demolishing the existing 13 buildings located on the project site, existing surface parking lots, and removal of vegetation and trees on the approximately 40.5-acre site. The existing buildings consist of 710,381 square feet of office and manufacturing buildings. The addresses of the existing buildings to be demolished are shown below:

Address		Address	
140-146	West Caribbean Drive	1393-1395	Borregas Avenue
360-364		1383	
370-376		1323	
380-382		1330-1338	Bordeaux Drive
390-394		1340-1346	
141	Caspian Court	1360-1368	

The proposed project includes two new 5-story office buildings totaling 1,041,890 square feet. The proposed buildings would be located at 100 Caribbean Drive and 200 Caribbean Drive. Please see **Figure 3: Conceptual Site Plan**. Between the two buildings, 100 Caribbean Drive would total 536,750 square feet with a Floor Area Ratio (FAR) of 0.71, and 200 Caribbean Drive would total 505,140 square feet with a FAR of 0.50. Combined, the two buildings would have a FAR of 0.66. The project would also develop a parking structure, a central utility plant and surface parking. The total number of parking spaces to be provided upon completion of the surface lots and parking structure would be 2,198 spaces. The proposed project will integrate measures to reduce reliance on automobiles and car-based commuting, including a Transportation Demand Management (TDM) trip reduction plan. The proposed project includes other amenities conducive to alternative transportation including two shuttle drop-off areas as well as secured bicycle parking at both buildings. Other improvements include infrastructure and utility improvements, walkways, green areas and open spaces.

The proposed 100 and 200 Caribbean Drive buildings would both be 5 stories, with an overall building height of 120 feet 5 inches, as measured from the finished floor to the highest elevation of the building. The proposed parking garage would be 5 levels, and the highest elevation would

be 71 feet 6 inches, as measured from the finished floor to the top point of the central utility plant. The proposed uses within the proposed office buildings are as follows:

Use	Square Feet	Percentage of Building Space
Office Space	271,040	26.01%
Amenities/Meeting Rooms /Food/Fitness	346,394	33.25%
Cores/Circulation/Restrooms	389,397	37.37%
Other	35,059	3.36%
Total	1,041,890	100%

The existing SCVWD West Channel (West Channel) bisects the campus such that 100 Caribbean Drive lies to the east and 200 Caribbean Drive lies to the west. The portion of the West Channel corridor separating 100 Caribbean Drive and 200 Caribbean Drive is approximately 1,100 feet in length, extending from West Caribbean Drive upstream to the southern end of the property line for the proposed project. The proposed project would excavate the existing storm channel, set back levees, grade a new low flow channel with associated floodplain benches, implement habitat restoration, construct two new bridge crossings (one pedestrian between the two buildings and one pedestrian engineered to support emergency vehicle access at a Caspian Drive extension), enhance the headwall at the box culvert to accommodate a sidewalk as requested by the City of Sunnyvale along West Caribbean Drive, and providing maintenance access for the Santa Clara Valley Water District (SCVWD).

These proposed improvements would provide, at a minimum, an equivalent level of flood protection through project area consistent with SCVWD's Sunnyvale East and West Channels Flood Protection Project. The proposed project would provide enhanced wetland and riparian habitat within the channel area. An enhanced creek corridor would become part of the development landscape of the proposed project to provide flood protection and enhance campus aesthetics, recreational opportunities, and environmental resources for wildlife habitat. The channel would be designed to work effectively with regional flood control and drainage planning and be adaptable to future climate conditions.

The project also includes the demolition of a single story industrial/R&D building at 1362 Borregas Avenue, totaling 26,880 square feet which will be demolished to accommodate temporary construction parking for 745 cars in lieu of onsite construction parking.

The proposed project is consistent with the Moffett Park Specific Plan and is consistent with the City of Sunnyvale's goals of increasing density in this area. The project would use available square footage from the City's Moffett Park Specific Plan development reserve. The project would not require an amendment to the City's General Plan or Moffett Park Specific Plan.

