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**CITY OF CAMPBELL**  
City Manager

July 20, 2021

MTC Public Information  
Attn: Draft EIR Comments  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
Sent via email: [eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov)

**Re: City of Campbell Comment on Draft Plan Bay Area 2050 & Environmental Impact Report**

Dear MTC Public Information Officer:

Thank you for the opportunity to review and comment on the Draft Plan Bay Area 2050 (PBA 2050) & the accompanying Draft Environmental Impact Report (EIR).

Our comments concern the description of the Valley Transportation Authority (VTA) Vasona Light Rail Extension within PBA 2050 and accompanying EIR. The Draft Transportation Project List accompanying PBA 2050 describes the Vasona Light Rail Expansion project (Page 9, RTPID 21-T10-089). This project would extend existing service from the Winchester Station in the City of Campbell, to Vasona Junctions which will include two new stations, one infill station and three-car trains.

As described in previous letters sent by City of Campbell Mayor Susan Landry in August and November 2020, the VTA Board of Directors voted to approve placing the Vasona Light Rail Expansion and Corridor Improvements program on hold on September 5, 2019, discontinuing further project development activities. In subsequent conversations I have had with VTA representatives, they have reiterated that the Vasona Light Rail Expansion Project remains on hold with no expectations that it will be built anytime in the near future.

All references to the Vasona Light Rail Expansion Project within PBA 2050 and the accompanying EIR and corresponding documents should reference this action and the status of this project.

The City of Campbell appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions at (408) 866-2125.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Loventhal". The signature is fluid and cursive, with the first name "Brian" written in a larger, more prominent script than the last name "Loventhal".

Brian Loventhal  
City Manager  
City of Campbell

Enclosures:

1. November 25, 2020 letter to the ABAG/MTC Public Information Office
2. August 5, 2020 letter to the ABAG/MTC Executive Director

cc: Campbell City Council

November 25, 2020

ABAG/MTC Public Information Office  
375 Beale Street, Suite 800  
San Francisco, CA 94105  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**RE: Proposed RHNA Methodology and Subregional Shares**

The City of Campbell would like to recognize the Housing Methodology Committee (HMC), Regional Planning Committee and ABAG Executive Board for their efforts to adopt a fair and accurate Regional Housing Needs Allocation (RHNA) Methodology to assign an identified housing need of 441,176 units for the Bay Area.

Understanding the impact that housing allocations will have on the Bay Area, the Campbell City Council received a presentation on the proposed RHNA Methodology and regional shares at their November 17, 2020 meeting. Having had the opportunity to review the proposed RHNA Methodology, the City Council seeks to highlight an ongoing issue with the accuracy of 2050 Household data reflecting forecasted growth from the Plan Bay Area 2050 (PBA 2050) Blueprint expanding on points raised in an August 5, 2020 letter to the ABAG/MTC Executive Director (see **Enclosure 3**) and identify concerns with the criteria used to establish Transit-Rich and High-Resource areas.

To summarize points raised in the August 5<sup>th</sup> letter, growth geographies used to derive the 2050 Household growth forecasts included areas that are unlikely or unable to be developed in the next 40 years. Since growth geographies assume increased housing production for qualifying Priority Development Areas (PDAs), Priority Production Areas (PPAs), Transit-Rich-High-Resource Areas (Outside PDAs), Transit-Rich Areas (Outside PDAs) and High Resource Areas (16-30 minute bus; Outside PDA) it is critical to ensure that the areas included are feasible before assigning a growth factor (i.e. for every 'x' acres of qualifying area, regardless of development potential, a population growth factor of 'y' shall be assumed). To ground the importance of this exercise, adopted Housing Elements are placed under a great deal of scrutiny by HCD to ensure that areas designated for housing development can in fact support the units assigned by a jurisdiction. Similarly, and recognizing that the Draft RHNA Methodology will be sent to

HCD for review, it is of paramount importance to ensure that areas assigned an increased growth factor are reviewed by a similar standard to ensure the 2050 Household data growth forecast, and the RHNA methodology, which uses its data as a baseline, are consistently sound in their application.

