Final Environmental Impact Report

For the
915 DeGuigne Residential Project
SCH# 2014112001

October 2015

PREFACE

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (FEIR) for the 915 DeGuigne Residential project. The Draft EIR was circulated to affected public agencies and interested parties for a 45-day review period from July 1, 2015 to August 14, 2015. This volume consists of comments received by the City of Sunnyvale, the Lead Agency on the Draft EIR, during the public review period, responses to those comments, and revisions to the text of the Draft EIR.

In conformance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the FEIR provides objective information regarding the environmental consequences of the proposed project. The FEIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The FEIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the FEIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the DEIR by making written findings for each of those significant effects.

According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

In accordance with CEQA and the CEQA Guidelines, the FEIR will be made available to the public prior to consideration of the Environmental Impact Report. All documents referenced in this FEIR

are available for public review in the office of the Department of Community Development, 456 W. Olive Avenue, Sunnyvale, California, on weekdays during normal business hours.

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SECTION 1.0 LIST OF AGENCIES AND ORGANIZATIONS TO WHOM THE DRAFT EIR WAS SENT

State Agencies

California Air Resources Board
California Department of Fish and Wildlife, Region 3
California Department of Housing and Community Development
California Department of Transportation, District 4
Department of the Navy
Department of Toxic Substances Control
Hetch-Hetchy Water & Power
Native American Heritage Commission
State Clearinghouse – Office of Planning and Research
State Water Resources Control Board

Regional Agencies

Association of Bay Area Governments
Bay Area Air Quality Management District
California Regional Water Quality Control Board, San Francisco Bay Region II
Peninsula Corridor Joint Power Board
Northern California Carpenters Regional Council
San Francisco Bay Conservation and Development Commission
Santa Clara County Department of Roads and Airports
Santa Clara County Planning Office
Santa Clara Valley Transportation Authority (VTA)

Cities

City of Cupertino
City of Los Altos
City of Mountain View
City of San Jose
City of Santa Clara

Organizations and Individuals

Adams Broadwell Joseph & Cardoza
Amah Mutsun Band of Mission San Juan Bautista
Amah Mutsun Tribal Band
Cupertino Union School District
Fremont Union High School District
Indian Canyon Mutsun Band of Costanoan
NASA Ames Research Center

Muwekma Ohlone Indian Tribe of the SF Bay Area
Northern California Carpenters Regional Council
Onizuka – Base Realignment and Closure – Air Force Real Property Agency
Santa Clara Unified School District
Sunnyvale Elementary School District
The Ohlone Indian Tribe

SECTION 2.0 LIST OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

State Agencies

A.	California Department of Transportation	August 14, 2015

Regional Agencies

B.	Santa Clara Valley Transportation Authority	August 12, 2015
C.	County of Santa Clara Roads and Airports Department	August 14, 2015

Organizations and Individuals

D.	Milton Wu	July 22, 2015
E.	Robert S. Lloyd	July 28, 2015
F.	Martin Landzaat	August 10, 2015
G.	Chris Walz	August 10, 2015
H.	Martin Landzaat	August 13, 2015
I.	Watt Development Company (Project Applicant)	August 13, 2015

In addition to the comment letters listed above, the City received verbal comments during the August 10th, 2015 Planning Commission Meeting. The meeting minutes are included as "letter" J.

SECTION 3.0 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

The following section includes all the comments on the Draft EIR that were received by the City in letters and emails during the 45-day review period. The comments are organized under headings containing the source of the letter and the date submitted. The specific comments from each of the letters or emails are presented as "Comment" with each response to that specific comment directly following. Each of the letters submitted to the City of Sunnyvale are attached in their entirety in Section 5.0 of this document.

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. Section 1.0 of this document lists all of the recipients of the Draft EIR.

Three comment letters were received from public agencies, none of whom may be Responsible Agencies under CEQA for the proposed project. The CEQA Guidelines require that:

> *A responsible agency or other public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency or which are required to be carried out or approved by the responsible agency. Those comments shall be supported by specific documentation. [§15086(c)]*

Regarding mitigation measures identified by commenting public agencies, the CEQA Guidelines state that:

> *Prior to the close of the public review period, a responsible agency or trustee agency which has identified what the agency considers to be significant environmental effects shall advise the lead agency of those effects. As to those effects relevant to its decisions, if any, on the project, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible or trustee agency is not aware of mitigation measures that address identified effects, the responsible or trustee agency shall so state. [§15086(d)]*

The CEQA Guidelines state that the lead agency shall evaluate comments on the environmental issues received from persons who reviewed the DEIR and shall prepare a written response to those comments. The lead agency is also required to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report. This FEIR contains written responses to all comments made on the Draft EIR received during the advertised 45-day review period. Copies of this FEIR have been supplied to all persons and agencies that submitted comments.

A. RESPONSE TO COMMENTS FROM CALIFORNIA DEPARTMENT OF TRANSPORTATION, August 14, 2015:

Comment A1: Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We have reviewed the DEIR to ensure consistency with our mission and state planning priorities of infill, conservationism, and efficient development. Please also refer to our previous comment letters on this project. We provide these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl.

Project Understanding

The proposed project is located approximately one-half mile southeast from the U.S. 101/N. Fairoaks Avenue interchange. It would demolish all the occupied existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) and a public park. The townhouses would be located on Parcel 1 and the park would be located on Parcel 2. The townhouses would range from two to four bedrooms.

Lead Agency

As the lead agency, the City of Sunnyvale (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

> **Response A1:** As stated, the City is the Lead Agency under CEQA and will be responsible for project mitigation. The project applicant will pay all applicable fees and all mitigation measures will be monitored by the City to ensure compliance. The commenter's concerns are acknowledged and will be provided to the decision-makers as part of the public record.

Comment A2: ***Traffic Impact Analysis (TIA)***

1. Responses 4 and 5: The city's Responses 4 and 5 (collectively Responses) to Caltrans comment letter on the Notice of Preparation requesting traffic fees be identified states, "The project would have no impacts to State facilities." However, the Responses are incongruent because the TIA:

    - Identifies the U.S. 101/N. Fairoaks Avenue northbound (NB) ramps as deficient under Existing, Existing Plus Project, Background, and Cumulative Conditions, with the left-turn pocket extending beyond the turn pocket by over 25 feet but does not propose any mitigation.

    - Does not include an analysis of the U.S. 101/N. Fairoaks Avenue southbound (SB) ramps, so a determination has yet to be made whether the proposed project will have impacts to the SB on- and off-ramps. Please provide Caltrans with a traffic analysis of the SB on- and off-ramps at this interchange.

Caltrans recommends mitigation for impacts to these NB and SB ramps be identified in the TIA and DEIR.

Response A2: As specifically noted on page 54 of the DEIR, "The City does not have a formal adopted threshold for queuing impacts, but rather treats queuing issues as operational issues, unless overall intersection LOS thresholds are exceeded. Traffic trips associated with queuing, as discussed below, have already been accounted for in the LOS analysis." Therefore, the potential transportation impacts caused by the proposed project or the maximum build-out/corner mixed use development scenario were fully analyzed and discussed in the TIA and the DEIR.

As noted in the comment, the U.S. 101/N. Fair Oaks NB ramps are deficient under existing conditions, and not as a result of the proposed project. Because there is no formal adopted threshold, no impact can be identified under CEQA and there is no mandate for mitigation. The City is, however, requiring an improvement at the Fair Oaks Avenue/US 101 Northbound Ramps as a condition of project approval, as discussed on page 54 of the DEIR.

The southbound ramps were not identified as a study intersection in the TIA because the project would not add at least 10 trips per lane per hour during one or more peak hours, consistent with VTA's adopted TIA guidelines. Because the southbound ramps were not required to be analyzed as part of the LOS analysis, they were not included in the operational queuing analysis.

Comment A3: 2. Calculation Sheets: Please provide Caltrans with the Traffic and Synchro software calculation sheets for our review and comments, including calculation sheets for the NB and SB ramps identified above.

Response A3: The appendices of the TIA have been provided to the commenter.

B. RESPONSE TO COMMENTS FROM SANTA CLARA VALLEY TRANSPORTATION AUTHORITY, August 12, 2015:

Comment B1: Santa Clara Valley Transportation Authority (VTA) staff have received the Draft EIR for 451 townhomes plus a park or mixed use development of 7,000 square feet of retail uses and 19 housing units on 25.2 acres at 915 DeGuigne Avenue and 936 Duane Avenue. We have the following comments.

Transportation Impact Analysis (TIA) Report
VTA commends the City for including an analysis of pedestrian and bicycle quality of service (QOS) in relation to the proposed "road diet" on DeGuigne Drive, per the updated 2014 VTA Transportation Impact Analysis (TIA) Guidelines. However, VTA notes that the analysis of potential effects on transit service (TIA pg. 35) is based on transit capacity rather than transit vehicle delay, as required per Section 9.2 of the 2014 TIA Guidelines. In addition, the TIA did not include an Auto Trip Reduction Statement (ATRS), as required per Section 8.2 and Appendix C of the 2014 TIA Guidelines. Please submit a revised TIA report or follow-up memo including the completed ATRS form and an analysis of transit vehicle delay due to the proposed project. As noted in the 2014 VTA Guidelines (page 46), the transit vehicle delay analysis may simply utilize information produced by the intersection Level of Service analysis, or other sources if available.

The October 2014 version of the VTA TIA Guidelines can be found online at - http://www.vta.org/cmp/toa-guidelines. For any questions about the updated TIA Guidelines, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

> **Response B1:** The City acknowledges the new requirements per the updated October 2014 VTA TIA Guidelines. However, the City made VTA aware that the traffic scope of work for this project was developed before the October 2014 TIA Guidelines were adopted by VTA per an email with VTA dated January 30, 2015. The City voluntarily incorporated a QOS analysis for the DeGuigne Drive "road diet" even though it was not required, since the scope of work was developed before the new TIA Guidelines were adopted. The October 2014 VTA TIA Guidelines were adopted while the traffic analysis had already commenced for this project. Therefore, no transit vehicle delay analysis or Auto Trip Reduction Statement was included as part of the traffic study.

Comment B2: Pedestrian and Bicycle Accommodations
VTA commends the City and project sponsor for proposing to include multi-use trails within the site (Figure 2.0-2), green-colored bicycle lanes along E Duane Avenue, and a new pedestrian crossing of E Duane Avenue at San Miguel Avenue including high visibility crosswalks, in-pavement warning lights and curb bulb-outs (Figure 2.0-4). These improvements will encourage walking and bicycling for daily tasks and improve pedestrian access to transit, thereby reducing automobile trips, vehicle miles traveled and greenhouse gas emissions associated with the project.

> **Response B2:** This comment is noted. No further response is required.

Comment B3: The existing sidewalks surrounding the site on Deguigne Drive and Duane Avenue appear to be only 4' in width, although the pedestrian conditions are improved by the presence of a planted buffer strip between pedestrians and automobiles with consistent street trees on all project street frontages. The site plans provided in the DEIR and TIA do not indicate whether the sidewalks will be widened as part of the project. VTA recommends increasing the sidewalk width while retaining the existing planted buffers as a condition of approval for the project. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve perceptions of comfort and safety on a roadway.

Response B3: As a Condition of Approval, the City is requiring the project applicant to remove and replace the existing curb, gutter and sidewalk along the Duane and DeGuigne frontages and install a new one-foot gutter and a six-foot sidewalk keeping the existing landscape strip.

Comment B4: Bus Service

VTA provides bus service on Duane Avenue and maintains a bus stop on eastbound Duane Avenue adjacent to the project site. VTA recommends that the project provide the following bus stop improvements:

- A 10' X 55' PCC bus stop pavement pad per VTA standards.
- Sidewalk must have a minimum 8' X 5' concrete boarding area at the front of the bus stop to be in compliance with ADA requirements.
- No street trees within the bus stop loading area. If street trees are to be planted in the bus stop area, their location must be coordinated with VTA Passenger Facilities by contacting bus.stop@vta.org or 408-321-5800.
- Bus stop should be moved to the east, outside of the "T" intersection.

Response B4: The VTA's recommendations for improvements to the existing bus stop on Duane Avenue are acknowledged. The commenter has provided no specific comment related to the environmental analysis in the DEIR. The commenter's concerns regarding the final bus stop design are acknowledged and will be provided to the decision-makers are part of the public record.

C. RESPONSE TO COMMENTS FROM SCC ROADS AND AIRPORTS DEPARTMENT, August 14, 2015:

Comment C1: The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to [sic] the draft environmental impact report (DEIR) and is submitting the following comments.

- On November 14, 2014, the County submitted a response to the Notice of Preparation for the DEIR requesting that all intersections on Lawrence Expressway between SR 237 and El Camino Real be studied as part of the Traffic Impact Analysis for the DEIR. However, the DEIR did not include the intersection of Lawrence Expressway/Kifer Road. Analysis for this intersection should be presented because traffic from Central Expressway accessing Lawrence Expressway would pass through this intersection which may cause significant impacts. Please provide a traffic impact analysis for this intersection and, should there be a significant impact, provide a mitigation measure to contribute a fair share toward the Lawrence Expressway Grade Separation Project.

  Response C1: The Lawrence Expressway/Kifer Road intersection was not identified as a study intersection in the TIA because the project would not add at least 10 trips per lane per hour during one or more peak hours under either scenario, consistent with VTA's adopted guidelines. Please note that both the project site and Central Expressway are north of the Lawrence Expressway/Kifer Road intersection. As such, project traffic would not have to travel through the Lawrence Expressway/Kifer Road intersection to access Central Expressway from the project site or access the project site from Central Expressway.

Comment C2: The DEIR did not use the approved CMP 2014 counts for PM peak for the CMP intersections resulting inconsistent [sic] Level of Service (LOS) finding from other studies. For expressway intersections that are not CMP or when CMP data is not available (i.e., AM Peak), comparisons with 2013 data showed large differences in existing volumes must be used as it affects the results of the other scenarios and the identification of traffic impacts to expressway intersections. Please revise the Traffic Impact Analysis appropriately so that significant impacts can be properly identified and mitigated.

Response C2: Consistent with City and VTA guidelines, the latest available traffic volumes were utilized for the evaluation resulting in the study collecting new traffic counts. These counts were more recent than the 2013 and 2014 CMP volumes and, therefore, represent a more current state of development and employment associated with traffic on the local roadway network. In addition, per CEQA Guidelines 15125(a), collecting new traffic counts provides a description of the physical environmental conditions in the vicinity of the project as they exist at the time of Notice of Preparation (NOP) was published. Accordingly, the TIA and the Draft EIR appropriately identified the potential impacts from the project and the maximum build-out/corner mixed use development scenario, and no additional analysis is required.

All other VTA TIA guidelines were followed in the development of the Traffix model.

Comment C3: With the available information in the DEIR, the County was not able to verify if accurate signal timing information was used for the analysis. Please demonstrate that accurate signal timing data was used. You may request this information by contacting Ananth Prasad (Ananth.prasad@rda.sccgov.org). If accurate data was not used, the traffic analysis needs to be corrected so that significant impacts can be properly identified and mitigated.

Response C3: Signal timing information (provided in the TIA appendices) was based on the Synchro models that the transportation consultant developed for the Responsive Signal timing project along Lawrence Expressway. Since multiple models were developed for the responsive timings, the 190 second cycle length model was used since this is the cycle length for the AM and PM Peak Hour. The use of the 190 second cycle length can be found in the output sheets found in Appendix A of the DEIR.

Comment C4: Mitigation measure MM CUM-2.2 on Page 183 is not sufficient. The eastbound triple left turn alone on Lawrence Expressway/Duane Avenue-Oakmead Parkway will not mitigate impacts due to unbalanced lane utilization. Restriping of Lawrence Expressway between Duane Avenue and US 101 would also be need to be implemented along with the proposed mitigation measure to improve lane utilization for proposed triple left to redirect lanes that connect US 101 on ramps. Also, DEIR must demonstrate that the project is feasible geometrically – the eastbound and westbound left turn movements must operate simultaneously.

Response C4: The future no project volume in the AM Peak Hour is 628 vehicles. While there may be a volume imbalance, adding an additional left turn lane will provide additional capacity. There is no evidence in the records, however, that supports the commenters claim that unbalanced lane utilization would prevent Mitigation Measure CUM-2.2 from mitigating the impact of the maximum build-out/corner mixed use development scenario. In addition, there are two lanes that lead to the US-101 ramps, and the ramps are 800 feet from the intersection. The 800 feet will allow for sufficient maneuvering and queuing space for vehicles to enter the appropriate lane for their destination. Also, if eastbound and westbound left-turn phases couldn't run together due to right-of-way constraints, making the added left turn lane more difficult to design, the County should consider running the eastbound and westbound left turn phasing as lead-lag phases, thereby removing the need for additional right-of-way acquisition.

In addition, as noted on page 183 of the DEIR, this mitigation measure could or would not be implemented without the approval of Santa Clara County. As stated on page 184 of the DEIR, if the mitigation measure could not be implemented, the impact would remain significant and unavoidable.

D. RESPONSE TO COMMENTS FROM MILTON WU, July 22, 2015:

Comment D1: I'd like to comment on the proposal to add 450 townhomes at 915 DeGuigne. In general, I'm in favor of the project, however, I am concerned about the size of the project.

Is there any ways [sic] we can decrease the size of the project?

> **Response D1:** Section 6.0 of the DEIR identifies possible alternative development scenarios to address the identified impacts of the proposed project. Based on the whole of the record, the City Council will make a determination on whether to deny the project, approve the project as proposed, or approve one of the project alternatives.

Comment D2: Also, I'd want to make sure that the location is pedestrian friendly.

> **Response D2:** As discussed in Section 2.2 of the DEIR, the project and the maximum build-out/corner mixed use development scenario include the creation of a *Sense of Place Plan* with the purpose of creating design standards and guidelines for enhanced transit, pedestrian, bicycle, and automobile circulation specific to the area. Furthermore, as shown on the Site Plan and Open Space Plan (Figures 2.0-1 and 2.0-2 of the DEIR), the project includes pathways throughout the site, making it pedestrian friendly.

Comment D3: I'm also really concerned about increased traffic on Duane (already a busy street), and the related bottleneck point (Lawrence and Fair Oaks).

> **Response D3:** As discussed in Section 4.2 of the DEIR, the proposed project and the maximum build-out/corner mixed use development scenario would not result in a significant transportation impact on any study intersections along Duane Avenue under either the existing plus project or background plus project conditions. The DEIR did identify an impact at the Duane Avenue/Fair Oaks Avenue intersection under cumulative conditions, but no feasible mitigation was identified due to the approved road diet for Duane Avenue (Section 5.0 of the DEIR).

Comment D4: Perhaps one way to mitigate traffic (rush hour and weekend) is to make sure there is a viable grocery store in the plaza across the street (and better commercial development). Could we please look into helping the shopping center flourish as a local destination of goods and services, minimizing the amount of traffic we see from local residents going OUT of the area to get daily needs? Thanks!

> **Response D4:** Because the applicant does not own or control the shopping plaza referenced in the comment, it would not be feasible to require the development of a grocery store in this location as mitigation for the proposed project. Furthermore, because there is no proposed project involving a grocery store at the plaza referenced by the comment, such a use is speculative, and an EIR is not required to engage in sheer speculation as to future environmental consequences. This comment is acknowledged and will be provided to the decision makers as part of the public record for this project.

Comment D5: P.S. Please make the proposed park…BIG!

Response D5: While the project does not meet the City's Parkland Dedication Ordinance, the park on Parcel 2 would be 0.8 acres and there would be a total of 2.5 acres of public open space on the project site. This comment is acknowledged and will be provided to the decision makers as part of the public record for this project.

E. RESPONSE TO COMMENTS FROM ROBERT S. LLOYD, July 28, 2015:

Comment E1: My name is Robert S. Lloyd and wife Doreen Lloyd. We have lived at 641 Santa Paula Avenue since 1957. Now the traffic is so bad on Duane Ave we have a hard time getting on Duane Ave. The traffic is so bad. The City is rationed (?) our water. I wonder where all the water is coming from. There is already so many new town houses around here now. This should be a time to stop it.

Response E1: This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The commenter's concerns regarding the traffic are acknowledged and will be provided to the decision-makers as part of the public record.

Please note that the availability of water supply to support both the proposed project and the Maximum Build Out/Corner Mixed-Use Development scenario is addressed is Section 4.13 and Appendix H of the DEIR.

F. RESPONSE TO COMMENTS FROM MARTIN LANDZAAT, August 10, 2015:

Comment F1: I would like the Final EIR to analyze the impact of the 915 DeGuigne Residential Project on the following public services:

EMS-paramedic capacity and response times
Trauma emergency capacity and access times
Emergency medical capacity and access times
Mental health services

The provision of emergency medical services (EMS) is divided between basic life support (EMT) and advanced life support (paramedics). The traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to people in need of their services. In addition, the traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to local trauma/emergency medical care facilities. I would like the Final EIR to analyze the EMS-paramedic capacity and travel times. Sunnyvale Public Safety officers are trained to provide EMT-basic service, I am requesting an analysis of the EMS-paramedic service.

The growth of Sunnyvale's population induced by the 915 DeGuigne Residential Project will impact the region's trauma emergency facilities. I would like the Final EIR to analyze the capacity and access times to Sunnyvale's trauma emergency medical care facilities.

The Final EIR should analyze the impact of the 915 DeGuigne Residential Project on local mental health services. Mental health services include family counseling, mental health clinics and professionals, including those specializing in drug and alcohol abuse treatment.

The 915 DeGuigne Residential Project may have a limited effect on Sunnyvale's EMS-paramedic, trauma emergency, emergency medical and mental health care services, the cumulative impact of recent and future projects in the City of Sunnyvale should also be considered.

Response F1: Please note that under CEQA, only public services controlled by the City are analyzed. The determination of an impact to public services under CEQA is not directly based on an increase in the demand for services, but rather the need for additional facilities to be constructed to meet City service goals. This is consistent with CEQA's mandate to address the physical environmental effects of a proposed project.

The services listed above are not controlled or operated by the City, but by third-party entities. The City has no adopted service goals for these services. In addition, the entities that own and operate these facilities and services would, on their own, need to make a determination as to whether any increase in local population would require additional facilities or personnel. If additional facilities or expansion of existing facilities was deemed necessary, it would require separate CEQA review. Therefore, no additional analysis will be provided as part of this EIR. The concerns raised will be provided to the decision-makers as part of the public record when considering the approval of this project.

G. RESPONSE TO COMMENTS FROM CHRIS WALZ, August 10, 2015:

Comment G1: I live a few blocks from the East Sunnyvale 936 E. Duane Ave development and I am concerned about the proposed corner community park. There doesn't look to be much functionality with the proposed park layout – it's mostly trees with a little walkway and a tiny bit of grass. Are there any alternate layouts being considered?

It seems like the perfect size for a small playground (along with some picnic tables and BBQ pits). Or maybe instead of "redwood grove", a beach volleyball or bocce ball court could be added.

> **Response G1:** This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The commenter's concerns regarding the final park design are acknowledged and will be provided to the decision-makers as part of the public record.

H. RESPONSE TO COMMENTS FROM MARTIN LANDZAAT, August 13, 2015:

Comment H1: I have the following comments:
In section 4.14.1.2 (School Facilities) and 4.14.3.2 (Schools), only data for current school enrollments and estimated increases due to the project are given. The Final EIR should analyze the cumulative impact of recent and future projects in the City of Sunnyvale on the listed schools. The Sunnyvale School District (SSD) and Fremont Union High School District (FUHSD) have 10 year enrollment projections, data from those projections should be included in the Final EIR. I have attached the enrollment projections for the SSD and FUHSD for your convenience.

Response H1: The cumulative impact of the proposed project on local schools is addressed in Section 5.0, page 177 of the DEIR. With regards to the student projection data provided for SSD, while the report prepared by Enrollment Projection Consultants shows an increase in enrollment at both San Miguel Elementary and Columbia Middle schools (Table 3), the projections are well below the current capacity of both schools. As a result, the project would not have a cumulatively considerable impact on these school facilities.

Fremont High School is currently over capacity as noted in the DEIR. The report by Enrollment Projection Consultants shows an increase in enrollment and an exceedance of capacity throughout the FUHSD. As discussed on page 177 of the DEIR, "school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. Under the terms of this statute, payment of statutory fees by property owners or property developers is deemed to mitigate in full for the purposes of CEQA any impacts to school facilities associated with a qualifying project. The fees are assessed based upon the proposed square footage of the new or expanded development. The project and all other residential projects will pay the maximum allowable school impact fees as described in California Government Code Section 53080 to offset the increased demands on school facilities. The project, by itself, would not have a cumulative considerable impact on local schools."

Beyond the payment of fees, no other mitigation is required under CEQA. If the FUHSD determines that additional school facilities will be required, the effects of the development would be addressed in a separate CEQA analysis. Please see page 44 of this Final EIR for proposed text amendments that further discuss FUHSD.

Comment H2: In Section 4.14.1.2 (School Facilities), it says the distance from the project to Fremont High School (FHS) is approximately 2.5 miles. According to Google Maps the walking distance is 3.4 miles.

Since the distance to FHS is great, the FUHSD sells discounted VTA bus passes to any student that lives north of El Camino Real.

Response H2: This comment does not raise any specific concerns related to the environmental analysis in the DEIR. The availability of transit passes will be provided to the decision-makers as part of the public record.

Please note, the distance referenced in the DEIR is "as the crow flies" (consistent with all other distance measurements in the DEIR) and is not based on walking distance.

Comment H3: In section 4.2.2.7 (Pedestrian/Bicycle Facilities and Transit Operations) is says [sic] *Currently, VTA bus routes that serve the project area are operating below capacity. As a result, existing bus services can accommodate an increase in ridership demand resulting from the proposed project.*

VTA route 55 is used by FHS students. From as far away as Lakewood Village, the route 55 bus picks up FHS students in several Sunnyvale neighborhoods. Due to the frequency of the route 55 bus and the school schedule, the route 55 bus is heavily impacted at certain times. The Final EIR should determine how many Fremont High students currently use the VTA route 55 bus. The author of the Final EIR should actually ride the route 55 bus from Lakewood Village to FHS on a school day morning and again at the end of the school day the from [sic] FHS to Lakewood Village to get an accurate count of FHS related ridership. The Final EIR should explain how an additional 45-68 FHS students generated by the 915 DeGuigne Project will be able to use the VTA route 55 bus.

Response H3: Based on bus load factor data obtained from VTA, the City was able to confirm that the Route 55 bus is over capacity at approximately 8:15 AM, 1:40 PM, and 3:20 PM. Only the 8:15 bus operates within the designed Peak Hour periods.

Based on the analysis completed for the TIA and DEIR, it was determined that the proposed project would generate 20 AM and 24 PM Peak Hour transit trips dispersed among the five routes nearest the project site, including Route 55. Based on 30-minute headways, it was determined that two new passengers would be added per bus (not taking into account any credit for possible ridership from the existing development when it was operational). Due to day to day variations in ridership the City has concluded that two additional passengers would not have a significant impact on transit facilities that support the project.

Additional text has been added to the EIR to clarify this. Please see page 40 of this Final EIR for the proposed text amendment.

I. RESPONSE TO COMMENTS FROM WATT DEVELOPMENT COMPANY, August 13, 2015:

Comment I1: Throughout the DEIR, please note that with respect to statement that the implementation of the Proposed Project and the Maximum Building Out/Corner Mixed-Use Development Scenario would result in a degradation of LOS under cumulative conditions at the Fair Oaks Avenue/Duane Avenue intersection, it should be better clarified that the reason is because the "road diet" that has already been approved by the City Council for Duane Avenue would remove a travel lane and not allow for an increase in roadway capacity that could otherwise be created by adding a southbound left turn lane on Fair Oaks Avenue (i.e., a receiving lane cannot be added on the east leg of the intersection). As described on page 42 of the DEIR, the roadway configuration of Duane Avenue will be modified between Fair Oaks Avenue and Steward Drive. The changes will include reducing the Duane Avenue roadway width from four lanes to two lanes and adding buffered bicycle lanes. The planned improvement consists of restriping the east leg of the intersection to allow for one left-turn lane, one through lane, and one right-turn lane.

> **Response I1:** The analysis in the DEIR is clear that there is no feasible mitigation to reduce the identified project impact at the Fair Oaks Avenue/Duane Avenue intersection under cumulative conditions because of the approved road diet (see Section 5.1.4). The road diet in and of itself does not cause the cumulative impacts at the Fair Oaks Avenue/Duane Avenue intersection under the Maximum Building Out/Corner Mixed-Use Development Scenario. No text amendments are proposed.

Comment I2: Please add the following not to the text as further explanation for Table 4.2-9 and Table 4.2-11:

"Please note that as shown in Table 4.2-9 (Existing Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the existing traffic, plus the traffic from the Proposed Project remains an acceptable LOS C. The AM peak hour delay is reduced from 24.0 to 23.6 and the PM peak hour delay is increased from 29.8 to 30.0. Similarly, please note that as shown on Table 4.2-11 (Background Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the background traffic, plus the traffic from the Proposed Project is materially reduced from the background only traffic for the AM peak hour delay from 29.6 to 26.5 and slightly increased for the PM peak hour delay from 38.6 to 39.0. The decreases from the addition of the Proposed Project are "because of a net negative generated in traffic trips resulting from the proposed change in land use."

> **Response I2:** Table 4.2-9 and 4.2-11 of the DEIR clearly show changes in delay resulting from the project. In addition, the reason for the decreases in delay are noted. As the primary intent of the DEIR is to identify overall impacts from the proposed project, the City has determined that there is no need to overemphasize minor decreases in delay at local intersections when it does not result in any measurable change in the LOS. No additional information or explanation is required. No text amendments are proposed.

Comment I3: In a couple of instances, with respect to the Proposed Project, the DEIR refers to "451" residences. Please note that the Proposed Project is up to "450" residences.

Response I3: The difference of one residential unit does not change the conclusions of the DEIR. The DEIR analyzes 451 dwelling units, consistent with the Notice of Preparation.

Comment I4: For clarity of future reference only, on pages 46-47, the heading for Table 4.2-9 should be revised as follows: "Existing Plus Proposed Project Levels of Service", and on pages 49-50, the heading for Table 4.2-11 should be revised as follows: "Background Plus Proposed Project Levels of Service.

Response I4: The requested text amendments haven been made. Please see page 40 of this document.

Comment I5: On page 72, please correct: "(see footnote ~~21~~ 27)."

Response I5: The requested text amendments haven been made. Please see page 41 of this document.

Comment I6: On pages 89 and 90, and throughout the DEIR with respect to this noise impact, especially Section 4.5.2.2, Noise Impacts to the Project Site, please clarify that this impact is TO the PROPOSED residences from existing road noise, not to existing residences. Please revise Impact NOI-1 as follows: "Residences located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards" to "New residences within the project site located along Duane Avenue could be exposed to interior noise levels from existing Duane Avenue Traffic in excess of acceptable City standards."