Project construction would begin after all City approvals, land use entitlements, and environmental clearances are obtained. These buildings would be built with similar construction schedules with 200 W. Caribbean Drive starting first, and 100 W. Caribbean Drive following approximately three months behind. It is anticipated that both buildings would be occupied at roughly the same time. The proposed project would be built in a single phase with a duration of approximately 30 months.

Potential Environmental Impacts: Environmental factors that would be potentially affected by the proposed project are:

- Transportation

Given the previously developed nature of the project site and the surrounding Moffett Park area, and the proposed project's consistency with the approved General Plan Land Use and Transportation Element and the approved Moffett Park Specific Plan, the following environmental factors are anticipated to be Effects Found to be Less Than Significant or Less Than Significant with Mitigation as a result of the proposed project and implementation of applicable mitigation measures:

Aesthetics	Greenhouse Gas Emissions
Air Quality	Hazards and Hazardous Materials
Biological Resources	Hydrology and Water Quality
Cultural Resources	Land Use and Planning
Energy	Noise
Geology/Soils	Public Services and Utilities

The following environmental factors are not impacted by the proposed project:

- Agricultural/forestry,
- Mineral resources,
- Population and housing,
- Recreation, and
- Wildfire.

Summary of Key Environmental Issues to be Addressed in Focused EIR:

- **Transportation:** The Focused EIR will evaluate the proposed project's impacts on traffic, circulation, intersection operation, level of service, vehicle miles traveled, public transit, and pedestrian and bicycle conditions.
- **Issues Specific To The West Channel:** The Focused EIR will evaluate the proposed projects' impacts specific to the West Channel improvements.

Other EIR Sections: The Focused EIR will include other sections required by CEQA including sections on: Project Alternatives, Cumulative Impacts, Significant Unavoidable Impacts, Significant Irreversible Environmental Changes, EIR Preparers, EIR References, and EIR Technical Appendices.

ENVIRONMENTAL REVIEW PROCESS

Following completion of the 30-day Notice of Preparation public review period, the City of Sunnyvale will incorporate relevant information into the Draft Focused EIR, including results of public scoping and technical studies. The Draft Focused EIR will be circulated for public review and comment for the required 45-day public review period. All parties that have requested to be included on the project mailing list will be provided with a Notice of Availability for the Draft Focused EIR. In addition, the Draft Focused EIR and related materials will be available for review on the City of Sunnyvale's website: <http://sunnyvale.ca.gov/>, and at the City of Sunnyvale, located at 456 W. Olive Avenue, Sunnyvale, CA 94086. Following expiration of the public review period for the Draft Focused EIR, the City of Sunnyvale will prepare Responses to Comments as part of the Final Focused EIR, which will be considered and acted upon by the City of Sunnyvale's City Council. The City of Sunnyvale will provide notification of future public meetings for this project to parties that have requested to be included on the project mailing list.


All parties that have submitted their names and mailing addresses for inclusion on the project mailing list will be notified as part of the project's CEQA review process. If you wish to be placed on the project mailing list, have any questions, or need additional information, please contact the person identified below.

A copy of the NOP has been posted on the City of Sunnyvale's website (<http://sunnyvale.ca.gov/>) and is on file at the City of Sunnyvale Community Development Department/Planning Division and the City of Sunnyvale's One-Stop Permit Center, 456 West Olive Avenue, Sunnyvale, CA 94086.

Should you have any questions or comments regarding this Notice of Preparation, please contact Ryan Kuchenig, Project Manager, City of Sunnyvale, at (408) 730-7431 or by email at: rkuchenig@sunnyvale.ca.gov.

