



**Council Meeting: February 8, 2011**

**SUBJECT: Update on SB 375 - Sustainable Communities Strategy and Regional Housing Needs Allocation (RHNA) Process --- Information Only**

**REPORT IN BRIEF**

This staff report describes Senate Bill 375, the Sustainable Communities Strategy (SCS) and the effect of the law on local governments as well as the Bay Area as a region. This report is based on information provided by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG).

The SCS will be developed in partnership with regional agencies, local jurisdictions and Congestion Management Agencies (CMAs) through an iterative process. The regional agencies recognize that input from local jurisdictions with land use and transportation authority is essential to create a feasible SCS. The SCS is advisory and does not alter the authority of jurisdictions over local land use and development decisions.

The purpose of this report is to provide the City Council with an overview of the SCS in relation to local land use and transportation policies, implementation needs, and quality of life. Key policy considerations will be highlighted, particularly related to the future adoption of the City's *Land Use and Transportation Element (LUTE)* and *Climate Action Plan (CAP)*.

This is an informational only item. Staff recommends that the City Council provide any comments on the regional SB 375 efforts that are currently underway.

**DISCUSSION**

**SB 375 Purpose and Approach:**

Senate Bill 375 became law in 2008 and is considered landmark legislation for California relative to land use, transportation and environmental planning. It calls for the development of a Sustainable Communities Strategy (SCS) in all metropolitan regions in California. Within the Bay Area, the law gives joint responsibility for the SCS to the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). These agencies

will coordinate with the Bay Area Air Quality Management District (BAAQMD) and the Bay Conservation and Development Commission (BCDC).

The SCS integrates several existing planning processes and is required to accomplish the following objectives:

- Provide a new 25-year land use strategy for the Bay Area that is realistic and identifies areas to accommodate all of the region's population, including all income groups; and
- Forecast a land use pattern, which when integrated with the transportation system, minimizes greenhouse gas emissions from automobiles and light trucks and is measured against regional target established for the Bay Area by the California Air Resources Board (CARB).

The SCS is a land use strategy required to be included as part of the Bay Area's 25-year Regional Transportation Plan (RTP). By federal law, the RTP must be internally consistent. Therefore, the over \$200 billion dollars of transportation investment typically included in the RTP must align with and support the SCS land use pattern. SB 375 also requires that an updated eight-year regional housing need allocation (RHNA) prepared by ABAG is consistent with the SCS. The SCS, RTP and RHNA will be adopted simultaneously in early 2013.

The SCS is not limited to assigning housing units to jurisdictions or achieving greenhouse gas targets. The primary goal is to build a Bay Area which will continue to thrive and prosper for the next 25 years and beyond. By directly confronting the challenges associated with population growth, climate change, economic realities and public health, the SCS is intended to achieve a Bay Area which is both more livable and more economically competitive. The general objectives of the SCS are to:

- Recognize and support compact walkable places where residents and workers have access to services and amenities to meet their day-to-day needs;
- Reduce long commutes and decrease reliance that increases energy independence and decreases the region's carbon consumption;
- Support complete communities which remain livable and affordable for all segments of the population, maintaining the Bay Area as an attractive place to reside, start or continue a business, and create jobs.
- Support a sustainable transportation system and reduce the need for expensive highway and transit expansions, freeing up resources for other more productive public investments;
- Provide increased accessibility and affordability to our most vulnerable populations; and

- Conserve water and decrease our dependence on imported food stocks and their high transport costs.

**Building on Existing Efforts:**

The SCS builds upon existing efforts in many Bay Area communities to encourage more focused and compact growth while recognizing the unique characteristics and differences of the region's various communities. Priority Development Areas (PDAs) are locally identified and regionally adopted infill development opportunity areas near transit. The PDAs provide a strong foundation for structuring the region's first SCS. PDAs are only three percent of the region's land area. However, local governments have indicated that based upon existing plans, resources, and incentives the PDAs can collectively accommodate a substantial amount of the Bay Area's housing and employment needs through 2035.

PDAs have been supported by planning grants, capital funding and technical assistance grants from MTC. The current RTP allocates an average of \$60 million a year to PDA incentive-related funding. Future RTPs, consistent with the SCS, will be structured to provide policies and funding that is supportive of PDAs and potentially other opportunity areas for sustainable development in the region. Sunnyvale has three designated PDAs that currently or in the future will allow for transit-oriented infill opportunities: Downtown Sunnyvale, El Camino Real corridor and Lawrence Caltrain Station area.