Response I6: The heading of the section is clear in that the discussion refers to impacts to the project site. Impacts from the project are specifically addressed in the following section (Section 4.5.2.3). Please see page 41 of this document for the proposed text amendment

Comment I7: On page 6, in Section 2.0, second paragraph, please correct: "The project site is accessed by ~~three~~ four driveways…."

Response I7: The requested text amendments haven been made. Please see page 40 of this document.

Comment I8: On page 16, in Section 3.2, under the subtitle "Consistency", please clarify that all references to "itigation" [sic] apply only to the Maximum Build Out/Corner Mixed-Use Development Scenario, not the Proposed Project.

Response I8: As stated in the consistency statement in Section 3.2, "The proposed project would have a less than significant impact on CMP intersections in the study area under existing and background conditions. The maximum build out/corner mixed-use development scenario would have a significant impact on one CMP intersection (Lawrence Expressway and Duane Avenue) under cumulative conditions." (Emphasis added) It is clear from this statement that the impacts were identified under the maximum build out/corner mixed-use

development scenario and that the mitigation noted would apply only to this development scenario. No text amendments are proposed.

Comment I9: On pages 18 and 19, in Section 3.4, City of Sunnyvale General Plan, under Policy LT-5-1c "Consistency", please clarify that all references to "mitigation" apply only to the Maximum Build Out/Corner Mixed-Use Development Scenario, not the Proposed Project.

Response I9: The fact that the identified cumulative impacts are under the Maximum Build Out/Corner Mixed-Use Development Scenario only is made clear throughout the analysis in the DEIR. No text amendments are proposed.

Comment I10: On pages 17 to 20, in Section 3.4, City of Sunnyvale General Plan, please clarify that references to the "project" refer to the "Proposed Project".

Response I10: In most cases, the consistency discussion describes the project, which makes it clear that the reference is to the proposed project. No text amendments are proposed.

Comment I11: On page 45, Table 4.2-7 and Table 4.2-8 should be replaced with new tables that incorporate the text of footnotes 13 and 14, which will result in a reduction of 75 Daily Trips and a reduction of 36 AM peak hour trips and 35 PM peak hour trips.

Response I11: Per direction from the City's Department of Transportation, the tables will remain as is with the clarifying footnotes. No text amendments are proposed.

Comment I12: On pages 66 and 67, in Table 4.3-4, please note that references to the "project" or "proposed development" refer to the "Proposed Project." Under "Tree Planting" and "Project Consistency" please modify the text as follows: "As designed, the Proposed Project ~~project~~ proposes ~~up to~~ .8 acres of new public park, plus 1.7 acres of new publically accessible open space including lawns and new trees. The Proposed Project proposes planning 693 new trees, plus maintaining 22 existing street trees. The new trees…"

Response I12: The requested text amendments haven been made as appropriate. Please see page 41 of this document.

Comment I13: On page 68, please correct the title to Table 4.3-6 as follows: "Operational Emissions for the ~~Proposed Project~~ Maximum Build Out/Corner Mixed-Use Development Scenario".

Response I13: The requested text amendments haven been made. Please see page 41 of this document.

Comment I14: On pages 149 to 151, in Section 4.11.3, Mitigation and Avoidance Measures for Cultural Resources, for clarity, the reference to "the southwest corner of Parcel 1" in MM CUL 1-1 should be revised to add "the southwest corner of Parcel 1, within a radius of 100 feet of CA-SCI-9,"; and the reference to "the project site" in MM CUL 1-2 should be revised to "within ~~the project site~~ a radius of 100 feet of CA-SC1-9,"; and, the reference to "the East Sunnyvale ITR parcel" in

MM CUL 1-4 should be revised to "within ~~the East Sunnyvale ITR parcel~~ a radius of 100 feet of CA-SCI-9,".

Response I14: The request text amendment cannot be included because the boundary of site CA-SC1-9 is not fully defined. Mitigation measure CUL 1-4 was, however, modified to clarify the testing area. Please see page 43 of this document for the proposed text amendment.

Comment I15: On page 171, in Section 4.14.3.1, Public Safety, please note that the Proposed Project provides for access to the site for emergency vehicles from driveways on DeGuigne Drive, and from an Emergency Vehicle Access Easement on Duane Avenue.

Response I15: The requested text amendments haven been made. Please see page 44 of this document.

Comment I16: On page 173, Section 4.14.3.3, Parks, should be revised to read "The ~~proposed project~~ Proposed Project would include approximately 1.7 acres of public publically accessible open space within the ~~housing development~~ project site and dedicate a new, .8 acre public park for a total of 2.5 1.4 acres of new publically accessible open space ~~park land~~…."

Response I16: The requested text amendments haven been made as appropriate. Please see page 44 of this document.

Comment I17: Throughout the document, reference to US EPA residential RSLs should be referenced as EPA RSLs and reference to the Regional Water Quality Control Board (RWQCB) residential ESLs should be referenced as RWQCB ESLs.

Response I17: This comment is acknowledged. The City's Hazardous Materials consultant determined that this is not substantial and no change is required. No text amendments are proposed.

Comment I18: Page 12 – first bullet: Within the two-inch layer of sand, horizontal ventilation piping will be evenly spaced through the building footprint, connected to a header, and directed through the building walls to the roof line;

Response I18: This comment is acknowledged.

Comment I19: Page 132 – last paragraph – The facility operated until 2003 when AMD transferred ownership of the property to Spansion. Spansion continues to occupy the site, but manufacturing operations on-site ceased in July 2013.

Response I19: The City's understanding of the site history, based on a review of all available information by the City's Hazardous Materials consultant, is outlined in the DEIR. No text amendments are proposed.

Comment I20: The accurate historic of ownership is as follows: In 2003, AMD transferred ownership of the property to FASL LLC, a joint venture of Fugitsu and AMD. In December 2005, FASL LLC became Spansion, Inc. (Spansion), a corporation specializing in flash memory devices (EPA 2009). The SDC building was built in approximately 1991 and used for flash memory manufacturing until the 915 DeGuigne Drive facility, including the SDC, was decommissioned in 2009 (T&R 2001a).

Response I20: Please refer to Response I19.

Comment I21: Page 133 – 4.10.2.2 first paragraph – The historic agricultural land uses on-site resulted in the accumulative of residual ~~pesticides (DDT~~ organochlorine pesticides ~~compounds, arsenic, and lead)~~ in the shallow soil.

As discussed, neither arsenic nor lead were detected on-site above background concentrations.

Response I21: As stated in Appendix G, the US EPA ESL reference is dated January 2015. The requested text amendment has been made. Please see page 42 of this document.

Comment I22: Page 136 final paragraph – In 2011, 25 exterior soil gas samples were collected at depths of approximately five feet. Soil vapor exceeded the EPA (Year of RSLs cited?) Residential Regional Screening Level (RSL) in eight of the 25 samples, generally in the western portion of the project site. In 2013, 20 soil gas samples were collected at depths of approximately five feet. The Residential RSL was exceeded in three of the 20 samples, again in the western portion of the site.

As discussed, I recommend the FEIR more clearly reference the RSLs as the EPA RSLs and the ESLs as the RWQCB ESLs. The citations in the document appear to be accurate otherwise.

Response I22: As stated in Appendix G, the US EPA ESL reference is dated January 2015. The City's Hazardous Materials consultant determined that the citations in the DEIR are correct and no change is required. No text amendments are proposed.

Comment I23: Page 137 first paragraph section 4.10.2.3 – Historic and current land uses on-site and up-gradient of the project site have resulted in site wide pesticide contamination, localized soil contamination, groundwater contamination, and <u>limited</u> soil vapor <u>contamination</u>.

Response I23: The term limited soil vapor contamination cannot be defined or quantified. The DEIR are correct as written and no change is required. No text amendments are proposed.

Comment I24: Page 138 footnote 57 – 57 Any soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be excavated and removed from the site or buried on-site in the basement of the ~~925~~ <u>915</u> DeGuigne building after demolition with approval from the RWQCB. No soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be located within two feet of the surface.

Response I24: The requested text amendment referencing the address of the basement has been made. Please see page 42 of this document.

The City has presented the preferred language for the Pesticide Mitigation Plan in the DEIR. No text amendments are proposed.

Comment I25: Page 139 second bullet – Within the two-inch layer of sand, horizontal ventilation piping will be evenly spaced through the building footprint, connected to a header, and directed through the building walls to the roof line;

Response I25: This comment is acknowledged.

Comment I26: Page 143 – MM HAZ-1.6: Trichlorobenzene (TCB) isomers 1,2,4-trichlorobenzene and 1,2,3-trichlorobenzene were detected in a soil sample collected from a depth of approximately 8.5 feet within the PAD C excavation backfill at concentrations of 57 and 18 mg/kg, respectively. These concentrations exceed the residential RSL. The project developer shall obtain written Water Board approval to leave impacted (concentrations exceeding the lower of the then-current Water Board or US EPA residential screening levels) soil beneath residences. A deed restriction or land use covenant shall detail the location of these soils. This document shall include a map of these impacted soils; shall restrict future excavation in these areas; and shall require future excavation be conducted in these areas only upon written approval by the Water Board and in accordance with the SMP.

As we discussed, at 8.5 ft below ground surface the TCB was likely in groundwater floating on the surface, and therefore would be covered by the existing deed restriction. We request that this MM Haz be dropped since the issue is covered by the existing deed restriction and TCB does not represent a risk to home owners by vapor intrusion, which is the only possible exposure pathway remaining under the deed restriction.

Response I26: As TCB isomers were detected in the remedial excavation backfill, it was assumed that this impact was likely associated with impacted ground water and thus would be covered by the Site deed restriction. The reported depth of ground water is nine to 10 feet, which is similar to the depth of the TCB isomer contamination. The contamination was, however, detected in a soil sample and the extent of this impact is unknown. Lastly, the TCB isomers are present (near the surface of the ground water table) above residential screening levels. Thus, as a conservative measure, the City wants an additional deed restriction that details the location of these soils.

Comment I27: Page 143 – MM HAZ-1.7: MM Haz-1.7 specifies one sample for every 250 cuyd of soil. SMP calls every 500 cuyds which is common language the RWQCB agrees to for large fill projects. DTSC guidance calls for 1 sample every 250 cuyd for the first 1000 cuyd then 1 every 500 cuyd. MM Haz-1.7 also calls for marking on a figure where OCP soils above residential ESLs will be located on the site.

I suggest that the following phrase will be edited in the recommended manner:

"discrete soil samples shall be collected of stockpiled soils and analyzed for potential contaminants of concern at a frequency of one sample per every 250 cubic yards (cy) for the first 1,000 cy and one sample every 500 cy thereafter."

Response I27: The requested text amendment has been made based on concurrence from the City's Hazardous Materials consultant. Please see page 43 of this document.

J. RESPONSE TO COMMENTS FROM PUBLIC HEARING, August 10, 2015:

Comment J1: Deborah Marks – Sunnyvale Resident.
Ms. Marks noted the number of trees of the site, those of significant size, and those in good or excellent condition. She also noted that all on-site trees have been proposed for removal, discussing the benefits of maintaining mature trees and suggested preserving the mature trees located at the periphery of the site.

Response J1: As noted on page 126 of the DEIR, the analysis assumed all trees on the project site would be removed. This provides the most conservative assessment of the potential impacts from the project relative to the loss of trees. It is reasonable to assume that some of the perimeter trees could be retained. If the project is approved, a final determination on which trees could be preserved would be made at the development permit stage of the project.

The project will be retaining at least 22 street trees along DeGuigne Drive. The following table indicates the proposed number of on-site trees removed, required replacements based on City policy, and number of trees proposed:

Tree Qty To Be Removed	Tree Sizes To Be Removed	Replacement Tree Size Required	Required Replacement Qty and Size	Proposed Replacement Qty and Size
101	12-18nches	1 24" Box or 2 15 gallon	101 24" Box	---
72	18-24 inches	1 36" Box or 2 24" Box	144 24" Box	---
33	Over 24 inches	1 48" Box or 2 36" Box or 3 24" Box	32 36" Box 51 24" Box	---
		Total	296 24" Box 32 36" Box	661 24" Box 32 36" Box

Comment J2: Commissioner Klein.
Commissioner Klein said he is unsure of whether the level of service table 4.2-5 on page 41 captures the current or expected level of service and the subsequent impacts of the project. He said the City is currently redoing the stretch along Duane Avenue, and he hopes the Final EIR will capture the expected level of service and impacts of the project.

Response J2: Table 4.2-5 specifically lists the current level of service (LOS) for the study intersections. This represents the existing physical conditions of the roadway and the current traffic volumes. As noted on page 42, the analysis of background conditions takes into account the Duane Avenue Road Diet Project. As a result, the LOS listed in table 4.2-6 for the study intersections assumes the Duane Avenue Road Diet to be in place. This methodology is repeated in the project analysis. The existing plus project scenarios do not account for the Duane Avenue Road Diet. The road diet is, however, accounted for in the background plus project scenarios.

Comment J3: Chair Melton.
Chair Melton clarified with Trudi Ryan, Planning Officer, that even technical questions regarding the meaning of words in the document are best made as comments. Chair Melton noted that page ix, the Cultural Resources section makes reference to hazardous materials mitigation, and section 4.10.2.2 regarding On-Site Sources of Contamination, it would be helpful if definitions could be added, particularly for "cutoff wall" and "dewatering".

> **Response J3:** The Chair is correct that the summary table in the DEIR incorrectly references hazardous materials mitigation under Section 4.11. Please see page 33 of this Final EIR for the proposed text amendment.
>
> Definitions have been added consistent with the requests of the Planning Commissions. Please see page 42 of this Final EIR for the proposed text amendments.

Comment J4: Chair Melton.
Chair Melton noted that in section 4.10.2.3 in the paragraph discussing historical data showing TCE concentrations, there are three instances where he believes the narrative is describing the Pad C remediation. He said he believes the former source area, soil excavation and dewatering program and ANS leak are all talking about the Pad C remediation, and that if those three things are talking about something other than that he suggests clarification. Chair Melton said the title of this same section, "Off-Site Sources of Soil and Groundwater Contamination," is confusing because many narratives talk about on-site sources of soil and groundwater contamination. Chair Melton noted that the report discuses four facilities to the south where underground water contamination has come on-site, and then mentions the former AMD facilities on parcel 1 of the project site. He noted that the narrative then abruptly transitions from things happening off-site to the discussion about Pad C remediation, and suggests moving the paragraph beginning with a discussion of TCE concentrations in its entirety to 4.10.2.2 to conclude the section about on-site sources of contamination or including a paragraph explaining this transition.

Chair Melton noted that the following paragraph describes 20 soil gas samples collected at depths of approximately five feet, and said it is unclear as to whether they pertain to Pad C remediation or elsewhere on parcel 1. He suggested some clarification in the narrative or a transition between paragraphs, and suggested writing in a footnote with an explanation on what a Residential Regional Screening Level (RSL) is, who owns the metric and the purpose of it. He asked about the meaning of the final sentence that states the Residential RSL was exceeded in three of the 20 samples on this portion of the site, and whether that is a big deal or not.

> **Response J4:** The discussion in Section 4.10.2.3 is in reference to the groundwater contamination that has migrated on-site from four off-site sources. The TCE contamination in the groundwater leached into the surrounding soils resulting in both soil and groundwater contamination on-site. Groundwater monitoring and soil excavation were completed as part of the remediation of the project site. The Pad C contamination, while also TCE, was more localized. Confusion between on-site and off-site contamination sources is due to the fact that on-site and off-site contaminants are similar chemical compounds, remediation activities occurred within the same time period, and on-site monitoring wells address both on-site and off-site sources as they are within the same groundwater layer. While Section 4.10.2.3

primarily discusses off-site sources of contamination, the off-site groundwater contamination cannot be separated from the on-site sources of contamination. Please see page 42 of this Final EIR for the proposed text amendments to clarify this issue.

The potential health risks for future residents of the site relative to the soil vapor samples are discussed in Section 4.10.3.2.

Comment J5: Chair Melton observed in section 4.10.4.2 on Project Specific Mitigation Measures that the construction of townhomes contemplated on parcel 1 would not disturb the underground cutoff walls that were built at the former Pad C site, and suggested that we need a new mitigation measure along the lines that nobody will disturb underground cutoff walls at the former Pad C site. He commented on mitigation measure Haz 1.7 as not contemplating possible underground storage tanks and associated piping on parcel 2 from the former gas station and it should.

Response J5: Based on the analysis completed by the City's Hazardous Materials consultant, no significant impact was identified regarding disturbance of the cutoff walls associated with the former Pad C (appendix G of the DEIR). As such, no mitigation was imposed on the project, under either development scenario. The City's Hazardous Materials consultant has, however, drafted a condition of project approval to address the concerns of the Planning Commission. Please see page 42 of this Final EIR for the proposed text amendments to clarify this issue.

Comment J6: Chair Melton suggested that the narrative of section 4.14.1.2 on School Facilities be expanded to include the plan at Fremont High School to deal with the overcapacity situation.

Response J6: Please see page 44 of this Final EIR for the proposed text amendments to clarify this issue.

Comment J7: Chair Melton disclosed that he met with the applicant and the environmental consultant advisor a week ago to discuss section 4.10 on environmental issues.

Response J7: This comment is noted.

SECTION 4.0 REVISIONS TO THE TEXT OF THE DRAFT EIR

The following section contains revisions/additions to the text of the *Draft Environmental Impact Report, 915 DeGuigne Residential Project*, dated July 2015. Revised or new language is underlined. All deletions are shown ~~with a line through the text.~~

Page ix Summary, Cultural Resources – Section 4.11 of this EIR, the text will be **REVISED** as follows:

Please see Section 4.11.3.2 for a complete list of ~~hazardous materials~~ cultural resources mitigation.

Page xii Summary, the following text has been **ADDED**[1] at the end of the Summary section to provide additional project details pertaining to the two project scenarios and the impacts of the proposed project:

Summary of the Project Scenarios

As proposed, the proposed project would demolish all the existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) on parcel 1 and a public park on parcel 2 ("proposed project"). This EIR also analyzes a maximum build out scenario that could construct up to 678 residential units (659 units on parcel 1 and 19 units on parcel 2) and 7,000 square feet of retail space on parcel 2 ("maximum build out/corner mixed-use development scenario").

Summary of Direct and Cumulative Impacts of the Project Scenarios

Proposed Project

In summary, construction of the proposed project would result in the following potentially significant impacts prior to mitigation: noise levels temporarily in excess of City standards at nearby sensitive receptors, potential disturbance to yet unrecorded subsurface cultural resources, and disturbance to nesting birds related to construction activity. With implementation of mitigation, no significant impacts related to the construction of the proposed project would remain.

Operation of the proposed project would result in the following potentially significant impacts at new residences built within the project site (not neighboring residences or other sensitive receptors) prior to mitigation: noise levels from traffic on Duane Avenue in excess of City standards and exposure to the existing hazardous materials on the project site. With implementation of mitigation, no significant impacts directly related to the operation of the proposed project would remain.
The proposed project would result in one cumulatively-considerable significant unavoidable impact with regard to LOS degradation at the Fair Oaks Avenue/Duane Avenue intersection, which cannot

[1] As noted at the beginning of Section 4.0, added text is typically underlined. The proposed text to be added to the summary, however, is extensive and for ease of reading it has not been underlined.

be feasibly mitigated because an additional southbound left turn lane cannot be added to Fair Oaks Avenue due to the City's previously approved road diet for Duane Avenue.

Maximum Build Out/Corner Mixed-Use Development Scenario

In summary, construction of the maximum build out/corner mixed-use development scenario would result in the following potentially significant impacts prior to mitigation: temporary air quality impact on nearby sensitive receptors, noise levels temporarily in excess of City standards at nearby sensitive receptors, potential disturbance to yet unrecorded subsurface cultural resources, and disturbance to nesting birds related to construction activity. With implementation of mitigation, no significant impacts related to the construction of the maximum build out/corner mixed-use development scenario would remain.

Operation of the maximum build out/corner mixed-use development scenario would result in the following potentially significant impacts at new residences built within the project site (not neighboring residences or other sensitive receptors) prior to mitigation: noise levels from traffic on Duane Avenue in excess of City standards and exposure to the existing hazardous materials on the project site. In addition, prior to mitigation, the maximum build out/corner mixed-use development scenario would result in potentially significant impacts on hydrology and utilities related the existing storm drainage system. With implementation of mitigation, no significant impacts directly related to the operation of the maximum build out/corner mixed-use development scenario would remain.

The maximum build out/corner mixed-use development scenario would result in two cumulatively-considerable significant unavoidable impacts with regard to (i) LOS degradation at the Fair Oaks Avenue/Duane Avenue intersection, which cannot be feasibly mitigated because an additional southbound left turn lane cannot be added to Fair Oaks Avenue due to the City's previously approved road diet for Duane Avenue, and (ii) LOS degradation at the Lawrence Expressway/Duane Avenue intersection that cannot be feasibly mitigated without the approval of Santa Clara County. In addition, the maximum build out/corner mixed-use development scenario would result in a cumulatively-considerable contribution to a significant impact at the Wolfe Road/Maude Avenue intersection that can be reduced to a less than significant level with the implementation of mitigation.

The following is a tabular summary of the significant impacts and mitigation measures addressed within this EIR with a comparison of the impacts and mitigation relative to the proposed project and the maximum buildout scenario. The project description and full discussion of impacts and mitigation measures can be found in *Section 2.0 Description of the Proposed Project, Section 4.0 Environmental Setting, Impacts, & Mitigation,* and *Section 5.0 Cumulative Impacts* of this EIR.

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
Impact AIR-1: Construction of the ***maximum build out/corner mixed-use development scenario*** could have a significant, temporary impact on nearby sensitive receptors. **MM AIR 1-1:** A Health Risk Analysis shall be completed for the ***maximum build out/corner mixed-use development scenario*** prior to issuance of any demolition or grading permits for the project. The analysis shall be based on project specific construction data. If emissions are calculated to be above the BAAQMD thresholds, mitigation measures will be required to reduce emissions below BAAQMD thresholds during all phases of construction. Measures may include, but are not limited to: • Use of newer or retrofitted construction equipment that has lower emissions rates than standard equipment; • Use of alternative fuel equipment; • Modification of construction techniques to avoid use of diesel-powered equipment; and • Phasing of construction activities.	Less Than Significant Impact	Temporary: Less Than Significant with Mitigation
Impact NOI-1: Residences located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards. [Note: Applies only to new residences built within the project site] **MM NOI 1-1**: Consistent with Title 24 requirements, a design-level acoustical analysis shall be completed by the project developer for new residential uses where exterior noise levels would exceed 60 dBA Ldn. The analysis shall meet the following noise reduction requirements: • Interior average noise levels shall be reduced to 45 dBA Ldn or lower to meet the local standard. • Building sound insulation requirements would need to include the provision of forced-air mechanical ventilation for all new units exposed to exterior noise levels greater than 60 dBA Ldn, so that windows could be kept closed at the occupant's discretion to control noise. • Special building construction techniques (e.g., sound-rated windows and building facade treatments) may be required for new residential uses adjacent to East Duane Avenue. These treatments include, but are not	Less Than Significant with Mitigation	Less Than Significant with Mitigation

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
limited to, sound rated windows and doors, sound rated wall constructions, and acoustical caulking. The specific determination of what treatments would be necessary shall be completed on a unit-by-unit basis during the final building design. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City along with the building plans and approved prior to issuance of building permits. **Impact NOI-2:** Students at the adjacent school could be exposed to interior and exterior noise levels in excess of acceptable City standards during construction. **MM NOI 2-1:** Construct solid plywood fences (minimum eight feet in height) or erect noise control blanket barriers between the construction site and adjacent classrooms, school playgrounds, or sensitive interior spaces to reduce noise levels to the extent feasible. **MM NOI 2-2:** Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. **MM NOI 2-3:** Locate stationary noise generating equipment as far as possible from adjacent school receivers. **MM NOI 2-4:** Acoustically shield stationary equipment located near existing school receivers. **MM NOI 2-5:** Utilize "quiet" air compressors and other stationery noise sources where technology exists. **MM NOI 2-6:** The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses and the school so that construction activities can be scheduled to minimize noise disturbance.	Temporary: Less Than Significant with Mitigation	Temporary: Less Than Significant with Mitigation

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
MM NOI 2-7: Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.		
Impact HYD-1: If the final site plan of the ***maximum build out/corner mixed-use development scenario*** has a total impervious surface area greater than the existing conditions, the project could have a significant impact on the existing storm drainage system. **MM HYD-1.1:** The project developer shall design the project to reduce directly connected impervious areas to ensure the flood design storm flows are maintained at or under the existing project flows.	Less Than Significant Impact	Less Than Significant with Mitigation
IMPACT BIO-1: Implementation of the proposed development project or any future development under the proposed General Plan Amendments could result in the loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment. **MM BIO 1-1:** Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors, in the San Francisco Bay area extends from February 1 through August 31. **MM BIO 1-2:** If it is not possible to schedule demolition and construction between September and January, then pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. This survey shall be completed no more than 14 days prior to the initiation of grading, tree removal, or other demolition or construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). During this survey, the ornithologist will inspect all trees and other possible nesting habitats (e.g., grasslands and buildings) within and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, will determine the extent of a construction-free buffer zone to be established around the nest, typically 250 feet, to ensure that nests of bird species protected by the MBTA or State Code will not be disturbed during project construction.	Less Than Significant with Mitigation	Less Than Significant with Mitigation

Direct Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
MM BIO 1-3: A final report of nesting birds, including any protection measures, shall be submitted to the Director of Community Development prior to the issuance of grading permits.		
Impact HAZ 1.1: Even with implementation of the proposed contamination remediation plan, redevelopment of the site with residential land uses could have a significant impact to future residents of the project site. Please see Section 4.10.4.2 for a complete list of mitigation measures related to Impact HAZ 1.1.	Less Than Significant with Mitigation	Less Than Significant with Mitigation
Impact CUL-1: Future development on the project site could impact as yet unrecorded subsurface cultural resources. Please see Section 4.11.3.2 for a complete list of mitigation measures related to Impact CUL-1.	Less Than Significant with Mitigation	Less Than Significant with Mitigation
Impact UTL-1: If the final site plan of the ***maximum build out/corner mixed-use development project*** has a total impervious surface area greater than the existing conditions, the project could have a significant impact on the capacity of the existing storm drainage system. **MM UTL-1.1:** The project developer shall design the project to reduce directly connected impervious areas to ensure the flood design storm flows are maintained at or under the existing project flows.	Less Than Significant Impact	Less Than Significant with Mitigation

Cumulative Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
Impact CUM-1: Implementation of the proposed project would result in a degradation of LOS under cumulative conditions at the Fair Oaks Avenue/Duane Avenue intersection. There are no feasible mitigation measures to reduce the identified impacts to the Fair Oaks Avenue/Duane Avenue intersection due to the road diet that is approved for Duane Avenue.	Significant Unavoidable Impact	Significant Unavoidable Impact
Impact CUM-2: Under cumulative conditions, implementation of the ***maximum build out project*** would result in result in a degradation of LOS at the Fair Oaks Avenue/Duane Avenue intersection, trigger a signal warrant at the Wolfe Road/Maude	Less Than Significant Impact	Significant Unavoidable Impact

Cumulative Significant Impact and Mitigation Measures	Proposed Project	Maximum Build Out/Corner Mixed-Use Development Scenario
Avenue intersection, and result in a degradation of LOS at the Lawrence Expressway/Duane Avenue intersection. **MM CUM-2.1:** If the ***maximum build out/corner mixed use development scenario*** is implemented, the project developer will be required to install traffic signals at the Wolfe Road/Maude Avenue intersections. Signalization of the intersection would be required prior to the issuance of occupancy permits for the residences. **MM CUM-2.2:** If the ***maximum build out/corner mixed use development scenario*** is implemented, the project developer willbe required to restripe the eastbound approach to be three left-turn lanes, one through lane, and one right turn lane at the Lawrence Expressway/Duane Avenue intersection. This mitigation measure could not be implemented without the approval of Santa Clara County. Restriping of the intersection would be required prior to the issuance of occupancy permits for the residences. The City of Sunnyvale, as the Lead Agency, cannot implement MM CUM-2.2 without approval of Santa Clara County. Thus, it is not certain that the identified mitigation measure could be implemented. In the event that MM CUM-2.2 could be implemented, the project's impact would be reduced to less than significant.		

Summary of Alternatives to the Project Scenarios

CEQA requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines specify that an EIR identify alternatives which "would feasibly attain the most basic objectives of the project but would avoid or substantially lessen many of the significant environmental effects of the project."

This EIR analyzes six alternatives to the proposed project and the maximum build out/corner mixed-use development scenario. The following are brief descriptions of each alternative and key conclusions. A full analysis of the project alternatives is provided in Section 6.0 of this EIR.

A. NO PROJECT ALTERNATIVE – NO BUILD

Alternative A assumes that the existing 471,000 square feet of office/manufacturing buildings remain on-site and could either be re-occupied by another industrial user or could remain partially occupied or vacant for the foreseeable future.

Conclusion: Implementation of Alternative A could avoid the all of the significant impacts and significant unavoidable transportation impacts identified in this EIR, but only if the buildings remain partially occupied. If the buildings were re-tenanted, full occupancy of the buildings on-site would produce traffic at a level that would result in a significant unavoidable cumulative transportation impact that is greater than the proposed project, but less than the maximum build out/corner mixed use development scenario. Alternative A does not meet any of the project objectives.

B. NO PROJECT ALTERNATIVE – BUILD OUT UNDER EXISTING LAND USE DESIGNATIONS

Alternative B assumes the project site would be redeveloped to the maximum capacity allowed under the current industrial general plan designation and zoning classification, which would entail demolition of the existing 471,000 square feet of office/manufacturing buildings on the project site and redevelopment of 478,000 square feet of industrial buildings on the project site.

Conclusion: Implementation of Alternative B could avoid the significant impacts related to noise, hazards and hazardous materials caused by the project or the maximum build out/corner mixed use development scenario because no housing would be developed on the site. Because the site would be redeveloped under this alternative, the significant impacts related to air quality, hydrology, biological resources, cultural resources, and traffic would be similar to the impacts caused by the project or the maximum build out/corner mixed use development scenario. Similar to Alternative A, Alternative B would produce traffic at a level that would result in a significant unavoidable cumulative transportation impact that is greater than the proposed project, but less than the maximum build out/corner mixed use development scenario. Alternative B would not meet the majority of the project objectives.