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 Not to scale



Source: Google Earth, 2019

FIGURE 2: Vicinity Map
Google Caribbean Campus



Not to scale

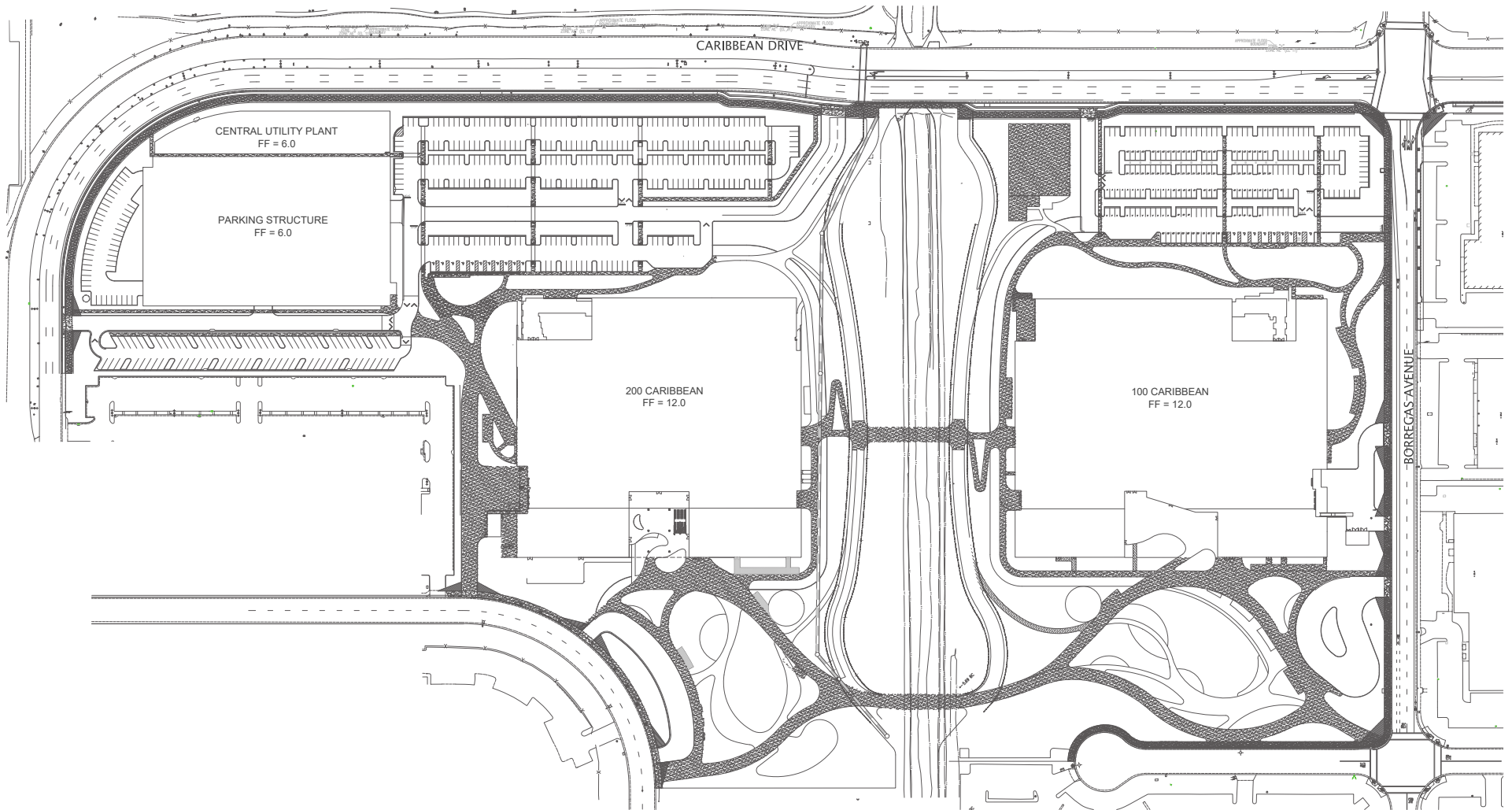



FIGURE 3: Conceptual Site Plan
Google Caribbean Campus

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DEPARTMENT OF TRANSPORTATION

DISTRICT 4

P.O. BOX 23660

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

www.dot.ca.gov

*Making Conservation
a California Way of Life!*

March 12, 2019

04-SCL-2018-00543

GTS ID 10695

Post Mile: SCL – 237- 3.028

Lillian Tsang
City of Sunnyvale
P.O. Box 60607
Sunnyvale, CA 94088

Google 100-200 W Caribbean Drive – Transportation Impact Analysis Scope

Dear Lillian Tsang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. We appreciate the opportunity to provide feedback at this critical early stage. Our comments are based on the Transportation Impact Analysis Scope.

