Council Meeting: November 20, 2012

SUBJECT: 2012-7728 – Discussion and Possible Action Regarding an Application to Initiate a General Plan Amendment study to change the Land Use Designation for 610 East Weddell Drive from Industrial to Residential Very High Density.

REPORT IN BRIEF
Sares-Regis submitted a letter on September 7, 2012 (see Attachment A), requesting the City Council initiate a General Plan Amendment study to allow consideration of a land use designation change from Industrial to Residential Very High Density (42 to 65 dwelling units per acre) for a 4.04 acre property located at 610 East Weddell Drive. The site is located at the southeast corner of Fair Oaks Avenue and Highway 101, and is currently occupied by a vacant single-story industrial building.

The subject site is zoned M-S/PD (Industrial and Service/Planned Development). As indicated in the applicant’s letter, residential uses are proposed with a requested density of approximately 50 dwelling units per acre. In order to allow residential uses at this density, the site’s Zoning and General Plan designations would need to be amended. A General Plan Amendment study would need to be initiated by the City Council before staff could accept formal applications for a General Plan Amendment, Rezoning or appropriate development review permits.

On July 17, 2012, the City Council initiated a General Plan Amendment study for an industrial site located nearby at 520 East Weddell Drive (RTC #12-163). For that site, the City Council initiated study of a range of potential residential densities from Medium to Very High. The subject site is similar to the site at 520 East Weddell Drive, but there are also key differences. The following report provides a detailed analysis of the potential justifications for and against initiating a General Plan Amendment study for the subject site at 610 East Weddell Drive. If the City Council chooses to initiate a study, staff recommends that this study be coordinated with the study for 520 East Weddell Drive.

BACKGROUND
The subject site is approximately 4 acres in area and is currently developed with a single-story industrial building with concrete tilt-up construction, a typical design in the M-S Zoning District. The site has been vacant about three years; it was previously used as a semiconductor research and development
facility. The subject site is separated from multi-family residential uses to the east by the East Channel and PG&E high voltage lines. Highway 101 is to the south; industrial and multi-family residential uses are to the west (across Fair Oaks Avenue). El Dorado Mobile Home Park is separated from the site by a PG&E substation to the north and part of the Hetch Hetchy right-of-way. Attachment D shows land uses in the vicinity of the subject site.

A study allowing for residential development in areas zoned for industrial use was completed in 1993 to address the City’s share of regional housing needs (the “Futures” study). As a result of that study, six industrial areas were rezoned to add an Industrial-to-Residential (ITR) Combining District to the existing M-S Zoning designations. The areas known as Futures Sites 7 and 8 are near the project site (see map in Attachment E). A subsequent study in 2003 changed the General Plan designation for Futures Sites 7 and 8 to Industrial-to-Residential Medium to High Density, which allows a range of densities between 14 and 42 dwelling units per acre.

As noted in RTC #12-163 (520 East Weddell Drive), the existing Industrial-to-Residential area is located entirely to the north of the Hetch Hetchy right-of-way. The intent of this boundary was to provide a buffer from Highway 101 to reduce noise and air quality impacts for new residential development. The properties between Weddell Drive and the Hetch Hetchy right-of-way have continued to be designated as Industrial in the General Plan. A 2006 study rezoned several properties on Weddell west of Fair Oaks to include a Place of Assembly (POA) Combining District, which allows consideration of places of assembly with a Use Permit. The subject site, located on the east side of Fair Oaks, does not include a POA Combining District.

If a General Plan Amendment study is initiated for this site, the project applicant intends to file a formal application for a General Plan Amendment to Residential Very High Density and a Rezone to R-5 Zoning. The applicant currently intends to redevelop the site with approximately 200 apartments ranging from studios to three-bedroom units.

**EXISTING POLICY**

Only the City Council is authorized to initiate proceedings to consider an amendment to the General Plan (SMC Section 19.92.020). Prior to any formal application for a General Plan Amendment, the City Council must first review a General Plan Amendment Initiation request to determine if the request warrants further study. Notice of Council consideration of a General Plan Amendment Initiation is through the posting of the City Council agenda. Nearby property owners and tenants are not notified until a study has been initiated, although in this case the applicant has scheduled a community outreach meeting for November 15, 2012, and notice was mailed to property owners near the site by the applicant. The approval of an initiation request would allow a formal application for a General Plan Amendment to be
submitted, at which time the merits of the proposed amendment would be further assessed. The approval of an initiation request does not commit the City Council to approve a formal General Plan Amendment request, nor any specific project proposal. If a study is initiated, the applicant would be required to submit subsequent discretionary applications for a General Plan Amendment and Rezone including payment of application fees and subsequent hearings by the Planning Commission and City Council.