**Regional/Local Partnership:**

To be successful, the SCS will require a partnership among regional agencies, local jurisdictions, Congestion Management Agencies (CMAs), transit agencies, and other regional stakeholders. MTC and ABAG are engaged in an intense information exchange with County/Corridor Working Groups throughout the Bay Area. These Groups are organized by county, by sub-regions within counties, and by corridors that span counties. They typically include city and county planning directors, CMA staff, and representatives of other key agencies such as transit agencies and public health departments. Working Group members are responsible for providing updates and information to their elected officials and policymakers through reports like this one and eventually through recommended council or board resolutions on the draft SCS.

Each county has established an SCS engagement strategy and has formed a County/Corridor Working Group according to its needs and ongoing planning efforts. For Santa Clara County, the Working Group consists of the Santa Clara County Cities Association, Santa Clara County City Managers Association and Santa Clara County Association of Planning Officials (SCCAPO). The Working Group provides a conduit for distributing ongoing information and coordinating the input of all Santa Clara County jurisdictions on the SCS process. The Valley Transportation Authority (VTA) is also integrally involved as the CMA for

Santa Clara County and will provide technical support to the Working Group and direct input to MTC on the SCS and RTP. Local jurisdictions transportation officials will also be providing input to the Working Group process through a subcommittee of the Working Group and VTA Technical Advisory Committee.

In addition to the County/Corridor Working Groups, a Regional Advisory Working Group (RAWG) was formed at the initial stage of the SCS process to facilitate policy and technical dialogue at the Bay Area regional level. The RAWG is composed of local government planning and transportation staffs and key stakeholders from the Bay Area representing non-profit, business and developer organizations. The Director of Community Development attends the RAWG meetings as one of the representatives for SCCAPO.

**Performance Targets and Indicators:**

SB 375 includes preparing a SCS but also monitoring the success of the Bay Area region in achieving the above goals and objectives. One of the first tasks for the regional agencies was to adopt performance targets and indicators that will help inform decisions about land use patterns and transportation investments. These targets and indicators will guide the preparation the SCS and RTP. In November/December 2010, draft targets and indicators were developed by the Performance Targets and Indicators Ad Hoc Committee of the RAWG. The targets were adopted by ABAG and MTC in January 2011 and the indicators will be adopted in Spring 2011. Attachment A identifies the adopted targets that will provide the foundation for developing and measuring the progress on the SCS. A primary target for the Bay Area is to reduce per capita carbon dioxide (CO<sub>2</sub>) emissions from cars and light-duty trucks by 15 percent in 2035 compared to 2005. This performance target was established by CARB and BAAQMD in September 2010 under the statutory authority of SB 375.

**Development of SCS Scenarios:**

The final SCS will be the product of an iterative process that includes a sequence of growth and supportive transportation scenarios. The first product will be an Initial Vision Scenario that is expected to be available for review in March 2011. This will be followed by more detailed and refined SCS scenarios that will be released in Summer and Fall 2011. A final draft SCS Scenario is scheduled for public review in early 2012. Attachment B outlines the SCS planning process, timeline and milestone dates.

Initial Vision Scenario: ABAG and MTC will release an Initial Vision Scenario in March 2011 based largely on input from local jurisdictions through the county/corridor engagement process and information collected by December 2010. The Vision Scenario will encompass an initial identification of places, policies and strategies for long-term, sustainable development in the Bay Area. Local governments have been asked to identify places of great potential for

sustainable development, including PDAs, transit corridors, employment areas, as well as infill opportunities areas that lack transit services but offer opportunities for increased walkability and reduced driving. Attachment C indicates the areas that Sunnyvale staff has initially identified as having highest potential for residential and employment development.

The Initial Vision Scenario will:

- Incorporate the 25-year regional housing need encompassed in the SCS;
- Provide a preliminary set of housing and employment growth numbers at regional, county, jurisdictional, and sub-jurisdictional levels; and
- Be evaluated against the greenhouse gas reduction target as well as the additional performance targets adopted for the SCS.

Detailed Scenarios: In Spring 2011, local governments and regional agencies will jointly evaluate the feasibility of achieving the Initial Vision Scenario by working on the Detailed Scenarios. The Detailed Scenarios will be different than the Initial Vision Scenario in that they will take into account constraints that might limit development potential, and will identify the infrastructure and resources that can be identified and/or secured to support the scenario. MTC and ABAG expect to release a first round of Detailed Scenarios by July 2011. Local jurisdictions will provide input, which will then be analyzed for the release of the Preferred Scenario by the end of 2011. The County/Corridor Working Groups as well as the RAWG will facilitate local input into the scenarios through 2011. The analysis of the Detailed Scenarios and Preferred Scenario will take into account the adopted performance targets and indicators.

