



April 7, 2022

City of Sunnyvale
456 W. Olive Ave
Sunnyvale, CA 94086

To Whom it May Concern,

Carmel Partners is a national multifamily housing developer that has developed over 40,000 apartments and currently has over 7,000 apartments in development, including a proposed project at 777 Sunnyvale Saratoga Road in the El Camino Real Specific Plan area. We wish to thank the City of Sunnyvale staff and officials for their leadership and hard work in planning for the future of the El Camino Real Specific Plan area, and want to express our feedback. The Plan does an excellent job in crafting a framework for a vibrant mixed-use area but we feel there are a couple of proposed development requirements related to commercial space and open space that are inconsistent with the housing market today and, if unchanged, would prevent realization of the vitality of the district and of greater Sunnyvale that the Plan aims to achieve.

The proposed commercial space requirement is unrealistic for parcels that do not front El Camino Real; this commercial space will be marginal or vacant.

The first development requirement we believe will prevent achievement of the vitality of the Specific Plan area is the commercial requirement with regard to properties that do not front onto El Camino Real. While El Camino Real is a major commercial thoroughfare, not all parcels benefit from similar levels of pedestrian, bicyclist, or automotive traffic, particularly the parcels lacking frontage on El Camino Real. Because the vitality of retail, especially big-box retail, has been waning for years due to the rise of online shopping and has been hampered even further by the COVID-19 pandemic, retail spaces require ideal circumstances if they hope to attract tenants today. We agree that commercial requirements are necessary for vibrant urban areas, however, parcels off major thoroughfares should be held to a more realistic standard as there is already an abundant supply of existing retail space on El Camino Real with easy surface parking. The existing surface-parked retail on El Camino Real will always out compete other more marginal retail. The proposed requirement for commercial space on parcels that do not front El Camino Real will result in retail that is expensive and undesirable, marginal at best, and probably vacant.

The table in Appendix A details the current vacant retail spaces in the immediate area as of April 5, 2022. There are numerous retail spaces already available, large retail spaces in developments without El Camino Real frontage and without surface parking will be hard to convince retailers to occupy. These empty retail spaces will become an eye-sore in the district, fail to generate amenities for residents, and provide no sales tax revenue for the city. We believe the Specific Plan should prioritize allocating the larger commercial requirements along El Camino Real and allow parcels without El Camino Real frontage to provide a lesser minimum required amount of commercial space, for example, a commercial space minimum of a 50' depth and for 75% of their parcel frontage. The exhibits in Exhibit A detail the differences between the current requirements and our recommended requirements.

The proposed open space requirements are inconsistent with and burdensome for the desired urban character of the ECR Specific Plan area.

Requiring 380 square feet per unit may be feasible for suburban and moderate density development intensities up to 45 dwelling units per acre, however the ECR Specific Plan is allowing for densities up to 114 dwelling units per acre when combined with the ECRSP Incentive Program and State Density Bonus Program. At these densities, 380 square feet per dwelling unit is inconsistent with typical local, regional and national standards for such housing densities, and can be substantially onerous and yield large spaces which may impede the ability to deliver the desired housing densities in an area which is well suited for high-density housing due to location to transit, employment, and neighborhood amenities. We believe open space requirements that are aligned with Sunnyvale's other specific plans will create a better balance of housing and open space and make for a more vibrant, active Specific Plan area. Below is a table comparing the open space requirements of the El Camino Real Specific Plan district to the high-density residential Lawrence Station Specific Plan and Downtown Specific Plan districts. As shown, the El Camino Real Specific Plan is requiring over 7.5 times the open space per dwelling unit than Sunnyvale's other specific plans:

