



October 14, 2016

Miriam Chion and Ken Kirkey  
Bay Area MetroCenter  
375 Beale Street  
San Francisco, CA 94105

RE: **Plan Bay Area 2040 Draft Preferred Growth Scenario - City of Sunnyvale Comments**

Dear Ms. Chion and Mr. Kirkey:

Thank you for the opportunity to review the Plan Bay Area 2040's Draft Preferred Growth Scenario (Scenario). On behalf of the City of Sunnyvale (City), we have studied the Scenario, and would like to express concern with the anticipated number of households provided in the data that have been allotted to the City. This number is considerably higher than the City's existing buildout estimate for that time frame. For simplicity we are equating Plan Bay Area term of "households" with the City terms "housing units" or "dwelling units" (du).

The City is currently working on an update to the Land Use and Transportation Element (LUTE) of the Sunnyvale General Plan. Analysis in the Public Review Draft LUTE, published in August 2016, concluded that the City's buildout would reach 72,180 housing units, of which approximately 27,577 - 28,577 are within PDAs. However, according to the Scenario, the Plan Bay Area forecasts the City to reach 80,700 households by 2040. The buildout number represents the maximum permitted under the Draft LUTE; therefore, the overestimation of households (8,520 households) is of concern to the City. The buildout number from the Draft LUTE has been used to analyze environmental impacts, as well as the City's capacity to adequately provide services, including, but not limited to, water and sewer. The overestimation on households may cause additional burden for the City by increasing environmental impacts and limiting the City's capacity to provide adequate services to its residents.

Consistent with the Plan Bay Area's strategy, focusing development towards Priority Development Areas (PDAs), the City also focuses its housing growth within PDAs.<sup>1</sup> The City's planning area boundaries are smaller than the adopted PDA boundaries; the PDA boundaries include neighborhoods influenced by and supportive of activities in the planning area, but are

---

<sup>1</sup> The City also anticipates a small amount of employment growth within its PDAs; however, the City's majority of employment growth would be expected from its three main employment centers: Moffett Park, Peery Park, and The Woods.

not likely to experience redevelopment or land use changes. The prime example of this is the corridor along El Camino Real where commercially zoned sites share a boundary with single-family residential homes. The commercial sites may redevelop as mixed use commercial with medium (up to 24 du/acre) to high or very high density (up to 50 du/ac, including density bonuses) residential; however, the City does not envision any growth or changes in the existing low-density residential neighborhoods. Due to the limited areas for growth, within portions of our PDAs, the estimated housing growth within PDAs is less than the Scenario anticipates. Additionally, the growth we expect within PDAs would not be as intensive as the Scenario forecasts (almost 40% of the City's overall housing growth, from 6,200 to 32,000). See Table 1 for comparison.

We are very comfortable with the employment forecast. As buildout would be about 8,000 jobs more, and development of industrial, office, and commercial has historically been a lower percentage of buildout than housing development, this job estimate for 2040 is appropriate.

**Table 1: Growth Scenario Comparison**

	Household Forecast		Employment Forecast	
	PBA	Sunnyvale	PBA	Sunnyvale
<b>PDA Only</b>	32,000	28,574	29,000	37,813
<b>Non-PDA</b>	48,700	43,606	87,000	86,185
<b>Total</b>	80,700	72,180	116,000	123,998
<b>Difference</b>	+8,520	-	-7,998	-

We strongly urge you to review the City's housing growth scenario again to accurately reflect the growth projected by the City. Please do not hesitate to contact Kelly Cha, Associate Planner at [kcha@sunnyvale.ca.gov](mailto:kcha@sunnyvale.ca.gov) or (408) 730-7408, if you have any questions regarding our comments. We welcome further discussions on the Draft Preferred Growth Scenario analysis, if needed.

Sincerely,



Trudi Ryan  
Community Development Director

cc: Mayor and City Councilmembers  
City Manager  
Planning Officer  
George Naylor, Transportation Planning Manager, Santa Clara VTA  
Robert Swierk, Principal Transportation Planner, Santa Clara VTA