### **Regional Housing Needs Allocation:**

As previously mentioned, SB 375 requires the next eight-year RHNA to be consistent with the SCS. Planning for affordable housing in the Bay Area is one of the essential tasks of sustainable development. Through the SCS, this task is integrated with the regional land use strategy, the development of complete communities and a sustainable transportation system. The process to update RHNA will begin in early 2011. The county/corridor engagement process will include discussions of RHNA, since both the SCS and RHNA require consideration of housing needs by income group. Cities will discuss their strategies for the distribution of housing needs at the county level and decide if they want to form a sub-regional RHNA group by March 2011. The pros and cons of forming a sub-region for Santa Clara County are currently being considered by the Working Group.

The distribution of housing needs will inform the Detailed SCS Scenarios. Regional agencies will take input from local jurisdictions with the goal of adopting the RHNA methodology by September 2011. The final housing numbers for the region will be issued by the State Department of Housing and

Community Development (HCD) by September 2011. The Draft RHNA will be released by spring 2012. ABAG will adopt the Final RHNA by the end of summer 2012. Sunnyvale will address the next round of RHNA in its next Housing Element update in 2014.

**Regional Transportation Plan:**

The SCS explicitly links land use choices and the transportation investments. MTC's and ABAG's commitment to minimizing greenhouse gas emissions and providing housing for all income levels translates into supporting the development of places committed to these goals and funding for transportation, infrastructure and housing. The regional agencies will work closely with the CMAs (VTA for Santa Clara County), other transportation agencies and local jurisdictions to define financial constrained transportation priorities in their call for transportation projects in early 2011. This may involve significant changes to projects listed in the RTP, including de-listing of some currently listed projects. From this response, a detailed project assessment will be completed by July/August 2011; the project assessment will be an essential part of the development of Detailed SCS Scenarios. MTC's Regional Transportation Plan (RTP) will be analyzed through 2012 and released for review by the end of 2012. ABAG will approve the SCS by March 2013. MTC will then adopt the final RTP and SCS by April 2013.

Regional agencies will prepare one Environmental Impact Report (EIR) for both the SCS and the RTP. This EIR might assist local jurisdictions in streamlining the environmental review process for some of the projects that are consistent with the SCS. Local jurisdictions are currently providing input for the potential scope of the EIR. Regional agencies are investigating the scope and strategies for an EIR that could provide the most effective support for local governments.

**Additional Regional Tasks:**

MTC, ABAG and the BAAQMD are coordinating the impacts of CEQA thresholds and guidelines recently approved by the BAAQMD. BAAQMD is currently developing tools and mitigation measures related to the CEQA thresholds and guidelines to assist with development projects in PDAs. The regional agencies will be coordinating other key regional planning issues including any adopted climate adaptation-related policy recommendations or best practices encompassed in the Bay Plan update recently released by the BCDC.

**Potential Outcomes of SCS:**

The SCS provides an opportunity for the City of Sunnyvale to advance local goals as part of a coordinated regional framework. By coordinating programs across multiple layers of government, a desired outcome of the SCS is improved public sector efficiency and more coordinated regulation and allocation of public funds. The SCS connects local neighborhood concerns, such as new

housing, jobs and traffic, to regional objectives and resources. It is a platform for cities and counties to discuss and address a wide spectrum of challenges, including high housing costs, poverty, job access, and public health, and identify local, regional, and state policies to address them. It could give local governments a stronger voice in identifying desired infrastructure improvements and provides a framework for evaluating those investments regionally.

The SCS may lead to incentives for encouraging cities to adopt policies and implement programs that benefit the quality of life beyond their borders, such as creating more affordable housing and jobs or reducing dependence on driving. Regional agencies are exploring the following support for the SCS:

- Grants for affordable housing close to transit;
- Infrastructure bank to support investments that can accommodate housing and jobs close to transit;
- Transportation investment in areas that can significantly contribute to the reduction of greenhouse gas emissions through compact development; and
- Infrastructure investments that can improve access to services through walking and transit.

Although it is too early to assess the outcome, the SCS process has raised questions and issues, such as: possible diversion of transportation resources to PDAs from other transportation needs; availability of limited resources for the Bay Area region and equitable distribution among jurisdictions to implement the SCS; environmental justice and social equity issues; competing priorities regarding balancing PDAs and Infill Opportunity Areas for employment and housing growth; and the potential need for more focused SCSs to address demographic, economic and geographic differences among sub-regions and corridors.

#### **Role of Sunnyvale in SCS Process:**

As the second largest city in Santa Clara County, it is important that Sunnyvale is represented in discussions on the SCS, RHNA and RTP. Although the future impacts of the SCS on local governments are not clear, it will affect the prioritization of discretionary RTP funds and will affect the RHNA housing methodology formula and the eventual number of housing units allocated to Sunnyvale. It is also expected that preference for future ABAG, MTC and other planning and capital grants that promote sustainable development and transportation will be influenced by the SCS.

