



June 1, 2017

Miriam Chion and Ken Kirkey
Metropolitan Transportation Commission
375 Beale Street
San Francisco, CA 94105
Email: eircomments@mtc.ca.gov

Re: Comments on Plan Bay Area and the associated Draft Environmental Impact Report

To Ms. Chion and Mr. Kirkey:

Thank you for the opportunity to review the Plan Bay Area 2040 (Plan) and associated Draft Environmental Impact Report (DEIR). This letter includes comments on the Bay Area Plan as well as on the associated DEIR from the City of Sunnyvale Community Development Department.

Comments on the Bay Area Plan

- The response to the City's comments on the Draft Preferred Scenario stated that the anticipated household and employment growth for the City of Sunnyvale listed in the Plan correctly reflects growth focused within Priority Development Areas (PDAs) and the Plan's performance targets. The City is concerned that the growth projections for Sunnyvale's PDAs may not have accounted for the existing stable development patterns.

The City has a great record of supporting housing development, and has a history of modifying long-range plans to increase opportunities for housing. The City agrees that provision of adequate housing is a regional issue, and all communities need to contribute to the solution to ameliorate the housing crisis in the region.

The City is currently studying the El Camino Real commercial corridor to identify appropriate sites for housing development. The site along El Camino Real corridor, currently zoned for commercial use, may be rezoned to allow mixed-use commercial with medium to very high density housing to create more housing opportunities where good transportation system and infrastructure can support increased population from the growth. However, the City does not anticipate any significant changes or growth in the existing low-density residential neighborhoods that are within the PDA boundary. Although they are part of the El Camino Real corridor PDA, they are well-established single-family home

neighborhoods that would be disruptive to recommend higher residential growth within those neighborhoods. Due to the limited areas for growth within the PDA boundaries, the estimation for housing growth for the City of Sunnyvale is less than the Plan anticipates.

However, we are exploring other potential housing growth areas, including areas within recently adopted specific and areas plans. Additional housing opportunities are currently and will be assessed within the Lawrence Station Area Plan, Downtown Specific Plan, and even Peery Park Specific Plan. The recently updated Land Use and Transportation Element (LUTE) identified Village Center sites where mixed uses with higher density residential would be allowed. The City also relaxed ADU regulations to be consistent with the recent State law changes, which opened more opportunities for housing even within low-density residential neighborhoods without disrupting community values, and is further evaluating ADU potential in the City.

The City has been preparing different PDA studies in the City, encouraging mixed-use development with higher residential density than what the current zoning allows to achieve sustainable development with the balance between job and housing. As mentioned previously, since the PDA study areas for the City are more compact than the official PDA boundaries, the City would not be able to accommodate more than the City’s buildout projections and preserve stable single-family residential neighborhoods, even with higher density housing proposed in PDA study areas. Approximately 70 percent of the City’s existing residential neighborhoods are low-density residential neighborhoods, where no changes are envisioned. Even with a few sites scattered around the City with higher residential density and higher density proposed for PDA study areas, the City would not be able to reach the projection the Final Scenario anticipates by 2040.

The City requests a review and reconsideration of the housing growth for the City of Sunnyvale to be consistent with the buildout projections by the City.

Table 1: Growth Projection Comparison

Households (DU) for Target Year 2040			Employment for Target Year 2040		
Sunnyvale LUTE	Draft Scenario	Final Scenario	Sunnyvale LUTE	Draft Scenario	Final Scenario
72,460	80,700	84,200	124,410	116,000	108,600
	+8,240	+11,740		-8,410	-15,810

Comments on the DEIR Document:

- The DEIR identified a total of 78 impacts with the Plan, and almost half of the identified impacts (38) would remain significant and unavoidable if mitigation measures selected for the Plan are not implemented by local jurisdictions for future individual projects, because “MTC/ABAG cannot require local implementing agencies to adopt mitigation measures identified in this EIR.”

The City of Sunnyvale is committed to improve and enhance regional issues with other partners in the Bay Area, and we are proud of our streamlined planning and building permit process. As stated in the DEIR, local implementing agencies are not required to implement mitigation measures. However, by implementing identified mitigation measures, local implementing agencies would be able to take advantage of streamlining environmental review process for individual projects in the future and tiering off from the certified EIR for the Plan.

The City of Sunnyvale would implement mitigation measures identified in the Plan whenever possible to contribute to reach the regional goals for the Bay Area, and assist project sponsors by streamlining individual projects in the future, if the DEIR gets certified. However, the City also retains authority to apply appropriate and feasible mitigation measures that are consistent with the City's goals and policies and general procedures and practices.

Thank you for your consideration in this matter. Please contact Kelly Cha, Associate Planner, at (408)730-7408, if you have any questions or concerns about items discussed in this letter.

Sincerely,



Trudi Ryan
Director, Community Development Department