C. MIXED-USE DEVELOPMENT ALTERNATIVE

The mixed-use development alternative would consist of a General Plan Amendment and rezoning to allow for a maximum of 384,199 square feet of retail/office and up to 609 residential units on-site. To maintain for-sale townhouses on-site, however, the total residential unit count in this alternative would have to be reduced to 281 units. The basic building design and orientation for the residences would be the same as the proposed project, and Alternative C would still include all identified green building design measures. This alternative would, however, construct two-story office buildings along the Duane Avenue frontage.

Conclusion: This alternative would avoid the noise impact on residences on the project site from Duane Avenue and provide more jobs and services within walking distance of existing housing than the project or the maximum build out/corner mixed use development scenario. This alternative would, however, substantially reduce the density of for-sale housing that could be placed on the site, which does not meet the City's and project applicant's objectives to the same extent as the project or the maximum build out/corner mixed use development scenario. The residential uses could include apartments as opposed to townhouses, but that would also be inconsistent with the City's goal of providing more for-sale housing, as outlined in the General Plan.

Implementation of Alternative C would avoid the significant noise impact identified in this EIR but most other impacts would be comparable to the proposed project or the maximum build out/corner mixed use development scenario. In addition, this alternative does not meet the project objectives to the same extent as the project or the maximum build out/corner mixed use development scenario. The Mixed-Use Development Alternative is identified as the Environmentally Superior Alternative.

D. COMMERCIAL/OFFICE DEVELOPMENT ALTERNATIVE

In an effort to avoid the significant noise and hazardous materials impacts that would result from residential development on the project site, but still redevelop approximately 25.2 acres of underutilized land within Sunnyvale, this alternative evaluates a commercial development on the site. Under the commercial development alternative, the site could be developed as a new office campus, a mix of office and retail, or a large retail center.

Conclusion: This alternative would avoid the noise and hazardous materials impacts of the project, and provide more jobs and services within walking distance of existing housing. Most other impacts would be comparable to the proposed project or the maximum build out/corner mixed use development scenario, and Alternative D would not provide for any new housing within Sunnyvale, which is inconsistent with the City's and project applicant's objectives and the General Plan.

E. REDUCED DENSITY ALTERNATIVE

In an effort to avoid the significant cumulative traffic impact at the Fair Oaks Avenue/Duane Avenue intersection that would result from both project scenarios, but still redevelop the site for housing, this alternative evaluates a reduced housing density alternative of 9.5 dwelling unit per acre, which would allow 239 units on-site, a net reduction of 211 units compared to the proposed project and a net reduction of 439 compared to the maximum buildout/corner mixed use scenario.

Conclusion: Alternative E avoids the cumulative traffic impact at Fair Oaks Avenue/Duane Avenue intersection. Due to redevelopment activity on the site, biology and cultural impacts remain comparable to both project scenarios, but temporary impacts to air quality and noise would be reduced due to the reduced amount of total construction. Impacts to the new residential units would be similar to both project scenarios, although there would be a reduced number of total units affected. The reduced density alternative would generally meet most of the project objectives, but would result in fewer for-sale residential units than the proposed project and would not meet the City's share of the regional housing needs to the same extent as the proposed project.

F. MIXED PROJECT ALTERNATIVE

The EIR addresses two development scenarios, the proposed project (450 residences and a park) and the maximum build out/corner mixed use development scenario (678 residential and 7,000 square feet of retail). The mixed project alternative evaluates the combined development of 450 residences on Parcel 1 (the same as the proposed project) and 19 residential units and 7,000 square feet of retail on Parcel 2 (the same as the corner mixed use scenario).

Conclusion: Alternative F would not avoid the noise impact from Duane Avenue or the cumulative traffic impacts to Fair Oaks Avenue/Duane Avenue intersection, but impacts would be otherwise comparable to the proposed project. This alternative would provide more housing than the proposed project, but less than the maximum build-out scenario, and it would provide more jobs and services within walking distance of existing housing. While this alternative would reduce the overall amount of open space proposed by the project because this alternative does not include a public park, it meets all but one of the project objectives to the same or a greater extent than the project.

The following two tabular summaries compare the impacts of each alternative to: first, impacts of the proposed project; and second, to impacts of the maximum build out/corner mixed use development scenario.

Comparison of Proposed Project to Alternatives							
	Proposed Project	**Alt. A: No Project – No Build**	**Alt. B: No Project – Build Out Existing Land Use Designations**	**Alt. C: Mixed-Use Development***	**Alt. D: Commercial/ Office Development**	**Alt. E: Reduced Density**	**Alt. F: Mixed Project**
Meets Project Objectives?	**All**	**None**	**Few**	**Some**	**Some**	**Most**	**Most**
Air Quality (During Construction)	**Less Than Significant**	**Less** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Greater** (Less Than Significant)
Noise (Operational Impact to Residences on Project Site)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Noise (Temporary Impact During Construction)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Hydrology	**Less Than Significant**	**Less** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)
Biology	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Hazards	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Cultural	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Utilities (Storm Drain System)	**Less Than Significant**	**Less** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Greater** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)
Transportation (Cumulative Only)	**Significant Unavoidable Impact**	**Greater**[1] (Significant Unavoidable Impact)	**Greater** (Significant Unavoidable Impact)	**Greater** (Significant Unavoidable Impact)	**Greater** (Significant Unavoidable Impact)	**Less** (Less Than Significant with Mitigation)	**Greater** (Significant Unavoidable Impact)

*Environmentally superior alternative

[1] Traffic generated under Alternative A would be greater than the traffic generated by the proposed project if the existing buildings on Parcel 1 were re-tenanted and fully occupied.

Comparison of Maximum Build Out/Corner Mixed Use Development Scenario to Alternatives							
	Maximum Build Out/Corner Mixed Use Development Scenario	**Alt. A: No Project – No Build**	**Alt. B: No Project – Build Out Existing Land Use Designations**	**Alt. C: Mixed-Use Development***	**Alt. D: Commercial/ Office Development**	**Alt. E: Reduced Density**	**Alt. F: Mixed Project**
Meets Project Objectives?	**Most**	**None**	**Few**	**Some**	**Some**	**Most**	**Most**
Air Quality (Temporary Impact During Construction)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Greater** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Less** (Less Than Significant)
Noise (Operational Impact to Residences on Project Site)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Less** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Noise (Temporary Impact During Construction)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Hydrology	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)
Biology	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Hazards	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Cultural	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)
Utilities (Strom Drain System)	**Less Than Significant with Mitigation**	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Similar** (Less Than Significant with Mitigation)	**Less** (Less Than Significant)	**Similar** (Less Than Significant with Mitigation)
Transportation (Cumulative Only)	**Significant Unavoidable Impact**	**Less**[2] (Significant Unavoidable Impact)	**Less** (Significant Unavoidable Impact)	**Similar** (Significant Unavoidable Impact)	**Greater** (Significant Unavoidable Impact)	**Less** (Less Than Significant with Mitigation)	**Less** (Significant Unavoidable Impact)

*Environmentally superior alternative

[2] Traffic generated under Alternative A would be less than the traffic generated under the Maximum Build Out/Corner Mixed Use Development Scenario even if the existing buildings on Parcel 1 were re-tenanted and fully occupied.

Areas of Known Controversy

Based on comments received, areas of known controversy include increased traffic.

Page 2 Section 2.0, Description of the Proposed Project, the second paragraph will be **REVISED** as follows:

Parcel 1 is 24.4 acres and is currently developed with 471,000 square feet of office/manufacturing facilities in three buildings, one of which is occupied (the occupied space totals 265,343 square feet with 495 employees). The site is accessed by ~~three~~ four driveways on E. Duane Avenue and three driveways on DeGuigne Drive. Parcel 2 is 0.8 acres and is currently developed with a 12,000 square foot industrial office building that is currently occupied by approximately 75 employees and is accessed by one driveway on E. Duane Avenue and one driveway on DeGuigne Drive.

Page 46 Section 4.2.2.4, Existing Plus Project Intersection Operations, the title of Table 4.2-9 will be **REVISED** as follows:

Existing Plus Proposed Project Intersection Levels of Service.

Page 49 Section 4.2.2.5, Background Plus Project Intersection Operations, the title of Table 4.2-11 will be **REVISED** as follows:

Background Plus Proposed Project Intersection Levels of Service.

Page 52 Section 4.2.2.7, Pedestrian/Bicycle Facilities and Transit Operations, the fifth paragraph will be **REVISED** as follows:

Currently, all but one of the VTA bus routes that serve the project area are operating below capacity. Route 55 currently has an average ridership of 10 passengers (average bus capacity is 38 seat), but has a maximum ridership demand of 49 passengers at approximately 8:15 AM, 1:40 PM, and 3:20 PM.

Because Route 55 is over capacity at specific points during the day, the anticipated ridership resulting from the project was calculated based on the Maximum Build Out/Mixed Use Scenario because it is a higher density project. Under this scenario, the project site would generate one passenger[2] during the AM peak hour, which aligns with the school peak. Although Route 55 is over capacity and serves Fremont High School, under either development scenario, the project would add no more than one passenger to the AM Peak Hour (the afternoon peak usage times on the bus route do not correlate to the Peak Hour traffic times). Taking into account day to day variations in travel times and transit use, the addition of one passenger in the AM

[2] This number was estimated based on 92 AM Peak Hour trips multiplied by 6.6 percent assumed transit use which equates to six riders. The six riders would be divided between five routes, equating to approximately one rider per route.

Peak Hour would not constitute a significant impact. As a result, existing bus services can accommodate an increase in ridership demand resulting from the proposed project. The proposed project will not alter existing transit facilities or conflict with the operation of existing or planned facilities. Therefore, the proposed project will have a less than significant impact on transit operations. **(Less Than Significant Impact)**

Page 67 Section 4.3.3.1, Bay Area 2010 Clean Air Plan, the last row of Table 4.3.4 will be **REVISED** as follows:

As designed, the project proposes up to 2.5 ~~1.7~~ acres of new open space including lawns and up to 693 new trees. The new trees will help with the absorption of air pollutants but could have a measurable effect on the urban heat island effect on-site. The proposed project, therefore, is consistent with this control measure.

Page 68 Section 4.3.3.2, Impacts to Regional and Local Air Quality, the title of Table 4.3-6 will be **REVISED** as follows:

Operational Emissions for the ~~Proposed Project~~ Maximum Build Out/Corner Mixed Use Development Scenario.

Page 72 Section 4.3.3.3, Construction Impacts, the paragraph after Table 4.3-10 will be **REVISED** as follows:

Construction of the project would involve demolition of the existing buildings and hardscape, grading and trenching, paving, building construction, and architectural coating. As shown in Table 4.3-9, the emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust associated with construction of the project would not exceed the BAAQMD significance thresholds and, therefore, would not result in a significant impact from construction emissions. It should be noted that in addition to the shorter construction schedule (see footnote ~~21~~ 27), concrete crushing was not assumed as part the maximum build out/corner mixed-use development scenario. For these reasons, the overall emissions of the maximum build out/corner mixed-use development scenario are estimated to be lower than the proposed project, even though it is a larger development.

Page 90 Section 4.5.2.2, Noise Impacts to the Project Site, impact statement NOI-1 will be **REVISED** as follows:

Future residences on the project site located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards. **(Significant Impact)**

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, the first paragraph will be **REVISED** as follows:

As noted above, Parcel 1 was historically agricultural land and was then developed with the exiting land uses in 1974. The historic agricultural land uses on-site resulted in the accumulation of residual organochlorine pesticides ~~(DDT compounds, arsenic, and lead)~~ in the shallow soil. Chemicals historically used by AMD for semi-conductor fabrication included solvents used as cleaning and degreasing agents as well as corrosives for manufacturing and waste treatment. Based on available records, these chemicals were stored in both aboveground and underground storage tanks. There were a total of 28 underground storage tanks (USTs), both vaulted and unvaulted, as well as below-grade acid neutralization systems (ANS). Of the 28 tanks, two had reported leaks.

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, a footnote will be **ADDED** the second paragraph as follows:

A cutoff wall is a wall of impervious material usually of concrete, asphaltic concrete, or steel sheet piling constructed used to reduce seepage.

Page 133 Section 4.10.2.2, On-Site Sources of Contamination, a footnote will be **ADDED** the second paragraph as follows:

Dewatering is the action of removing groundwater or surface water from a construction site. The dewatering process is typically done by pumping or evaporation and is usually done before excavation for footings or to lower a water table that might interfere with excavations.

Page 136 Section 4.10.2.3, Off-Site Sources of Soil and Groundwater Contamination, the second paragraph will be **DELETED** from Section 4.10.2.3 and **ADDED** after the fourth paragraph in Section 4.10.2.2.

Page 136 Section 4.10.2.3, Off-Site Sources of Soil and Groundwater Contamination, the last paragraph will be **REVISED** as follows:

In 2011, 25 exterior soil gas samples were collected at depths of approximately five feet. Soil vapor exceeded the EPA 2015 Residential Regional Screening Level (RSL) in eight of the 25 samples, generally in the western portion of the project site. In 2013, 20 soil gas samples were collected at depths of approximately five feet. The Residential RSL was exceeded in three of the 20 samples, again in the western portion of the site.

Page 138 Section 4.10.3.2, Hazardous Materials Impacts to the Project Site, footnote 57 will be **REVISED** as follows:

Any soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be excavated and removed from the site or buried on-site in the basement of the ~~925~~ 915 DeGuigne building after demolition with approval from the RWQCB. No soil exceeding the RWQCB

Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be located within two feet of the surface.

Page 140 Section 4.10.3.2, Hazardous Materials Impacts to the Project Site, the following language will be **ADDED** before impact statement HAZ 1.1:

Grout curtain/cut-off walls are located near the former Pad C. As a condition of project approval, the following construction measures shall be implemented to protect these features during construction:

- Developer shall not damage the cut-off walls; if Developer needs to modify the cut-off walls, written approval shall be obtained from the Water Board prior to performing this work.
- Any damage to the cut-off walls shall be immediately repaired by the Developer under the oversight of the Water Board.

Page 143 Section 4.10.4.2, Project Specific Mitigation Measures, mitigation measure HAZ-1.7 will be **REVISED** as follows:

During construction activities, undocumented fill in former UST pits located beneath residential structures and in the park shall be removed and replaced as engineered fill. If an organic vapor meter detects vapors greater than background levels, discrete soil samples shall be collected of stockpiled soil and analyzed for contaminants of potential concern at a frequency of one sample per every 250 cubic yards (cy) for the first 1,000 cy and one sample every 500 cy thereafter. If concentrations of contaminants of potential concern are detected exceeding the lower of the then current Water Board or US EPA residential screening levels, this soil shall be appropriately disposed off-site and confirmation samples shall be collected in the excavation (one per each sidewall and two at the base of the excavation, and in areas of stained or odorous soil). If contaminant concentrations in the confirmation samples exceed residential screening levels, written approval shall be obtained from the Water Board to leave impacted soil in-place. Alternatively, this soil shall be remediated to the lower of the then-current Water Board or US EPA residential screening levels. If this soil is left in-place, a deed restriction or land use covenant shall detail the location of these soils. This document shall include a map of these impacted soils; shall restrict future excavation in these areas; and shall require future excavation be conducted in these areas only upon written approval by the Water Board and in accordance with the SMP.

Page 149 Section 4.11.3.2, Project Specific Mitigation Measures, the first paragraph of mitigation measure CUL-1.1 will be **REVISED** as follows:

Prior to the initiation of any ground disturbing activities or issuance of grading permits for the southwest corner of Parcel 1, a qualified professional archaeologist shall undertake a presence/absence testing program to identify the horizontal and vertical extent of any potential buried archaeological deposits associated with CA-

SC1-9 or other as yet unknown cultural resources at this location within the project site. The boundaries of the area to be tested within southwest corner of Parcel 1 shall be determined by the archaeologist based on available records for site CA-SC1-9.

Page 171 Section 4.14.3.1, Public Safety, the first paragraph will be **REVISED** as follows:

The existing conditions on-site (office/manufacturing facilities) create a demand for fire and police services because the site is occupied. Redevelopment of the project site would result in a change in land use from industrial to residential which would increase the permanent resident population of the City which could result in an increase in demand for fire and police protection services. Under either development scenario, the project will be required to be built to applicable Fire Code standards in use when construction permits are issued, including sprinklers and smoke detectors, and will include features that would reduce potential fire hazards. Access to the site for emergency vehicles will be provided from project driveways on DeGuigne Drive, built to the Fire Service Bureau's specifications. In addition, an Emergency Vehicle Access Easement will be provided from Duane Avenue. The Department of Public Safety will review the final project design to ensure that it incorporates appropriate safety features to minimize criminal activity.

Page 172 Section 4.14.3.2, Schools, the second paragraph will be **REVISED** as follows:

Based on Fremont Union High School District's student generation rate of 0.10 students per unit, the proposed project would generate approximately 45 high school structure and the maximum building out/corner mixed-use development would generate approximately 68 students.[104] Though Fremont High School is ~~already~~ currently above capacity ~~and would not be able to accommodate students generated by either project. In response to larger than expected enrollment at Fremont High School,~~ the FUHSD Measure ~~B~~ K Bond program was ~~modified~~ designed to address future projected enrollment ~~needs~~ at Fremont High School, which includes enrollment created by this project. The current Measure K Bond program includes the construction of additional classrooms and other facilities that would increase the educational capacity of Fremont High School and prevent overcrowding.[3]

Page 173 Section 4.14.3.3, Parks, the second paragraph will be **REVISED** as follows:

The proposed project would include 1.7 acres of public open space within the housing development and dedicate a new 0.8-acre public park for a total of approximately ~~1.4~~ 2.5 acres of new ~~park land~~ publically accessible open space. The total park space, does not meet the five-acre minimum and, as a result, the project will also be required to pay the City Park In-Lieu Fees. With payment of the park in-lieu fees and the proposed open space on-site, the proposed project would have a less than significant impact on park facilities within the City. The maximum build

[3] Personal Communication with City Staff – Jason Crutchfield, FUHSD, September 21, 2015.

out/corner mixed-use development scenario would also be require to meet the City's parkland dedication requirements through a combination of on-site open space and fees, in compliance with applicable City standards, and would have a less than significant impact. **(Less Than Significant Impact)**

SECTION 5.0 COPIES OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

ATTACHMENT 9

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

Serious Drought. Help save water!

August 14, 2015

SCL101945
SCL/101/PM 44.5
SCH# 2014112001

Mr. Ryan Kuchenig
Planning Division
City of Sunnyvale
456 W. Olive Avenue
Sunnyvale, CA 94088

Dear Mr. Kuchenig:

De Guigne Residential Project (945 De Guigne Drive) – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We have reviewed the DEIR to ensure consistency with our mission and state planning priorities of infill, conservationism, and efficient development. Please also refer to our previous comment letters on this project. We provide these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl.

Project Understanding
The proposed project is located approximately one-half mile southeast from the U.S. 101/N. Fairoaks Avenue interchange. It would demolish all the occupied existing industrial buildings on the project site to allow for construction of up to 450 attached townhouses (18.5 dwelling units per acre) and a public park. The townhouses would be located on Parcel 1 and the park would be located on Parcel 2. The townhouses would range from two to four bedrooms.

Lead Agency
As the lead agency, the City of Sunnyvale (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Traffic Impact Analysis (TIA)
1. Responses 4 and 5: The City's Responses 4 and 5 (collectively Responses) to Caltrans comment letter on the Notice of Preparation requesting traffic fees be identified states, "The

project would have no impacts to State facilities." However, the Responses are incongruent because the TIA:

- Identifies the U.S. 101/N. Fairoaks Avenue northbound (NB) ramps as deficient under Existing, Existing Plus Project, Background, and Cumulative Conditions, with the left-turn pocket extending beyond the turn pocket by over 25 feet but does not propose any mitigation.

- Does not include an analysis of the U.S. 101/N. Fairoaks Avenue southbound (SB) ramps, so a determination has yet to be made whether the proposed project will have impacts to the SB on- and off-ramps. Please provide Caltrans with a traffic analysis of the SB on- and off-ramps at this interchange.

Caltrans recommends mitigation for impacts to these NB and SB ramps be identified in the TIA and DEIR.

2. Calculation Sheets: Please provide Caltrans with the Traffix and Synchro software calculation sheets for our review and comments, including calculation sheets for the NB and SB ramps identified above.

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy

SANTA CLARA
Valley Transportation Authority

August 12, 2015

City of Sunnyvale
Planning Division
P.O. Box 3707
Sunnyvale, CA 94088-3707

Attention: Ryan Kuchenig

Subject: 915 DeGuigne Residential Project

Dear Mr. Kuchenig:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for 451 townhomes plus a park or mixed use development of 7,000 square feet of retail uses and 19 housing units on 25.2 acres at 915 DeGuigne Avenue and 936 Duane Avenue. We have the following comments.

Transportation Impact Analysis (TIA) Report

VTA commends the City for including an analysis of pedestrian and bicycle quality of service (QOS) in relation to the proposed "road diet" on DeGuigne Drive, per the updated 2014 VTA Transportation Impact Analysis (TIA) Guidelines. However, VTA notes that the analysis of potential effects on transit service (TIA pg. 35) is based on transit capacity rather than transit vehicle delay, as required per Section 9.2 of the 2014 TIA Guidelines. In addition, the TIA did not include an Auto Trip Reduction Statement (ATRS), as required per Section 8.2 and Appendix C of the 2014 TIA Guidelines. Please submit a revised TIA report or follow-up memo including the completed ATRS form and an analysis of transit vehicle delay due to the proposed project. As noted in the 2014 VTA TIA Guidelines (page 46), the transit vehicle delay analysis may simply utilize information produced by the intersection Level of Service analysis, or other sources if available.

The October 2014 version of the VTA TIA Guidelines can be found online at http://www.vta.org/cmp/tia-guidelines. For any questions about the updated TIA Guidelines, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

Pedestrian and Bicycle Accommodations

VTA commends the City and project sponsor for proposing to include multi-use trails within the site (Figure 2.0-2), green-colored bicycle lanes along E Duane Avenue, and a new pedestrian crossing of E Duane Avenue at San Miguel Avenue including high visibility crosswalks, in-pavement warning lights and curb bulb-outs (Figure 2.0-4). These improvements will encourage

walking and bicycling for daily tasks and improve pedestrian access to transit, thereby reducing automobile trips, vehicle miles traveled and greenhouse gas emissions associated with the project.

The existing sidewalks surrounding the site on Deguigne Drive and Duane Avenue appear to be only 4' in width, although the pedestrian conditions are improved by the presence of a planted buffer strip between pedestrians and automobiles with consistent street trees on all project street frontages. The site plans provided in the DEIR and TIA do not indicate whether the sidewalks will be widened as part of the project. VTA recommends increasing the sidewalk width while retaining the existing planted buffers as a condition of approval for the project. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve perceptions of comfort and safety on a roadway.

Bus Service

VTA provides bus service on Duane Avenue and maintains a bus stop on eastbound Duane Avenue adjacent to the project site. VTA recommends that the project provide the following bus stop improvements:

- A 10' X 55' PCC bus stop pavement pad per VTA standards.
- Sidewalk must have a minimum 8' X 5' concrete boarding area at the front of the bus stop to be in compliance with ADA requirements.
- No street trees within the bus stop loading area. If street trees are to be planted in the bus stop area, their location must be coordinated with VTA Passenger Facilities by contacting bus.stop@vta.org or 408-321-5800.
- Bus stop should be moved to the east, outside of the "T" intersection

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Brandert, Caltrans

SU1404

County of Santa Clara
Roads and Airports Department

101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

August 14, 2015

Ryan Kuchenig
Senior Planner
456 West Olive Avenue
Sunnyvale, CA 94088-3707

SUBJECT: Notice of Availability of Draft Environmental Impact Report
915 DeGuigne Residential Project

Dear Mr. Kuchenig:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to the draft environmental impact report (DEIR) and is submitting the following comments.

- On November 14, 2014, the County submitted a response to the Notice of Preparation for the DEIR requesting that all intersections on Lawrence Expressway between SR 237 and El Camino Real be studied as part of the Traffic Impact Analysis for the DEIR. However, the DEIR did not include the intersection of Lawrence Expressway/Kifer Road. Analysis for this intersection should be presented because traffic from Central Expressway accessing Lawrence Expressway would pass through this intersection which may cause significant impacts. Please provide a traffic impact analysis for this intersection and, should there be a significant impact, provide a mitigation measure to contribute a fair share toward the Lawrence Expressway Grade Separation Project.
- The DEIR did not use the approved CMP 2014 counts for PM peak for the CMP intersections resulting inconsistent Level of Service (LOS) findings from other studies. For expressway intersections that are not CMP or when CMP data is not available (i.e., AM Peak), comparison with 2013 data showed large differences in existing volumes resulting in better LOS than field conditions indicate. The correct existing traffic volumes must be used as it affects the results of the other scenarios and the identification of traffic impacts to expressway intersections. Please revise the Traffic Impact Analysis appropriately so that significant impacts can be properly identified and mitigated.
- With the available information in the DEIR, the County was not able to verify if accurate signal timing information was used for the analysis. Please demonstrate that accurate signal timing data was used. You may request this information by contacting Ananth Prasad (Ananth.prasad@rda.sccgov.org). If accurate data was not used, the traffic analysis needs to be corrected so that significant impacts can be properly identified and mitigated.
- Mitigation measure MM CUM-2.2 on Page 183 is not sufficient. The eastbound triple left turn alone on Lawrence Expressway/Duane Avenue-Oakmead Parkway will not mitigate impacts due to unbalanced lane utilization. Restriping of Lawrence Expressway between Duane Avenue and US 101 would also need to be implemented along with the proposed mitigation measure to improve lane utilization for proposed triple left to redirect lanes that connect to US 101 on ramps. Also, DEIR must demonstrate that the project is feasible geometrically – the eastbound and westbound left turn movements must operate simultaneously.

If you have any questions about these comments, please contact Aruna Bodduna at 408-572-2462 or at aruna.bodduna@rda.sccgov.org.

Sincerely,

Dawn S. Cameron
County Transportation Planner

cc: MA, AP

On Wed, Jul 22, 2015 at 9:46 AM, Milton Wu <miltonjwu@gmail.com> wrote:
Hi,

I'd like to comment on the proposal to add 450 townhomes at 915 DeGuine. In general, I'm in favor of the project, however, I am concerned about the size of the project.

Is there any ways we can decrease the size of the project? Also, I'd want to make sure that the location is pedestrian friendly. I'm also really concerned about increased traffic on Duane (already a busy street), and the related bottleneck point (Lawrence and Fair Oaks).

Perhaps one way to mitigate traffic (rush hour and weekend) is to make sure there is a viable grocery store in the plaza across the street (and better commercial development). Could we please look into helping that shopping center fluorish as a local destination of goods and services, minimizing the amount of traffic we see from local residents going OUT of the area to get daily needs? Thanks!

—Milton

P.S. Please make the proposed park... BIG!

Dept of Community Development
Att Ryan Kucheneig
My Name is Robt & Lloyd and Wife
Dorian Lloyd
We have lived at 641 Santa Paula Ave
Since 1957.
Now the Traffic is so bad on
Duane Ave we have a hard time
Getting on Duane Ave.
The Traffic is so bad.
The City is Retired and water.
I wonder where all the Water is
Coming From.
There is already so many New
Town Houses around here Now.
There should be a Time to Stop it
Robt & Lloyd
641 Santa Paula Ave
Sunnyvale Calif 94085

562 Carlisle Way
Sunnyvale, CA 94087

August 10, 2015
BY EMAIL (.PDF)

City of Sunnyvale
Department of Community Development
P.O. Box 3707
Sunnyvale, CA 94088-3707

Attention: Ryan Kuchenig
(rkuchenig@ci.sunnyvale.ca.gov)

Re: 915 DeGuigne Residential Project Draft Environmental Impact Report (DEIR)

Dear Mr. Kuchenig:

I would like the Final EIR to analyze the impact of the 915 DeGuigne Residential Project on the following public services:

EMS-paramedic capacity and response times
Trauma emergency capacity and access times
Emergency medical capacity and access times
Mental health services

The provision of emergency medical services (EMS) is divided between basic life support (EMT) and advanced life support (paramedics). The traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to people in need of their services. In addition, the traffic generated by the 915 DeGuigne Residential Project will impact the travel times of EMS-paramedic vehicles to local trauma/emergency medical care facilities. I would like the Final EIR to analyze the EMS-paramedic capacity and travel times. Sunnyvale Public Safety officers are trained to provide EMT-basic service, I am requesting an analysis of the EMS-paramedic service.

The growth of Sunnyvale's population induced by the 915 DeGuigne Residential Project will impact the region's trauma emergency facilities. I would like the Final EIR to analyze the capacity and access times to Sunnyvale's trauma emergency medical care facilities.

The additional people brought into Sunnyvale by the 915 DeGuigne Residential Project will impact Sunnyvale's emergency medical care facilities. The Final EIR should analyze the capacity and access times to Sunnyvale's emergency medical care facilities.

The Final EIR should analyze the impact of the 915 DeGuigne Residential Project on local mental health services. Mental health services include family counseling, mental health clinics and professionals, including those specializing in drug and alcohol abuse treatment.

The 915 DeGuigne Residential Project may have a limited effect on Sunnyvale's EMS-paramedic, trauma emergency, emergency medical and mental health care services, the cumulative impact of recent and future projects in the City of Sunnyvale should also be considered.

Regards,

Martin Landzaat

From: <Chris.Walz@l-3com.com>
Date: Mon, Aug 10, 2015 at 4:52 PM
Subject: East Sunnyvale
To: rkuchenig@sunnyvale.ca.gov

Hello,

I live a few blocks from the East Sunnyvale 936 E Duane Ave development and I am concerned about the proposed corner community park. There doesn't look to be much functionality with the proposed park layout – it's mostly trees with a little walkway and a tiny bit of grass. Are there any alternate layouts being considered?

It seems like the perfect size for a small playground (along with some picnic tables and BBQ pits). Or maybe instead of "redwood grove", a beach volleyball or bocce ball court could be added.

Thanks,

Chris Walz

956 San Saba Ct

Sunnyvale, Ca 94085

562 Carlisle Way
Sunnyvale, CA 94087

August 13, 2015
BY EMAIL (.PDF)

City of Sunnyvale
Department of Community Development
P.O. Box 3707
Sunnyvale, CA 94088-3707

Attention: Ryan Kuchenig
(rkuchenig@sunnyvale.ca.gov)

Re: 915 DeGuigne Residential Project Draft Environmental Impact Report (DEIR)

Dear Mr. Kuchenig:
I have the following comments:

In section 4.14.1.2 (School Facilities) and 4.14.3.2 (Schools), only data for current school enrollments and estimated increases due to the project are given. The Final EIR should analyze the cumulative impact of recent and future projects in the City of Sunnyvale on the listed schools. The Sunnyvale School District (SSD) and Fremont Union High School District (FUHSD) have 10 year enrollment projections, data from those projections should be included in the Final EIR. I have attached the enrollment projections for the SSD and FUHSD for your convenience.