Project Understanding

The Project site contains seven vacant existing buildings totaling 400,157 square feet (sf) and six occupied existing buildings totaling 310,224 sf. Occupied building uses include an industrial laboratory, warehouse, light manufacturing, and offices. The Project would demolish the 13 existing buildings to accommodate the proposed new construction. The Project proposes construction of a new 536,750 sf five-story office building to be located at 100 W Caribbean Drive, and a new 505,140 sf five-story office building and a five-story parking garage containing 3,473 vehicle parking spaces with attached three-story central utility plant to be located at 200 W Caribbean Drive. The total proposed office gross floor area of the entire site is 1,041,890 sf. Regional access is provided via State Route (SR) 237 at Caribbean Drive and Lawrence Expressway ramps, one mile east from the project site. Since this project meets the criteria to be deemed of statewide, regional or areawide significance per CEQA Section 15206, the project's environmental document should be submitted to both the Santa Clara Valley Transportation Authority and MTC for review and comment.

Vehicle Trip Reduction

Given the project's intensification of use and significant amount of vehicle parking spaces, the

project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Parking should be reduced significantly. Such measures will be critical to facilitate efficient transportation access to and from the project site and reduce transportation impacts associated with the project. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and convenient transit access;
- Secured bicycle storage facilities located conveniently near entrances to minimize detriment of bicycle use due to weather conditions;
- Bicycle parking;
- Subsidized transit passes on an ongoing basis;
- Shuttle services for employees
- Fix-it bicycle repair station(s);
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces conveniently located to encourage carpooling and clean-fuel vehicles;
- Lower parking ratios;
- Showers, changing rooms and clothing lockers for bike commuters;
- Bicycle route mapping resources and bicycle parking incentives;
- Emergency Ride Home program;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with annual Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on nearby State facilities. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

Multimodal Transportation

The project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to nearby jobs, neighborhood services, and transit. Since the proposed project is adjacent to the existing Sunnyvale Bay Trail Class 1 Bike Path, the proposed project should provide a connection to this Bike Path with the proposed Class 1 Bike Path within the project.

Lillian Tsang
City of Sunnyvale
March 11, 2019
Page 3

Transportation Impact Fees

The Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. Please consider fair share contributions for the two Express Lane projects identified on SR 237 and US 101 respectively. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Lead Agency

As the Lead Agency, the City of Sunnyvale is responsible for all project mitigation, including any needed improvements to the STN. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures. Mitigation that includes the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Transportation Permit

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, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to: Caltrans Transportation Permits Office, 1823 14th Street, Sacramento, CA 95811-7119. See the following website for more information:
<http://www.dot.ca.gov/hq/traffops/permits>.

Should you have any questions regarding this letter, please contact Michael McHenry at (510) 286-5562 or Michael.mchenry@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c. Santa Clara Valley Transportation Authority

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
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*Making Conservation
a California Way of Life!*

May 21, 2019

04-SCL-2018-00576

GTS ID 10695

Post Mile: SCL – 237 - 3.028

Ryan Kuchenig
City of Sunnyvale
P.O. Box 60607
Sunnyvale, CA 94088

Google 100-200 W Caribbean Drive – Notice of Preparation

Dear Ryan Kuchenig:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. We appreciate the opportunity to provide feedback at this critical early stage. Our comments are based on the Notice of Preparation of an EIR. Our previous letter regarding the Draft Traffic Impact Analysis dated March 12th 2019 shall be incorporated herein by reference.

Project Understanding

The Project site contains seven vacant existing buildings totaling 400,157 square feet (sf) and six occupied existing buildings totaling 310,224 sf. Occupied building uses include an industrial laboratory, warehouse, light manufacturing, and offices. The Project would demolish the 13 existing buildings to accommodate the proposed new construction. The Project proposes construction of a new 536,750 sf five-story office building to be located at 100 W Caribbean Drive, and a new 505,140 sf five-story office building and a five-story parking garage containing 3,473 vehicle parking spaces with attached three-story central utility plant to be located at 200 W Caribbean Drive. The total proposed office gross floor area of the entire site is 1,041,890 sf. Regional access is provided via State Route (SR) 237 at Caribbean Drive and Lawrence Expressway ramps, one mile east from the project site. Since this project meets the criteria to be deemed of statewide, regional or areawide significance per CEQA Section 15206, the project's environmental document should be submitted to both the Santa Clara Valley Transportation Authority and MTC for review and comment.

