



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 attachment¹ (reference **Exhibit B** – City of Campbell Exclusion Map).

¹ 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.

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- 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

City of Campbell PDA Map

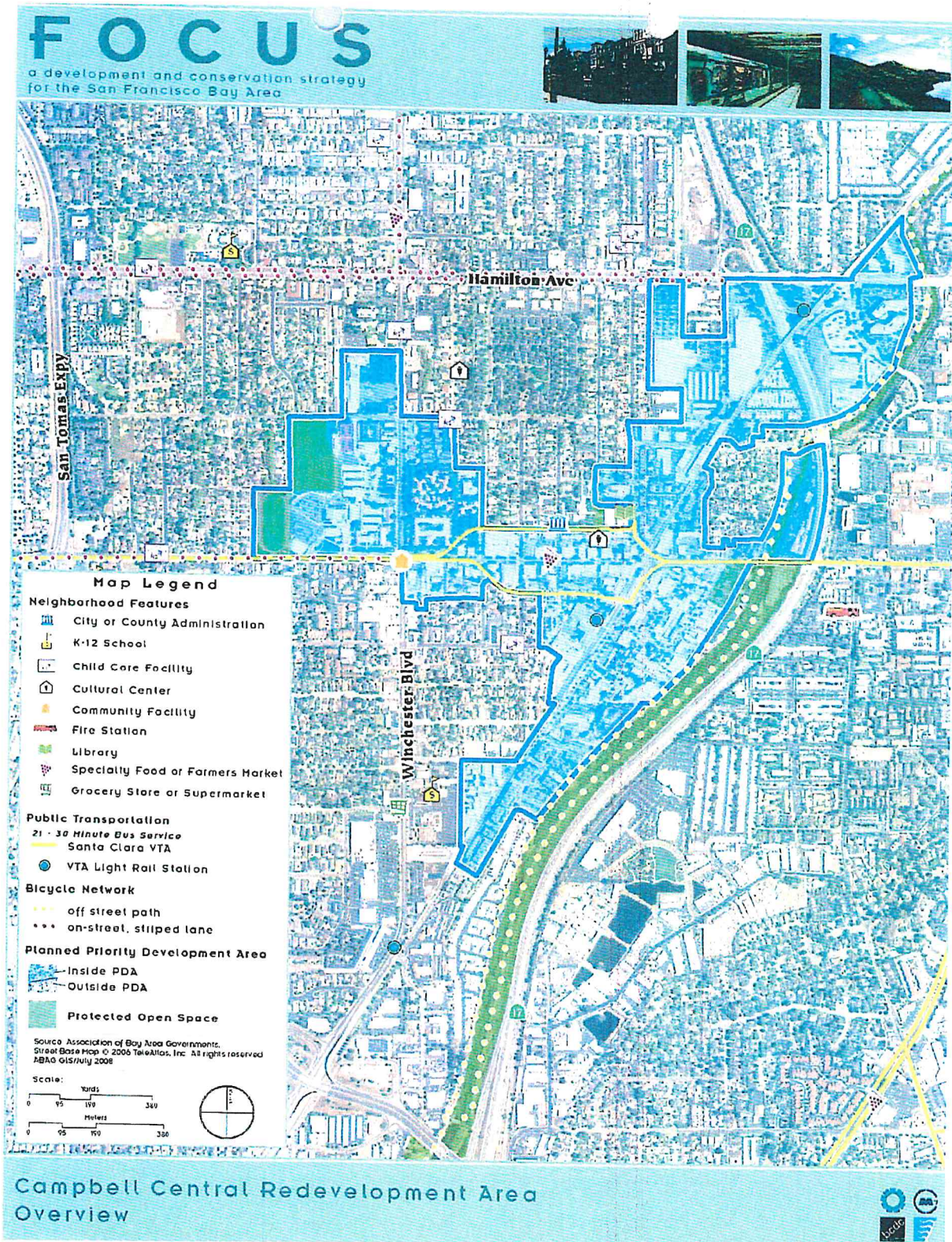


Exhibit A