In section 4.14.1.2 (School Facilities), it says the distance from the project to Fremont High School (FHS) is approximately 2.5 miles. According to Google Maps the walking distance is 3.4 miles.

Since the distance to FHS is great, the FUHSD sells discounted VTA bus passes to any student that lives north of El Camino Real.

In section 4.2.2.7 (Pedestrian/Bicycle Facilities and Transit Operations) is says

Currently, VTA bus routes that serve the project area are operating below capacity. As a

result, existing bus services can accommodate an increase in ridership demand resulting from the proposed project.

VTA route 55 is used by FHS students. From as far away as Lakewood Village, the route 55 bus picks up FHS students in several Sunnyvale neighborhoods. Due to the frequency of the route 55 bus and the school schedule, the route 55 bus is heavily impacted at certain times. The Final EIR should determine how many Fremont High students currently use the VTA route 55 bus. The author of the Final EIR should actually ride the route 55 bus from Lakewood Village to FHS on a school day morning and again at the end of the school day the from FHS to Lakewood Village to get an accurate count of FHS related ridership. The Final EIR should explain how an additional 45-68 FHS students generated by the 915 DeGuigne Project will be able to use the VTA route 55 bus.

Regards,

Martin Landzaat

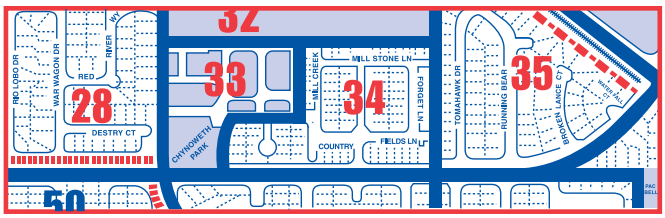
ENROLLMENT PROJECTION CONSULTANTS

Providing School Districts with Accurate Enrollment Forecasts by Location

Area 32
Older Mobile Home Park
450 units, 90 K-8 students, 0.20 SGR

Area 28
Recent Upper-Income Det. Homes
218 units, 85 K-8 students, 0.39 SGR

Area 33
Recent Upscale Townhouses
82 units, 9 K-8 students, 0.11 SGR



Area 34
Recent Middle-Income Det. Homes
94 units, 33 K-8 students, 0.35 SGR

Area 35
Older Middle-income Det. Homes
89 units, 57 K-8 students, 0.64 SGR

Elementary and Middle School
Attendance Boundaries

Superintendent and Board of Education
Sunnyvale School District
PO Box 3217
Sunnyvale, CA 94088-3217

December 1, 2014

Dear Superintendent and Board of Education:

This is the concluding documentation to the latest forecast update. As with our past reports, we start with a summary (below) and then provide some background information, including a table comparing your current enrollment to what was expected from a year earlier. Subsequent sections follow the order of the remaining tables, starting with the updated projections in Tables 2 and 3 and then the underlying factors to those numbers in Tables 4 to 7. The appendices provide more detail for those who want to delve further into the data.

Projections Summary

Despite the 48-student decline this year, the trends over the last several years, along with local birth data and the new housing expectations, continue to justify a projected enrollment increase. Total enrollment in the Sunnyvale School District (henceforth SSD or district) thus is forecast to grow in each of the next five years, resulting in 329 more students. This includes a rise by 88 from the "current" (October 1, 2014) 6,801 students to 6,889 in October 2015. Further gains of between 48 and 68 students are projected annually during the remainder of that period.

This growth occurs in both grade levels, but is much greater at the middle school level. The elementary and secondary totals are forecast to add similar amounts of 39 and 49 students, respectively, in the next year. Over the following 24 months, however, the net elementary difference, compared to the current total, is a gain of just 20 students (i.e., a drop by 19 from 2015). The middle school total in 2017, by contrast, could be 174 above this year's figure.[1] And while the projected rise in 2018 and 2019 is concentrated in the lower grades, the net differences over the next half-decade are still more significant at the middle school level, with 196 of the 329 additional students.

The expected changes also vary between attendance areas. The only projected "resident" student shift by more than 20 next year is in the Sunnyvale Middle region, with 46 students added. The Columbia region is instead forecast for a stable total. The modest elementary differences in 2015 are in the small range of from a 14-student loss for Fairwood to a gain of 19 for Ellis. The differences, however, become more significant in subsequent years. By 2018, the four elementary areas within the Columbia Middle region could have a combined net difference of zero students, while the Vargas area could have 24 fewer students and the combined Cherry Chase, Cumberland and Ellis area (in the Sunnyvale Middle region) should be up by more than 100 students. The result could be the latter three schools having a total of more than 2,550 resident students (in TK-5), with Cherry Chase above 900. Sunnyvale Middle's region is projected to gain over three times as many students (131) as Columbia's (37), resulting in the former approaching 1,300 students while the latter could have only around 750.

[1] Whenever just a year is stated in the text, such as 2017, the reference is for early October of that year.

Table 1: Comparison of Actual to Projected Enrollments*

Location and Enrollment Subject	Fall of	District-Enrolled Resident Students by Grade [TK]	TK+K	1	2	3	4	5	6	7	8	TK-8 Total
Columbia MS Region												
Actual	2013	[41]	315	326	316	329	287	290	242	242	242	2,589
Actual	2014	[79]	329	293	306	320	313	267	254	234	233	2,549
Projected from 2013-14	2014		341	299	316	313	322	276	267	241	239	2,614
Actual 2014 Shift, graduation into this grade			*NA*	*-22*	*-20*	*4*	*-16*	*-20*	*-36*	*-8*	*-9*	
2014 Difference, Actual-to-Projected			**-12**	**-6**	**-10**	**7**	**-9**	**-9**	**-13**	**-7**	**-6**	**-65**
Sunnyvale MS Region												
Actual	2013	[80]	595	510	570	464	455	421	409	370	391	4,185
Actual	2014	[90]	525	569	481	547	450	446	381	391	373	4,163
Projected from 2013-14	2014		512	575	497	566	444	436	400	407	370	4,207
Actual 2014 Shift, graduation into this grade			*NA*	*-26*	*-29*	*-23*	*-14*	*-9*	*-40*	*-18*	*3*	
2014 Difference, Actual-to-Projected			**13**	**-6**	**-16**	**-19**	**6**	**10**	**-19**	**-16**	**3**	**-44**
Total Enrollment (including incoming inter-district students and a few students listed at unlocatable addresses)												
Actual	2013	[121]	929	845	899	801	751	716	654	615	639	6,849
Actual	2014	[172]	869	876	800	879	768	725	641	632	611	6,801
Projected from 2013-14	2014		864	891	822	891	774	721	670	651	612	6,896
Actual 2014 Shift, graduation into this grade			*NA*	*-53*	*-45*	*-20*	*-33*	*-26*	*-75*	*-22*	*-4*	
2014 Difference, Actual-to-Projected			**5**	**-15**	**-22**	**-12**	**-6**	**4**	**-29**	**-19**	**-1**	**-95**

* Figures cover all TK-8 students in files provided to EPC by the SSD. Differences of 20+ students in 2014 are boxed.

Forecasting Issues in the Latest Enrollment Findings

Your student population had unexpected changes during the last 24 months. The "resident" TK-8 totals for the two middle school regions went in different directions between 2012 and 2013, with Columbia's losing 102 while Sunnyvale's gained 180.[2] Although we accurately projected that such extreme differences and amounts would not be repeated this year, what we did not foresee was that Sunnyvale's previous resident TK-8 growth by 180 would shift to a 22-student decline for this year. We instead had projected a modest rise by that same number, for a difference of 44 between the actual and projected resident Sunnyvale TK-8 totals for this year (see far right column in center section of Table 1). Some of the student-body-class reductions that contributed to this decline were significant, such as last year's 510 resident students in first grade becoming just 481 in second grade for this year. That was a net loss of 29 students. The reduction in the class graduating from fifth to sixth was even more severe, at -40 in the Sunnyvale area. Nonetheless, when one considers that the aggregate difference over the last two years is 158 more students in the Sunnyvale region, the general recent trend is still for growth.

This year's TK-8 total in the Columbia area fell by another 40 rather than having the projected growth by 25, for a notable 65-student deviation. Contributing to the latest drop were again some unusually large reductions in a few class advancements, such as losing 20 (6%) in graduating from first to second, that are unlikely to continue to the same degree. This and other factors discussed later justify expecting a more stable Columbia resident TK-8 total.

[2] "Resident" numbers are the district-enrolled students with home addresses in a specified area, regardless of the schools they actually attend. "Sunnyvale" without accompanying wording, such as "City of", means related to Sunnyvale Middle School.

District-Wide Projected Enrollments

The total enrollment is forecast to grow by 329 students in the next five years (see bold box in Table 2 on page 4). The largest annual increase (in the TK-8 total) is projected for 2015, with 88 students added. Between 48 and 68 more students are added in each of the following four years.

This rise will be concentrated at the secondary level, especially in 2016 and 2017. The forecast is to gain 39 and 49 students in the elementary (TK-5) and middle school (6-8) totals, respectively, next year, which is relatively balanced. Over the following 24 months, however, all of the net increase is projected at the middle school level, with an additional 125 students (to 174 above the current figure). The elementary count, by contrast, could fall by 19 during that time, to just 20 more than at present. And while the increase in 2018 and 2019 becomes greater at the elementary level, the total net differences in five years are 133 more elementary students and 196 additional middle school students. That is almost a 50% larger rise in the secondary grades.

As we have said in the past, the main reasons for these grade-level variances are (1) extrapolations of the current enrollment distribution through the grades and (2) the projected TK+K amounts. Your district has had a tendency to lose students, in net, as each class graduated into the next grade. This trend became more pronounced in the Columbia region in the last two years and the Sunnyvale region in the latest year, as is alluded to in the previous section. It therefore is not surprising for there to be fewer students now in each of the middle school grades than in either of the two highest elementary grades (4-5) and, in turn, to have fewer in either of those upper elementary grades than in any of the lower grades (TK-3). Nonetheless, with 114 more students now in fifth than eighth and over 230 more students in third than any middle school grade, these differences are too great to be offset by losses as those classes graduate upward. Even after projecting a net decline by 60 as those 725 fifth graders advance into sixth, the result is still a much higher total in sixth than the 611 currently in eighth (who will have graduated). Two years later, when that exceptionally large third grade class will have graduated out of the elementaries and into the middle schools, there will be corresponding impacts by grade level (i.e., elementary loss and secondary gain).

Also impacting the elementary total are the projected TK+K amounts.[3] The current TK+K enrollment correlates to an unusually low birth year (2009) in the City of Sunnyvale zip codes. With higher birth totals since 2009 in those zip codes (in aggregate) and children moving into new housing during the intervening five years, moderately larger TK+K amounts are likely in the near term, with further growth probable in subsequent years, as is explained later in the report. This TK+K increase offsets the decline that otherwise would have occurred in the elementary total as the largest current classes, particularly the current third graders, start graduating into the middle schools.

Continuing this higher TK+K expectation after 2019, which is reasonable considering the improving economy and the large number of homes forecast in the next decade, should contribute to further enrollment growth to 2024. The projected increase by 573 students in ten years, however, is only a general "target" estimate. There is a wide potential range of deviation from any forecast that far into the future. Birth totals could vary greatly in the next few years, with corresponding kindergarten impacts. The number of new housing units being built also could be significantly different in the final forecast years. We therefore recommend focusing your planning on the projections through 2019 and using these 2024 enrollment estimates solely for "what if" facility considerations.

[3] We are projecting TK (transitional kindergarten) and K (kindergarten) students together due to how the District handles TK students. Most of the TK students (estimated at 85%) go directly into first in the following school year. This keeps the TK+K total close to representing a 12-month birth period, just as all grades historically have. There is no real need to separate TK from K in the analyses and projections accordingly.

Table 2: Actual and Projected Students by Grade and Grade Level, October of 2013 to 2024

Early Oct. of	Actual and Projected Total Enrollment by Grade (including SDC)									Actual and Projected Total Enrollment by Grade Group		
	TK+K*	1	2	3	4	5	6	7	8	**TK-5**	**6-8**	**Total**
2014**	869	876	800	879	768	725	641	632	611	4,917	1,884	6,801
2015***	895	853	837	793	845	733	665	635	633	4,956	1,933	6,889
2016***	876	882	816	827	765	803	674	659	635	4,969	1,968	6,937
2017***	897	862	848	803	797	730	730	667	661	4,937	2,058	6,995
2018	916	883	828	840	775	761	669	723	667	5,003	2,059	7,062
2019	927	901	848	820	812	742	698	662	720	5,050	2,080	7,130
2024****	934	915	878	870	844	806	729	707	691	5,247	2,127	7,374
Total Grade-Level Enrollment Change in One Year, to October of 2015										**39**	**49**	**88**
Total Grade-Level Enrollment Change in Two Years, to October of 2016										**52**	**84**	**136**
Total Grade-Level Enrollment Change in Three Years, to October of 2017										**20**	**174**	**194**
Total Grade-Level Enrollment Change in Four Years, to October of 2018										**86**	**175**	**261**
Total Grade-Level Enrollment Change in Five Years, to October of 2019										**133**	**196**	**329**
Total Grade-Level Enrollment Change in Ten Years, to October of 2024****										330	243	573
*Real Potential Lower Total in 2015 (essentially -1.25% mainly due to potential TK+K deviation*****)*												*6,800*
*Real Potential Higher Total in 2015 (essentially +1.25% mainly due to potential TK+K deviation*****)*												*6,980*
Real Potential Lower Total in 2019 (essentially -3.75% within footnote caveats)												*6,860*
Real Potential Higher Total in 2019 (essentially +3.75% within footnote caveats)												*7,400*
Projected Students from New Housing:												
2019	10	10	9	9	8	8	6	6	7	54	19	73
2024****	19	18	17	17	16	15	14	13	14	102	41	143

* Kindergarten cutoff birthdate shifted from Dec. 2 to Nov. 1 for 2012-13, from Nov. 1 to Oct. 1 for 2013-14 and from Oct. 1 to Sept. 1 for 2014-15, resulting in the kindergarten in each of those school years covering only 11 months of births (such as for births from Oct. 1, 2008, to Sept. 1, 2009, being in the 2014-15 kindergarten age group). Transitional Kindergarten (TK) expanded accordingly from covering one birth month in 2012-13 to three months in 2014-15 and thereafter. The Sunnyvale School District (SSD), however, places TK students in the same classrooms, with the same program, as K students and then lets any of the TK students graduate directly into first grade upon parent request, for which most have been doing so. This means there has been little distributional impact through the grades due to the K cutoff date shift and the creation of the TK program. (In most districts there is now more than a 12-month birth period enrolled in TK+K.)

** Actual October 1, 2014, enrollment using student files provided by the SSD.

*** TK+K totals through 2017 include the impact of the recent economic situation on birth totals starting in 2009.

**** Forecasts more than five years into the future have a wide potential range of deviation and should be considered solely as general estimates.

***** The TK+K fluctuations from the forecast in any one year can be more significant than are likely on an ongoing basis.

Notes: Projections and real potential ranges are for currently operating facilities and programs (including at local private schools), with the ranges covering essentially an 80% probability. Under those assumptions, there are approximately 10% possibilities for each of even lower or higher numbers than the ranges shown. All figures include SDC students in TK-8.

Projected Resident Student Populations by Existing Attendance Areas

The following text is repeated from past reports. Readers who already know how to interpret the difference between resident and attending figures can skip to *"Key Findings Related to the Projections by Location"* (below).

This forecast is again based on an analysis of where the students live (the resident population[4]) rather than the schools they happen to attend (the attending enrollment). Resident populations differ from enrollments mainly because of (1) known intra-district enrollment (between SSD schools) and (2) known inter-district enrollment (from addresses that are outside the SSD). By coding all of the student addresses to planning areas that represent various housing types and locations, we have been able to identify and evaluate how the student population is evolving in each situation. We flip back-and-forth between these "resident" and "enrollment" amounts in the text below and it is important to remember the distinction between these two types.

Understanding the Data in Table 3

Table 3, on page 6, contains two sets of data. The figures on the left (under *"Actual Resident-to-Enrollment part"*) show how the current enrollment at each school differs from the resident population. There are 551 SSD-enrolled TK-5 students, for instance, with home addresses in the Lakewood attendance area. Lakewood's enrollment, however, is 458, which is 93 less than that resident total. This net difference is shown by the "-93" in the top row of the "Attending Adjust" column in the table. The second set of data, on the right side of the table (under *"Projected Resident Student Population part"*), covers the projected resident amounts. These are not projected enrollments. They do indicate, however, the extent to which the current areas might continue to be suitable without any revisions. In Cumberland's case, the total TK-5 population rises by only 12 for next year but could be up by 44 to 2016 and 71 (cumulative) in 2018, as is shown in bold in the columns on the right side of the table.

Key Findings Related to the Projections by Location

The resident student differences within each attendance area are relatively small for 2015. The only region forecast for a change by more than 20 students is Sunnyvale Middle, with 46 added (in the relevant grades). Next year's resident Columbia total, by contrast, is projected to be down by one student. All of the elementary regions are forecast for resident totals (in TK-5) that are within 20 of their current figures. The largest gain is by 19 for the Ellis region and the greatest decline is by 14 in the Fairwood attendance area, neither of which is a major shift.

More significant cumulative differences are projected over the next two-to-four years. This is particularly true in the southern part of the SSD. The Cumberland and Ellis regions are forecast to add 44 and 27 students, respectively, between 2014 and 2016. While the resident Cherry Chase number drops by a nominal eight students in two years, if the internal growth for Cumberland and Ellis means they can no longer take Cherry Chase students as intra-district transfers or "overflows", then the enrollment could rise for Cherry Chase as well. Without some resident students attending other schools, the Cherry Chase enrollment could exceed 900. The one exception among the four elementaries in the Sunnyvale region is Vargas, with a modest projected resident student decline into the mid 500s.

The four elementary areas in the Columbia region collectively have only minimal projected changes through 2018. Although the resident student expectations are modest declines for Fairwood and Bishop and comparable gains for Lakewood and San Miguel, the aggregate projected difference from 2014 to 2018 is exactly zero.

The largest resident increase will occur in the relevant grades for Sunnyvale Middle. The forecast is for that area to add 131 students in four years, which is more than three times the 37-student rise projected for Columbia. The projected result is a Sunnyvale total approaching 1,300 by 2018 and a Columbia count of about 750. That would be a difference of more than 500 resident students between the two middle schools.

[4] "Resident" throughout this report means physical resident, not legal resident.

Table 3: Actual Enrollments and Actual and Projected Resident Student Populations by School
(with color highlighting of growth in yellow and decline in orange for attendance area change differences of 20+ students)

School	*Actual Resident-to-Enrollment part*			*Projected Resident Student Population part*						
	Actual October 1, 2014*			Projected Resident Student Population in the Relevant Grades on October 1 of				**Projected Resident Student Population Change to Oct. of**		
	Resident Students	Attending Adjust**	Attending Enrollment	2015	2016	2017	2018	**2015**	**2016**	**2018**
Lakewood	551	-93	458	562	563	562	565	**11**	**12**	**14**
Fairwood	232	205	437	218	209	216	219	**-14**	**-23**	**-13**
Bishop	630	-1	629	634	614	607	607	**4**	**-16**	**-23**
San Miguel	415	-15	400	431	439	431	437	**16**	**24**	**22**
Vargas	572	-28	544	573	558	550	548	**1**	**-14**	**-24**
Cherry Chase	895	-23	872	885	887	895	907	**-10**	**-8**	**12**
Cumberland	709	39	748	721	753	748	780	**12**	**44**	**71**
Ellis	842	-13	829	861	869	853	865	**19**	**27**	**23**
Elementary Total***	4,846	71	4,917	4,885	4,892	4,862	4,928	39	46	82
Incoming IDA (TK5)	60	-60	NA	60	66	64	63	0	6	3
Unlocatable (TK-5)	11	-11	NA	11	11	11	12	0	0	1
Columbia	721	11	732	720	746	750	758	**-1**	**25**	**37**
Sunnyvale	1,145	7	1,152	1,191	1,202	1,286	1,276	**46**	**57**	**131**
Middle Total***	1,866	18	1,884	1,911	1,948	2,036	2,034	45	82	168
Incoming IDA (6-8)	17	-17	NA	20	18	20	22	3	1	5
Unlocatable (6-8)	1	-1	NA	2	2	2	3	1	1	2

* Actual totals, and all other figures, are based on student records provided by the Sunnyvale School District (SSD).

** School net attending adjustments include (1) intra-district attendance, (2) incoming inter-district attendance (IDA) and (3) students listed at unlocatable addresses. Outgoing inter-district attendance was not identified. See Appendix A for additional information.

*** Elementary and middle school resident totals exclude both incoming IDA and students listed at unlocatable addresses.

Note: Projected amounts contain hidden fractions, so the totals above may not sum exactly to those shown in other tables.

Underlying Factors to the Projections: Trends in Existing Housing

All of the trend findings in "existing housing" have been recalculated for this study, including by several value classifications of single-family-detached residences ("SFD") and attached units ("ATT", covering apartments, condos, townhouses and plexes). There also are residual groupings for students from mobile homes ("MH") and in areas with a thorough mix of housing types. A key change from past studies, however, is that we are now using October 1, 2010, as the cutoff date for identifying areas of almost exclusively "existing housing". This changed the student numbers in the categories that had dwellings added between the previous October 1, 2006, cutoff date and the current 2010 date. Key information on the main housing trends is summarized in Tables 4A, 4B and 5, with additional details, including the by-grade figures and for the categories of MH, mixed-type and inter-district students, provided in Appendix B1. Readers already familiar with how to interpret the data in these tables can jump ahead to the *"Key Findings Related to the Data in Tables 4A and 4B"* subsection (lower page 7).

Understanding the Data in Tables 4A and 4B

The Table 4A figures (see page 8) are for the resident totals of district-enrolled students in October of the last three years (2011 to 2014) coming from areas of "existing housing". The purpose of this data is to identify how the student population is evolving in the established neighborhoods, by type and general value levels. The counts are provided in groups of essentially three grades each (TK-2, 3-5 and 6-8, as well as in TK-8) so that we can easily show both (1) how the populations have changed as those students graduated upward by three grades in three years and (2) the general age distribution of the students. Existing "Relatively Affordable & Modest" SFD residences, for instance, had 568 students in TK-2 in 2011 and 529 students in grades 3-5 this year, which was a net loss of 39 students in that population as it graduated forward by three grades. This is shown as "-39" in the table (see lowest row in top section of page 8). We also show how the TK-2 group itself has changed during that time, which was a net decline by 21 students in falling from 568 to 547. That shift in TK-2 is "boxed" because it is an important indication of whether the families of the students are getting older, with declining kindergartens likely, or are instead becoming younger (through turnover), thereby generating potential kindergarten growth.

For those who are reading the version of this report with color highlighting in the tables, you also will see (1) yellow shading for when the TK-2 and/or TK-8 totals were rising, (2) orange shading for when either or both of those totals were declining, (3) blue in the boxes showing positive three-year differences and (4) pink in the boxes identifying negative three-year differences. The purpose of this is to more clearly show, within each category, if the three-year differences came from consistent trends or shifting amounts. Again using "Relatively Affordable & Modest" SFD homes as an example, the TK-2 and TK-8 totals rose from 2011 to 2012 and declined since then, which means the reductions were greater in the last two years (by 39 and 70) than the three-year figures indicate.

Also provided in Table 4A are the differences in the current totals from the amounts projected a year ago. We are including this to show where the largest deviations occurred.

Table 4B has the same structure as 4A, but the comparison is between areas of existing and new housing.

Key Findings Related to the Data in Tables 4A and 4B

How sudden the shift from growth to decline was in most of these categories can be seen in Table 4A. For the "Moderate to Upper Incomes" SFD category, the TK-8 total rose from 1,407 in 2011 to 1,437 in 2012 and then 1,528 in 2013. That was a two-year increase by 121 students. We only had projected an additional four students in 2014, for a much slower rate of growth than before, but that still turned out to be high by 16 because the total instead went down by 12. Nonetheless, that small decline needs to be put in the context of the significant gaining trend over the last three years. The TK-8 total from the less expensive SFD neighborhoods, by contrast, shifted so clearly into decline that the rise from 2011 to 2012 was more than offset. There also was greater than a 10% loss as the 518 students in 3-5 in 2011 became just 449 in 6-8 today (-69). Even if that rate of decline continues, however, there still should not be nearly as much future reduction (if any) in the 6-8 and TK-8 totals because of how low the current 6-8 count is (at 449 now versus 496 in 2011).

Also flipping from growth to decline during the last three years were the "Most Affordable" ATT units. The totals in both TK-2 and TK-8 rose from 2011 to 2012 (and by much more since 2009, which are not shown in these tables) but have fallen since then. The current distribution, plus continuation of the significant reductions as classes graduate upward, suggests that further consequential student decline will occur in these units (in aggregate). The updated projections follow this finding, which mainly impacts the northern part of the district. If not for significant new housing amounts and generally rebounding birth figures in all residences, the results of this "Most Affordable" ATT trend would have been lower total enrollments in the northern attendance areas.

The other value ranges of existing ATT units, which we have merged together into "Affordable to High Amenity", collectively followed the same basic TK-2 and TK-8 patterns as the more expensive SFD homes. What happened in 2014 does not change the strong growth trend over the last several years. The TK-2 total, after rising by 47

Table 4A: Student Population Trends from Areas of Existing Detached and Attached Housing*
(color highlighting means: yearly growth in yellow and decline in orange; three-year growth in blue and decline in pink)

Classification of Existing Dwellings				Resident Students by Grade Group				Projected	Actual
Type**	Category***	Subject****	Oct. of	TK-2	3-5	6-8	TK-8	TK-8 from 2013-14	Differs from Proj.
SFD	**Relatively Affordable & Modest**	Resident Total	2011	**568**	518	496	**1,582**		
			2012	**586**	521	488	**1,595**		
			2013	**577**	516	461	**1,554**		
			2014	**547**	529	449	**1,525**	1,542	-17
		3-Year Change Within Group		**-21**			**-57**		
		3-Year Change from Prior Group			-39	-69			
	Moderate to Upper Incomes	Resident Total	2011	**517**	477	413	**1,407**		
			2012	**499**	523	415	**1,437**		
			2013	**550**	540	438	**1,528**		
			2014	**551**	526	439	**1,516**	1,532	-16
		3-Year Change Within Group		**34**			**109**		
		3-Year Change from Prior Group			9	-38			
	All SFD (including two mixed-value areas)	Resident Total	2011	**1,098**	1,008	919	**3,025**		
			2012	**1,097**	1,055	912	**3,064**		
			2013	**1,142**	1,067	911	**3,120**		
			2014	**1,110**	1,067	897	**3,074**	3,112	**-38**
		3-Year Change Within Group		**12**			**49**		
		3-Year Change from Prior Group			-31	-111			
ATT	**Most Affordable**	Resident Total	2011	**631**	564	458	**1,653**		
			2012	**634**	556	494	**1,684**		
			2013	**613**	534	479	**1,626**		
			2014	**569**	560	472	**1,601**	1,625	-24
		3-Year Change Within Group		**-62**			**-52**		
		3-Year Change from Prior Group			-71	-92			
	Affordable to High Amenity	Resident Total	2011	**548**	396	280	**1,224**		
			2012	**563**	423	261	**1,247**		
			2013	**595**	405	287	**1,287**		
			2014	**569**	445	284	**1,298**	1,323	-25
		3-Year Change Within Group		**21**			**74**		
		3-Year Change from Prior Group			-103	-112			
	All ATT	Resident Total	2011	**1,179**	960	738	**2,877**		
			2012	**1,197**	979	755	**2,931**		
			2013	**1,208**	939	766	**2,913**		
			2014	**1,138**	1005	756	**2,899**	2,948	**-49**
		3-Year Change Within Group		**-41**			**22**		
		3-Year Change from Prior Group			-174	-204			

(footnotes provided at the bottom of Table 4B)

Table 4B: Student Population Trends between All Existing and New Housing Locations*
(color highlighting means: yearly growth in yellow and decline in orange; three-year growth in blue and decline in pink)

Dwelling Classification Type**	Category***	Subject****	Oct. of	Resident Students by Grade Group TK-2	3-5	6-8	TK-8	Projected TK-8 from 2013-14	Actual Differs from Proj.
All	**All Existing*** (includes mobile home parks and areas with a mix of housing types)	Resident Total	2011	**2,523**	2,185	1,842	**6,550**		
			2012	**2,561**	2,246	1,858	**6,665**		
			2013	**2612**	2,235	1,884	**6,731**		
			2014	**2480**	2,326	1,854	**6,660**	6,750	**-90**
		3-Year Change Within Group		**-43**			**110**		
		3-Year Change from Prior Group			-197	-331			
SFD	**Recently Built Middle Income** (only new SFD since Sept. 2010*)	Resident Total	2011	**4**	1	1	**6**		
			2012	**4**	3	3	**10**		
			2013	**7**	2	2	**11**		
			2014	**8**	4	2	**14**	13	**1**
ATT	**Recently Built High Amenity** (only new ATT since Sept. 2010*)	Resident Total	2011	**9**	7	4	**20**		
			2012	**13**	11	7	**31**		
			2013	**20**	11	12	**43**		
			2014	**23**	17	12	**52**	70	**-18**

* Existing housing figures are from planning areas with fewer than five net additional housing units since September 2010. New housing locations are those planning areas with a net increase of at least five housing units since September 2010.

** "SFD" = single-family-detached homes; "ATT" = attached, for apartment, condo, townhouse and plex units

*** Categories are subjective assignments by EPC of the dominant housing situation in each planning area.

**** Changes are over three years for groupings of three grades, with TK-2 compared to the prior K-2, 3-5 to the prior K-2, 6-8 to the prior 3-5, and TK-8 to the prior K-8. TK-2 currently contains 36 birth months, as do the three-grade groups.

(nearly 9%) from 2010 to 2012, did drop back by 26 this year. That shift in the lowest grades limited the TK-8 increase to just 11 in 2014. This was the largest "existing housing" deviation from the last forecast, in percentage terms, in being 2% (25 students) below the projections. But the multi-year trend is still for significant growth and rebounding birth numbers should restore that trend in both TK-2 and TK-8.

The one situation where the trends notably differed between these ATT dwellings and the more expensive SFD homes is in the advancement patterns between the three-grade groups. Those SFD residences had a small gain as the students graduated from TK-2 to 3-5 and a moderate decline (by 38, or 8%) from 3-5 to 6-8. Existing "Affordable to High Amenity" ATT units, by contrast, had reductions by 103 and 112 students in the graduations into 3-5 and 6-8, respectively. A net of over one in every four students (almost 29%) in grades 3-5 in 2011 was no longer enrolled in the SSD in 6-8 this year. That rate of decline is so severe and so far outside the norm for this category that we doubt it will continue to the same degree. We discuss this further in the next subsection.