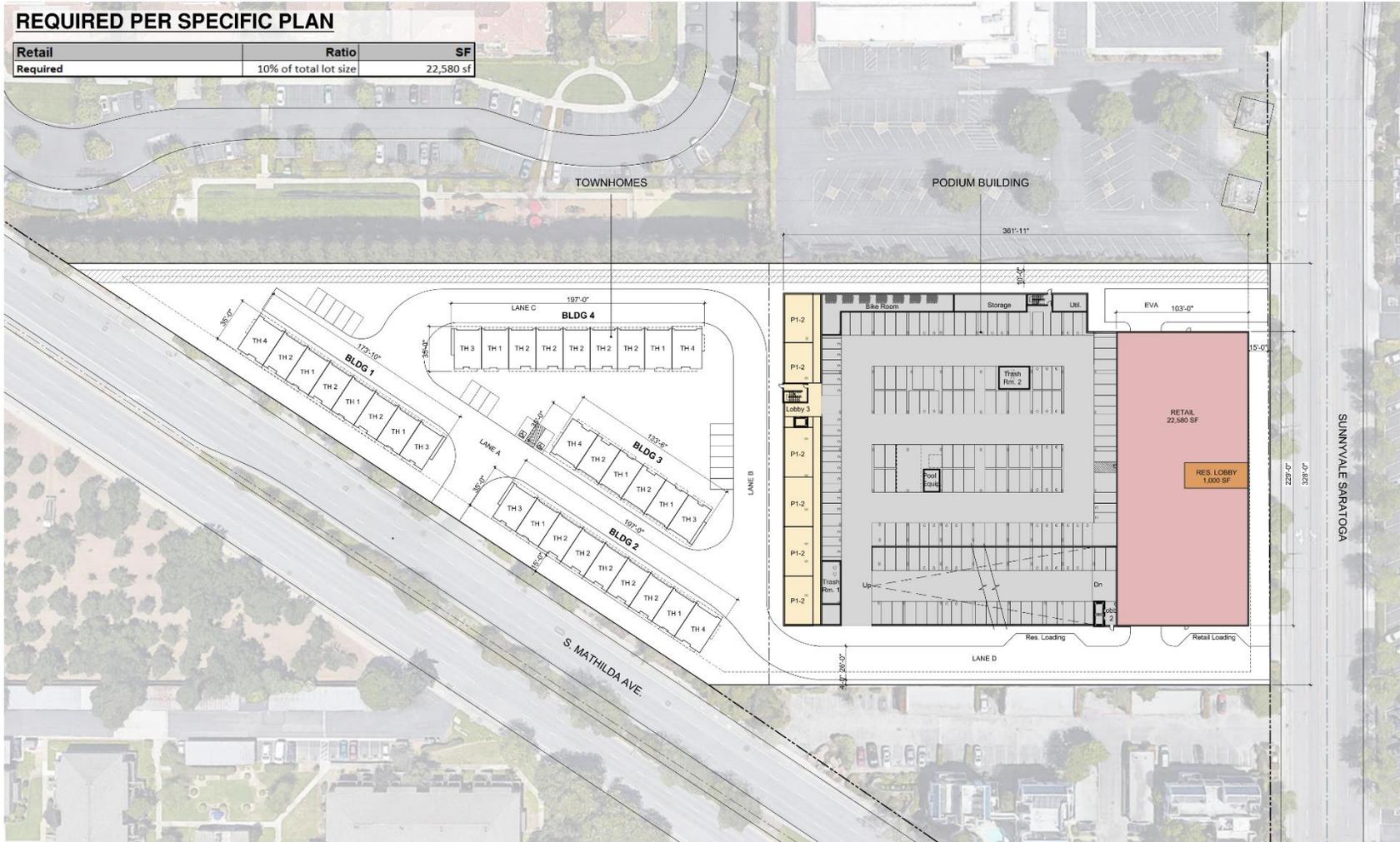
	El Camino Real Specific Plan	Lawrence Station Specific Plan	Downtown Specific Plan
Useable Open Space Requirement	380 square feet per unit	50 square feet per unit	50 square feet per unit

Carmel Partners believes that with these two changes, the El Camino Real Specific Plan will foster a more active and vibrant district in the future and create a more sustainable and reliable tax and revenue basis for the City of Sunnyvale. We wish to thank the city for all it's hard work and effort in drafting an impressive and well-thought-out specific plan and would welcome the chance to voice our thoughts in meetings going forward.