Sunnyvale staff is directly involved in several committees that are providing input to the regional agencies on the SCS and RTP. This includes participation on the RAWG, County Working Group and VTA Technical Advisory Committee.

Staff has also provided specific information to ABAG and MTC staffs on the City's land use and transportation policies and development constraints and challenges. Recently, staff commented on ABAG's preliminary identification of the City's designated PDAs, Infill Opportunity Areas and place types (Attachment C). Along with the adopted performance targets, this input from all jurisdictions is being used to prepare the Initial Vision Scenario.

Several City planning efforts are also aligned with the SCS. Most notable are the *Land Use and Transportation Element (LUTE)* and *Climate Action Plan (CAP)* that are being prepared through the Horizon 2035 Committee. The Committee is currently finalizing the draft goals, policies and actions for the CAP which will be integrated and referenced in the LUTE. The LUTE and CAP will address issues that will advance the SB 375 statutory goals and the SCS performance targets for reducing greenhouse gas (GHG) emissions by 2035. The LUTE will articulate land use policies for the PDAs and Infill Opportunity Areas such as El Camino Real corridor, Moffett Park Business Park, Lawrence Caltrain Station area, Peery Park and East Sunnyvale ITR area. Further, the LUTE will address transportation policies that are relevant to the SCS such as transit, pedestrian and bicycle access, the new General Plan Guidelines on "complete streets," strategies to reduce vehicular trips and parking, and coordination on regional transportation programs and projects. Staff expects that a draft LUTE and CAP will be available for public review this summer, and City Council adoption of both documents with a final environmental impact report (FEIR) will occur in early 2012.

Other City efforts that support the SCS goals include:

- *Lawrence Station Area Plan:* A consultant has been obtained through a planning grant provided by VTA to complete the first two phases of the work program. This includes: developing and evaluation land use options for higher density residential, employment and mixed use development at the station area; and defining concepts for creating a walkable neighborhood and improving access to the station. A kick-off community workshop is scheduled in February and staff is continuing to pursue other grants in order to complete the full work program, which would conclude with adoption of a Station Area Plan, General Plan and zoning amendments, and FEIR.
- *Town Center Project/Downtown Specific Plan:* The Town Center Project implements the vision in the Downtown Specific Plan. The six-block project is a prime example of redeveloping a downtown area into a transit-oriented and walkable mixed use place type consistent with the goals for a PDA and the SCS.
- *El Camino Precise Plan/Grand Boulevard Initiative:* The El Camino Real corridor is a designated PDA in the city with the potential for higher

density development at future transit nodes along the corridor. While continuing to emphasize the importance of the street as a commercial corridor, the Precise Plan supports the guiding principles established through the Grand Boulevard Initiative (GBI), which fully embraces the goals of the SCS. The City remains an active participant on the GBI Advisory Committee. Staff is also working with VTA on the proposed bus rapid transit (BRT) proposal.

- *“Tool Kit” for Mixed Use Development:* This study issue has been highly ranked by the City Council but is still pending the availability of grant funds to begin the work. Staff is pursuing grant opportunities through ABAG and MTC and is hopeful of securing funding in 2011. The study would develop zoning standards and design guidelines to clarify City policies for mixed use development at favorable locations in the City, such as the PDAs and the Infill Opportunity Areas. This effort has several objectives: neighborhood issues/concerns about density, massing, land use compatibility, design and parking could be addressed proactively; developers would have greater certainty about the City’s expectations for this place type; and the project approval process could be facilitated.

### **Next Steps**

- Regional agencies expect to release an Initial Vision Scenario for review in March 2011. Staff will provide comments and keep the City Council and Planning Commission informed about the progress on the SCS with opportunities for input.
- Staff will continue their involvement on the County Working Group and regional committees that are providing input to the regional agencies on the SCS, RHNA and RTP to ensure that the City of Sunnyvale’s interests are well represented.
- Santa Clara County jurisdictions are currently evaluating the benefits of forming a sub-regional RHNA process and a resolution may be brought to the City Council in the near future on this item.

### **RECOMMENDATION**

This is an information item only and no action is required. Staff recommends that the City Council provide any comments on the regional SB 375 efforts that are currently underway.