Recognizing that not all areas can be developed and transitioning that logic to the City of Campbell geography, the following should be considered as 'exclusions' from the eligible area calculations of the PBA2050 growth projections (only some of these, such as roadways, have been excluded):

- Open Space/Los Gatos Creek Trail
- Valley Water Percolation Ponds
- Existing Special Needs and Affordable Housing (per AB-1397 which severely restricts the use of housing opportunity sites identified in the previous RHNA 5 Cycle)
- Campbell Community Center
- Campbell Civic Center
- Public and County Parks
- Schools
- Churches
- Senior Housing (i.e. Merrill Gardens, Rincon Gardens, Wesley Manor)
- Underground Aquifers
- Natural Waterways
- Job Centers (that will not be removed due to its high improvement costs; e.g., 8x8 Inc., Hamilton Plaza)
- Highways, Expressways, Roads
- PG&E Substations
- Properties redeveloped in the last 20 to 30 years

The maps attached to this letter illustrate some of the itemized areas for exclusion. A summary of each map and its general purpose is as follows:

1. Exclusion Areas Map: This map provides an overview of areas within growth geographies planned around light rail which should be excluded based on some of the items provided in the list above (see **Enclosure 1**). Areas shown with a red crosshatch reflect areas that are inaccessible to existing light rail stations. Areas shown with a green crosshatch reflect areas which should be omitted since they rely on the construction of a light rail station that is no longer proposed by VTA (see **Enclosure 4**). Based on this analysis, while 2,209 acres may be planned for higher growth, less than 55% (1,228 acres) of that area may be able to accommodate redevelopment.

2. Recently Developed Properties Map: This map highlights properties within the growth geographies planned around light rail which should be excluded on the basis they are unlikely to be developed having been built in the last twenty years (2000 to 2020 ~ 72.5 acres) to thirty years (1990 to 1999 ~ 54 acres) (reference **Enclosure 2**).

In addition to the above geography characteristics which should be excluded from future growth forecasts, the City of Campbell is comprised of relatively small parcels which will make it virtually impossible, outside a mandated eminent domain program, to assemble multiple properties to achieve the anticipated growth projections.

Further, the Campbell City Council believes that other jurisdictions have unique geographies as well and, therefore, had requested that the 2050 Households data be modified to reflect individual jurisdictions' land constraints. The City believes these changes could easily be made by requesting each jurisdiction to prepare a formal list of excluded properties to be considered in the underlying data without undermining the HMC methodology. Recognizing local constraints, the City of Campbell prepared its own map illustrating properties within the growth geographies which should have been excluded as previously noted (see **Enclosure 1 & 2**). For Campbell the 2050 Household data also assumed the construction of the Hacienda and Vasona light rail stations. As you may be aware, the Santa Clara Valley Transportation Authority (VTA) Board voted to place the Vasona Light Rail Extension and Corridor Improvement Program on an indefinite hold at its September 5, 2019 meeting (see **Enclosure 4** – Santa Clara VTA Board of Directors September 5, 2019 Meeting Minutes). Considering the fact that the Vasona light rail extension had been contemplated for over two decades and has been found to be infeasible by the VTA in 2019, population projections which rely on its construction should be removed from the 2050 Household baseline since there are no longer plans to extend the light rail.