The only other deviation from the forecast by more than 1.5% was in the new "High Amenity" attached housing. Hundreds of such new units were "first occupied" in the twelve months up to October 1, 2014, but very few SSD students are listed at addresses in those dwellings. The projections were high by 18 students as a result (see lowest data row in Table 4B). While it is common for the average student generation rates (SGRs) to be much lower in the first months after a tract is built, with a subsequent student increase, having such a small current total is a surprise. That count should rise with time, as is explained in more detail in the SGR section of this report.

The bottom line is that, among all of the unexpectedly lower student numbers by housing type in 2014, only the TK-8 losses in the "Most Affordable" ATT group appear probable to continue. Those reductions should be more than offset by gains elsewhere in the future.

Advancement Rates from Existing Housing

Readers who understand advancement and cumulative rates can jump to the *"Key Findings …"* subsection below.

Grade-to-grade advancement rates are calculations of the net change in the number of students in each grade as they graduate into the next grade in the following school year. These figures, which are sometimes called cohort survival rates, are most applicable to an accurate forecast when they are determined specifically for students from existing dwellings. For example, if there had been a total of 100 students in kindergarten last year and 105 in first grade this year from the same group of homes, that would be a +5% (1.05) net advancement rate gain. Such rates usually are averaged over the last several years within each single-grade advancement to avoid giving too much influence to nuances that may have occurred in any one year.

For this study, we again determined the average over the last four years, with a slight "weighting" added for the change in the last year. The recent population counts by grade and the resultant calculated single-grade rates are provided in Appendix B1 for each major housing category. The cumulative impacts of those rates are discussed below, in relation to the figures shown in Table 5 on page 11.

These rates are a different way to evaluate the existing housing trends described in the previous section. There is one key difference, however, which is that the student totals also change due to the class sizes of the incoming TK+K students and outgoing eighth graders; those do not factor into advancement rates.

Understanding the Data in Table 5 and the related Appendix B1

Cumulative rates shown in the column titled "This Study" in Table 5 are the result of a compounding of the latest individual grade-to-grade advancement rates from first to eighth. This identifies the change, from the same housing units, in each student body class as it graduated upward through the grades.[5] Using the "Relatively Affordable & Modest" SFD category in the table as an example, the "0.74" means that 100 students in first grade in one year would become 74 students seven years later in eighth grade (i.e., a 26% reduction), if these rates continue to occur.

Key Findings Related to the Data in Table 5

The latest cumulative rates are down in every category compared to our previous calculations, despite having several overlapping years of data. For detached residences, the updated rates are within the ranges in the three SSD studies prior to last year's and thus are not as great an issue. While the latest 0.74 figure in the "Relatively Affordable & Modest" SFD homes is outside the "normal range" being determined elsewhere for that housing category (i.e., 0.75 to 1.15), it nonetheless is in the vicinity of what has been calculated before within the SSD. And the new 0.89 rate identified in "Moderate to Upper Income" SFD dwellings is a return to being within the past range in the SSD (0.88 to 0.94); it was the last study's higher 0.97 figure that was the exception.

The latest rates in both value groups of ATT housing, however, are much lower than in any of our last four SSD studies. For the "Affordable to High Amenity" units, in particular, the new 0.57 figure is not only both 10% below

[5] We exclude the rate entering first grade from this cumulative calculation because that is impacted by both (1) students coming from private kindergarten programs and (2) a few TK students not going into first grade in the following year. Those factors, while important, are separate issues from identifying the changes occurring in existing housing through turnover, which is the main reason for identifying these cumulative rates.

Table 5: Summary of Recent Cumulative Advancement Rates by Category of Existing Housing*

Residential Category**	Current SSD Students	Cumulative Average Advancement Rates from 1st to 8th*** This Study	Last Study	Prior Three Studies	Normal Range
SFD: Relatively Affordable & Modest	1,525	0.74	0.76	0.74 - 0.82	0.75 - 1.15
SFD: Moderate to Upper Income	1,516	0.89	0.97	0.88 - 0.94	0.80 - 1.30
ATT: Most Affordable	1,601	0.81	0.87	0.93 - 1.01	0.75 - 1.15
ATT: Affordable to High Amenity	1,298	0.57	0.63	0.74 - 0.79	0.75 - 1.20

* These "existing housing" figures are from aggregate counts of planning areas with virtually no net increase in dwelling units since Sept. 2010, with the exception of the prior-study rates for "ATT: Affordable to High Amenity" being since Sept. 2006.

** "SFD" = single family detached homes; "ATT" = Attached, for apartment, condo, townhouse and plex units; Categories are subjective assignments by EPC of the dominant student-generating housing situation in each planning area.

*** Cumulative rates are the cumulative impact from first to eighth grades of the individual grade-to-grade net advancement (a.k.a., cohort survival) rates averaged over several recent years. For example, "ATT: Affordable to High Amenity" units, in aggregate, have averaged net population losses in the number of students in the graduation from most grades into the next. The cumulative impact of those rates is 0.57 (-43%). This means that, if these rates continue, there eventually would be 43% fewer eighth graders from these same housing units as there had been first graders seven years earlier. The rate of change between kindergarten and first grade is excluded from these cumulative rates because that is often impacted by students coming out of private kindergarten programs. While those private kindergarten programs are an important forecast component, that is a separate issue from evaluating the impact of housing turnover, which is the main purpose of these cumulative rates. The "Normal Range" is the recent vicinity that over 80% of our clients are in for the categories listed. A few districts have figures well outside these ranges.

Note: see Appendix B1 for additional information

the rate in the last study (0.63) and more than 20% under those in prior studies (0.74 to 0.79), it also is far outside the “normal range” elsewhere. Whenever we calculate cumulative rates that deviate so severely from the norm, our usual finding a study or two later has been that the figure evolved toward the normal range. Although that did not happen between the last study and this study, it remains the more probable scenario for the future. The updated projections follow this expectation, while still having a cumulative rate that is below the normal range.[6]

What this table does not show (see Appendix B1 instead) is that a key source of these low cumulative rates continues to be in the underlying grade-to-grade rates from fifth to sixth. Shifts to private school attendance starting in sixth grade appear to be contributing to this. That is projected to be ongoing.

Comparison of Local Birth Counts to Corresponding Kindergarten Populations

One method for estimating pending kindergarten enrollments is to review local birth statistics. While we feel that identifying the evolving trends in each neighborhood and housing category are just as important, birth data is useful if there is a consistent correlation between births and the corresponding (five years later) kindergarten populations in the local area.

These births-to-kindergarten figures are provided in Table 6 on page 12. The birth counts are for the combined 94085, 94086, 94087 and 94089 zip code regions, which cover a much larger area than the district. It thus

[6] The latest rate calculated in the “Most Affordable” ATT units is projected to continue.

Table 6: Comparison of Births in Local Zip Codes to Corresponding SSD-Enrolled Kindergarten and TK Students*

Birth Year and School Enrollment Date	**Total Births in Sunnyvale Zip Code Areas**	Resident District-Enrolled Kindergarten and TK Students	Ratio of Kindergarten and TK Students to Births
2004 Births and Oct. 2009 Kindergarten Students	2,309	801	35%
2005 Births and Oct. 2010 Kindergarten Students	2,373	863	36%
2006 Births and Oct. 2011 Kindergarten Students	2,407	906	38%
2007 Births and Oct. 2012 Kindergarten Students (incl. TK)	2,513	851	34%
2008 Births and Oct. 2013 Kindergarten Students (incl. TK)	2,443	910	37%
2009 Births and Oct. 2014 Kindergarten Students (incl. TK)	**2,288**	854	37%
Average Relevant to Kindergarten in last Three Years	2,415		36%

	note that birth counts below are higher than in latest year above, so TK+K total should rise	If the current method by which the SSD handles TK, K and 1st grade enrollments continues, then the pending resident TK+K totals could be guided by the following figures**	
		3-Year Avg. Ratio	Current Ratio
2010 Births and Potential Oct. 2015 Kindergarten+TK totals	**2,432**	879	908
2011 Births and Potential Oct. 2016 Kindergarten+TK totals	**2,299**	831	858
2012 Births and Potential Oct. 2017 Kindergarten+TK totals	**2,428**	878	906

* These are the kindergarten and TK students with home addresses in SSD parts of the 94085-7 and 94089 zip code areas.

** This is assuming that 85% to 90% of each year's TK students become 1st graders in the following year (skipping K).

Sources: State Center for Health Statistics (births) and EPC (kindergarten and TK totals, based on SSD student records)

Notes: (1) These figures are one of many factors in the kindergarten projections. Enrollment trends by location and new housing are also key factors, with modest revisions based on the above data. (2) See Appendix B2 for additional information.

makes sense (along with private school enrollment) that only a portion of those births showed up as SSD kindergartners and TK students five years later. As can be seen in the top data row of the table, for instance, the 2,309 births in 2004 translated into just 801 resident kindergartners in the fall of 2009. That is a 35% ratio. For the last three school years, the correlative average is 36% and the latest ratio is slightly higher at 37%.[7]

What is of greater importance here, however, is not the correlative ratio, but the direction of change in the number of births. The birth total relevant to the current TK+K population was just 2,288. The birth totals relevant to the next three years of TK+K are all larger than that, including an increase by 144 (from 2,288 to 2,432) for the birth year correlating to the 2015 TK+K.[8]

As local housing costs continue to soar, there may be a net reduction in families of marginal financial means in the most affordable units, but the trend in all other residences should follow the usual pattern of increased birth numbers in “good” economic times. That expectation justifies projecting even higher birth numbers after 2012.

[7] The 2007-to-2012 34% ratio is considered a statistical exception. Aside from that, as birth counts went up, the corresponding TK+K total went up, and when the birth total dropped in 2009, the corresponding (current) TK+K also went down.

[8] The procedure by which the SSD is handling students of TK-eligibility age, with the probability that about 85% will go into first grade in the following year (skipping K), should lead to only slightly more than 12 months worth of births ever being in TK+K.

Projected Impacts of New Housing

New dwellings impact the enrollment through a combination of (1) the number of residences expected in the various housing types, by year and location, and (2) the projected number of students in each of those units. These two components are discussed in the following italicized subsections. Most of the text below (other than the updated rates) is repeated from past reports, so some readers may want to skip to *"Projected New Housing"*.

Average Student Generation Rates (SGRs) from Recently Built Housing

Student generation rates (SGRs) are the average rates at which residences "yield" students, such as one student in every two homes (a 0.50 SGR). SGRs usually are calculated by identifying the number of district-enrolled students in a suitable sample of residential units from the local area.

The rates identified from recently built housing are often considered the best estimation of what similar future homes will generate, at least in the first few years of occupation. Four such SGR categories were determined necessary (and have been updated) for the projections. These categories are:

(1) "SFD and SFA" - tracts of mostly market-rate, single-family-detached (SFD) and comparable attached (SFA) homes (i.e., large plex units with attached two-car garages for each unit and private outside areas)

(2) "Regular ATT" – all non-SFA attached (ATT) housing developments with a majority of market-rate units

(3) "BMR Non-SRO" (ATT) – attached complexes with at least 50% of the units originally offered at below-market rates (i.e., affordable to occupants with annual incomes below a certain level, such as 80% of the median income); this excludes motel-like "SRO" (single room occupancy) BMR projects

(4) "BMR SRO" (ATT) – BMR units that generally are studios with only limited kitchen facilities and have no more than one parking space per unit

Samples taken in these categories were refined with this update to include the most recently completed tracts and exclude developments that are now too old (i.e., built before 2008 for both "SFD and SFA" and "Regular ATT"). The updated sample of 60 new "SFD and SFA" homes in the SSD currently provides 14 district-enrolled students. That translates into a TK-8 SGR of 0.23, or the equivalent of 23 students in every 100 such new residences. Since 13 of the 14 students in this sample are now in the elementary grades, there is a concentration of young families and thus a likelihood of a rising SGR over the first decade of occupation. There are only 25 SSD students coming from the revised sample of 1,121 recent "Regular ATT" units, for a 0.02 TK-8 SGR. This rate should rise significantly over time, which is a common occurrence from Regular ATT units.

The latest "BMR Non-SRO" developments in the SSD are too old to include in a new housing SGR sample, but we have identified a 0.48 rate from 40 more recently built units in the City of Sunnyvale part of Cupertino USD.

There are no recently built "SRO BMR" units in the vicinity, but a local project completed over a decade ago has just one student in 193 units (which rounds to a 0.01 SGR). We have never determined SGRs above 0.02 from modern developments of such units in other districts.

Projected New Housing

Residential developments had both faster and slower timelines than expected in the last year, but the South Bay is still the midst of a housing "boom". Complexes that had slower building and occupancy rates over the previous twelve months include, in the SSD, the "Avon 101" apartments on northern Fair Oaks. Most of those 97 pending units, however, are one-bedroom, so few students are expected as that building becomes occupied in 2015. Also taking longer to fill than previously forecast are the "Las Palmas" townhomes on the south side of El Camino west of Mathilda, but the rest of those (88 out of 105) should be moved into by next fall. This is in the Cumberland area

and will provide additional students. A 67-unit ATT complex at the junction of South Bayview and East Evelyn, in the Ellis area, had been forecast to be 50% occupied on October, 1, 2014, but is instead only now being built, with completion perhaps a year off. These modest delays contributed to the lower-than-projected enrollment for this fall, but the enrollment impact still will occur in the future. Progressing at a quicker pace than expected was the first (main) phase of the Stewart Village Apartments on Stewart Drive, with nearly all of the just-finished 202 units occupied on October 1, 2014, and the rest right after. The next phase, with 57 apartments, probably is still a few years off due to some land-use issues. Such an isolated location, however, in an office setting far from any SSD school, has resulted in no students at the moment.

Several additional developments are projected to have move-ins in the next year. Two small projects just east of northernmost Morse Avenue should have their combined 65 townhouses all occupied during that time. These are in the Lakewood region. Around 50% of the 85 regular ATT units, 40 regular BMR units and 83 SRO units in the development on the former Armory site could be occupied by next October (with the remainder for 2016).[9] This complex is in San Miguel's area and could have 20+ students. The "Loft House" apartments by the Town Center had the first approximately 20 units occupied as of this October 1 and the other 113 are now being moved into. This is in the Bishop area. Three small developments with a total of 37 ATT units in the Ellis region (on Mathilda near ECR, on Old San Francisco near Fair Oaks, and on Willow Ave.) also should be finished. The result is a projection of 500 dwelling units being "first occupied" in 2015 (i.e., in the twelve months to October 1, 2015).

That new occupancy rate (500 units annually) could continue for at least three more years as more developments in the Lakewood, San Miguel, Vargas, Cumberland and Ellis regions are built. The largest total from 2014 to 2018 is forecast for the Ellis region, with 459 mainly multiple-bedroom ATT units that could provide consequential student numbers. This includes the Prometheus apartments that are now under construction and a pending project on the former St. Jude medical facility property.

The greatest concentration then shifts to the San Miguel area in subsequent years. That region could have more than 1,000 units built in the next decade, while Ellis's also could gain around 1,000 (including the aforementioned amounts). Large percentages of those totals, however, are on questionable sites that are sometimes referred to as the "Spansion", "Greystar" and former Sheraton locations.

A total of 143 students are forecast in 2024 from the 4,150 new housing units projected over the next decade. This could be an overly conservative student estimate; more than three times that amount is easily achievable.

Table 7: Projected New Housing Units

Housing Type*	Projected Additional Units in Such Developments in 12 Months to Oct. 1 of**										10-Year
(Developments of)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Regular ATT	434	433	496	497	397	395	384	299	290	305	**3,930**
BMR Non-SRO	20	20	0	0	0	0	7	20	20	0	**87**
BMR SRO	40	43	0	0	0	0	0	0	0	0	**83**
SFD and SFA	6	4	4	3	3	5	9	9	4	3	**50**
Total	500	500	500	500	400	400	400	328	314	308	**4,150**

* See report text for explanation of these types and the average number of students expected per unit in each type.

** These figures are from site-specific projections based on EPC fieldwork and information from planners in the City of Sunnyvale Community Development Department. Totals are for units that have been "first occupied" rather than building permit or sale or rental dates. Housing units restricted to seniors are excluded.

[9] Slightly less than 50% has been projected for 2015.

Concluding Commentary

School test score ratings available on the web continue to impact enrollments in attendance areas in many school districts. Much of the public believes that educational quality can be determined by modest differences in such ratings. Socio-economic changes now underway in north central Santa Clara County, including in the SSD, may have small negative enrollment impacts at first but larger positive results, in student numbers, in the long-run as the test scores subsequently rise. Higher ratings for schools such as Vargas, Ellis and others in the SSD could cause greater-than-projected eventual district enrollment growth.

Sincerely,

{Signature not provided with electronic PDF version}

Thomas R. Williams, Partner in Enrollment Projection Consultants

Appendix A1: Detail to Table 3 on the Current Resident-to-Attending Comparison for each Existing Attendance Area

School (NW to SE)	Enrollment Category	Actual October 1, 2014, Students by Grade (including SDC) TK+K	1	2	3	4	5	6	7	8	Total
Lakewood	Actual Attendance*	74	74	81	83	81	65				458
	Resident Population	95	96	99	101	87	73				551
	Net Difference (A-R)	-21	-22	-18	-18	-6	-8				**-93**
Fairwood	Actual Attendance*	85	86	70	69	65	62				437
	Resident Population	44	31	36	28	46	47				232
	Net Difference (A-R)	41	55	34	41	19	15				**205**
Bishop	Actual Attendance*	115	94	107	115	115	83				629
	Resident Population	115	97	103	112	115	88				630
	Net Difference (A-R)	0	-3	4	3	0	-5				**-1**
San Miguel	Actual Attendance*	75	66	64	69	67	59				400
	Resident Population	75	69	68	79	65	59				415
	Net Difference (A-R)	0	-3	-4	-10	2	0				**-15**
Columbia	Actual Attendance*							259	239	234	732
	Resident Population	[329]	[293]	[306]	[320]	[313]	[267]	254	234	233	721
	Net Difference (A-R)							5	5	1	**11**
Vargas	Actual Attendance*	75	96	92	101	98	82				544
	Resident Population	74	105	101	106	102	84				572
	Net Difference (A-R)	1	-9	-9	-5	-4	-2				**-28**
Cherry Chase	Actual Attendance*	145	146	147	142	142	150				872
	Resident Population	161	152	152	144	139	147				895
	Net Difference (A-R)	-16	-6	-5	-2	3	3				**-23**
Cumberland	Actual Attendance*	146	156	108	141	85	112				748
	Resident Population	134	143	99	137	87	109				709
	Net Difference (A-R)	12	13	9	4	-2	3				**39**
Ellis	Actual Attendance*	154	158	131	159	115	112				829
	Resident Population	156	169	129	160	122	106				842
	Net Difference (A-R)	-2	-11	2	-1	-7	6				**-13**
Sunnyvale	Actual Attendance*							382	393	377	1,152
	Resident Population	[529]	[569]	[481]	[547]	[450]	[446]	381	391	373	1,145
	Net Difference (A-R)							1	2	4	**7**
TOTAL	Actual Attendance*	869	876	800	879	768	725	641	632	611	6,801
	Resident Population	854	862	787	867	763	713	635	625	606	6,712
	Net Difference (A-R)**	15	14	13	12	5	12	6	7	5	**89**

* Actual attendance according to the student enrollment database provided to EPC by the SSD.
** Total net difference is 77 incoming inter-district students and 12 students listed at unlocatable addresses.

Appendix A2: Projected Resident Totals and Potential Attending Amounts if Current Net Adjustment Trends Continue

School (NW to SE)	Enrollment Category	Projected October 1, 2015, Students by Grade (including SDC) TK+K	1	2	3	4	5	6	7	8	Total
Lakewood	Resident Population	102	91	91	97	98	83				562
	Net Adjustment	-21	-21	-22	-18	-18	-6				-106
	Potential Attendance	81	70	69	79	80	77				**456**
Fairwood	Resident Population	41	43	29	35	27	43				218
	Net Adjustment	41	41	55	34	41	19				231
	Potential Attendance	82	84	84	69	68	62				**449**
Bishop	Resident Population	115	110	92	102	108	107				634
	Net Adjustment	-1	0	-3	4	3	0				3
	Potential Attendance	114	110	89	106	111	107				**637**
San Miguel	Resident Population	80	74	68	68	78	63				431
	Net Adjustment	-1	0	-3	-4	-10	2				-16
	Potential Attendance	79	74	65	64	68	65				**415**
Columbia	Resident Population	[338]	[318]	[280]	[302]	[311]	[295]	238	252	230	720
	Net Adjustment							2	5	6	13
	Potential Attendance							240	257	236	**733**
Vargas	Resident Population	102	73	102	99	98	99				573
	Net Adjustment	1	1	-9	-9	-5	-4				-25
	Potential Attendance	103	74	93	90	93	95				**548**
Cherry Chase	Resident Population	157	160	147	151	137	133				885
	Net Adjustment	-16	-16	-6	-5	-2	3				-42
	Potential Attendance	141	144	141	146	135	136				**843**
Cumberland	Resident Population	127	136	138	101	134	85				721
	Net Adjustment	12	12	12	9	4	-2				47
	Potential Attendance	139	148	150	110	138	83				**768**
Ellis	Resident Population	158	151	157	127	153	115				861
	Net Adjustment	-2	-2	-11	2	-1	-7				-21
	Potential Attendance	156	149	146	129	152	108				**840**
Sunnyvale	Resident Population	[544]	[520]	[544]	[477]	[521]	[432]	419	377	395	1,191
	Net Adjustment							6	1	2	9
	Potential Attendance							425	378	397	**1,200**
TOTAL	Resident Population	882	838	824	780	833	728	657	629	625	6,796
	Net Adjustment*	13	15	13	13	12	5	8	6	8	93
	Projected Attendance	895	853	837	793	845	733	665	635	633	**6,889**

* Total projected net difference is 80 incoming inter-district students and 13 students listed at unlocatable addresses.

Notes: (1) Projected amounts contain hidden fractions, so the totals above may not sum exactly to those in other tables. (2) Potential attendance if current net adjustments continue next year, but advanced by one grade and fine-tuned as necessary to match the overall forecast. These are simply theoretical numbers that have been provided to help the District in determining what changes to the net adjustment levels may be warranted. The actual levels that will be permitted next year will be driven by capacity constraints (epecially for Fairwood) and other other factors. (3) Resident counts include home-schooled students.

Appendix B1: Detail for Tables 4 and 5 on Resident Student Population Trends and Grade-to-Grade Advancement Rates from Existing Housing as of October 1, 2010*

Classification of Existing Dwellings		Oct.	Number of Resident Students by Grade enrolled in SSD (with TK both in TK+K and TK) and Resultant Weighted 4-Year Avg. Annual Advancement Rates Entering Each Grade****										
Type**	Category***	of	[TK]	TK+K	1st	2nd	3rd	4th	5th	6th	7th	8th	TK-8
SFD	Relatively Affordable & Modest	2010		214	176	178	195	170	176	181	155	168	1,613
		2011		195	208	165	175	186	157	166	181	149	1,582
		2012		193	190	203	169	170	182	157	157	174	1,595
		2013	[24]	196	189	192	198	163	155	159	151	151	1,554
		2014	[35]	195	186	166	189	188	152	145	152	152	1,525
					0.97	0.94	0.99	0.96	0.94	0.94	0.96	0.98	
	Moderate to Upper Incomes	2010		160	180	177	157	138	158	145	126	136	1,377
		2011		178	158	181	184	158	135	146	143	124	1,407
		2012		162	190	147	185	187	151	128	150	137	1,437
		2013	[29]	192	169	189	161	189	190	153	136	149	1,528
		2014	[27]	194	190	167	185	160	181	163	139	137	1,516
					1.02	0.98	1.03	1.01	0.97	0.93	0.99	0.99	
	All SFD Categories	2010		376	359	358	355	314	337	328	285	307	3,019
	(incl. two mixed-value areas)	2011		380	368	350	362	347	299	315	326	278	3,025
		2012		359	386	352	359	360	336	290	310	312	3,064
		2013	[53]	394	361	387	362	356	349	315	292	304	3,120
		2014	[63]	391	383	336	378	351	338	311	295	291	3,074
					0.99	0.96	1.01	0.98	0.96	0.93	0.98	0.98	
ATT	Most Affordable	2010		199	191	191	196	180	162	160	147	172	1,598
		2011		233	198	200	187	186	191	161	156	141	1,653
		2012		223	223	188	192	185	179	170	162	162	1,684
		2013	[26]	194	207	212	179	181	174	157	164	158	1,626
		2014	[41]	180	180	209	213	177	170	148	161	163	1,601
					0.95	0.99	0.98	0.97	0.97	0.90	1.00	0.99	
	Affordable to High Amenity	2010		207	178	174	155	119	110	87	106	114	1,250
		2011		202	195	151	166	133	97	95	79	106	1,224
		2012		179	207	177	143	154	126	80	91	90	1,247
		2013	[26]	224	180	191	154	127	124	108	81	98	1,287
		2014	[49]	199	206	164	181	134	130	108	95	81	1,298
					0.97	0.90	0.93	0.88	0.91	0.86	0.93	1.05	
	All ATT Categories	2010		406	369	365	351	299	272	247	253	286	2,848
		2011		435	393	351	353	319	288	256	235	247	2,877
		2012		402	430	365	335	339	305	250	253	252	2,931
		2013	[52]	418	387	403	333	308	298	265	245	256	2,913
		2014	[90]	379	386	373	394	311	300	256	256	244	2,899
					0.96	0.95	0.96	0.93	0.95	0.88	0.97	1.01	

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Appendix B1: Detail for Tables 4 and 5 on Resident Student Population Trends and Grade-to-Grade Advancement Rates from Existing Housing as of October 1, 2010*

Classification of Existing Dwellings		Oct.	Number of Resident Students by Grade enrolled in SSD (with TK both in TK+K and TK) and Resultant Weighted 4-Year Avg. Annual Advancement Rates Entering Each Grade****										
Type**	Category***	of	[TK]	TK+K	1st	2nd	3rd	4th	5th	6th	7th	8th	K-8
MH	Affordable	2010		17	14	19	16	18	28	15	12	22	161
		2011		18	20	15	18	16	17	24	15	10	153
		2012		25	20	19	15	21	15	17	25	18	175
		2013	[3]	18	24	20	22	13	22	16	17	26	178
		2014	[2]	17	20	21	24	25	13	24	17	18	179
Mix Types	Most Affordable to Modest	2010		63	61	39	59	51	41	36	42	35	427
		2011		67	64	61	43	65	57	42	46	47	492
		2012		58	72	69	59	43	56	49	43	37	486
		2013	[12]	69	58	66	74	57	38	49	53	44	508
		2014	[11]	59	60	50	62	73	54	38	54	48	498
All	All Existing Housing (incl. residual categories)	2010		862	804	782	781	683	678	627	592	652	6,461
		2011		901	845	777	777	747	661	637	623	582	6,550
		2012		846	910	805	769	764	713	606	631	621	6,665
		2013	[121]	901	832	879	792	735	708	647	607	630	6,731
		2014	[166]	846	852	782	860	760	706	630	622	602	6,660
					0.98	0.95	0.99	0.96	0.95	0.91	0.98	0.99	
All	Areas with New Housing (incl. existing units in areas of consequental new housing)	2010		1	3	1	1	2	0	1	0	1	10
		2011		4	1	3	1	3	3	1	1	2	19
		2012		5	7	1	6	3	2	4	2	1	31
		2013	[0]	9	4	7	1	6	3	4	5	3	42
		2014	[3]	8	10	5	7	3	7	5	3	4	52
	Incoming Inter-District Attend. (students listed at addresses outside the district region)	2010		5	4	7	6	5	8	5	6	10	56
		2011		12	6	6	7	7	5	6	7	10	66
		2012		11	12	8	4	2	6	2	5	4	54
		2013	[0]	12	9	11	7	8	5	3	3	6	64
		2014	[2]	10	12	12	12	3	11	6	6	5	77

* These are aggregate figures from planning areas with virtually no consequential net increase in housing units since September 2010.

** "SFD" = Single Family Detached homes; "ATT" = Attached, for apartment, condo, townhouse & small plex units; "MH" = Mobile Home

*** Categories are subjective assignments by EPC of the dominant housing situation in each planning area; some areas may have small percentages of other housing categories.

**** For example, the "0.95" entering first grade from "ATT Most Affordable" in the SSD means that the student population decreased by an average of 5% from kindergarten (incl. TK) to first from the same housing units over the last four years, except that the rate of change in the final year has been weighted at 150% in the calculation.

Notes: (1) The rates shown are the actual calculated rates. These have been modified where warranted in the projections.
(2) Totals from new and existing housing and IDA do not add up to district totals due to fewer than 20 stu./yr. at unlocatable addresses.

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Appendix B2: Comparison of Births in Local Zip Codes to Corresponding SSD-Enrolled Kindergarten and TK Populations*

Birth Year and School Enrollment Date	Total Births in north Sunnyvale **Zip Code Area 94089****	Resident District-Enrolled Kindergarten and TK Population*	Ratio of Kindergarten and TK Population to Births
2004 Births and Oct. 2009 Kindergarten Students (FYI only)	269	116	43%
2005 Births and Oct. 2010 Kindergarten Students (FYI only)	298	130	44%
2006 Births and Oct. 2011 Kindergarten Students (FYI only)	308	123	40%
2007 Births and Oct. 2012 Kindergarten Students (incl. TK)	327	110	34%
2008 Births and Oct. 2013 Kindergarten Students (incl. TK)	314	113	36%
2009 Births and Oct. 2014 Kindergarten Students (incl. TK)	308	113	37%
Average Relevant to Kindergarten in last Threee School Years	316		35%

	okay recent 3% corrrelation range (from 34% - 37%); birth counts are generally higher below than above	If the current method by which the SSD handles TK, K and 1st grade enrollments continues, then the pending resident TK+K totals from 94089 could be guided by the following figures	
		3-Year Avg. Ratio	Current Ratio
2010 Births and Potential Oct. 2015 Kindergarten+TK totals	334	118	123
2011 Births and Potential Oct. 2016 Kindergarten+TK totals	326	116	120
2012 Births and Potential Oct. 2017 Kindergarten+TK totals	339	120	124

Birth Year and School Enrollment Date	Total Births in mid Sunnyvale **Zip Code Areas 94085-94086****	Resident District-Enrolled Kindergarten and TK Population*	Ratio of Kindergarten and TK Population to Births
2004 Births and Oct. 2009 Kindergarten Students (FYI only)	1,296	432	33%
2005 Births and Oct. 2010 Kindergarten Students (FYI only)	1,356	493	36%
2006 Births and Oct. 2011 Kindergarten Students (FYI only)	1,402	536	38%
2007 Births and Oct. 2012 Kindergarten Students (incl. TK)	1,383	497	36%
2008 Births and Oct. 2013 Kindergarten Students (incl. TK)	1,405	508	36%
2009 Births and Oct. 2014 Kindergarten Students (incl. TK)	1,308	460	35%
Average Relevant to Kindergarten in last Threee School Years	1,365		36%

	narrow recent 1% corrrelation range (from 35% - 36%); birth counts are a mix of directions below vs. above	If the current method by which the SSD handles TK, K and 1st grade enrollments continues, then the pending resident TK+K totals from 94085-6 could be guided by the following figures	
		3-Year Avg. Ratio	Current Ratio
2010 Births and Potential Oct. 2015 Kindergarten+TK totals	1,400	501	492
2011 Births and Potential Oct. 2016 Kindergarten+TK totals	1,303	466	458
2012 Births and Potential Oct. 2017 Kindergarten+TK totals	1,381	494	486

* These are the kindergarten and transitional kindergarten students with home addresses in the SSD sections of these zip code areas.
** 94089 and 94086 regions are where the recently built housing is concentrated, which contributes to the rise in births in those areas.
Sources: State Center for Health Statistics (births) and EPC (kindergarten totals, based on SSD student records)

Note: These figures are one of many factors in the kindergarten projections. Other factors include student trends by location, new housing and socio-economic issues, with modest revisions to those findings based on this data.