The following are the key General Plan goals relating to this General Plan Amendment Initiation request:

**Land Use and Transportation Chapter**

**GOAL LT-3:** Ensure ownership and rental housing options in terms of style, size and density that are appropriate and contribute positively to the surrounding area.

- **LT-1.7a:** Locate higher intensity land uses and developments so that they have easy access to transit services.
- **LT-3.1c:** Promote the maintenance and rehabilitation of existing housing.

**Policy LT-3.4** Determine appropriate density for housing based on site planning opportunities and proximity to services.

- **LT-3.4a:** Locate higher-density housing with easy access to transportation corridors, rail transit stations, bus transit corridor stops, commercial services and jobs.

**GOAL LT-4:** Preserve and enhance the quality character of Sunnyvale’s industrial, commercial and residential neighborhoods by promoting land use patterns and related transportation opportunities that are supportive of the neighborhood concept.

**Policy LT-4.1:** Protect the integrity of the City’s neighborhoods; whether residential, industrial or commercial.

**Policy LT-4.2:** Require new development to be compatible with the neighborhood, adjacent land uses, and the transportation system.
Housing and Community Revitalization Element

**GOAL HE-1:** Foster the expansion of the housing supply to provide greater opportunities for current and future residents within limits imposed by environmental, social, fiscal and land use constraints.

**Policy HE-1.1:** Encourage diversity in the type, size, price and tenure of residential development in Sunnyvale, including single-family homes, townhomes, apartments, mixed-use housing, transit-oriented development and live-work housing.

**GOAL HE-2:** Maintain and enhance the conditions and affordability of existing housing in Sunnyvale.

Safety and Noise Chapter

**Policy SN-8.5:** Comply with “State of California Noise Guidelines for Land Use Planning” (Figure 6-5) for the compatibility of land uses with their noise environments, except where the City determines that there are prevailing circumstances of a unique or special nature.

Environmental Management Chapter

**GOAL EM-11** Improve Sunnyvale’s air quality and reduce the exposure of its citizens to air pollutants.

**Policy EM-11.2** Utilize land use strategies to reduce air quality impacts, including opportunities for citizens to live and work in close proximity.

DISCUSSION
If a request for a General Plan Amendment from Industrial to Residential Very High Density were approved, it would likely result in redevelopment of the site with multi-family residential uses. The applicant has submitted conceptual plans for a four-story apartment project with approximately 200 units (see Attachment F). The conceptual plans also show structured parking and residential amenities such as open space and a swimming pool.

Density
The subject site is 4.04 acres in size. The following table indicates the number of dwelling units which could be permitted on the subject site under various General Plan land use designations and the corresponding Zoning designations. Additional discussion of density limitations based on General Plan and Zoning designations, as well as density bonuses, is provided below.
### General Plan Designation and Zoning

<table>
<thead>
<tr>
<th>General Plan Designation</th>
<th>General Plan Density Range (Units per acre)</th>
<th>Zoning Density (Max. units per acre)</th>
<th>Max. Units on Subject Site (per Zoning, without density bonuses)</th>
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<tbody>
<tr>
<td>Medium</td>
<td>14 – 27</td>
<td>24 (R-3)</td>
<td>96 (R-3)</td>
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<td>High</td>
<td>27 – 42</td>
<td>36 (R-4)</td>
<td>145 (R-4)</td>
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<tr>
<td>Very High</td>
<td>42 – 65</td>
<td>45 (R-5); Other densities may be allowed per Specific Plans</td>
<td>181 (R-5)</td>
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**General Plan density:** The site’s existing General Plan designation of Industrial does not support development with primarily residential uses. The applicant proposes a General Plan designation of Residential Very High Density, for which permitted density ranges from 42 to 65 dwelling units per acre. This General Plan designation is generally associated with R-5 Zoning. Staff notes that the range of densities permitted under this designation is wider than the range permitted for R-5 Zoning, since the General Plan designation is designed to accommodate density bonuses as well as potential alternative Zoning designations such as Specific Plan areas. On the subject site, a General Plan designation of Residential Very High Density would result in an allowable range of 169 to 262 units.