Separately, the City understands the HMC methodology relies on the underlying use of Plan Bay Area 2050 and, by extension, the criteria used to establish Transit-Rich and High-Resource Areas. The City has identified concerns with the criteria used to establish both categories as follows:

- Transit-Rich Areas: Recognizing that buses do not travel on fixed rails and change headway schedules, routes, and rates frequently based on ridership (changing several times over the last few years, and more recently in response to COVID-19) it is not appropriate for the City, or growth forecasts to plan for development reliant on such routes without assurance that the schedules, routes and rates used in the studied areas would remain for the plan period.
- High-Resource Areas: These areas are generally encumbered by high costs of living and dense populations. The City understands that high living costs are

detrimental to low-income households and can limit a family's the upward economic mobility in an area that limits such opportunities. However, most of Campbell's neighborhoods are not densely developed or populated with properties averaging in size of approximately 6,000 square feet. In order to achieve a site capable of accommodating sufficient land necessary to realize greater density, multiple parcels would have to merge. Relying on willing property owners to sell will result in a realistic obstruction to this goal. Unless the City adopts an eminent domain program to take private property for housing production, the growth projection will be found unrealistic.

By accounting for these considerations, the City believes a fairer and more accurate outcome will be established, which in turn will result in a more appropriate projected assignment of housing unit production, and an outcome that is ultimately more in line with the objectives of ABAG/MTC. Moving forward, the City would also like to express an interest in participating in the Plan 2050 Implementation Phase discussions with ABAG/MTC to understand expectations for cities to incorporate best practices into policy documents.

Sincerely,

Susan M. Landry  
City of Campbell Mayor

Enclosures:

1. Exclusion Areas Map
2. Recently Developed Properties Map
3. August 5, 2020 letter to the ABAG/MTC Executive Director
4. Santa Clara VTA Board of Directors September 5, 2019 Meeting Minutes

cc: ABAG Executive Board, Bay Area Metro Center 375 Beale Street, Suite 800, San Francisco, CA 94105-2066



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**CITY OF CAMPBELL**  
**Mayor's Office**

August 5, 2020

Therese McMillan  
ABAG/MTC Executive Director  
Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105

Re: Plan Bay Area 2050: DRAFT Blueprint Growth Geographies

Dear Ms. McMillan:

The City of Campbell has had an opportunity to review the Draft Blueprint Growth Geographies that were prepared as part of the Plan Bay Area 2050 (PBA2050) development process. Understanding the Association of Bay Area Governments' (ABAG) and the Metropolitan Transportation Commission's (MTC) role in regional housing and transportation planning, the City Council received a presentation of the PBA2050 material at their July 21, 2020 meeting. Several growth geographies mapping observations were discussed and the City of Campbell City Council requests that you review these observations and consider modifications to the Draft Blueprint Growth Geographies.

The City understands that the use of Priority Development Areas (PDAs) and Priority Production Areas (PPAs) in the Growth Geographies are intended to improve the PBA2050's ability to meet challenging GHG reductions, housing and equity requirements. As you are aware, the City has one locally designated PDA which encompasses approximately 265 acres and it is centered primarily within Downtown Campbell and its surrounding two light rail stations (See **Exhibit A**). The vast majority of the City's existing PDA area identifies developable lands, except for the Campbell Community Center and a small portion of Los Gatos Creek. These areas have been the City's focus for housing production opportunities as reflected in the City's Housing Element.

Despite being the densest City in Santa Clara County, the City strives to be proactive in encouraging housing and commercial development. From review of the growth

geography maps, it appears several communities less developed than Campbell are planned for less development. The City believes growth expectations should take existing density into account to ensure growth is equitable. Specific to housing development, the City has policies requiring 15% of units in developments with 10 or more units to be affordable, and 20% of all units in developments with 5 units or more units to be 'accessory dwelling unit ready'. While the City continues to hear that communities are to blame for development delays, a considerable amount of delay is caused by developer delay in response to correction requests. It should also be recognized that despite the best intentions of a community, a City cannot force a developer to build or a property owner to sell their property and communities should not be penalized for actions outside of their control.