Reviewed by:

Hanson Hom  
Director, Community Development

Approved by:

Gary M. Luebbers  
City Manager

**Attachments**

- A. ABAG and MTC Adopted SCS Performance Targets
- B. Sustainable Communities Strategy Planning Process
- C. Staff Response on SCS Vision Scenario
- D. Urban Land Institute Impact Analysis Report

## Performance Targets for the Sustainable Communities Strategy/Regional Transportation Plan

GOAL/OUTCOME	#	RECOMMENDED TARGET <i>Unless noted, all targets are for year 2035 compared to a year 2005 base</i>
CLIMATE PROTECTION	<b>1</b>	Reduce per-capita CO <sub>2</sub> emissions from cars and light-duty trucks by 15% <i>Statutory - Source: California Air Resources Board, as required by SB 375</i>
ADEQUATE HOUSING	<b>2</b>	House 100% of the region's projected 25-year growth by income level (very-low, low, moderate, above-moderate) without displacing current low-income residents <i>Statutory - Source: ABAG adopted methodology, as required by SB 375</i>
HEALTHY & SAFE COMMUNITIES	<b>3</b>	Reduce premature deaths from exposure to particulate emissions: <ul style="list-style-type: none"> <li>• Reduce premature deaths from exposure to fine particulates (PM<sub>2.5</sub>) by 10%</li> <li>• Reduce coarse particulate emissions (PM<sub>10</sub>) by 30%</li> <li>• Achieve greater reductions in highly impacted areas</li> </ul> <i>Source: Adapted from federal and state air quality standards by BAAQMD</i>  Associated Indicators <ul style="list-style-type: none"> <li>• Incidence of asthma attributable to particulate emissions</li> <li>• Diesel particulate emissions</li> </ul>
	<b>4</b>	Reduce by 50% the number of injuries and fatalities from all collisions (including bike and pedestrian) <i>Source: Adapted from California State Highway Strategic Safety Plan</i>
	<b>5</b>	Increase the average daily time walking or biking per person for transportation by 60% (for an average of 15 minutes per person per day) <i>Source: Adapted from U.S. Surgeon General's guidelines</i>

Attachment A  
Resolution No. 3987  
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GOAL/OUTCOME	#	<b>RECOMMENDED TARGET</b> <i>Unless noted, all targets are for year 2035 compared to a year 2005 base</i>
OPEN SPACE AND AGRICULTURAL PRESERVATION	<b>6</b>	Direct all non-agricultural development within the urban footprint (existing urban development and urban growth boundaries) <ul style="list-style-type: none"> <li>• Scenarios will be compared to 2010 urban footprint for analytical purposes only.</li> </ul> <i>Source: Adapted from SB 375</i>
EQUITABLE ACCESS	<b>7</b>	Decrease by 10% the share of low-income and lower-middle income residents' household income consumed by transportation and housing <i>Source: Adapted from Center for Housing Policy</i>
ECONOMIC VITALITY	<b>8</b>	Increase gross regional product (GRP) by 90% – an average annual growth rate of approximately 2% (in current dollars) <i>Source: Bay Area Business Community</i>
TRANSPORTATION SYSTEM EFFECTIVENESS	<b>9</b>	<ul style="list-style-type: none"> <li>• Decrease average per-trip travel time by 10% for non-auto modes</li> <li>• Decrease automobile vehicle miles traveled per capita by 10%</li> </ul> <i>Source: Adapted from Caltrans Smart Mobility 2010</i>
	<b>10</b>	Maintain the transportation system in a state of good repair: <ul style="list-style-type: none"> <li>• Increase local road pavement condition index (PCI) to 75 or better</li> <li>• Decrease distressed lane-miles of state highways to less than 10% of total lane-miles</li> <li>• Reduce average transit asset age to 50% of useful life</li> </ul> <i>Source: Regional and state plans</i>

