RE: Sunnyvale Land Use and Transportation Element Update

Dear Mayor Hendricks and City Council Members:

On behalf of the Sunnyvale Sustainable and Affordable Living Coalition, Greenbelt Alliance, and Friends of Caltrain, we thank you for this opportunity to comment on the update to the Land Use and Transportation Element (LUTE) of the city of Sunnyvale’s General Plan.

The Sunnyvale Sustainable and Affordable Living Coalition is a new and rapidly growing coalition of individuals and organizations that are working together toward a more vibrant, inclusive, and people-friendly Sunnyvale. Greenbelt Alliance is dedicated to shaping how the Bay Area grows to protect our natural and agricultural lands from sprawl development and help our cities and towns become even better places to live. Friends of Caltrain works towards a modern, integrated, and comprehensive transit network, with equitable access and transit-supportive policies.

The City of Sunnyvale has recently released a draft of the LUTE for public consideration. Unfortunately, this draft has several significant shortcomings which must be remedied before the city moves forward. In particular, the draft LUTE would significantly worsen the jobs-housing balance in Sunnyvale and fails to include sufficient measures to address housing affordability and advance sustainable transportation choices for all.

Sunnyvale’s LUTE will shape the future of our community for years to come. It establishes the overall vision for how the city should grow as well as its major transportation priorities. It should provide meaningful solutions for our pressing housing affordability crisis and foster thriving, walkable neighborhoods that allow more residents to live closer to where they work, rather than face grueling commutes on our congested roads. It should catalyze more transportation choices for residents and workers, making it easier to walk, bike, or take transit. These strategies would create a more climate-friendly, sustainable future; strengthen our local economy; and improve the quality of life for everyone in our community.

To ensure the final LUTE achieves these goals, we offer the following recommendations.

1. **Provide sufficient homes**

   Job growth in Sunnyvale and the region has far outstripped housing supply. This is leading to an escalating crisis in housing affordability as people with the most money, including foreign investors, can bid up housing prices and outbid current residents.
We are pleased that the draft LUTE would allow more homes than are currently permitted under the existing General Plan. However, the draft LUTE would significantly worsen the jobs-housing balance in Sunnyvale, permitting far more new jobs than new homes. This approach would exacerbate the many challenges Sunnyvale and the rest of the Bay Area are experiencing with a rapidly growing workforce and insufficient housing—decreasing housing affordability, worsening traffic congestion, increasing air pollution, and adding pressure for sprawl development on our natural and agricultural lands.

The city has also included “Alternative 2,” in the Draft LUTE, which would wisely provide a better ratio of new homes and jobs in an attempt to avoid worsening the city’s jobs-housing balance. This is a step in the right direction, yet the alternative fails to accomplish its stated goal. This is primarily due to the city’s use of outdated job-density information, which results in the city underestimating the number of new jobs that are likely to result from each alternative’s development pattern. In addition, Alternative 2 proposes 11 million square feet of new office space, which is very similar to the draft LUTE.

We propose a “Livable Alternative” that would keep the jobs-housing balance from getting worse, adding a robust 7 million square feet of office space beyond current conditions and providing 19,500 more homes throughout the city in various change areas, representing 5,400 more new homes than the draft LUTE.

2. **Promote thriving village centers**

We commend the Sunnyvale City Council and staff for their inclusion of several “village centers” in the draft LUTE. These areas can become important hubs for the entire community—thriving neighborhoods where homes, shops, jobs, transit, and other amenities are all close at hand. This will allow residents and visitors alike to meet their needs in walkable, bikeable, and transit-accessible settings, increase the customer base for local shops, provide much-needed housing opportunities, and reduce the need to drive.

The city should consider opportunities to provide more homes in these village centers than included in the draft LUTE. In addition, the final LUTE should be amended to include additional strategies to actively promote the development of village centers and improve transit connectivity.

3. **Create homes we can all afford**

As Sunnyvale’s economy grows, the city must provide sufficient housing for people across the income spectrum, including seniors, teachers, young adults, and low-wage workers. Unfortunately, Sunnyvale has a particularly severe lack of homes that are affordable to low- to moderate-income residents. The city has undertaken several bold initiatives to address this issue, yet it still lacks the programs and policies necessary to provide an inclusive and affordable community for all.

The final LUTE should include a statement that calls out the city’s commitment to increasing housing affordability, particularly for those most in need. The city should also include strategies in the LUTE to help provide homes for residents across the income spectrum. For example, the LUTE should explicitly prioritize affordable homes in areas within ½ mile of major transit stops. It
should also commit to utilizing innovative tools to incentivize the creation of affordable homes in areas identified for new growth. In particular, it should create new programs modeled upon the community benefit policy in the city’s new Lawrence Station Area Plan to encourage more affordable homes.

In addition, the city should commit to re-examining its requirements for affordable housing (Housing Impact Fee, BMR program, etc.) to encourage additional funding for affordable housing and to protect currently existing affordable housing. The City should commit to examining housing type spread exploring a variety of approaches to improve “affordability by design” including support for smaller units, ADUs, and “missing middle” housing types.

Strategies to improve housing affordability should focus on increasing the amount, not just the percentage of affordable housing; this requires increasing the housing supply, improving the jobs/housing balance, and working with regional partners to do so.

4. Set bold goals for sustainable transportation

Everyone who lives and works in Sunnyvale deserves to have an array of sustainable transportation choices—where walking, biking, and transit are safe and accessible and driving is not the only option. All people should have the opportunity to live close to where they work to avoid lengthy commutes on our congested roads to find an affordable place to live. These approaches will reduce air pollution and greenhouse gas emissions, improve community health, and reduce traffic and congestion.

Unfortunately, the draft LUTE moves in the wrong direction—increasing the number of vehicle miles traveled (VMT) per person above current levels, making the problem worse, rather than better.

The final LUTE should include bold targets for the reduction of VMT per person as well as vehicle mode-share goals for increasing the share of trips made by walking, cycling, and transit. A good model can be found in Mountain View’s plans for North Bayshore, which include an overall trip cap, requirements to reduce solo driving to no more than 45% of all trips, and specific mode-share goals for transit, carpool, walking, and bicycling. The city is now using these goals to prioritize local transportation investments. Following the Mountain View model, we urge Sunnyvale to set specific trip and mode-share goals for each precise plan area to guide decision-making and investment priorities.

In addition, the city should calculate the expected VMT per person for each of its LUTE alternatives. This would allow the public and decision makers to compare each alternative’s environmental performance and help ensure that the final LUTE is best positioned to make the city a more sustainable and affordable place to live. In its calculations, the city should always consider commute trips by Sunnyvale workers, in addition to trips by residents, to effectively assess the transportation outcomes of its decisions.

We also urge the city to move forward in an expeditious manner to adopt the new state requirement to use VMT per person as the primary transportation metric under CEQA. This metric is much better at assessing the environmental impacts of land use and transportation decisions than the city’s current approach. Cities including San Francisco, Oakland, and Pasadena have already made the change, and others are poised to join them shortly. The faster
the city adopts this new metric, the sooner it will reap the many sustainability and quality-of-life benefits of this approach.

Thank you for your time and consideration. We look forward to working with you to help create a plan that we can all be proud of, and that makes Sunnyvale an even better place to live.

Sincerely,

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