PDA Map & Eligible Acres Table: In review of the '[Spring 2020 Priority Development Area \(PDA\) Letter of Interest Guide Map](#)' which was used to generate the [PDA-Eligible Acres Table](#) it was found that the map included the Vasona and Hacienda as future stations. As you may be aware, the Santa Clara Valley Transportation Authority (VTA) Board voted to place the Vasona Light Rail Extension and Corridor Improvement Program on an indefinite hold at its September 5, 2019 meeting. As such, the baseline data used to determine the number of PDA eligible acres for the City of Campbell (2,621 acres), and potentially for other communities as well, was inaccurate and should be recalculated prior to including Transit-Rich Areas (TRAs) and High-Resource Areas (HRAs) in the studied growth geographies.

Further, while the City recognizes the opportunity provided by the Horizon Initiative to provide feedback on baseline data – baseline data should be recognized as a moving target when undertaking a multi-year study and should be reevaluated for accuracy and to account for stakeholder feedback up until the point Plan Bay Area 2050 is adopted. In review of the baseline data, the City believes Housing Elements should have been taken into consideration recognizing that opportunities exist outside of the PDA areas (i.e. identified housing opportunity sites) – particularly for communities with less than 50% of their PDA eligible acres designated. Further, recognizing that buses do not travel on fixed rails and change schedules, routes, and rates frequently based on ridership (changing several times over [last few years](#), and more recently in response to [COVID-19](#)) it is not appropriate for the City, or Plan Bay Area 2050 to plan for development reliant on such routes without assurance that the schedules, routes and rates used in the studied areas to establish potential PDA Map and Eligible Acres Table as well as the Draft Blueprint Growth Geographies would remain for the plan period.

Draft Blueprint Growth Geographies for Study: Review of the Draft Blueprint Growth Geographies mapping exercise reveals an underlying assumption that the areas falling within designated areas are directly correlated with a jurisdiction's ability to promote future housing and job growth within said areas. While this may be true in part and the City remains in support of assessing future growth opportunity areas, it is important to

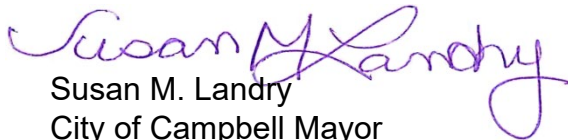


recognize that not all 'acreage' can be developed. For example, if one were to analyze a coastal city and measured a one-half (½) mile radius around its downtown core, the ocean would be included in the jurisdiction's acreage calculation despite its inability to be developed. Recognizing that not all areas can be developed and applying that logic to the City of Campbell geography, the following should be considered as 'exclusions' from the eligible area calculations. For ease of reference these areas have been graphically depicted in the enclosed attachment<sup>1</sup> (reference **Exhibit B** – City of Campbell Exclusion Map).

- Public Parks (already understood to be excluded)
- Open Space, Los Gatos Creek, and the Los Gatos Creek Trail
- Valley Water Percolation Ponds
- Existing Special Needs and Affordable Housing (per Assembly Bill 1397)
- Campbell Community Center
- Campbell Civic Center
- Priority Conservation Areas (PCAs)
- Schools
- Churches
- Highways, Expressways, Roads
- PG&E Substations
- Recently developed properties (it is unlikely for new development to be redeveloped in the next 40 years)

The Campbell City Council believes that other jurisdictions have unique geographies as well and, therefore, requests that the Draft Blueprint Growth Geographies be modified to reflect individual jurisdictions' land constraints in forming the PDA-Eligible acres. In this regard, the final Plan Bay Area 2050 document will be a more accurate depiction of housing and job growth projections.

Sincerely,

  
Susan M. Landry  
City of Campbell Mayor

Encl:

Exhibit A – City of Campbell PDA Map

Exhibit B – City of Campbell Exclusion Area Map

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<sup>1</sup> Areas in white have been removed from the growth geographies based on the criteria listed with the exception of recently developed properties which are shown in red or blue based on construction date information.



# City of Campbell PDA Map





# Campbell Central Redevelopment Area (PDA)