Lillian Tsang
City of Sunnyvale
May 21, 2019
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Multimodal Transportation

We would like to reference our March 12th 2019 letter emphasizing the importance of multimodal transportation. The project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to nearby jobs, neighborhood services, and transit. Since the proposed project is adjacent to the existing Sunnyvale Bay Trail Class 1 Bike Path, the proposed project should provide a connection to this Bike Path with the proposed Class 1 Bike Path within the project.

Sea Level Rise

This project is located in an area vulnerable to impacts from sea level rise. The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies planning construction projects in areas vulnerable to sea level rise to begin planning for potential impacts by considering a range of sea level rise scenarios for years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans.

Should you have any questions regarding this letter, please contact Zachary Chop at (510) 622-1643 or zachary.chop@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department

1550 Harbor Blvd., Suite 100

West Sacramento, CA 95691 Phone (916) 373-3710

Email: nahc@nahc.ca.govWebsite: <http://www.nahc.ca.gov>

Twitter: @CA_NAHC



May 20, 2019

Ryan Kuchenig
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

RE: SCH#2001052121 Google Caribbean Campus, Santa Clara County

Dear Mr. Kuchenig:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Planning Division
RECEIVED

MAY 22 2019

City of Sunnyvale

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email
address: Gayle.Totton@nahc.ca.gov.

Sincerely,



for
Gayle Totton
Associate Governmental Program Analyst

cc: State Clearinghouse



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

ALAMEDA COUNTY

John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
Mark Ross

MARIN COUNTY

Katie Rice
(Chair)

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Gordon Mar
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY

David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY

Margaret Abe-Koga
Cindy Chavez
(Secretary)
Liz Kniss
Rod G. Sinks
(Vice Chair)

SOLANO COUNTY

James Spering
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



May 31, 2019

Ryan Kuchenig, Senior Planner
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

RE: Google Caribbean Campus Project – Notice of Preparation

Dear Mr. Kuchenig,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for a draft Focused Environmental Impact Report (Focused EIR) for the proposed Google Caribbean Campus Project (Project). This Project would demolish 13 existing office and manufacturing buildings to develop two five-story office buildings, a parking structure, surface parking, and a central utility plant on a 40.5-acre site in the City of Sunnyvale. The office buildings would total 1,041,890 square feet and include office space, meeting rooms, and amenities such as food and fitness centers.

Air District staff recommends the Focused EIR include the following information and analysis regarding potential regional and local air quality impacts and greenhouse gas (GHG) emissions in the San Francisco Bay Area Air Basin:

- **The Focused EIR should evaluate the Project's impacts on Air Quality and Greenhouse Gas Emissions.** The NOP states that the Project's impacts to Air Quality and Greenhouse Gas Emissions are anticipated to be Less Than Significant or Less Than Significant with Mitigation. However, the NOP states that Transportation is expected to be potentially affected by the Project. The total number of parking spaces would be 2,198 spaces. Although the Air District supports the Project's inclusion of a Transportation Demand Management trip reduction plan, because the project includes over one million square feet of commercial space and no housing, it is quite likely that increases in vehicle trips will impact air quality and GHG emissions. The Air District urges the City to evaluate Air Quality and Greenhouse Gas Emissions as key environmental issues in the Focused EIR.
- **The Project Description and Project Location should include the 1362 Borregas Avenue site.** The NOP states that the Project would also demolish a single-story industrial/R&D building at 1362 Borregas Avenue to accommodate temporary construction parking for 745 cars in lieu of onsite construction parking. This site and its associated transportation impacts should be added to the Project Description and Project Location and be included in the air quality and GHG analysis.
- **The Air District recommends that a significance determination be based on an evaluation of the Project's consistency with the most recent draft of the SB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's CEQA Guidelines are based on the State's 2020 greenhouse gas targets, which are now superseded by the 2030 targets for greenhouse gases established in SB 32.