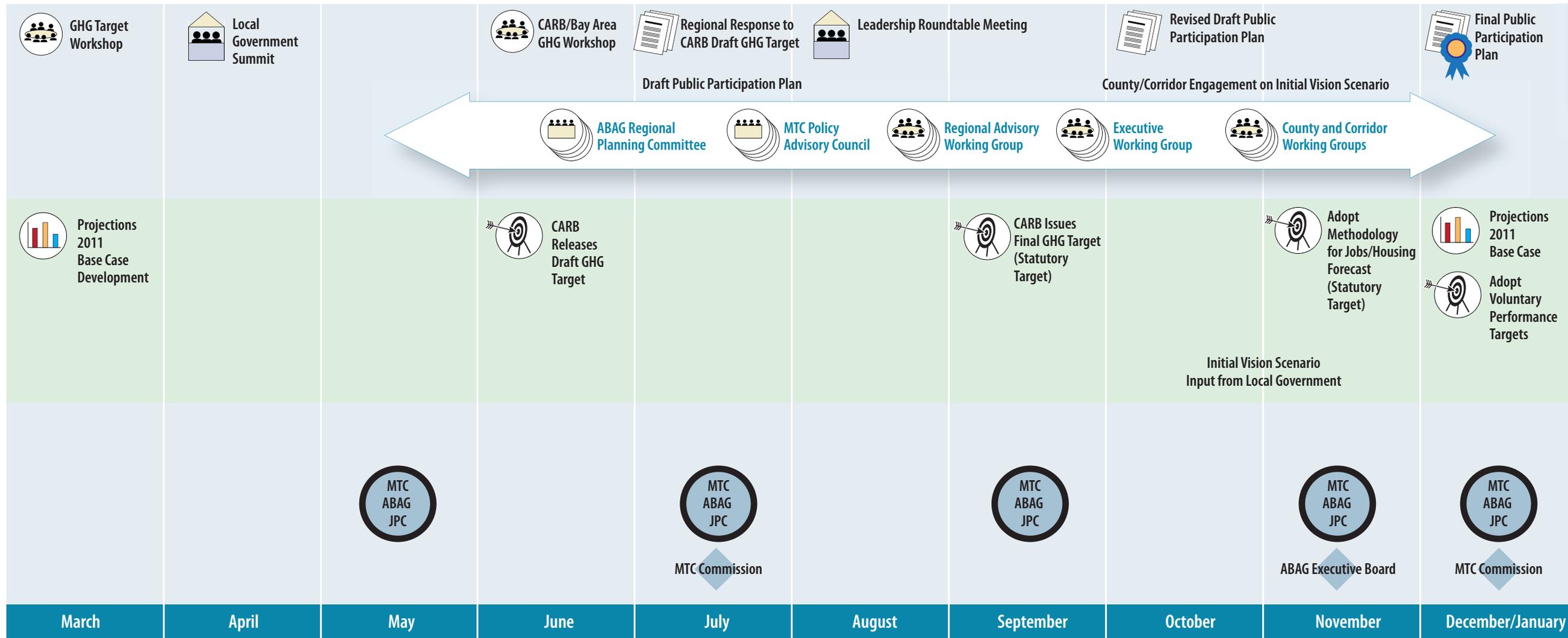
# Sustainable Communities Strategy Planning Process: Phase 1 Detail for 2010\*

Phase 1: Performance Targets and Vision Scenario

Local Government and Public Engagement

Milestones

Policy Board Action



January 2011

2010

\*Subject to change

**Policy Board Actions**

- Meeting for Discussion/ Public Comment
- JOINT meeting of the ABAG Administrative Committee, the Joint Policy Committee and the MTC Planning Committee for Discussion/Public Comment
- Decision
- Document Release

**ABAG** - ABAG Administrative Committee  
**JPC** - Joint Policy Committee  
**MTC** - MTC Planning Committee

For more information on key actions and decisions and how to get involved, visit [OneBayArea.org](http://OneBayArea.org)

# Sustainable Communities Strategy Planning Process: Phase 2 Detail for 2011\*

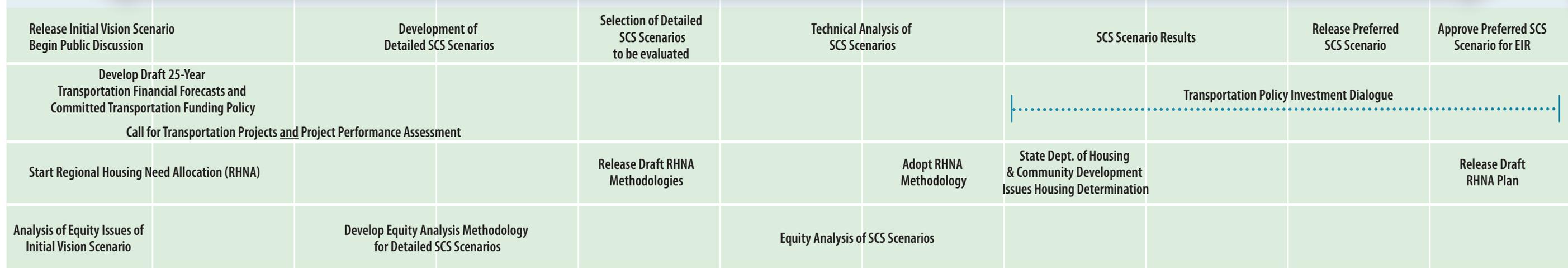
Phase 2: Scenario Planning, Transportation Policy & Investment Dialogue, and Regional Housing Need Allocation