**Zoning density:** Along with the requested change in the General Plan designation, the applicant would request a change in the site’s Zoning designation to Very High Density Residential (R-5). Outside of Specific Plan areas, the R-5 Zoning District offers the highest permitted density without taking advantage of density bonuses. R-5 Zoning permits a maximum density of 45 dwelling units per acre; this would result in a maximum of 181 permitted units on the subject site.

**Density bonuses:** In addition to the maximum number of units permitted by a site’s Zoning designation, applicants may take advantage of several density bonus options to increase permitted density. The City currently offers a 5% density bonus for green building (projects achieving 110 points or more on the GreenPoint Rated Checklist). State law also provides for a density bonus of up to 35% for projects providing affordable housing units (California Government Code Section 65915-65918); the actual bonus depends on the percentage of the project which will be affordable and the level of affordability. A project taking advantage of both the City’s green building bonus and the maximum bonus available for affordable housing could increase density by 40%.

Based on the applicant’s conceptual plans (Attachment F), 200 dwelling units will be requested resulting in a density of approximately 50 dwelling units per
acre. With the request for R-5 Zoning, the City’s density bonus for green building would not be enough to achieve the additional 19 units contemplated by the applicant. However, State affordable housing density bonuses could be used to achieve these additional units.

**Neighborhood Compatibility**

Attachments B, C and D depict surrounding General Plan designations, Zoning designations, and uses in the vicinity of the subject site. The requested General Plan Amendment and Rezone would result in a higher density than that of nearby residential development (proposed 50 dwelling units per acre versus existing 7-12 dwelling units per acre on the east side of Fair Oaks and 18-42 dwelling units per acre on the west side of Fair Oaks). The proposed density is similar to the proposed density authorized for study at the 520 East Weddell site on the west side of Fair Oaks Avenue.

Due to the surrounding residential uses, transitioning the subject site from industrial to residential could increase neighborhood compatibility by eliminating the potential for manufacturing and other uses which may be less compatible with residential. However, as noted above, the proposed density is significantly higher than the densities of surrounding residential uses, and this could result in incompatibility with respect to noise, traffic, and building form. There are also other potential challenges for residential redevelopment of this site. The site is somewhat isolated, being separated from surrounding residential by the Hetch Hetchy right-of-way to the north, an easement containing high-voltage power lines to the east, Fair Oaks Avenue to the west, and Highway 101 to the south. A study would also examine whether higher density residential uses in proximity to PG&E high-voltage wires and a substation pose any hazards to or have impacts on future residents.

The site is located near major arterial streets and freeways, which could provide convenient vehicle access to the site. However, the site’s proximity to high-volume roadways is also likely to result in increased exposure of residents to noise and air quality impacts and may impact traffic on nearby roads. Potential traffic, noise, and air quality impacts of a new residential development would need to be studied. Through appropriate mitigation (including siting of buildings and construction techniques) it is possible to locate residential uses close to freeways. Staff notes that a similar residential project was approved in 2008 adjacent to Highway 237 at Lawrence Expressway (BRE’s “Lawrence Station” mixed-use development).

The VTA light rail line is located less than half a mile to the north, with the Tasman station at the corner of Fair Oaks Avenue and Tasman Drive. The site’s proximity to a light rail station would provide transit opportunities for potential residents and could reduce anticipated vehicle trips. In addition, a recently-constructed mixed-use development adjacent to the light rail station provides a variety of neighborhood-serving retail, dining, and personal services.
If the City Council decides to initiate the requested General Plan Amendment study, consistency with other General Plan policies would be evaluated. In addition, the study would examine the following:

- Consider all possible environmental impacts resulting from the new development, including impacts on traffic, parks, and schools.
- Consider all possible environmental impacts on future residents of high density residential development at the project site, including noise, air quality, and potential hazards resulting from adjacent uses such as industrial uses and the PG&E high-voltage wires and substation.
- Review the economic development implications of reducing available industrially zoned property.
- Consider the advantages and disadvantages of increased residential opportunities in the neighborhood.
- Examine the opportunity to provide additional affordable housing units.
- Consider open space options such as extension of the John W. Christian Greenbelt.
- Evaluate the project’s ability to integrate into the surrounding area.