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Appendix B2: Comparison of Births in Local Zip Codes to Corresponding SSD-Enrolled Kindergarten and TK Populations*

Birth Year and School Enrollment Date	Total Births in south Sunnyvale **Zip Code Area 94087**	Resident District-Enrolled Kindergarten and TK Population*	Ratio of Kindergarten and TK Population to Births
2004 Births and Oct. 2009 Kindergarten Students (FYI only)	744	253	34%
2005 Births and Oct. 2010 Kindergarten Students (FYI only)	719	240	33%
2006 Births and Oct. 2011 Kindergarten Students (FYI only)	697	247	35%
2007 Births and Oct. 2012 Kindergarten Students (incl. TK)	803	244	30%
2008 Births and Oct. 2013 Kindergarten Students (incl. TK)	724	289	40%
2009 Births and Oct. 2014 Kindergarten Students (incl. TK)	672	281	42%
Average Relevant to Kindergarten in last Threee School Years	733		37%

	correlation rates in latest two K+TK more likely for the future, but birth counts below less than most above	If the current method by which the SSD handles TK, K and 1st grade enrollments continues, then the pending resident TK+K totals from 94087 could be guided by the following figures	
		3-Year Avg. Ratio	Current Ratio
2010 Births and Potential Oct. 2015 Kindergarten+TK totals	698	261	292
2011 Births and Potential Oct. 2016 Kindergarten+TK totals	670	250	280
2012 Births and Potential Oct. 2017 Kindergarten+TK totals	708	265	296

Birth Year and School Enrollment Date	Total Births in **Four Above Zip Code Areas**	Resident District-Enrolled Kindergarten and TK Population*	Ratio of Kindergarten and TK Population to Births
2004 Births and Oct. 2009 Kindergarten Students (FYI only)	2,309	801	35%
2005 Births and Oct. 2010 Kindergarten Students (FYI only)	2,373	863	36%
2006 Births and Oct. 2011 Kindergarten Students (FYI only)	2,407	906	38%
2007 Births and Oct. 2012 Kindergarten Students (incl. TK)	2,513	851	34%
2008 Births and Oct. 2013 Kindergarten Students (incl. TK)	2,443	910	37%
2009 Births and Oct. 2014 Kindergarten Students (incl. TK)	2,288	854	37%
Average Relevant to Kindergarten in last Threee School Years	2,415		36%

	okay recent 3% corrrelation range (from 34% - 37%); counts below are greater than in latest year above	If the current method by which the SSD handles TK, K and 1st grade enrollments continues, then the pending resident TK+K totals could be guided by the following figures	
		3-Year Avg. Ratio	Current Ratio
2010 Births and Potential Oct. 2015 Kindergarten+TK totals	2,432	879	908
2011 Births and Potential Oct. 2016 Kindergarten+TK totals	2,299	831	858
2012 Births and Potential Oct. 2017 Kindergarten+TK totals	2,428	878	906

* These are the kindergarten and transitional kindergarten students with home addresses in the SSD sections of these zip code areas.

Sources: State Center for Health Statistics (births) and EPC (kindergarten and TK totals, based on SSD student records)

Note: These figures are one of many factors in the kindergarten projections. Other factors include student trends by location, new housing and socio-economic issues, with modest revisions to those findings based on this data.

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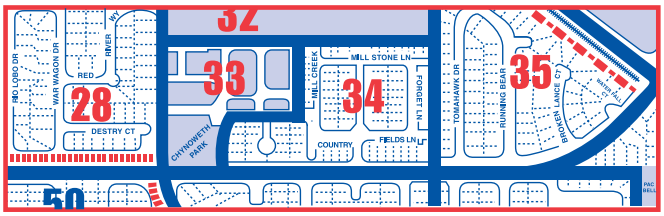
ENROLLMENT PROJECTION CONSULTANTS

Providing School Districts with Accurate Enrollment Forecasts by Location

Area 32
Older Mobile Home Park
450 units, 90 K-8 students, 0.20 SGR

Area 28
Recent Upper-Income Det. Homes
218 units, 85 K-8 students, 0.39 SGR

Area 33
Recent Upscale Townhouses
82 units, 9 K-8 students, 0.11 SGR



Area 34
Recent Middle-Income Det. Homes
94 units, 33 K-8 students, 0.35 SGR

Area 35
Older Middle-income Det. Homes
89 units, 57 K-8 students, 0.64 SGR

Elementary and Middle School
Attendance Boundaries

Superintendent and Board of Trustees
Fremont Union High School District
589 West Fremont Avenue
Sunnyvale, CA 94087

December 31, 2014

Dear Superintendent and Board Members:

This is the concluding documentation to the latest forecast update. As with our past reports, we begin with a summary (below) and then provide some background information, including a table comparing your current enrollment to what was expected from a year earlier. Subsequent sections follow the order of the remaining tables, starting with the updated projections in Tables 2 and 3 and then the underlying factors to those numbers in Tables 4 to 8. The appendices provide more detail for those who want to delve further into the data.

Summary of Forecast Numbers Related to Facilities

Total enrollment in the Fremont Union High School District (henceforth FUHSD or district) is forecast to rise by 108 to October 2015 and then more significantly over the following five years. The cumulative projected increase in the next 36 months is by 700 students. An expected enrollment high point in 2020 could have over 1,200 more students than in the "current" (October 2014) total.[1] Thereafter a modest enrollment decline should occur.

The projected short-term "resident" increase is again concentrated in the Cupertino High region, with relatively modest differences in the other attendance areas. The former is forecast to have 121 additional resident students in 2015 and another 115 (236 total) to 2016. The Fremont High region has the second largest projected gain in the next two years, with 96 more students. The resident totals for the other high schools are forecast to stay within 70 of their current amounts in 2015 and 2016. How the FUHSD handles intra-district attendance will alter these amounts for the enrollment at each site.

By 2018, however, each of the attendance areas is forecast for differences of greater than 100 resident students. Cupertino is projected to have 460 more than at present, Fremont 273 and Homestead 137, all of which become even larger amounts two years later. Monta Vista's resident total reaches 172 above the current figure in 2018, but that is a temporary occurrence, as the projected count falls thereafter. And the Lynbrook region is expected to have a reduction by 107 students over the next four years, with a further decline in subsequent years. The result, unless either the attendance areas and/or intra-district patterns change, will be Lynbrook having far fewer enrolled students than at the other regular high schools, including potentially a 2020 difference of over 1,000 students between Cupertino and Lynbrook.

[1] Whenever just a year is stated in the text, such as 2020, the reference is for early October of that year.

Background and Forecast Accuracy

This is the tenth consecutive year that we have provided a neighborhood-specific forecast for the FUHSD. My firm, Enrollment Projection Consultants (EPC), specializes in these in-depth studies, where every key component of the recent enrollment trends is determined, analyzed, compared to the knowledge gained from our experience in over 300 previous studies, and then projected. To do this, we drove literally every street in the district in our first FUHSD study to learn the community and divide it into suitable planning areas. These planning areas represent a single dominant housing type wherever feasible, including by subjective price ranges and average home and parcel sizes. Several years of student files (including from the elementary "feeder" districts) have been coded against a street index representing those areas so that the trends in each housing situation could be identified and evaluated for the likelihood to continue, by degree, in the projections.

While the previous eight forecasts were all within 0.8% of the actual total FUHSD enrollment in the following year, the projection from last year for the current total was not. Those studies prior to last year's averaged being within ½ of 1% of the actual total for the first projection year and within 1% of actual for the third projection year, which are considered very high accuracy levels. And the first projection for ten years out, or from 2005 to 2015, had a 2015 estimate that is only 301 below what we are now expecting for next year (i.e., a difference of less than 3%, which means the estimate from 2005 was statistically accurate for such a long period of time).[2]

Last year's forecast for the FUHSD total, however, is high by a significant 126 students, or 1.2%, with all of the consequential difference being in ninth grade (i.e., by 99 students, as is shown in the bottom row of Table 1 on page 3). The deviations in the other high school grades are nominal (by less than 15 students per grade in totals of over 2,600 per grade), as is the eighth grade count from the two "feeder" districts. This means that last year's estimate for the presence of children in these upper grades was accurate, but that there was a change in the net difference in the number of feeder district eighth graders who graduated into being ninth graders enrolled in the FUHSD. For the three prior ninth grade enrollments, there had been an average net gain of 54 students in the classes that graduated from the feeder districts. Most of that increase presumably was from students coming out of private middle school programs. The current ninth grade class, however, has 13 fewer students than were in eighth grade in the feeders a year ago.

This suggests that the usual net gain in FUHSD students coming from private middle schools did not occur this year, but we consider that to be an aberration specific to 2014. The clear trend in recent years has been to add students as the local public school classes graduated from eighth to ninth and a one-year shift does not eliminate that trend. There would have been a greater impact on the short-term projections for the FUHSD if this year's deviation from the forecast had been spread across more of grades 8-12, as that would have indicated net enrollment losses from housing turnover.

Our bigger concern for the mid- and long-range forecast is instead what happened in the rest of the feeder district grades (TK-7) in 2014. Those grades collectively had averaged adding 314 students annually from 2010 to 2013. The change in the last year, by contrast, was a drop by 87 students. Although we had accurately projected much less than that 314-student increase would occur for 2014, we did not foresee a shift to a decline. The forecast was high by 153 in TK-7 as a result.

The portion of this shortfall that is in the Cupertino Union School District (CUSD) can be attributed to simply a slight delay in the opening a major apartment complex (i.e., the students there enrolled just after, rather than just before, the October 1 enrollment date that we are using), but the decline in the Sunnyvale School District (SSD) is an issue. We do not fully understand the causes of some of the severe reductions there, especially for the classes graduating from fifth to sixth, but these have been factored into the updated forecast. This especially impacts the projected high school totals in the Fremont attendance area after 2016, with less (but still significant) growth now the most likely scenario.

[2] These differences for all prior projections are shown in Appendix B1 on page 21.

Table 1: Comparisons of Actual and Projected Enrollments from All Relevant Districts Combined*

Enrollment Subject	Early Oct.	Enrolled Students in All Relevant Districts TK-7	8	9	10	11	12	9-12 Total	TK-12 Total
Actual Students	**2010**	22,303	2,599	2,642	2,639	2,531	2,545	10,357	35,259
	2011	22,705	2,589	2,668	2,657	2,640	2,531	10,496	35,790
	2012	23,197	2,592	2,642	2,697	2,667	2,641	10,647	36,436
	2013	23,246	2,787	2,632	2,640	2,696	2,689	10,657	36,690
	2014	23,159	2,710	2,774	2,632	2,630	2,703	10,739	36,608
Actual Difference within Group:									
Annual Average, 2010 to 2013		***314***	*63*					*100*	***477***
2013 to 2014		***-87***	*-77*					*82*	***-82***
Actual Difference, Graduation into this Grade:									
Annual Average, 2010 to 2013				***54***	***14***	***3***	***8***		
2013 to 2014				***-13***	***0***	***-10***	***7***		
Projected from 2013-14	2014	23,312	2,698	2,873	2,646	2,632	2,714	10,865	36,875
2014 Difference, Actual-to-Projected		**-153**	**12**	**-99**	**-14**	**-2**	**-11**	**-126**	**-267**

* Figures cover all students, including NPS, enrolled in the SSD, CUSD and FUHSD.

District-Wide Projected Enrollments: 2014 to 2020

The total FUHSD enrollment is forecast to grow by 1,244 students in the next six years (see bold box in Table 2 on page 4). One of the smallest annual increases projected during that time is in 2015, with just 108 students added. Between 219 and 348 more students are expected in each of the following four years, to a 2019 total that could be 1,160 above the current count. Another 84 students are projected in 2020, to what could be the highest enrollment in the next decade, at nearly 12,000 students. The "current" (October 1, 2014) total is just 10,739.

Evolution of the current student distribution through the grades, including in the elementary "feeder" districts, is a key reason for this growth. The smallest single-grade totals this year are in tenth and eleventh, with about 2,630 each. There is a slightly larger class now in twelfth, at 2,703, and a comparable amount in eighth, at 2,710. All of the grades from first to seventh, however, have much larger totals, with third-through-fifth having the most at close to 3,000 students each. This distribution will not make a big difference in next year's FUHSD total because the outgoing twelfth grade class and the incoming class from eighth have similar student numbers. Thereafter, however, those smallest classes now in tenth and eleventh will be graduating out at the same time as the larger classes start to reach the ninth grade. The four largest current classes will be in the high school grades in 2020, which is why that year is forecast to have the highest FUHSD enrollment. While this comparison by grade is an oversimplification of all of the underlying factors to the projections, it does give a good quick insight into why the forecast grows so rapidly after next year, until an enrollment "peak" is reached in six years.

Table 2: Projected Total District October Enrollment, 2014 to 2024

Early Oct.	Total Projected Enrollment by Grade in the Sunnyvale and Cupertino Union Elementary School Districts									Total Projected Enrollment by Grade in Fremont Union HSD				**FUHSD (9-12) Total**
	TK+K	1	2	3	4	5	6	7	8	9	10	11	12	
2014*	2,760	2,868	2,917	2,987	2,980	2,988	2,885	2,774	2,710	2,774	2,632	2,630	2,703	**10,739**
2015	2,907	2,654	2,914	2,940	2,986	2,954	2,947	2,905	2,794	2,761	2,791	2,642	2,653	**10,847**
2016	2,856	2,805	2,688	2,923	2,947	2,947	2,898	2,959	2,917	2,859	2,772	2,797	2,663	**11,091**
2017	2,950	2,744	2,848	2,691	2,925	2,918	2,877	2,910	2,971	2,978	2,869	2,776	2,816	**11,439**
2018	3,036	2,816	2,786	2,860	2,689	2,893	2,863	2,886	2,920	3,027	2,986	2,874	2,793	**11,680**
2019	3,056	2,880	2,858	2,797	2,862	2,655	2,832	2,874	2,891	2,980	3,037	2,992	2,890	**11,899**
2020	3,071	2,882	2,923	2,869	2,799	2,831	2,585	2,839	2,885	2,953	2,985	3,039	3,006	**11,983**
2021	3,075	2,880	2,925	2,934	2,871	2,768	2,769	2,590	2,849	2,946	2,961	2,987	3,051	**11,945**
2022	3,086	2,885	2,923	2,936	2,937	2,840	2,707	2,777	2,598	2,911	2,951	2,968	3,003	**11,833**
2023	3,102	2,894	2,928	2,933	2,938	2,904	2,777	2,715	2,787	2,656	2,915	2,960	2,985	**11,516**
2024	3,115	2,908	2,936	2,937	2,934	2,904	2,839	2,784	2,723	2,847	2,659	2,922	2,974	**11,402**

Total Fremont UHSD Enrollment Change in One Year, to October 2015	**108**
Total Fremont UHSD Enrollment Change in Two Years, to October 2016	**352**
Total Fremont UHSD Enrollment Change in Three Years, to October 2017	**700**
Total Fremont UHSD Enrollment Change in Four Years, to October 2018	**941**
Total Fremont UHSD Enrollment Change in Five Years, to October 2019	**1,160**
Total Fremont UHSD Enrollment Change in Six Years, to October 2020 (at peak projected FUHSD total)	**1,244**

Real Potential Lower FUHSD Total in 2015 (essentially -1.0%)	*10,740*
Real Potential Higher FUHSD Total in 2015 (essentially +1.0%)	*10,960*
Real Potential Lower FUHSD Total in 2020 (essentially -4.0%)	*11,500*
Real Potential Higher FUHSD Total in 2020 (essentially +4.3%)	*12,500*

Projected FUHSD students from net additional new housing through 2020	217
Projected FUHSD students from net additional new housing through 2024	364

* This is the actual enrollment in student files provided to EPC by the relevant districts, including all TK-12 SDC (Special Ed.) and NPS (non public school) students maintained in databases of the three districts. (The TK-12 NPS total is less than 60.)

Notes: (1) Projected amounts are for current facilities, educational programs and level of inter-district control. (2) Enrollments anywhere within "real potential" ranges are quite possible, with the likelihood of being more to the lower or higher end of each range dependent in part on inter-district enforcement levels (especially the extent of identifying incorrect home addressing). Potential ranges shown are for essentially an 80% probability. There is an approximately 10% possibility for each of lower or higher totals. (3) All figures include SDC and NPS students enrolled in the relevant districts. (Some earlier FUHSD forecasts excluded NPS.) (4) Nuances of the recent evolution of the kindergarten (K) eligibility cutoff birth date from December 2 to September 1, plus the related "Transitional Kindergarten" (TK) program for those in the affected birth months, will create some by-grade distributional differences that start impacting the FUHSD in 2021. There were three adjacent student body classes in K in October 2012 to 2014 that essentially covered only eleven-month birth periods, but that was mostly offset by correlating to high birth count years for all but the current K. TK expanded from representing essentially one month of births in October 2012 to three months of births in October 2014 and thereafter. This raises the TK+K amount from covering 14 birth months this year to 15 months in all forecast years in the CUSD. (The SSD has policies that lower that figure.) Those three adjacent CUSD student body classes containing only eleven birth months will start graduating into the FUHSD grades in 2021, but with a more significant impact starting in 2023. Also starting to impact the FUHSD after 2022 will be student body classes coming from the low birth-count years of 2009 to 2012 (during the recession). These factors should create an FUHSD enrollment reduction after 2020. Enrollments that far into the future, however, have a large potential range, so only the likelihood of a consequential drop after a peak in about 2020 should be noted. The forecast figures in 2024 should be considered as just general estimates. (5) The TK+K figures shown in last year's version of this table were incorrect because they excluded CUSD TK students.

District-Wide Projected Enrollments: After 2020

To repeat from our last report: There is almost certainly going to be an enrollment decline after 2020 due to nuances now occurring in the lowest grades. The birthdate cutoff for kindergarten eligibility evolved over the last three years from December 2 to September 1. Children with birthdates that previously would have qualified for kindergarten (K) enrollment are instead supposed to enroll in a new "transitional kindergarten" (TK) program. The Sunnyvale SD implemented this program in a way that keeps the by-grade totals relatively close to covering twelve birth months (i.e., by allowing TK students, upon parent request, to go directly into first in the following year). For the Cupertino USD and most other districts, however, more formal observance of the TK-then-K policy means there are three smaller student body classes graduating upward, compared to what would have been in those classes if not for this eligibility date shift. This reduction starts to impact the FUHSD total in 2021 (from the current second grade class) and will be fully in the high school grades in 2023 and 2024, with some impact through 2026.

Compounding the reduction to an 11-month period for this year's kindergarten class is the correlation to a low birth total in 2009 (during the economic recession).[3] That unusually small K total will evolve into the ninth grade enrollment in 2023. This is a key reason why the FUHSD total significantly drops between 2022 and 2023. The projected 2024 total, nonetheless, is still nearly 700 above the current amount and that could be an overly conservative figure, especially if new housing starts generating more students in the SSD part of the FUHSD.

Projected Resident Student Populations by Existing Attendance Areas

The following text is repeated from past reports. Readers who already know how to interpret the difference between resident and attending figures can skip to *"Key Findings by the Existing FUHSD Attendance Areas"*.

This forecast is again based on an analysis of where the students live (the resident population) rather than the schools they happen to attend (the attending enrollment). Resident populations differ from enrollments because of (1) intra-district enrollment (between FUHSD schools), (2) incoming inter-district enrollment (from addresses outside the FUHSD) and (3) Community High and NPS students.[4] By coding student addresses from the current and prior years to planning areas that represent various housing types and locations, we have been able to identify and evaluate how the student population is evolving in each situation. We flip back-and-forth between the "resident" and "enrollment" amounts in the text below and it is important to remember the distinction between these types.

The current and projected resident numbers, along with the current attendance figures, are provided in Table 3 on page 6.

Understanding the Data in Table 3

Table 3 contains two sets of data. The figures on the left (under *"Actual Resident-to-Enrollment part"*) show how the current enrollment at each school differs from the resident population. There are 1,973 district-enrolled (9-12) students, for instance, with home addresses in the Fremont attendance area. That school's enrollment, however,

[3] The current first and second grade classes correlate to higher birth count years (i.e., mainly from five years earlier), while the 2015, 2016 and 2017 kindergartens correlate to recession-influenced low birth total years. Please note that the birth period for the TK+K total was 12 months (11+1) in 2012 and 13 in 2013 (11+2), is 14 for this year (11+3) and will be 15 (12+3) in all future years. There also are expected to be higher percentages of TK-eligible children enrolled in TK in the future. These factors contribute to the higher projected-than-current TK+K figures.

[4] Community High and Non Public School (NPS) students do not have specified attendance area subsections of the district, so those students are instead resident to the attendance areas of the five main high schools. FUHSD students enrolled in other special district programs are included in the figures for the five regular high schools. All counts cover only 9-12 (i.e., no Adult Ed or eighth graders taking FUHSD classes). It also should be noted that "resident" throughout this report means physical resident, not legal resident.

Table 3: Actual Enrollments and Actual and Projected Resident (9-12) Students by FUHSD Attendance Area

School	*Actual Resident-to-Enrollment part*			*Projected Resident Student Population part*							
	Actual October 2014*			Projected Res. 9-12 Student Pop. (incl. SDC and NPS) in Oct. of				9-12 Student Population Change to Oct. of***			
	Resident Students	Attending Adjust**	Attending Enrollment	2015	2016	2018	2020	**2015**	**2016**	**2018**	**2020**
Fremont	1,973	-8	1,965	1,986	2,069	2,246	2,415	**13**	**96**	**273**	**442**
Homestead	2,404	-1	2,403	2,398	2,419	2,541	2,682	**-6**	**15**	**137**	**278**
Monta Vista	2,360	-9	2,351	2,365	2,424	2,532	2,438	**5**	**64**	**172**	**78**
Cupertino	2,100	49	2,149	2,221	2,336	2,560	2,713	**121**	**236**	**460**	**613**
Lynbrook	1,748	88	1,836	1,722	1,682	1,641	1,569	**-26**	**-66**	**-107**	**-179**
Community	NA	14	14	NA	NA	NA	NA				
NPS	NA	21	21	NA	NA	NA	NA				
Total***	10,585	154	10,739	10,692	10,930	11,520	11,817	107	345	935	1,232

* The actual student counts in grades 9-12 are based on student records provided to EPC by the FUHSD (incl. SDC and NPS).

** Net attending adjustments include (1) intra-district attendance, (2) incoming inter-district enrollment and (3) students listed at unlocatable home addresses. This includes 152 inter-district students and two unlocatable addresses in the current records.

*** "Resident" totals differ from Table 2 because they exclude incoming inter-district enrollment and addresses unlocatable by attendance region.

Notes: (1) Students enrolled in Middle College, College Advantage, Horizon, New Start, Vista and Young Parent programs are included in the above attendance numbers for the five regular schools. (2) Appendix A provides actual October 2014 resident and attending amounts by grade. (3) Projections include fractional amounts, so the amounts shown here may not sum exactly to totals in other tables.

is 1,965, which is eight less than the resident total. This net difference is shown by the "-8" in the top row of the "Attending Adjust" column in the table. The second set of data, on the right side of the table (under *"Projected Resident Student Population part"*), has the projected resident amounts. These are not projected enrollments. They do indicate, however, where changes in the population may warrant a concern. In Lynbrook's case, for example, the resident total, which already is the lowest in the district, is forecast to drop by 179 in six years. This declining amount is shown in the bottom row of the box in the far right column of the table. Continuing or expanding the net adjustment gain of 88 for Lynbrook will help maintain a higher enrollment there.

Key Findings by the Existing FUHSD Attendance Areas

We always start this subsection with a comparison between the actual and projected totals by attendance area, for which there are some consequential differences in 2014. (Such figures are not shown in the above table.) Mainly due to the aforementioned lack of a rise in the relevant populations graduating from eighth to ninth, the current Homestead, Monta Vista and Lynbrook totals are each 38 to 50 below what was projected from a year ago. Having this ninth grade shortfall occur mainly in these areas reinforces our estimation that this was mostly a one-year aberration. Those highest-API-scoring schools have always added students in ninth that had not been enrolled in even the CUSD in eighth in the previous year. Considering the prestige of these schools, we expect such gains entering ninth will reappear. The Fremont total came within three of what was projected (in 9-12), but that has the greater long-range concern about unforeseen losses in TK-7 within that region. Cupertino's total is only off by 19 and that is entirely attributable to a delay in an apartment complex opening in that attendance area.

As in our recent studies, the largest projected resident increase is in the Cupertino attendance area. This is true, in comparison to the current totals, to every year of the next decade. The expected resident Cupertino growth for 2015 is by 121 students, while the next highest rise is by just 13 in Fremont's region. The cumulative differences to 2016 are 236 more students for Cupertino, 96 for Fremont, 64 for Monta Vista and just 15 for Homestead. The Lynbrook area is forecast to have a 66-student decline during that time. Two years later, in 2018, the Cupertino area is projected to have the most resident students, with 2,560 (from a net four-year gain of 460). That is up from having the third largest total today. Fremont, Homestead and Monta Vista also could have significant four-year growth, with 273, 137 and 172 more students, respectively, but only the former two and Cupertino have further increases to 2020. The Monta Vista total instead reaches a high of 2,532 in 2018, but declines thereafter.

The differences become even greater to the overall enrollment high point in 2020, but with a key caveat for the Fremont area. The projected resident total for Cupertino exceeds 2,700 students, with Homestead's figure a close second at just under 2,700. Both Monta Vista and Fremont are forecast for around 2,400 students, but the Fremont total could be much higher (2,600+) if either (1) new dwellings start generating more students from within that area and/or (2) there is less of a severe reduction in the underlying student population graduating upward. The Lynbrook area, with little new housing expected and a current resident student distribution in TK-12 that is severely slanted toward the upper grades, is forecast to have fewer than 1,600 high school students by 2020. That is a projected difference of over 1,100 resident students between Cupertino and Lynbrook. An even greater divergence is possible for the current attendance areas in subsequent years (which is not shown in this table because the numbers have too wide of a potential deviation for that far into the future).

Underlying Factors to the Projections: Recent Student Population Evolution by High School Region

The five high school attendance areas have had dramatic recent differences in how their TK-12 populations evolved. The Fremont High region, in particular, has had a huge distributional slant toward the lower grades for several years, but there also have been significant reductions in each class graduating through the grades. This can be seen in the top section of Table 4 on page 8. The 898 resident students in kindergarten in 2010 (before TK came into existence) evolved over the next five years to 783 in fourth, for a 115-student reduction (-13%). The 686 students in fourth in 2010 became a class of just 498 in 2014, which is a loss of 188 students (-27%). If these patterns continue, then each resident total in K could be reduced by 40% by the time it gradates into ninth. So even though there are now, and have been for awhile, far more students in the lower grades in this area than for any of the other four regular high schools, the attrition rate is so severe through the grades that there has been less growth than in the Homestead and Cupertino areas. There even was a decline in the Fremont TK-12 total in the last year, despite all of the new housing being built there.

Nonetheless, the Fremont High region did add over 500 students in TK-12 since 2009, and that was joined by growth of 683 and 988 TK-12 students in the Homestead and Cupertino areas, respectively, for a combined rise by over 2,000 students. With much of that significant growth having occurred in TK-5 for each area, there will be notable future resident gains in the high school grades for all three schools.

Evolving in the opposite direction are the resident numbers in the Monta Vista and Lynbrook attendance areas. The Monta Vista region does have a modest "bubble" graduating upward that is now in fifth through ninth. This should create some increase in that high school total for the next few years. The totals in the lower grades there, however, are collapsing and this will impact Monta Vista by 2020 and thereafter. The Lynbrook region has had a relatively stable resident 9-12 count since 2009, but smaller totals have been graduating upward through the elementary grades. The resident totals now in seventh and eighth are the smallest in those grades in some time.

Although we had similar findings in the resident TK-12 numbers in our last report, some of the trends became even more evident in the latest data, especially (1) the losses in the graduation through the grades in Fremont's region and (2) the pending high school decline for the Lynbrook area.