Local Government and Public Engagement



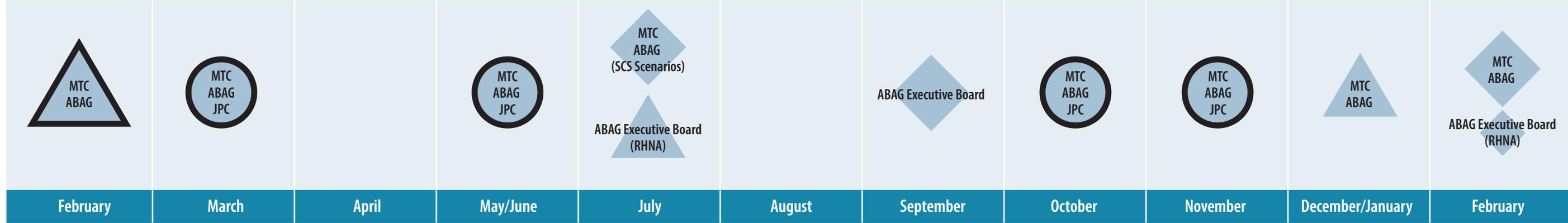
- Phase Two Actions/Decisions:**
- Initial Vision Scenario
  - Financial Forecasts
  - Detailed SCS Scenarios
  - RHNA Methodology
  - Preferred SCS Scenario
  - Draft RHNA Plan

Milestones



- Scenario Planning
- Transportation Policy and Investment Dialogue
- Regional Housing Need Allocation
- Equity Analysis

Policy Board Action



2011 February March April May/June July August September October November December/January February 2012

\*Subject to change

**Policy Board Actions**

● Meeting for Discussion/ Public Comment



JOINT meeting of the ABAG Administrative Committee, the Joint Policy Committee and the MTC Planning Committee for Discussion/Public Comment



◆ Decision



▲ Document Release



JOINT document release by ABAG and MTC

ABAG - ABAG Administrative Committee  
JPC- Joint Policy Committee  
MTC- MTC Planning Committee

For more information on key actions and decisions and how to get involved, visit [OneBayArea.org](http://OneBayArea.org)

December 2010

# Sustainable Communities Strategy Planning Process: Phases 3 & 4 Details for 2012–2013\*

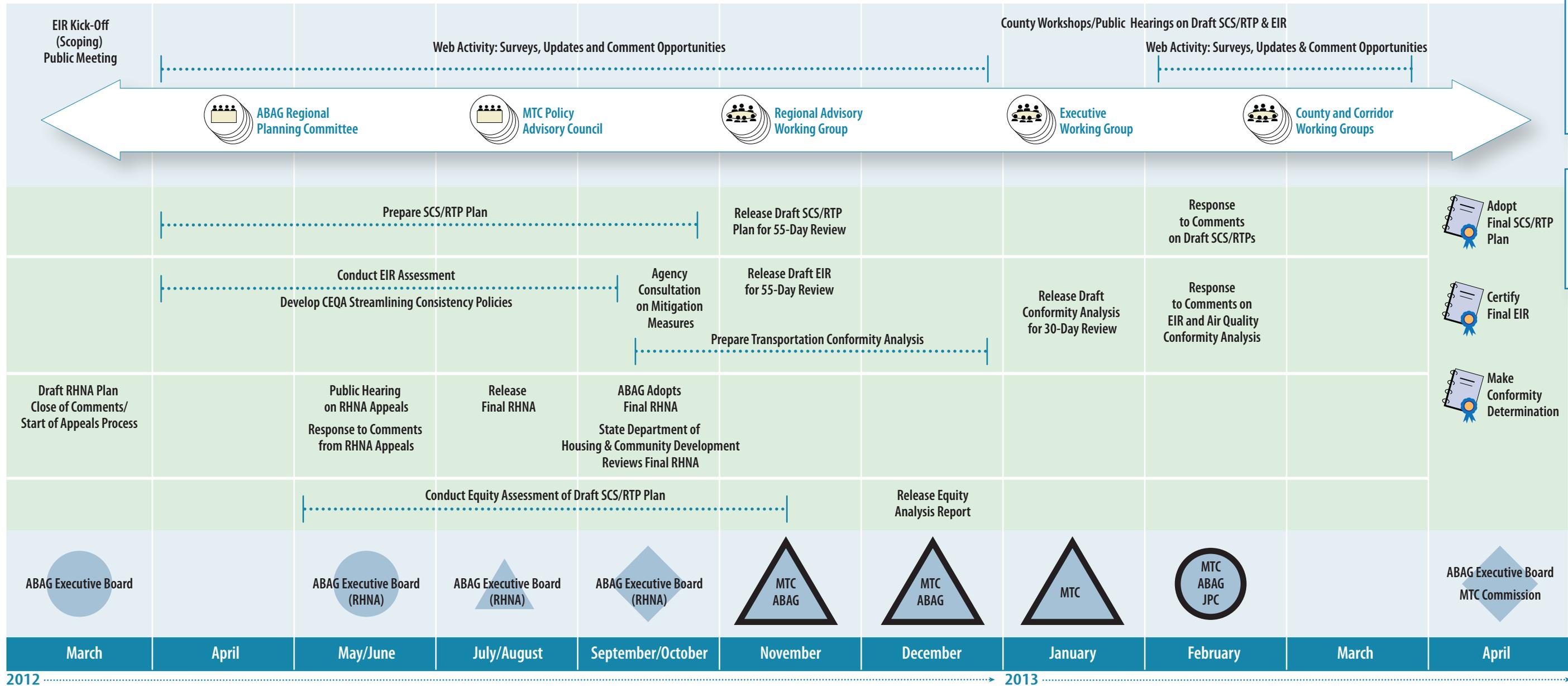
Phase 3: Housing Need Allocation, Environmental/Technical Analyses and Final Plans