**Companion site: 520 East Weddell Drive**

As noted above, the City Council previously initiated a General Plan Amendment study for an industrial site located near the subject site at the northwest corner of Fair Oaks Avenue and Highway 101 (520 East Weddell Drive, RTC #12-163). Study of the site at 520 East Weddell is just beginning, and preparation of detailed environmental studies is likely.

The subject site has some similarities to the site at 520 East Weddell: the two sites have a similar size and shape, both sites are located at the junction of Fair Oaks Avenue and Highway 101 along freeway ramps, both sites are located south of and adjacent to the Hetch Hetchy right-of-way in the area between Morse Avenue and the East Channel where the John W. Christian Greenbelt has not been extended, and both sites are industrially zoned in an area with existing residential uses. However, there are also key differences between these sites. The site at 520 East Weddell is directly south of an existing Industrial-to-Residential area (ITR-7), and the ITR Zoning could be extended to encompass that site. The subject site is not directly adjacent to an existing ITR area and would be a stand-alone parcel with Very High Density Residential Zoning. The subject site is also more physically isolated from adjacent residential uses; it is separated by a PG&E substation to the north and high-voltage power lines and a flood control channel to the east. The subject site is located at the end of a cul-de-sac which is shared with El Dorado Mobile Home Park, while the site at 520 West Weddell Drive is located along a stretch of Weddell Drive that continues to both the east and west, providing greater connection to surrounding uses.
The prior initiation of a study for the site at 520 East Weddell Drive does not compel the City Council to allow study of the site at 610 East Weddell Drive. As noted above, the two sites have similarities but also some key differences. However, if both sites are to be studied for potential residential redevelopment, staff recommends that they be examined concurrently (and with a single environmental document). A single study would make it easier to examine the cumulative impacts of the two projects, and would also minimize redundant study efforts.

**BALANCED GROWTH PROFILE**

The City seeks to maintain a reasonable balance between population growth and job growth, as well as between development and the infrastructure which supports it. The Balanced Growth Profile contained in the Sunnyvale Community Vision document is a planning tool which can be used to monitor growth and to determine the relative balance between the factors cited above (see Attachment G). Elements of this profile include population, jobs, housing units, office/industrial, retail, tax revenue, public school capacity, transportation capacity, utility capacity, and park capacity.

The following table provides information on the current status of housing and job growth compared with projections in the 2005 Balanced Growth Profile.

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<th>BALANCED GROWTH PROFILE</th>
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<td>Dec 31 2011 Profile</td>
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<td>35% of 2005-2025</td>
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<td>% of growth</td>
<td>% of growth</td>
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<tr>
<td>(7,200 d.u.)</td>
<td>(7,200 d.u.)</td>
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<tr>
<td>(7.6 M s.f.)</td>
<td>(7.6 M s.f.)</td>
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<tr>
<td>Housing Units</td>
<td>19.21%</td>
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<td>Office/Industrial Floor Area</td>
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*2012 data includes completed projects and projects under construction which are expected to be completed by the end of the year.

If the City Council initiates the requested General Plan Amendment study, staff would use this tool to determine if all elements are changing in a balanced manner.
**FISCAL IMPACT**
There is no fiscal impact to the City to initiate a General Plan Amendment study. If the Council initiates the study, a formal application with appropriate fees would need to be submitted. The required fees would offset the cost of completing the study. Fiscal impacts of a resulting residential development would be evaluated as part of a formal application process following initiation of a study.

**ECONOMIC DEVELOPMENT IMPLICATIONS**
Competition for industrially zoned land in Sunnyvale is high at this time. The City’s diverse economy provides many “new economy” jobs which tend to locate in industrial zones. These industries include light manufacturing, biomedical device manufacturing, and clean energy technology. In addition to directly supporting job-producing uses, industrially zoned land is crucial to many services essential to Sunnyvale’s business and residential communities, including distribution, recycling, construction, and automobile repair. Through approval of a Use Permit, industrially zoned properties may also develop as hotels. Given the increasing competition for industrially zoned land, the City Council may wish to retain existing industrially zoned parcels rather than considering conversion to residential.