- **The Focused EIR should evaluate the Project's consistency with the City of Sunnyvale Climate Action Plan.** The City adopted its Climate Action Plan in 2014 and is working on an updated plan called the Climate Action Playbook, which is expected to be released in Summer 2019. The Focused EIR should evaluate the Project's consistency with the City's most recently adopted Climate Action Plan.
- **The Focused EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
- **The Focused EIR should quantify the Project's potential construction and operational impacts to local and regional air quality.** The Air District's CEQA Guidelines provide guidance on how to evaluate a project's or plan's construction, operational, and cumulative air quality and GHG impacts. The CEQA Guidelines can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **The Focused EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the project's construction and operation.** Air District staff recommends that the Focused EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on nearby sensitive receptors.
- **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
- **If any aspects of the Project may require a permit from the Air District (for example, back-up diesel generators), then the Air District may be a responsible agency for California Environmental Quality Act (CEQA) purposes.** Please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Josephine Fong, Environmental Planner, at (415) 749-8637, or jfong@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Director Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Director Rod G. Sinks



May 30, 2019

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

Attention: Ryan Kuchenig

Subject: Notice of Preparation of a Draft EIR for the Google Caribbean Campus Project

Dear Mr Kuchenig:

Thank you for including the City of Santa Clara in the environmental review process for the First Amendment to the Notice of Preparation of a Draft EIR for the Google Caribbean Campus Project which proposes demolition of multiple buildings and construction of 1,041,890 sq ft of office development and 2,198 parking spaces. The City of Santa Clara has the following comments:

- The City of Santa Clara uses criteria from the VTA TIA Guidelines as a basis for determining study intersections. Accordingly, municipal and CMP intersections with ten or more project trips per approach lane should be analyzed. Please consider analyzing the following intersections as part of your traffic analysis as project trips most likely will traverse these intersections:
 - Lawrence Expressway / Kifer Rd.
 - Lawrence Expressway / Reed Ave.-Monroe St.
 - Lick Mill Blvd. / Tasman Dr.
 - Bowers Ave. / US 101 NB Ramps
 - Bowers Ave. / US 101 SB Ramps
 - Bowers Ave. / Augustine Dr.
 - Bowers Ave. / Scott Blvd.
 - Bowers Ave. / Central Expressway
 - Bowers Ave. / Kifer Rd.-Walsh Ave.
 - Bowers Ave. / Chromite Dr.
 - Bowers Ave. / Monroe St.
- For any intersections analyzed within the City of Santa Clara, the City requests you use the peak hour factor found from the traffic counts and an intersection's actual signal timing in your analysis. Please contact the Santa Clara Traffic Division, for intersection signal timing sheets.

- The project site is located near the western boundary of the City of Santa Clara. Relevant approved projects within Santa Clara need to be included in the study estimates of the Background traffic volumes. Attached is the list of both approved and pending projects within the City of Santa Clara.
- Similarly, pending projects within Santa Clara needs to be incorporated in the Cumulative traffic volume estimates in order to reflect the growth in both the local and regional traffic. Attached is the list of both approved and pending projects within the City of Santa Clara.
- The local transportation analysis should include an analysis of bicycle facilities in terms of their availability, project effects on future bike plans, and improvements proposed by the project. Maps and information on existing and planned bicycle facilities within Santa Clara can be found on the City's website at <http://santaclaraca.gov/government/departments/publicworks/engineering/committees/bicycle-and-pedestrian-advisory-committee>.
- Any physical improvements required or planned at study intersections needs to evaluate secondary impacts to alternative modes of transportation.
- Fair share contributions should be made for significant impacts found along roadways and/or intersections, including the expressways.

Should you have any questions regarding this letter, please contact Reena Brilliot, Planning Manager, at (408) 615-2450 or Carol Shariat, Principal Transportation Planner, at (408) 615-3024.

Sincerely,



Andrew Crabtree
Director of Community Development

Attachment: May 29, 2019 City of Santa Clara Project Tracking List