Table 4: TK-12 Public School Resident Student Trends in Each Current High School Attendance Area

High School Region	Oct. of	Number of Students Residing in High School Region and Enrolled in SSD, CUSD and FUHSD*													
		TK+K	1	2	3	4	5	6	7	8	9	10	11	12	TK-12
Fremont	2009	864	885	792	760	686	596	569	547	574	495	464	506	518	8,256
	2010	898	866	864	785	711	649	566	566	542	535	514	459	516	8,471
	2011	985	886	833	828	756	663	588	548	536	523	527	505	460	8,638
	2012	891	965	862	827	815	714	588	576	532	475	514	536	508	8,803
	2013	915	885	910	832	792	739	621	578	540	493	460	501	554	8,820
	2014	913	880	839	875	783	731	645	585	546	498	492	469	514	8,770
	Change from October 2009 to October 2014														**514**
Homestead	2009	604	605	578	501	560	512	523	540	494	576	543	542	575	7,153
	2010	601	628	597	580	521	564	518	530	544	567	585	551	533	7,319
	2011	590	608	625	623	571	529	558	532	532	599	579	582	536	7,464
	2012	585	630	600	625	619	568	542	557	537	600	606	582	568	7,619
	2013	659	590	655	603	614	591	554	549	586	588	602	613	575	7,779
	2014	595	651	602	660	616	614	579	557	558	635	572	598	599	7,836
	Change from October 2009 to October 2014														**683**
Cupertino	2009	602	608	576	580	554	534	496	473	463	438	432	438	378	6,572
	2010	581	634	612	590	561	565	526	502	478	466	453	424	435	6,827
	2011	569	593	640	584	594	580	558	516	494	497	483	459	430	6,997
	2012	608	622	639	648	600	593	556	554	525	508	500	477	458	7,288
	2013	583	618	624	642	649	611	585	574	558	522	518	497	479	7,460
	2014	569	568	653	607	650	641	597	591	584	545	547	507	501	7,560
	Change from October 2009 to October 2014														**988**
Monta Vista	2009	467	515	549	567	597	517	576	597	589	641	687	593	604	7,499
	2010	492	521	542	565	581	599	544	572	602	618	644	670	582	7,532
	2011	455	537	541	588	585	579	615	527	576	607	613	637	655	7,515
	2012	436	494	550	588	601	602	599	630	545	584	610	613	634	7,486
	2013	446	486	512	553	610	611	625	605	635	559	584	614	597	7,437
	2014	403	472	518	496	578	601	642	633	611	632	544	583	601	7,314
	Change from October 2009 to October 2014														**-185**
Lynbrook	2009	254	268	297	303	376	340	406	393	429	420	414	445	452	4,797
	2010	240	296	303	321	340	394	385	424	396	436	430	401	439	4,805
	2011	253	293	338	322	333	353	429	410	423	426	432	432	397	4,841
	2012	222	279	317	361	358	364	383	447	425	450	439	437	415	4,897
	2013	231	254	307	323	376	385	377	381	447	444	451	439	422	4,837
	2014	237	264	274	321	327	377	400	389	388	440	442	447	419	4,725
	Change from October 2009 to October 2014														**-72**

* Figures include TK-12 SDC and a nominal number of NPS students. Students in former Montebello SD included before 2009.

Notes: (1) Figures exclude intra- and inter-district enrollments and a small number of students listed at residentially unlocatable addresses such as PO boxes. (2) Color codes for by-grade student totals are: red = 900s, pink = 800s, rust = 700s, orange = 600s, yellow = 500s, green = 400s, blue = 300s, lavender = 200s, grey = highest TK-12 total since 2008 for each school area

Recent Resident Student Population Changes in Existing Housing

All of the trend findings in "existing housing" have been recalculated for this study, including by several value classifications of single-family-detached residences ("SFD") and attached units ("ATT", covering apartments, condos, townhouses and plexes). A key change from past studies, however, is that we are now using October 1, 2010, as the cutoff date for identifying areas of almost exclusively "existing housing". This changed the student numbers in the categories that had dwellings added between the previous October 1, 2006, cutoff date and the current 2010 date. Key information on the main housing trends is summarized in Tables 5A, 5B and 6, with additional detail provided in Appendix B2. This is all based on aggregates of the relevant student population counts in the nearly 500 planning areas that we are analyzing the data by for your district.

These figures have been compiled separately by the Sunnyvale SD (SSD) and Cupertino Union SD (CUSD) regions because of trend differences between similar dwellings in those respective locations.

Understanding the Data in Tables 5A and 5B

Table 5A, on page 10, contains student totals from 2011 through 2014 from areas with virtually no housing units added since September 2010. The counts are provided in TK-8 and 9-12. Having figures for both groups shows how the student population is evolving, in terms of getting older or younger on average. "All Existing" ATT units in the SSD, for instance, now have 22 more TK-8 students and 39 fewer high school students than in 2011 (see middle part of Table 5A). There was thus a distribution shift toward the elementary grades, which indicates the current families have younger children on average (through turnover).

Table 5B has a similar structure to 5A but differs by comparing the recent impacts of new vs. existing housing.

Key Findings Related to the Data in Tables 5A and 5B

Existing ATT housing in the CUSD was the main source of both the TK-8 and 9-12 growth. Those units added 175 FUHSD students (+7%) and an even more significant 766 CUSD students (+11%) in just the last three years. Our past finding of growth also coming from such units in the SSD, however, has disappeared in this latest data. While 22 TK-8 students were added over the last three years in these SSD dwellings, that is the net of growth to 2012 and a decline by 32 since then. And the high school total went down by 45 this year from those units. We should note that these latest losses came mainly from the most affordable ATT units in the SSD. All of the other value classifications of existing attached dwellings, which are combined into feeder district totals in this table, (1) had more stable student numbers in the SSD area and (2) were the main source of growth in the CUSD region.

The three-year differences from existing SFD homes are 34 and 31 more high school students in the SSD and CUSD areas, respectively, but the latter gain could be short lived. This is because there also was a 384-student decline (-3%) in the CUSD grades, including by 350 in just the last year, from those residences. While much of that reduction came from a low kindergarten enrollment in 2014 (i.e., with no FUHSD impact until 2023), some of it occurred in the middle school grades in mainly the southern Fremont attendance area.[5]

Locations with new housing provided only 28 more FUHSD students and 41 additional SSD and CUSD students since 2011 (see Table 5B). We had expected a larger gain from the hundreds of new units occupied in the SSD in the last year. The implications of this are discussed in the new housing section of this report.

[5] Also contributing to the 2014 decline in these CUSD homes was the graduation of a large eighth grade population.

Table 5A: Most Significant Resident Student Population Trends in Existing Housing by Residential Category*

Elem. District Region	Existing Residences (built before 2006) Type**	Category***	Early Oct. of	Students in TK-8	TK-8 Resident Stu. Pop. Change Since Prior Year	TK-8 Resident Stu. Pop. Change Since Oct. 2011	Students in 9-12	9-12 Resident Stu. Pop. Change Since Prior Year	9-12 Resident Stu. Pop. Change Since Oct. 2011
SSD	**SFD**	**All Existing**	2011	3,025			1,282		
			2012	3,064	39		1,309	27	
			2013	3,120	56		1,321	12	
			2014	3,074	-46	**49**	1,316	-5	**34**
	ATT	Most Affordable	2011	1,653			623		
			2012	1,684	31		618	-5	
			2013	1,626	-58		668	50	
			2014	1,601	-25	-52	640	-28	17
		All Existing (incl. Most Affordable)	2011	2,877			1,074		
			2012	2,931	54		1,060	-14	
			2013	2,913	-18		1,080	20	
			2014	2,899	-14	**22**	1,035	-45	**-39**
CUSD	**SFD**	**All Existing**	2011	11,124			5,228		
			2012	11,177	53		5,245	17	
			2013	11,090	-87		5,217	-28	
			2014	10,740	-350	**-384**	5,259	42	**31**
	ATT	Most Affordable	2011	998			548		
			2012	1,029	31		587	39	
			2013	1,044	15		568	-19	
			2014	1,077	33	79	549	-19	1
		All Existing (incl. Most Affordable)	2011	7,128			2,410		
			2012	7,441	313		2,525	115	
			2013	7,681	240		2,537	12	
			2014	7,894	213	**766**	2,585	48	**175**

* These are aggregate counts of planning areas with virtually no new housing units added since September 2010.

** "SFD" = single family detached homes; "ATT" = Attached, including condo, townhouse, apartment & duplex-fourplex units

*** Categories are for subjective assignments by EPC of the dominant housing situation in each area; areas without a dominant type are excluded. Students from areas with a mix of pre-2010 and more recently built units are also excluded.

Note: A few student counts have changed notably by category since our last study due to the shift from fall 2006 to fall 2010 for the cutoff date for existing housing (i.e., in categories where additional housing units were occupied between those dates).

Table 5B: Comparison of Recent Student Population Changes between Areas of Existing and New Housing

District Region	Subject	Early Oct. of	Students in TK-8	TK-8 Resident Stu. Pop. Change Since Prior Year	TK-8 Resident Stu. Pop. Change Since Oct. 2011	Students in 9-12	9-12 Resident Stu. Pop. Change Since Prior Year	9-12 Resident Stu. Pop. Change Since Oct. 2011
SSD	Existing Dwellings*	2011	6,550			2,626		
		2012	6,665	115		2,618	-8	
		2013	6,732	67		2,631	13	
		2014	6,660	-72	110	2,603	-28	-23
	New Dwellings**	2011	20			9		
		2012	31	11		15	6	
		2013	42	11		16	1	
		2014	52	10	32	25	9	16
CUSD	Existing Dwellings*	2011	18,416			7,726		
		2012	18,791	375		7,861	135	
		2013	18,956	165		7,838	-23	
		2014	18,813	-143	397	7,916	78	190
	New Dwellings**	2011	64			31		
		2012	67	3		36	5	
		2013	64	-3		37	1	
		2014	73	9	9	43	6	12

* "Existing" figures are aggregate counts of areas with virtually no net increase in housing units since September 2010. This includes students in residual categories not shown in Table 5A, such as mobile home parks (in SSD) and mixed-type areas.

** "New" figures are from areas with consequential net numbers of housing units first occupied since September 2010 and can include a few students from older units.

Note: Figures are for students enrolled in the three relevant districts and exclude both incoming inter-district students and students listed at residentially unlocatable addresses such as PO boxes.

Average Student Grade-to-Grade Advancement Rates from Existing Housing

The following explanations are repeated from past reports. Readers who already know how to interpret this data can proceed to the *"Key Findings Related to the Data in Table 6"* subsection on page 12.

Grade-to-grade "advancement" rates are calculations of the net change in the number of students in each grade as they "graduate" into the next grade in the following school year. These figures, which are sometimes called "cohort survival" rates, are most applicable to an accurate forecast when they are determined specifically for students from existing dwellings. For example, if there had been a total of 100 students in eighth grade last year and 105 in ninth grade this year from the same group of homes, that would be a +5% (1.05) net advancement rate gain. Such rates usually are averaged over the last several years within each single-grade advancement to avoid giving too much influence to nuances that may have occurred in any one year.

For this study, we have again determined the average over the last four years, with a slight weighting added for the final year of change. These rates are then evaluated for their likelihood to continue, by degree, through the forecast period.

Understanding the Data in Table 6

The rates entering each high school grade are shown in bold on the right side of Table 6 on page 13. In the "Affordable to Modest" SFD group in the SSD region, for instance, the boxed "1.02" rate entering ninth grade means that, on average, a net of 102% of the eighth grade population in one year became ninth graders a year later from the same homes. That rate is then evaluated for its likelihood to continue, by degree, in the forecast.

The cumulative rates shown in the middle columns of Table 6 are the result of a compounding of the individual grade-to-grade rates from first to eighth. These figures identify the net aggregate change, from the same housing units, in each student body class as it graduates upward through all of the elementary grades.[6] Again using the "Affordable to Modest" SFD group within the SSD as an example, the "0.74" from 2010 to 2014 means that 100 students in first grade in one year would become 74 students seven years later in eighth grade (i.e. a 26% reduction), if these rates continue. These cumulative figures are a good indication of the net effect that families moving in and out are having on the TK-8 enrollments and the subsequent high school populations.

Key Findings Related to the Data in Table 6

The big shift that has occurred in this data is the decline in the cumulative rates in the SSD region. Those are down in every category compared to our previous calculations, despite having several overlapping years of data. For the SSD's detached homes, the updated rates are within the ranges in the three studies prior to last year's and thus are not as great an issue. The new 0.89 rate identified in "Moderate to Upper Income" SFD dwellings, for example, is a return to being within the past range in the SSD area (0.88 to 0.94); it was the last study's higher 0.97 figure that was the exception. The latest rates in both value groups of attached housing in the SSD region, however, are much lower than in any of our last four studies. For the "ATT All Other" (affordable to high amenity) units, in particular, the new 0.57 figure is not only both 10% below the rate in the last study (0.63) and more than 20% under those in prior studies (0.74 to 0.79), it also is far outside the "normal range" we are determining elsewhere. Whenever we calculate cumulative rates that deviate so severely from the norm, our usual finding a study or two later has been that the figure evolved toward the normal range. Although that did not happen between the last study and this study for "ATT All Other", it remains the more probable scenario in the future. The updated projections follow this expectation, while still having a cumulative rate that is below the normal range.[7]

What this table does not show (see Appendix B2 instead) is that a key source of these low ATT cumulative rates in the SSD continues to be the underlying grade-to-grade rates from fifth to sixth. Shifts to private school attendance starting in sixth grade appear to be contributing to this. This is projected to be ongoing.

The only significant net gain occurring in the SSD region in ninth grade, however, is in the more expensive SFD homes, at +19%. That large increase presumably represents students who graduated from private middle school programs. Considering the losses mentioned above between especially fifth and sixth from the "All Other" ATT units in the SSD, we would have expected a rate well over 1.00 entering ninth from those dwellings as well. This was the situation during the 2006-to-2010 period (with no years of overlap with the latest calculation), when there was a 15% increase entering ninth. The updated calculation is instead just a 3% pickup.

The CUSD's cumulative rates in the "Most Affordable" ATT and "Originally Affordable or Modest" SFD categories, by contrast, continue to be among the highest that we have calculated and, surprisingly, they rose from the 2009-to-2013 period to the latest one. Those rates had steadily declined in the preceding studies, as was projected. Aside from these 2009-to-2013 exceptions, however, the latest figures (in these two categories) do continue a downward trend compared to their previous figures. The cumulative rates for the "Most Affordable" ATT group,

[6] The rates entering first and ninth grades are excluded from this cumulative calculation because those are often impacted by students coming from private schools. The latter factor, while important, is a separate issue from identifying the changes caused, in most districts, mainly by housing turnover.

[7] The latest rate calculated in the "Most Affordable" ATT units is projected to continue. These "normal ranges" are discussed in more detail in reports provided this year to the SSD and CUSD, as well as in our 2011-12 report for the FUHSD.

Table 6: Summary of Resident Student Grade-to-Grade Advancement Rate Findings in Existing Housing

Neighborhods of Existing Residences* Region	Type**	Current Students Enrolled in the two ESDs and FUHSD	Cumulative Rates from 1st to 8th*** 2006 to 2010	2007 to 2011	2008 to 2012	2009 to 2013	2010 to 2014	Four-Year Weighted Avg. Rate at which Net Number of Stu. Advanced from Prior Grade to this Grade in Oct. Each Year**** 2006 to 2010 9th	2010 to 2014 (This Study) 9th	10th	11th	12th
SSD	SFD - Affordable to Modest	2,174	0.82	0.74	0.77	0.76	0.74	1.03	1.02	0.99	0.97	0.99
	SFD - Moderate to Upper Income	2,173	0.94	0.92	0.88	0.97	0.89	1.16	1.19	1.00	1.02	0.97
	ATT - Most Affordable	2,241	0.98	1.01	0.93	0.87	0.81	1.01	1.04	0.98	0.99	1.03
	ATT - All Other	1,693	0.79	0.74	0.79	0.63	0.57	1.15	1.03	0.96	1.00	1.00
CUSD	SFD - Originally Affordable to Modest	1,726	1.42	1.34	1.29	1.21	1.27	1.06	1.04	1.02	1.01	1.01
	SFD - Moderate to Upper Income	14,273	1.20	1.21	1.23	1.20	1.18	0.99	0.99	1.00	0.99	0.99
	ATT - Most Affordable	1,626	1.47	1.38	1.25	1.21	1.24	1.18	1.09	1.04	1.06	0.94
	ATT - All Other	8,853	0.82	0.81	0.88	0.87	0.86	1.00	0.99	0.99	0.99	0.97

* These are areas with virtually no added housing units since Sept. 2010 for this study and since earlier dates for prior studies.

** "SFD" is for single-family detached homes and "ATT" covers attached units, including apartments, condos, townhouses and plexes. Value levels are based on EPC evaluation of the dominant housing situation in each planning area. The totals in these levels may not sum to aggregate SFD and ATT figures shown elsewhere because of a small number of students in mixed-value SFD or ATT areas.

*** This is the portion of the number of students in any one year in first grade that would be in eighth grade seven years later using these rates. The "0.57" from "ATT - All Other" in the Sunnyvale SD region, for instance, means that, on average, there would be 57% as many eighth graders (i.e., -43%) in these same homes as there were first graders seven years earlier.

**** For example, the boxed "1.09" entering ninth grade from "ATT - Most Affordable" in the Cupertino USD region means that the student population rose by an average of 9% in graduating from the eighth to ninth grade from the same housing units over the last four years, except that the rate of change in the latest year has been weighted at 150% in the calculations.

Note: Advancement rates shown are the actual calculated rates. These have been modified where warranted in the forecast.

for example, went from 1.47 in the 2006-to-2010 period to 1.24 in the latest period. We expect modest further declines, toward the normal ranges, will occur in the future, which means that the recent student growth in these dwellings could be ending.

All of the remaining updated cumulative rates and high school advancement rates in the CUSD region are reasonable to be ongoing; only the rates in the SSD area have a high potential for major swings in the future.[8]

Projected Impacts of New Housing

New dwellings impact the enrollment through a combination of (1) the number of residences expected in the various housing types, by year and location, and (2) the projected number of students in each of those units. These two components are discussed in the following italicized subsections. Most of the text below, other than the updated rates, is repeated from past reports, so some readers may want to skip to "*Projected New Housing Amounts*" on page 15.

Average Student Generation Rates (SGRs) from Recently Built Housing

Student generation rates are the average rates at which residences "yield" students, such as one student in every two homes (a 0.50 SGR). Public school SGRs usually are calculated by identifying the number of students in a sufficiently large unit sample from the local area.

The rates identified from recently built housing are often considered the best estimation of what similar future homes will generate, at least in the first few years of occupation. Several of these SGR categories were again determined necessary (and have been updated) for the projections. Two pairs of these categories are for the same housing classifications, but within the separate SSD and CUSD regions.[9] The categories are:

(1) "SFD and SFA" - tracts of mostly market-rate, SFD and comparable attached (SFA) homes (i.e., large plex units with attached two-car garages and private spaces per unit) [split into SSD and CUSD sections]

(2) "Regular ATT" – all non-SFA attached housing developments with a majority of market-rate units [split into SSD and CUSD sections]

(3) "BMR ATT" – attached complexes with at least 50% of the units originally offered at below-market rates (i.e., affordable to occupants with annual incomes below a certain level, such as 80% of the median income); this excludes motel-like "SRO" BMR projects [for all of the FUHSD, including in both ESDs]

(4) "SRO BMR" – BMR units that generally are studios lacking functional kitchens and have limited parking options [only from, and projected in, the SSD section]

These SGRs for FUHSD students can differ based on the feeder district location, with new homes in the CUSD area consistently having higher rates in both TK-8 and 9-12. A sample of 60 recently built "SFD and SFA" homes in the SSD currently provides five FUHSD-enrolled students (see top row of Table 7 on page 15). That translates into a 0.08 SGR in grades 9-12, or the rounded equivalent of eight students in every 100 such new residences. Recent "SFD and SFA" dwellings in the CUSD, by contrast, have a 0.25 high school SGR (i.e., more than triple the rate in the SSD for comparable residences). A shift has occurred in the SGR distribution from these CUSD homes, however, in that there no longer is a greater proportionate concentration in the elementary grades. This means that there is less likelihood of a further rise in the high school SGR from those dwellings (from within the CUSD region).

[8] Appendix B2 provides the individual grade-to-grade rates into 5-8, including by more categories than those summarized here.

[9] Some samples have changed since the last study, with the just-completed tracts added and developments that are now too old (within the context of suitable sample sizes, relative to the housing amounts being projected in that type) excluded.

Table 7: Student Generation Rates (SGRs) from Recently Built Housing

Elementary District Region	Category of Recently Built Housing*	Sampled Housing Units	Actual October 2014 Students Enrolled in the Respective Districts TK-2	3-5	6-8	9-12	Current Student Generation Rate (SGR) (rounded) TK-8	9-12	TK-12
Sunnyvale (SSD)	**SFD and SFA**	60	8	4	2	5	0.23	**0.08**	0.32
	Regular ATT	1,121	10	8	7	23	0.02	**0.02**	0.04
Cupertino (CUSD)	**SFD and SFA**	232	42	44	43	59	0.56	**0.25**	0.81
	Regular ATT	321	40	45	35	37	0.37	**0.12**	0.49
All Areas	**BMR ATT (non-SRO)**	40	5	5	9	15	0.48	**0.38**	0.85
	BMR SRO ATT	193	0	1	0	1	0.01	**0.01**	0.01

* "SFD" = single family detached; "SFA" = single family attached, for modern large (1500+ sq. ft.) individually-owned townhome and plex units with multi-car garages connected to each unit; "Regular ATT" (attached) = combined apartment, condo and traditional townhome and plex units; "BMR"= developments with at least 50% of units at below-market-rates; "SRO" = single-room-occupancy locations (developments of small studios with limited kitchen facilities and only one parking space per unit)

Note: "SFD and SFA" and "Regular ATT" samples are of virtually all non-replacement units in developments of three or more units completed since 2007 and (in the CUSD) 2005, respectively, to generate sufficient sample sizes. The only BMR ATT (non-SRO) location was built in 2006, while the one BMR SRO ATT location was built in 2000. No other recent BMR sites exist.

There is also a difference between the two "Regular ATT" samples. There are just 23 FUHSD students coming from an updated sample of 1,121 such units in the SSD, for a 0.02 SGR in grades 9-12. Although this may sound low to some readers, such a high school SGR is not out-of-line with our findings from new ATT complexes in comparable elementary district regions and settings. Many of these modern ATT developments have higher percentages of studios, one-bedroom and smaller two-bedroom units than in the attached housing developments built prior to the 1980s. They also tend to be designed more for singles and childless couples, with features such as weight rooms and spas but only minimal "green" areas for children. As a result, even though this 0.02 high school SGR could increase after several years of occupation, it will never approach the SGR level of the average older ATT development.

The key shift that occurred in this SGR is the lower rate in the elementary grades. A larger Regular ATT unit sample in our previous study had a 0.06 TK-8 SGR. With the slightly older units in that sample now excluded and the most recently completed locations in the SSD added, that SGR is now only 0.02, or one TK-8 student in every 50 units. The newest units in that sample had even lower rates in both TK-8 and 9-12. This justified a reduction in the expected SGR over time from such units, with the impact being mainly on Fremont High (for grades 9-12)

The recent "Regular ATT" units in the CUSD, on the other hand, have a notable 0.12 high school SGR. The 0.37 TK-8 SGR in those dwellings also suggests that this 9-12 SGR will become even larger in the next few years.[10]

Only small samples are available of recently built units in the BMR categories, but this should suffice because few are projected. The sample of 40 "BMR ATT (non-SRO)" units in the FUHSD currently has a 0.38 SGR in 9-12 (from 15 students). A 193-unit development of entirely "BMR-SRO" units currently has one FUHSD student and one SSD student. Such a low student yield is not surprising for this housing type.

[10] These SGRs have been applied to the total number of projected Regular ATT units in the CUSD region, but some allocations have been shifted between developments where appropriate. The projected student numbers coming out of the "19800 Apartments", for example, with solely multiple-bedroom units, are higher per unit than from the strictly one-bedroom "Main Street Apartments", but the aggregate unit total matches the 0.37 SGR in the first years of occupation.

Projected New Housing Amounts

The following paragraphs cover the elementary feeder regions separately, with information provided in reports to each of those districts essentially copied here. This provides consistency between the reports. Readers who do not need a listing of the major projected sites can proceed to the last paragraph of this subsection (on page 17).

Residential developments had both faster and slower timelines than expected in the last year, but the South Bay is still in the midst of a housing "boom". Complexes that had slower building and occupancy rates over the previous twelve months include, in the SSD, the "Avon 101" apartments on northern Fair Oaks. Most of those 97 pending units, however, are one-bedroom, so few students are expected as that building becomes occupied in 2015. Also taking longer to fill than previously forecast are the "Las Palmas" townhomes on the south side of El Camino west of Mathilda, but the rest of those (88 out of 105) should be moved into by next fall. A 67-unit ATT complex at the junction of South Bayview and East Evelyn had been forecast to be 50% occupied on October 1, 2014, but is instead only now being built, with completion perhaps a year off. These modest delays contributed to the lower-than-projected enrollment for this fall, but the enrollment impact still will occur in the future. Progressing at a quicker pace than expected was the first (main) phase of the Stewart Village Apartments on Stewart Drive, with nearly all of the just-finished 202 units occupied on October 1, 2014, and the rest right after. The next phase, with 57 apartments, probably is still a few years off due to some land-use issues. Such an isolated location, however, in an office setting far from any SSD or FUHSD school, has resulted in no students at the moment.

Several additional developments are projected to have move-ins in the SSD region in 2015. Two small projects just east of northernmost Morse Avenue should have their combined 65 townhouses occupied during that time. Around 50% of the 85 regular ATT units, 40 regular BMR units and 83 SRO units in the development on the former Armory site could be occupied by next October (with the remainder for 2016).[11] The "Loft House" apartments by the Town Center had the first approximately 20 units occupied as of this October 1 and the other 113 are now being moved into. Three small developments with a total of 37 ATT units (on Mathilda near ECR, on Old San Francisco near Fair Oaks, and on Willow Ave.) also should be finished. The result is a projection of 500 dwelling units in the SSD region being "first occupied" in 2015 (i.e., in the twelve months to October 1, 2015), all of which are in the Fremont High attendance area.

That new occupancy rate (500 units annually in the SSD region) could continue for at least three more years as more in-the-process developments are built. This includes the Prometheus apartments that are now under construction near the Town Center and a pending project on the former St. Jude medical facility property on East Evelyn. Both of these are in the Fremont area. While there are three developments forecast in the Homestead area between 2016 and 2018, those are at locations by El Camino Real and on the west side of N. Mathilda that are unlikely to generate significant student numbers.

The five-to-ten year forecast in the SSD region (and the Fremont attendance area) includes questionable sites that are sometimes referred to as the "Spansion", "Greystar" and former Sheraton locations.

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The largest development that did not become occupied as quickly as projected in the CUSD region is the "19800 Apartments" complex (aka "Rose Bowl") near Vallco. This is in Cupertino High's attendance area. That complex had been slated to open in August but instead started having occupancies in October 2014. With 204 entirely multiple-bedroom units, this will provide significant student numbers. It should be fully occupied by next fall.

Also forecast in the CUSD in the next two years are (1) a new phase of the Biltmore apartments by the southwest corner of Stevens Creek Blvd. and Blaney Avenue and (2) the "Main Street Apartments" that are adjacent to the "19800" complex. Both are in the Cupertino High attendance area. The former has 80 new units that were just starting to be moved into in October 2014. The rest will be occupied shortly. The "Main Street" complex, with 120 strictly studio and one-bedroom residences, could be fully occupied in 2016, as should two small projects on Foothill Blvd. with a total of 21 units.

[11] Slightly less than 50% has been projected for 2015.

The subsequently projected housing units in the CUSD are mainly in the Fremont, Cupertino and Monta Visa regions. The largest possibility in the Fremont High part of the CUSD area is on the west side of the El Camino Real and Fremont Avenue intersection. While the final numbers that will be approved and the precise timing are unknown, the unit total and densities being requested in this "Butcher's Corner" project are unlikely to occur. This could take years in the planning process. We are estimating 120 Regular ATT units eventually will be permitted, with completion in 2017 and 2018. These will be mostly, if not entirely, large multiple bedroom residences.

The State requires the periodic "Housing Element" for each city and county to include allowing for their designated "fair share" of potential new residences, which the City of Cupertino just provided for in a council vote during their December 3, 2014, meeting. Two alternative plans were approved in that vote. The first, which is referred to as "Plan A", requires that a specific plan be approved by May 31, 2018, for redevelopment of the Vallco property. We are assuming the owners of that property will meet this requirement, which will keep the substitute "Plan B" from occurring instead.

Under this Plan A, a total of 1,400 more housing units could be built in Cupertino (in addition to what is already approved). This includes 600 units in an expansion of the Hamptons Apartments complex in the Santa Clara Unified School District. All in the FUHSD, however, are (1) 389 maximum (360 projected) on the Vallco property, which probably will occur between 2017 and 2019 in the Cupertino High area, (2) 200 in The Oaks shopping center on Stevens Creek Blvd. across from Foothill College, also possible within five years but projected in 2020 and 2021, in the Monta Vista area, and (3) 200 at the Marina Foods location on the north side of Stevens Creek Blvd. just west of De Anza Blvd. This last possibility, which is also in the Monta Vista region, is estimated to occur late in the forecast period. Also included in Plan A are 11 units on a small parcel on the south side of Stevens Creek Blvd. near Wolfe Road.

These projected units in the SSD and CUSD regions total to 5,970 residences, which is 670 more than in our last forecast. Nearly two-thirds of these (3,854) are in the Fremont High attendance area, but over 90% of those are in the low yielding "Regular ATT" category in the SSD. The 835 regular attached units projected in the Cupertino High region, under the much higher "Regular ATT" SGR in the CUSD, should have a greater enrollment impact. Only around 600 new residences are forecast in each of the Homestead and Monta Vista areas, while the total for Lynbrook's area is just 46 homes (see Table 8 on page 18). The result is a projection of 364 FUHSD students in 2024 from these developments, as is shown in the lowest data row of Table 2 on page 4.

Concluding Commentary

There is a huge upside potential to the Fremont High numbers because of how low some cumulative rates and new home SGRs have become for that area. With the high school SGR from new Regular ATT units there being just one student in every 50 residences, it is impossible to become much lower, but it could rise significantly. We simply do not have local trend data that justifies projecting the latter in this update. The unusually low cumulative rates from the majority of the homes in Fremont's region also could jump by more than we are projecting. So even though the latest data only warrants forecasting a "peak" of about 2,400 resident high school students for Fremont, a much higher total easily could occur.