The subject site has been vacant for about three years, and sale and leasing efforts were most recently complicated by a foreclosure. Recent market conditions have also been challenging; however, as noted above, the market for industrial land is growing stronger. The conditions which have challenged sale or lease of the property in the past are most likely temporary, and do not necessarily indicate the site is obsolete or unusable for industrial purposes. Some of the non-manufacturing uses which can be permitted in industrial zoning districts, such as hotel or self-storage uses, may be particularly appropriate on the subject site given its isolation from surroundings and its proximity to residential uses and the freeway.

**ENVIRONMENTAL REVIEW**
This action is not considered a “project” under the California Environmental Quality Act (CEQA) because initiation of a General Plan Amendment study has no potential to create a significant environmental impact (California Public Resources Code Section 21065). If a General Plan Amendment study is initiated, it is likely that a Mitigated Negative Declaration or Environmental Impact Report (EIR) would be necessary. The type of environmental document required will depend on the findings of required technical studies which would be submitted with a formal application. Required technical studies will include noise, air quality/greenhouse gas, traffic, and Phase I/II environmental studies. Additional studies may also be required.
PUBLIC CONTACT
Public contact was made by posting the Council agenda on the City's official-notice bulletin board outside City Hall, at the Sunnyvale Senior Center, Community Center and Department of Public Safety; and by making the agenda and report available at the Sunnyvale Public Library, the Office of the City Clerk and on the City's Web site.

ALTERNATIVES
1. Do not initiate a General Plan Amendment study at this time, and retain the subject property’s Industrial land use designation in the General Plan.

2. Initiate a General Plan Amendment study to consider changing the site’s land use designation from Industrial to Residential Very High Density, including consideration of a range of residential densities from Medium to Very High, and combine this study with the previously initiated study for 520 East Weddell Drive.

3. Initiate a General Plan Amendment study to consider changing the site’s land use designation from Industrial to Residential with a narrower range of densities than the range described in Alternative 2, and combine this study with the previously initiated study for 520 East Weddell Drive.

4. Initiate a General Plan Amendment study per Alternative 2 or 3 above, and allow the study to proceed independently of the previously initiated study for 520 East Weddell Drive.

RECOMMENDATION
Staff makes no recommendation on the issue of initiating a General Plan Amendment for this site. However, if a study is initiated, staff recommends that it be combined with the previously initiated study for 520 East Weddell Drive.

Several factors potentially support the appropriateness of residential uses on the subject site. Residential redevelopment could provide a better transition to nearby existing residential than would industrial uses. The site is located near major arterial streets and freeways, is less than half a mile from a VTA light rail station, and is located near retail and personal services. Although the proximity to high-voltage wires, a PG&E substation, and Highway 101 raise concerns about residential development on this site, similar impacts have been successfully mitigated on other sites. However, the Council may wish to limit consideration of very high density residential for land use compatibility with the adjacent lower density mobile home park.

At the same time, there are several justifications for retaining the site’s existing industrial designation. Although industrial uses on the site may not be desirable, the site is not necessarily obsolete as an industrially-zoned property. Other potential uses include hotels, offices, or self-storage uses, which can be
considered under the existing Zoning designation and could integrate successfully into the surrounding neighborhood. Additionally, the subject site is not located directly adjacent to an existing ITR area, and if the requested amendments were granted it would be a stand-alone parcel with Very High Density designations.

In conclusion, staff finds there are equal justifications for initiating a General Plan Amendment study as well as for denying initiation of a study and maintaining the existing industrial designation.

Reviewed by:

Hanson Hom, Director, Community Development Department
Prepared by: Mariya Hodge, Associate Planner
Reviewed by: Trudi Ryan, Planning Officer

Approved by:

Gary M. Luebbers
City Manager

**Attachments:**
A. Applicant’s letter of request
B. General Plan land use maps for surrounding area
C. Zoning map for surrounding area
D. Map of land uses in the vicinity
E. Map of Industrial-to-Residential areas in the vicinity
F. Conceptual plans
G. Balanced Growth Profile submitted with the 2012-2013 Budget
September 7, 2012

City of Sunnyvale City Council

Anthony Spitaleri       David Whittum
Christopher Moylan      Jim Griffith
Pat Meyering            Tara Martin-Milius
Jim Davis
City of Sunnyvale
456 West Olive Avenue
Sunnyvale, CA 94088

RE: Request for Initiation of General Plan Amendment and Rezoning: 610 E. Weddell Drive, Sunnyvale, CA

Dear Honorable Mayor and Council Members:

Sares-Regis respectfully requests that the Sunnyvale City Council initiate a General Plan Amendment and Rezoning study for the property located at 610 E. Weddell Drive (“Site”). The 4.33 acre Site is located on the northeastern corner of the intersection between US-101 and N. Fair Oaks Avenue. The 4.33 acre parcel is currently zoned MS/PD – Industrial and Service.