Phase 4: Plan Adoption

Local Government and Public Engagement

Milestones

Policy Board Action



- Phase Three Actions/Decisions:**
- Draft SCS/RTP Plan
  - Draft EIR
  - Draft RHNA Plan
  - Final RHNA

- Phase Four Decisions:**
- Final SCS/RTP Plan
  - Final EIR
  - Final Conformity

December 2010

\*Subject to change

**Policy Board Actions**

● Meeting for Discussion/ Public Comment



JOINT meeting of the ABAG Administrative Committee, the Joint Policy Committee and the MTC Planning Committee for Discussion/Public Comment

◆ Decision

▲ Document Release



JOINT document release by ABAG and MTC

ABAG - ABAG Administrative Committee  
JPC- Joint Policy Committee  
MTC- MTC Planning Committee

For more information on key actions and decisions and how to get involved, visit [OneBayArea.org](http://OneBayArea.org)



January 3, 2011

Association of Bay Area Governments  
Attn: Justin Fried, Regional Planner  
101 Eighth St.  
Oakland, CA 94607

Dear Mr. Fried:

The following comments are forwarded to you from the City of Sunnyvale regarding the One Bay Area Sustainable Community Strategies exercise for identifying places and policies for sustainable development. Sunnyvale has reviewed the maps and the place-types indicated and has modified the choices originally designated for areas in Sunnyvale as follows:

- Much of Sunnyvale was designated as a place for significant residential change. This is not the case and these areas have been removed from the map Sunnyvale is providing.
- Three employment growth areas have been designated that were previously not on the Sunnyvale map- Moffett Park, Peery Park and Reamwood Station Area. These employment areas are a "new place type" as the choices provided did not provide a choice that was strictly commercial with no residential.
- The existing PDAs have not changes except that the City is currently considering increasing residential growth within the Node areas of the El Camino Real PDA.
- Only two other areas have been designated for significant residential growth – the existing industrial-to-residential (ITR) transition area that is turning into a medium density residential neighborhood near Tasman Station at the corner of Fair Oaks Avenue and the area known as East Sunnyvale ITR near Duane Avenue and Lawrence Expressway.

In addition to these map changes which are being forward to you, the forms provided for each place type have been completed and are accompanying this transmittal. The additional following comments are provided regarding the use of this information for future funding decisions.

- A general concern with the voluntary targets is how will reliable data be gathered for the targets? It is important for potentially affected jurisdictions to understand how targets will be measured, what data collection might be expected of which jurisdictions,

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TDD (408) 730-7501**

and what the anticipated data sources and methodologies for each target will be. The more specificity at this stage of the process the better, in order to evaluate the practicality and efficacy of the targets.

- A transportation system effectiveness measure that would combine velocity with trip length with mode could be useful in determining effectiveness (are people getting where they need to go faster) and transportation/land use efficiency (are vehicle miles traveled being reduced, is use of more sustainable and efficient modes of transportation increasing). Perhaps a relatively simple comparison measure of trip speed, trip length, and travel mode would work.
- Application of place types should be done carefully in the context of decisions that may affect distribution of infrastructure investment. Balancing regional planning goals to address global climate change with local planning goals to address global climate change is key. Regardless of the form of local communities, be it more urban city center or suburban transit neighborhood, investment in measures to improve the Bay Area environment should be equitably distributed among the entire population, as global warming affects all citizens.
- Priority Development Areas are important tools for the Sustainable Communities Strategy. However, they should not be considered the highest or the sole priority for scarce discretionary transportation investment, particularly for funds that otherwise be made available for local discretionary investment. Transportation needs are diverse, and vary from community to community. Existing and anticipated discretionary transportation funding should not be earmarked for investment in Priority Development Areas, at the expense of funding for other (greater, more diverse) needs. Development of a new funding source or sources for investment in PDA's is critical. New funding sources should be explored and identified as an implementation means for the SCS, perhaps related to PDA development rights or transportation or transit privatization opportunities in or connecting PDA's.

Thank you for the opportunity to comment on the work in progress. If you have any questions about the response from the City of Sunnyvale, please contact me at (408) 730-7591.

Sincerely,



Gerri Caruso

Principal Planner, AICP