Sincerely,

{Signature not provided with electronic PDF version}

Thomas R. Williams, principal demographer for Enrollment Projection Consultants

Table 8: Projected New Housing Units (excludes housing restricted to seniors)*

Current Attend. Area	Housing Category	ESD Region	Projected Net Additional Units in 12 Months to October 1 of 2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Fremont HS	**Regular ATT**	SSD	434	272	396	417	397	395	384	240	290	305	**3,530**
	Regular ATT	CUSD	0	0	60	60	0	0	0	0	0	0	**120**
	BMR ATT	SSD	20	20	0	0	0	0	7	0	0	0	**47**
	SRO BMR	SSD	40	43	0	0	0	0	0	0	0	0	**83**
	SFD & SFA	SSD	6	4	4	3	3	3	0	0	4	3	**30**
	SFD & SFA	CUSD	18	2	0	0	4	0	0	0	10	10	**44**
	Total		518	341	460	480	404	398	391	240	304	318	**3,854**
Homestead HS	**Regular ATT**	SSD	0	161	100	80	0	0	0	59	0	0	**400**
	Regular ATT	CUSD	0	0	0	0	0	0	0	50	40	40	**130**
	BMR ATT	SSD	0	0	0	0	0	0	0	20	20	0	**40**
	SFD & SFA	SSD	0	0	0	0	0	2	9	9	0	0	**20**
	SFD & SFA	CUSD	0	0	0	1	0	1	1	4	1	0	**8**
	Total		0	161	100	81	0	3	10	142	61	40	**598**
Monta Vista HS	**Regular ATT**	CUSD	0	15	0	0	0	100	100	100	100	100	**515**
	BMR ATT	CUSD	0	0	0	0	0	0	0	0	10	10	**20**
	SFD & SFA	CUSD	12	7	7	6	7	15	15	9	5	6	**89**
	Total		12	22	7	6	7	115	115	109	115	116	**624**
Cupertino HS	**Regular ATT**	CUSD	255	120	100	100	160	50	50	0	0	0	**835**
	BMR ATT	CUSD	0	0	5	5	0	0	0	0	0	0	**10**
	SFD & SFA	CUSD	0	0	0	0	0	0	0	3	0	0	**3**
	Total		255	120	105	105	160	50	50	3	0	0	**848**
Lynbrook HS	**Regular ATT**	CUSD	0	30	0	0	0	0	0	0	0	0	**30**
	SFD & SFA	CUSD	12	0	2	2	0	0	0	0	0	0	**16**
	Total		12	30	2	2	0	0	0	0	0	0	**46**
Sunnyvale SD	Regular ATT	SSD	434	433	496	497	397	395	384	299	290	305	3,930
	BMR ATT	SSD	20	20	0	0	0	0	7	20	20	0	87
	SRO BMR	SSD	40	43	0	0	0	0	0	0	0	0	83
	SFD & SFA	SSD	6	4	4	3	3	5	9	9	4	3	50
	Total		500	500	500	500	400	400	400	328	314	308	4,150
Cupertino USD	Regular ATT	CUSD	255	165	160	160	160	150	150	150	140	140	1,630
	BMR ATT	CUSD	0	0	5	5	0	0	0	0	10	10	30
	SFD & SFA	CUSD	42	9	9	9	11	16	16	16	16	16	160
	Total		297	174	174	174	171	166	166	166	166	166	1,820
Fremont UHSD	**Regular ATT**	(all)	689	598	656	657	557	545	534	449	430	445	**5,560**
	BMR ATT	(all)	20	20	5	5	0	0	7	20	30	10	**117**
	SRO BMR	(all)	40	43	0	0	0	0	0	0	0	0	**83**
	SFD & SFA	(all)	48	13	13	12	14	21	25	25	20	19	**210**
	Total		797	674	674	674	571	566	566	494	480	474	**5,970**

* from site-specific projections that are based on EPC fieldwork and information from the relevant city planning departments

Appendix A1: Actual October 2014 Resident Populations versus Attending Enrollments

High School	Category	Actual Oct. 2014 Feeder ESD and FUHSD Students, incl. SDC and NPS* 6	7	8	9	10	11	12	9-12 Total
Fremont	Attendance				501	495	466	503	1,965
	Resident Population	645	585	546	498	492	469	514	1,973
	Net Difference (A-R)				3	3	-3	-11	**-8**
Homestead	Attendance				631	567	600	605	2,403
	Resident Population	579	557	558	635	572	598	599	2,404
	Net Difference (A-R)				-4	-5	2	6	**-1**
Monta Vista	Attendance				626	542	575	608	2,351
	Resident Population	642	633	611	632	544	583	601	2,360
	Net Difference (A-R)				-6	-2	-8	7	**-9**
Cupertino	Attendance				559	562	521	507	2,149
	Resident Population	597	591	584	545	547	507	501	2,100
	Net Difference (A-R)				14	15	14	6	**49**
Lynbrook	Attendance				453	454	461	468	1,836
	Resident Population	400	389	388	440	442	447	419	1,748
	Net Difference (A-R)				13	12	14	49	**88**
Community	Attendance (no Res. Pop.)				0	7	3	4	14
NPS	Attendance (no Res. Pop.)				4	5	4	8	21
Total	Attendance				2,774	2,632	2,630	2,703	10,739
	Resident Population	2,863	2,755	2,687	2,750	2,597	2,604	2,634	10,585
	Net Difference (A-R)**				24	35	26	69	154

* Attendance figures exclude eighth graders taking classes at the high schools.

** Total net difference is 152 incoming inter-district students (outgoing amount not calculated) and two students listed at unlocatable addresses.

Note: Students enrolled in unlisted special programs are included in the attendance numbers for the five regular high schools.

Appendix A2: Projected October 2015 Resident Student Populations and
Potential Attending Enrollments if Current Intra- and Inter-District Levels continue Next Year
(graduated up by one grade with adjustments for both advancement rates and special schools)*

		Projected Oct. 2015 Feeder ESD and FUHSD Students, incl. SDC and NPS**							
High School	Category	6	7	8	9	10	11	12	9-12 Total
Fremont	Resident Population	658	631	569	513	497	499	477	1,986
	Potential Net Adjustment				2	4	4	5	15
	Potential Attendance				515	501	503	482	**2,001**
Homestead	Resident Population	608	582	568	611	633	568	586	2,398
	Potential Net Adjustment				-5	-3	-4	10	-2
	Potential Attendance				606	630	564	596	**2,396**
Monta Vista	Resident Population	619	648	638	613	633	544	575	2,365
	Potential Net Adjustment				-6	-5	-1	0	-12
	Potential Attendance				607	628	543	575	**2,353**
Cupertino	Resident Population	653	614	601	602	558	552	509	2,221
	Potential Net Adjustment				13	15	16	22	66
	Potential Attendance				615	573	568	531	**2,287**
Lynbrook	Resident Population	392	406	394	402	441	439	440	1,722
	Potential Net Adjustment				12	14	13	22	61
	Potential Attendance				414	455	452	462	**1,783**
Community	Attendance (extrapolated)				0	0	7	3	10
NPS	Attendance (extrapolated)				4	4	5	4	17
Total	Resident Population	2,930	2,881	2,770	2,741	2,762	2,602	2,587	10,692
	Projected Net Adjustment***				20	29	40	66	155
	Attendance				2,761	2,791	2,642	2,653	10,847

*** This information is provided to assist the FUHSD in planning for individual school enrollments. District decisions based on both these numbers and many other factors will almost certainly alter the actual net adjustments that will occur for each school.**

** Potential attendance figures exclude eighth graders taking classes at the high schools.

*** Projected total net adjustment is 153 incoming inter-district students and two students listed at unlocatable addresses. The former is based on recent FUHSD averages of (1) accepting around 89% as many 9th grade inter-district students as had been enrolled as 8th graders the year before in the ESDs and (2) about 40 more inter-district students in 12th, compared to the amount in 11th the year before, presumably via "senior privilege"; but with all of those differences fine-tuned as necessary to match the aggregate forecast. The actual levels, however, easily could be modified by District decisions, such as to accept more students to maintain enrollments.

Notes: (1) Students enrolled in unlisted special programs are included in the attendance numbers for the five regular schools.
(2) The projections have hidden fractional amounts, so the totals shown here may not exactly match those in other tables.

Appendix B1: Accuracy of Past EPC Projections for the FUHSD

School Year of Forecast Study	Total Difference of Actual FUHSD Total from Projected FUHSD Total in				Highest Total Forecast in Following 10 Years		Now Being Forecast in Same Yr. as Past Study	
	Year 1 #	**Year 1 %**	Year 3 #	**Year 3 %**	Year	Total	Total	Difference
2007-08	-18	-0.17%	-1	-0.01%	2017	11,583	11,439	-144
2008-09	-42	-0.41%	142	1.37%	2018	11,716	11,680	-36
2009-10	80	0.78%	263	2.53%	2019	11,783	11,899	116
2010-11	32	0.31%	59	0.56%	2020	12,279	11,983	-296
2011-12	23	0.22%	-70	-0.65%	2020	12,088	11,983	-105
2012-13	-40	-0.37%	NA	NA	2020	12,352	11,983	-369
2013-14	-126	-1.16%	NA	NA	2020	12,135	11,983	-152
Average in First Seven Studies*	45	**0.44%**	102	**0.98%**				

* These are the averages with all differences treated as positive figures. The "Year 1" average in the first eight studies is 0.43%.

Appendix B2: Detail for Tables 5 and 6 on Resident Student Population Trends and Grade-to-Grade Advancement Rates from Existing Housing by Category *in the Sunnyvale SD Region (with focus on data in the high school grades)*

Classification of Existing Dwellings*		Oct.	Resident Students by Grade enrolled in SSD and Resultant Avg. 4-Year Rates Entering Each Grade****					Cumulative Advancement Rate from	Resident Students by Grade enrolled in FUHSD and Resultant Avg. 4-Year Rates Entering Each Grade****				
Type**	Category***	of	5th	6th	7th	8th	TK-8	1st-to-8th*****	**9th**	10th	11th	12th	9-12
SFD	Relatively Affordable and Modest	2010	176	181	155	168	1,613		205	206	172	214	797
		2011	157	166	181	149	1,582		176	207	191	162	736
		2012	182	157	157	174	1,595		153	174	207	189	723
		2013	155	159	151	151	1,554		182	143	169	202	696
		2014	152	145	152	152	1,525		150	183	141	175	649
			0.94	0.94	0.96	0.98		**0.74**	**1.02**	0.99	0.97	0.99	
	Moderate through Upper Incomes	2010	158	145	126	136	1,377		115	143	126	119	503
		2011	135	146	143	124	1,407		152	114	147	119	532
		2012	151	128	150	137	1,437		155	158	114	141	568
		2013	190	153	136	149	1,528		166	157	167	120	610
		2014	181	163	139	137	1,516		178	162	158	159	657
			0.97	0.93	0.99	0.99		**0.89**	**1.19**	1.00	1.02	0.97	
	All SFD Categories (including one mixed-value area)	2010	337	328	285	307	3,019		325	353	298	338	1,314
		2011	299	315	326	278	3,025		330	327	344	281	1,282
		2012	336	290	310	312	3,064		313	334	327	335	1,309
		2013	349	315	292	304	3,120		348	304	338	331	1,321
		2014	338	311	295	291	3,074		331	345	304	336	1,316
			0.96	0.93	0.98	0.98		**0.81**	**1.10**	0.99	1.00	0.98	
ATT	Most Affordable	2010	162	160	147	172	1,598		155	137	146	133	571
		2011	191	161	156	141	1,653		174	159	147	143	623
		2012	179	170	162	162	1,684		146	169	157	146	618
		2013	174	157	164	158	1,626		162	151	177	178	668
		2014	170	148	161	163	1,601		174	149	137	180	640
			0.97	0.90	1.00	0.99		**0.81**	**1.04**	0.98	0.99	1.03	
	Affordable through High Amenity	2010	110	87	106	114	1,250		118	99	107	104	428
		2011	97	95	79	106	1,224		127	116	94	114	451
		2012	126	80	91	90	1,247		105	118	121	98	442
		2013	124	108	81	98	1,287		95	98	107	112	412
		2014	130	108	95	81	1,298		95	93	104	103	395
			0.91	0.86	0.93	1.05		**0.57**	**1.03**	0.96	1.00	1.00	
	All ATT Categories	2010	272	247	253	286	2,848		273	236	253	237	999
		2011	288	256	235	247	2,877		301	275	241	257	1,074
		2012	305	250	253	252	2,931		251	287	278	244	1,060
		2013	298	265	245	256	2,913		257	249	284	290	1,080
		2014	300	256	256	244	2,899		269	242	241	283	1,035
			0.95	0.88	0.97	1.01		**0.69**	**1.04**	0.97	0.99	1.01	

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Appendix B2: Detail for Tables 5 and 6 on Resident Student Population Trends and Grade-to-Grade Advancement Rates from Existing Housing by Category *in the Cupertino USD Region (with focus on data in the high school grades)*

Classification of Existing Dwellings* Type**	Category***	Oct. of	Resident Students by Grade enrolled in CUSD and Resultant Avg. 4-Year Rates Entering Each Grade**** 5th	6th	7th	8th	TK-8	Cumulative Advancement Rate from 1st-to-8th*****	Resident Students by Grade enrolled in FUHSD and Resultant Avg. 4-Year Rates Entering Each Grade**** **9th**	10th	11th	12th	9-12
SFD	Gentrifying Areas that Originally were Affordable or Modest	2010	153	120	149	115	1,122		138	158	173	147	616
		2011	135	160	119	143	1,124		121	139	161	172	593
		2012	128	132	162	126	1,150		154	126	147	168	595
		2013	119	136	139	158	1,151		134	157	127	155	573
		2014	120	134	147	142	1,157		156	137	152	124	569
			1.00	1.06	1.04	1.01		**1.27**	**1.04**	1.02	1.01	1.01	
	Originally Moderate Income	2010	109	94	84	90	985		93	101	89	95	378
		2011	112	107	99	86	1,026		88	94	101	93	376
		2012	115	110	111	99	1,062		88	88	89	101	366
		2013	124	116	114	110	1,072		103	88	86	93	370
		2014	143	125	122	111	1,049		113	111	83	87	394
			0.98	1.00	1.05	0.99		**1.09**	**1.02**	1.03	0.96	1.02	
	Originally Middle Income	2010	785	711	743	700	6,299		722	766	693	720	2,901
		2011	731	807	728	753	6,311		710	720	757	702	2,889
		2012	786	751	835	738	6,320		748	720	722	746	2,936
		2013	780	770	757	840	6,269		727	759	717	710	2,913
		2014	699	791	781	769	6,028		795	725	745	707	2,972
			1.02	1.01	1.02	1.01		**1.20**	**0.98**	1.00	0.99	0.99	
	Upper Middle through Highest Income	2010	323	327	324	354	2,674		337	328	342	331	1,338
		2011	313	322	331	315	2,663		363	338	329	340	1,370
		2012	298	308	323	332	2,645		316	354	349	329	1,348
		2013	309	296	316	328	2,598		335	323	359	344	1,361
		2014	348	301	298	309	2,506		325	329	319	351	1,324
			1.02	0.99	1.01	0.99		**1.19**	**1.01**	0.99	1.01	0.99	
	All SFD Categories	2010	1370	1252	1300	1259	11,080		1290	1353	1297	1293	5,233
		2011	1291	1396	1277	1297	11,124		1282	1291	1348	1307	5,228
		2012	1327	1301	1431	1295	11,177		1306	1288	1307	1344	5,245
		2013	1332	1318	1326	1436	11,090		1299	1327	1289	1302	5,217
		2014	1310	1351	1348	1331	10,740		1389	1302	1299	1269	5,259
			1.02	1.01	1.02	1.00		**1.19**	**1.00**	1.01	1.00	1.00	

Appendix B2, page 2 of 3, with footnotes at the bottom of the final page

Appendix B2: Detail for Tables 5 and 6 on Resident Student Population Trends and Grade-to-Grade Advancement Rates from Existing Housing by Category *in the Cupertino USD Region (with focus on data in the high school grades)*

Classification of Existing Dwellings* Type**	Category***	Oct. of	Resident Students by Grade enrolled in CUSD and Resultant Avg. 4-Year Rates Entering Each Grade**** 5th	6th	7th	8th	TK-8	Cumulative Advancement Rate from 1st-to-8th*****	Resident Students by Grade enrolled in FUHSD and Resultant Avg. 4-Year Rates Entering Each Grade**** 9th	10th	11th	12th	9-12
ATT	Most Affordable	2010	108	113	114	123	1,004		140	138	126	134	538
		2011	97	115	120	120	998		131	153	147	117	548
		2012	116	108	116	115	1,029		143	137	166	141	587
		2013	110	126	110	130	1,044		132	143	139	154	568
		2014	112	122	123	120	1,077		129	136	154	130	549
			0.99	1.10	1.01	1.06		**1.24**	**1.09**	1.04	1.06	0.94	
	Affordable & Modest	2010	277	275	275	269	3,051		273	248	243	222	986
		2011	311	267	237	258	3,164		278	260	233	223	994
		2012	335	304	258	250	3,334		256	275	246	228	1,005
		2013	381	309	300	241	3,485		252	245	267	245	1,009
		2014	398	355	307	298	3,605		247	235	250	261	993
			0.97	0.95	0.96	0.98		**0.81**	**1.02**	0.95	0.97	0.97	
	Moderate through High Amenity (including "Duets")	2010	311	253	285	220	2,851		233	209	203	198	843
		2011	310	306	251	267	2,966		228	234	207	199	868
		2012	326	314	295	253	3,078		266	239	227	201	933
		2013	379	333	305	292	3,152		239	264	245	212	960
		2014	395	373	327	293	3,212		273	258	267	245	1,043
			0.98	1.00	0.98	0.97		**0.92**	**0.97**	1.04	1.00	0.97	
	All ATT Categories	2010	696	641	674	612	6,906		646	595	572	554	2,367
		2011	718	688	608	645	7,128		637	647	587	539	2,410
		2012	777	726	669	618	7,441		665	651	639	570	2,525
		2013	870	768	715	663	7,681		623	652	651	611	2,537
		2014	905	850	757	711	7,894		649	629	671	636	2,585
			0.97	0.99	0.97	0.99		**0.91**	**1.01**	1.00	1.00	0.96	

* These are the aggregate counts from planning areas with virtually no net increase in housing units since September 2010.

** "SFD" = single family detached homes; "Attached" = condominum, townhouse, apartment & traditional duplex-fourplex units

*** Categories are subjective assignments by EPC of the dominant housing situation in each planning area; some areas may have small percentages in other groups.

**** For example, the "1.01" entering ninth grade from "All ATT Categories" in the CUSD means that the student population grew by an average of 1% from eighth to ninth from the same housing units over the last four years, except that the rate of change in latest year has been weighted at 150% in the calculation.

***** This is the portion of the number of students in any one year in first grade that would be in eighth grade seven years later using these rates. For instance, the "0.91" for "All ATT" in the CUSD means that, on average, there would be 9% fewer eighth graders from these same housing units as there had been first graders seven years earlier (if these rates continue).

Note: The rates shown are the actual calculated rates. These have been modified where warranted in the forecast, including for some differences identified (but not shown here) by attendance area location.

Appendix B2, page 3 of 3

Ryan -

The following are our comments to the DEIR for your consideration.

After you have had an opportunity to review the comments, please contact me if you have any questions.

Regards,

Jeff Warmoth

· Throughout the DEIR, please note that with respect to statement that the implementation of the Proposed Project and the Maximum Build Out / Corner Mixed-Use Development Scenario would result in a degradation of LOS under cumulative conditions at the Fair Oaks Avenue/Duane Avenue intersection, it should be better clarified that the reason is because the "road diet" that has already been approved by the City Council for Duane Avenue would remove a travel lane and not allow for an increase in roadway capacity that could be otherwise be created by adding a southbound left turn lane on Fair Oaks Avenue (i.e., a receiving lane cannot be added on the east leg of the intersection). As described on page 42 of the DEIR, the roadway configuration of Duane Avenue will be modified between Fair Oaks Avenue and Stewart Drive. The changes will include reducing the Duane Avenue roadway width from four lanes to two lanes and adding buffered bicycle lanes. The planned improvement consists of the restriping the east leg of the intersection to allow for one left-turn lane, one through lane, and one right-turn lane.

· Please add the following note to the text as further explanation for Table 4.2-9 and Table 4.2-11:
"Please note that as shown on Table 4.2-9 (Existing Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the existing traffic, plus the traffic from the Proposed Project remains an acceptable LOS C. The AM peak hour delay is reduced from 24.0 to 23.6 and the PM peak hour delay is increased from 29.8 to 30.0. Similarly, please note that as shown on Table 4.2-11 (Background Plus Proposed Project Intersection Levels of Service), the LOS at the Fair Oaks Avenue/Duane Avenue intersection for the background traffic, plus the traffic from the Proposed Project is materially reduced from the background only traffic for the AM peak hour delay from 29.6 to 26.5 and slightly increased for the PM peak hour delay from 38.6 to 39.0. The decreases from the addition of the Proposed Project are "because of a net negative generated in traffic trips resulting from the proposed change in land use."

· In a couple of instances, with respect to the Proposed Project, the DEIR refers to "451" residences. Please note that the Proposed Project is up to "450" residences.

· For clarity of future reference only, on pages 46-47, the heading for Table 4.2-9 should be revised as follows: "Existing Plus Proposed Project Levels of Service", and on pages 49-50, the heading for Table 4.2-11 should be revised as follows: "Background Plus Proposed Project Levels of Service.

· On page 72, please correct: "(see footnote ~~21~~ 27)."

· On pages 89 and 90, and throughout the DEIR with respect to this noise impact, especially Section 4.5.2.2, Noise Impacts to the Project Site, please clarify that this impact is TO the PROPOSED residences from existing road noise, not to existing residences. Please revise Impact NOI-1 as follows: "Residences located along Duane Avenue could be exposed to interior noise levels in excess of acceptable City standards" to "New residences within the project site located along Duane Avenue could be exposed to interior noise levels from existing Duane Avenue traffic in excess of acceptable City standards."

· On page 6, in Section 2.0, second paragraph, please correct: "The project site is accessed by ~~three~~ four driveways…."

· On page 16, in Section 3.2, under the subtitle "Consistency", please clarify that all references to " itigation" apply only to the Maximum Build Out / Corner Mixed-Use Development Scenario, not the Proposed Project.

· On pages 18 and 19, in Section 3.4, City of Sunnyvale General Plan, under Policy LT-5-1c "Consistency", please clarify that all references to " mitigation" apply only to the Maximum Build Out / Corner Mixed-Use Development Scenario, not the Proposed Project.

· On pages 17 to 20, in Section 3.4, City of Sunnyvale General Plan, please clarify that references to the "project" refer to the "Proposed Project".

· On page 45, Table 4.2-7 and Table 4.2-8 should be replaced with new tables that incorporate the text of footnotes 13 and 14, which will result in a reduction of 75 Daily Trips and a reduction of 36 AM peak hour trips and 35 PM peak hour trips.

· On pages 66 and 67, in Table 4.3-4, please note that references to the "project" or "proposed development" refer to the "Proposed Project". Under "Tree Planting" and "Project Consistency" please modify the text as follows: "As designed, the Proposed Project ~~project~~ proposes ~~up to~~ .8 acres of new public park, plus 1.7-acres of new publicly accessible open space including lawns and new trees. The Proposed Project proposes planting 693 new trees, plus maintaining 22 existing street trees. The new trees…"

· On page 68, please correct the title to Table 4.3-6 as follows: "Operational Emissions for the ~~Proposed Project~~ Maximum Build Out / Corner Mixed-Use Development Scenario".

· On pages 149 to 151, in Section 4.11.3, Mitigation and Avoidance Measures for Cultural Resources, for clarity, the reference to "the southwest corner of Parcel 1" in MM CUL 1-1 should be revised to add "the southwest corner of Parcel 1, within a radius of 100 feet of CA-

SC1-9,"; and the reference to "the project site" in MM CUL 1-2 should be revised to "within ~~the project site~~ a radius of 100 feet of CA-SC1-9,"; and, the reference to "the East Sunnyvale ITR parcel" in MM CUL 1-4 should be revised to "within ~~the East Sunnyvale ITR parcel~~ a radius of 100 feet of CA-SC1-9,".

· On page 171, in Section 4.14.3.1, Public Safety, please note that the Proposed Project provides for access to the site for emergency vehicles from driveways on DeGuigne Drive, and from an Emergency Vehicle Access Easement on Duane Avenue.

· On page 173, Section 4.14.3.3, Parks, should be revised to read "The ~~proposed project~~ Proposed Project would include approximately 1.7 acres of ~~public~~ publicly accessible open space within the ~~housing development~~ project site and dedicate a new, .8 acre public park for a total of 2.5 ~~1.4~~ acres of new publicly accessible open space ~~park land~~…."

Throughout the document, reference to US EPA residential RSLs should be referenced as EPA RSLs and reference to the Regional Water Quality Control Board (RWQCB) residential ESLs should be referenced as RWQCB ESLs.

Page 12 – first bullet: Within the two-inch lay**er** of sand, horizontal ventilation piping will be evenly spaced throughout the building footprint, connected to a header, and directed through the building walls to the roof line;

Page 132 – last paragraph – The facility operated until 2003 when AMD transferred ownership of the property to Spansion. Spansion continues to occupy the site, but manufacturing operations on-site ceased in July 2013.

The accurate history of ownership is as follows: In 2003, AMD transferred ownership of the property to FASL LLC, a joint venture of Fujitsu and AMD. In December 2005, FASL LLC became Spansion, Inc. (Spansion), a corporation specializing in flash memory devices (EPA 2009). The SDC building was built in approximately 1991 and used for flash memory manufacturing until the 915 DeGuigne Drive facility, including the SDC, was decommissioned in 2009 (T&R 2011a).

Page 133 – 4.10.2.2 first paragraph - The historic agricultural land uses on-site resulted in the accumulation of residual ~~pesticides (DDT~~ **organochlorine pesticides** ~~compounds~~, ~~arsenic, and lead)~~ in the shallow soil.

Page 136 final paragraph – In 2011, 25 exterior soil gas samples were collected at depths of approximately five feet. Soil vapor exceeded the EPA **(Year of RSLs cited?)** Residential Regional Screening Level (RSL) in eight of the 25 samples, generally in the western portion of the project site. In 2013, 20 soil gas samples were collected at depths of approximately five feet. The Residential RSL was exceed in three of the 20 samples, again in the western portion of the site.

Page 137 first paragraph section 4.10.3.2 - Historic and current land uses on-site and up-gradient of the project site have resulted in site wide pesticide contamination, localized soil contamination, groundwater contamination, and **limited** soil vapor **contamination**.

Page 138 footnote 57 - 57 Any soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be excavated and removed from the site or buried on-site in the basement of the ~~925~~**915** DeGuigne building after demolition with approval from the RWQCB. No soil exceeding the RWQCB Residential Environmental Screening Levels for direct exposure (ESLs, May 2013) for the OCPs will be located within two feet of the surface.

Page 139 second bullet – Within the two-inch lay**er** of sand, horizontal ventilation piping will be evenly spaced throughout the building footprint, connected to a header, and directed through the building walls to the roof line;

Page 143 - **MM HAZ-1.6:** Trichlorobenzene (TCB) isomers 1,2,4-trichlorobenzene and 1,2,3-trichlorobenzene were detected in a soil sample collected from a depth of approximately 8.5 feet within the PAD C excavation backfill at concentrations of 57 and 18 mg/kg, respectively. These concentrations exceed the residential RSL. The project developer shall obtain written Water Board approval to leave impacted (concentrations exceeding the lower of the then-current Water Board or
US EPA residential screening levels) soil beneath residences. A deed restriction or land use covenant shall detail the location of these soils. This document shall include a map of these impacted soils; shall restrict future excavation in these areas; and shall require future excavation be conducted in these areas only upon written approval by the Water Board and in accordance with the SMP.

Page 143 - **MM HAZ-1.7: MM Haz-1.7 specifies one sample for every 250 cuyd of soil. SMP calls every 500 cuyds which is common language the RWQCB agrees to for large fill projects. DTSC guidance calls for 1 sample every 250 cuyd for the first 1000 cuyd then 1 every 500 cuyd. MM Haz-1.7 also calls for marking on a figure where OCP soils above residential ESLs will be located on the site.**

“discrete soil samples shall be collected of stockpiled soils and analyzed for potential contaminants of concern at a frequency of one sample per every 250 cubic yards (cy) **for the first 1,000 cy and one sample every 500 cy thereafter**.”

3 15-0764 **File #:** 2014-7416 & 2014-7417
Location: 915 De Guigne Drive, 936 East Duane Avenue and surrounding area
Zoning: M-S (Industrial and Service) Proposed R-3/PD (Medium Density
Residential/Planned Development)
Proposed Project:
PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for Residential Project and East Sunnyvale Sense of Place Plan
Project Planner: Ryan Kuchenig, (408) 730-7431, rkuchenig@sunnyvale.ca.gov

Ryan Kuchenig, Senior Planner, said the purpose of this public hearing is to gather public input on the adequacy of the 915 De Guigne Residential Project Draft Environmental Impact Report (EIR). He provided comments on the project and noted that staff would not be responding to questions and all comments given tonight would be included in the Final EIR.

Chair Melton opened the public hearing.

Deborah Marks, a Sunnyvale resident, noted the number of trees on the site, those of a significant size and those in good or excellent condition. She also noted that all onsite trees have been proposed for removal, discussed the benefits of maintaining mature trees and suggested preserving the mature trees located at the periphery of the site.

Comm. Klein said he is unsure of whether level of service table 4.2-5 on page 41 captures the current or expected level of service and the subsequent impacts of that project. He said the City is currently redoing the stretch along Duane Avenue, and he hopes the Final EIR will capture the expected level of service and impacts of that project.

Chair Melton clarified with Trudi Ryan, Planning Officer, that even technical questions regarding the meaning of words in the document are best made as comments. Chair Melton noted that page ix, the Cultural Resources section makes reference to hazardous materials mitigation, and section 4.10.2.2 regarding Onsite Sources of Contamination, it would be helpful if definitions could be added, particularly for “cutoff wall” and “dewatering.”

He noted that in section 4.10.2.3 in the paragraph discussing historical data showing TCE concentrations, there are three instances where he believes the narrative is describing the Pad C remediation. He said he believes the former

source area, soil excavation and dewatering program and ANS leak are all talking about the Pad C remediation, and that if those three things are talking about something other than that he suggests clarification. Chair Melton said the title of this same section, "Off-site Sources of Soil and Groundwater Contamination," is confusing because many narratives talk about onsite sources of soil and groundwater contamination. He noted that the report discusses four facilities to the south where underground water contamination has come onsite, and then mentions the former AMD facilities on parcel 1 of the project site. He noted that the narrative then abruptly transitions from things happening offsite to the discussion about the Pad C remediation, and suggested moving the paragraph beginning with a discussion on the TCE concentrations in its entirety to 4.10.2.2 to conclude the section about onsite sources of contamination or including a paragraph explaining this transition.

Chair Melton noted that the following paragraph describes 20 soil gas samples collected at depths of approximately five feet, and said it is unclear as to whether they pertain to Pad C remediation or elsewhere on parcel 1. He suggested some clarification in the narrative or a transition between paragraphs, and suggested writing in a footnote with an explanation on what a Residential Regional Screening Level (RSL) is, who owns the metric and the purpose of it. He asked about the meaning of the final sentence that states the Residential RSL was exceeded in three of the 20 samples on this portion of the site, and whether that is a big deal or not.

Chair Melton observed in section 4.10.4.2 on Project Specific Mitigation Measures that the construction of townhomes contemplated on parcel 1 would not disturb the underground cutoff walls that were built at the former Pad C site, and suggested that we need a new mitigation measure along the lines that nobody will disturb underground cutoff walls at the former Pad C site. He commented on mitigation measure Haz 1.7 as not contemplating possible underground storage tanks and associated piping on parcel 2 from the former gas station and it should.

Chair Melton suggested that the narrative of section 4.14.1.2 on School Facilities be expanded to include the plan at Fremont High School to deal with the overcapacity situation.

He disclosed that he met with the applicant and the environmental consultant advisor a week ago to discuss section 4.10 on environmental issues.

Chair Melton closed this public hearing item.