We request that this General Plan Amendment and Rezoning Initiation would allow for the study of a residential project consisting of 45 units per acre requiring a General Plan Amendment and zone change from the current zoning designation of MS/PD to R-5 Very High density residential zoning. The proposed project will include a 3 and 4 story apartment project with 1, 2 and 3 bedroom units for a total of 190-195 units (45 du/acre).

The Site as it exists today includes a vacant and defunct industrial building. It is one of a few remaining properties within a larger Industrial and Service zoning district along N. Fair Oaks Avenue that has not been converted to a residential use. The MS zoning district in this area has a combined district designation allowing for the conversion of residential use in most areas. The current use on the Site is no longer keeping with its surrounding residential uses. The proposed redevelopment of the Site for residential use with increased density will fulfill several objectives of the city of Sunnyvale General Plan and keep in theme with recent developments near the Site.

The Site’s walkable adjacency to the John Christianson Greenbelt, the Fair Oaks and Weddell bus routes, the Fair Oaks light rail station, and the close proximity to the US-101 will fulfill the General Plan’s goal of locating higher density housing near transit options (LT-3.4a – Locate higher density housing with easy access to transportation corridors, rail transit stations, bust transit corridor stops, commercial services and jobs).

Sares Regis Group of Northern California, L.P.
901 Mariners Island Boulevard, 7th Floor, San Mateo, California 94404
T: 650-378-2800   F: 650-570-2233
We believe this request is consistent with many of the goals of the City of Sunnyvale General Plan and the proposed project will provide additional quality housing options for the city's residents.

Sares Regis owns, develops, and manages multifamily properties throughout California. Our current portfolio consists of over 15,000 units under management with several projects located in the Bay Area. We currently have active multifamily development pipeline of over 2,500 units including projects under construction in Foster City, Redwood City, San Mateo, and Los Altos. We have a long history of developing high-quality housing in Sunnyvale, and we look forward to the prospect of creating another great community.

We also look forward to continuing to develop our proposed plan with city staff, neighbors, and other stakeholders of Sunnyvale. I am available to answer any questions about our company or our proposed development plan should you have any questions.

Respectfully,

Jeff Smith  
Vice President, Development  
Sares Regis Group
City of Sunnyvale
Zoning - 610 E. Weddell Drive

Zoning Districts
- R0 - Low Density Residential
- R2 - Low Medium Density Residential
- R3 - Medium Density Residential
- R4 - High Density Residential
- R5 - High Density Residential and Office District
- RMH - Residential Mobile Home

Combining Districts
- PD - Planned Development
- POA - Places of Assembly
- ITRR3 - Industrial to Residential (Medium)

MS - Industrial and Service
MPT - Moffett Park TOD
MPI - Moffett Park Industrial
C1 - Neighborhood Business
C2 - Highway Business
PF - Public Facilities

Future Park
550 E. Weddell Drive

500 E. Weddell Drive

610 E. Weddell Drive

October 2012
### 2011 BALANCED GROWTH PROFILE

#### Balanced Growth Indices

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</table>

**Notes**

¹FY 2004/2005 is the base year for the Balanced Growth Index. All revenues are converted to FY 2004/2005 dollars for comparison purposes.

²This index only represents new floor area, and does not reflect tenant improvements to existing floor area.

³The number of housing units has been corrected for the base year of 2005 and the subsequent years.

⁴Data has been modified resulting in a decrease in base year, projections, and current year estimates. There is a significant challenge in finding reliable estimates of Sunnyvale jobs. This version of the Balanced Growth Profile provides Association of Bay Area Governments (ABAG) data from most recent publications while staff explores a more reliable annual estimate of jobs. Data for 2011 is not yet available.

⁵In a "balanced growth scenario" each profiled item would increase 5% each year. Cumulative "balanced growth" to the end of 2011 would be 30%.