Sincerely,

Lisa Phyfe
Carmel Partners

Exhibit A



Architecture + Planning
The Leamington Building
1814 Franklin Street
Suite 400
Oakland, CA 94612
510.272.2910
ktgy.com

CP VII SARATOGA, LLC
1000 Sansome Street
San Francisco, CA 94111

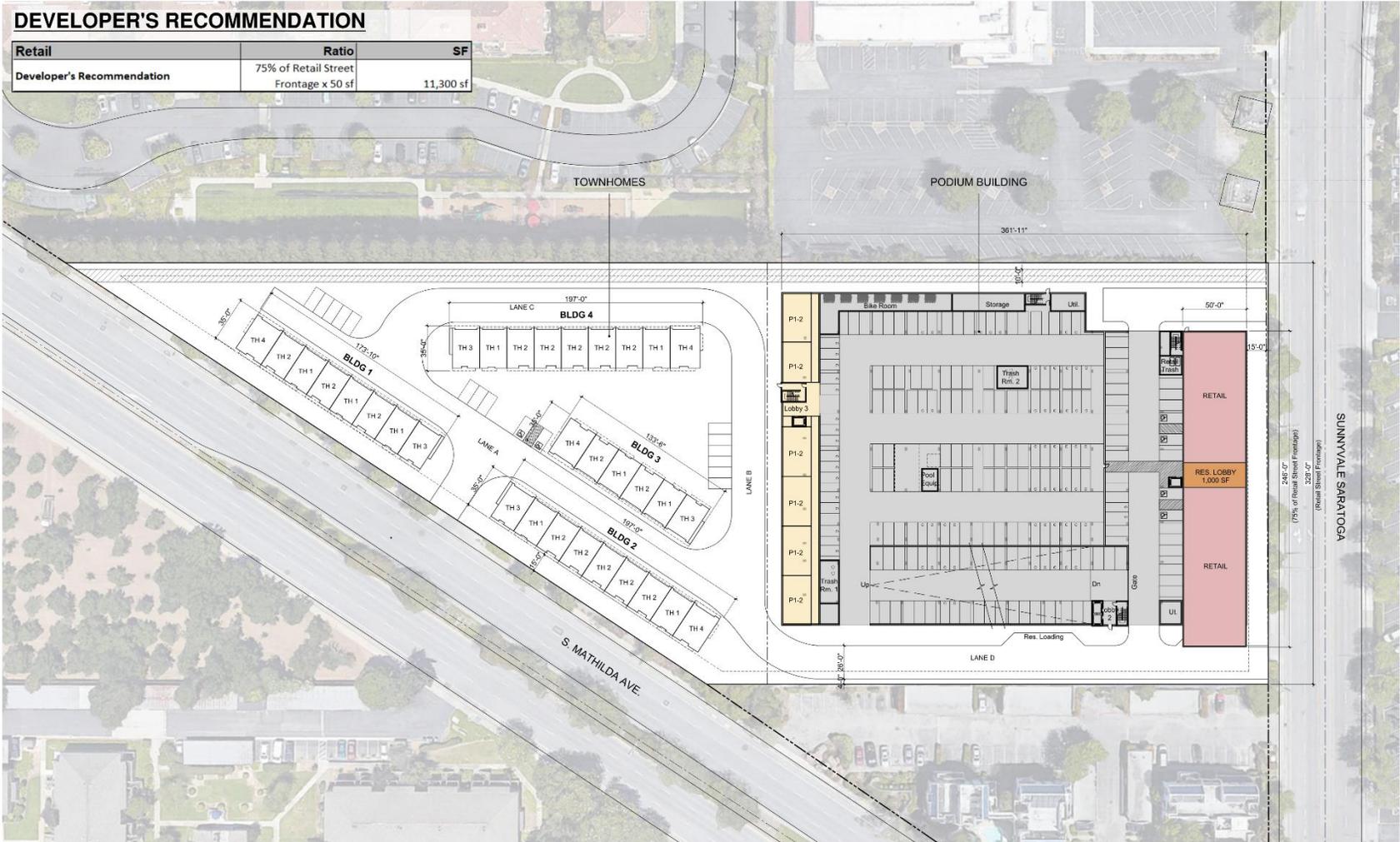
777 SUNNYVALE SARATOGA
SUNNYVALE, CA 94087
PROJECT NO. 190167

PROGRESS SET



BUILDING PLANS
LEVEL 1 - GROUND

A3.1



Architecture • Planning
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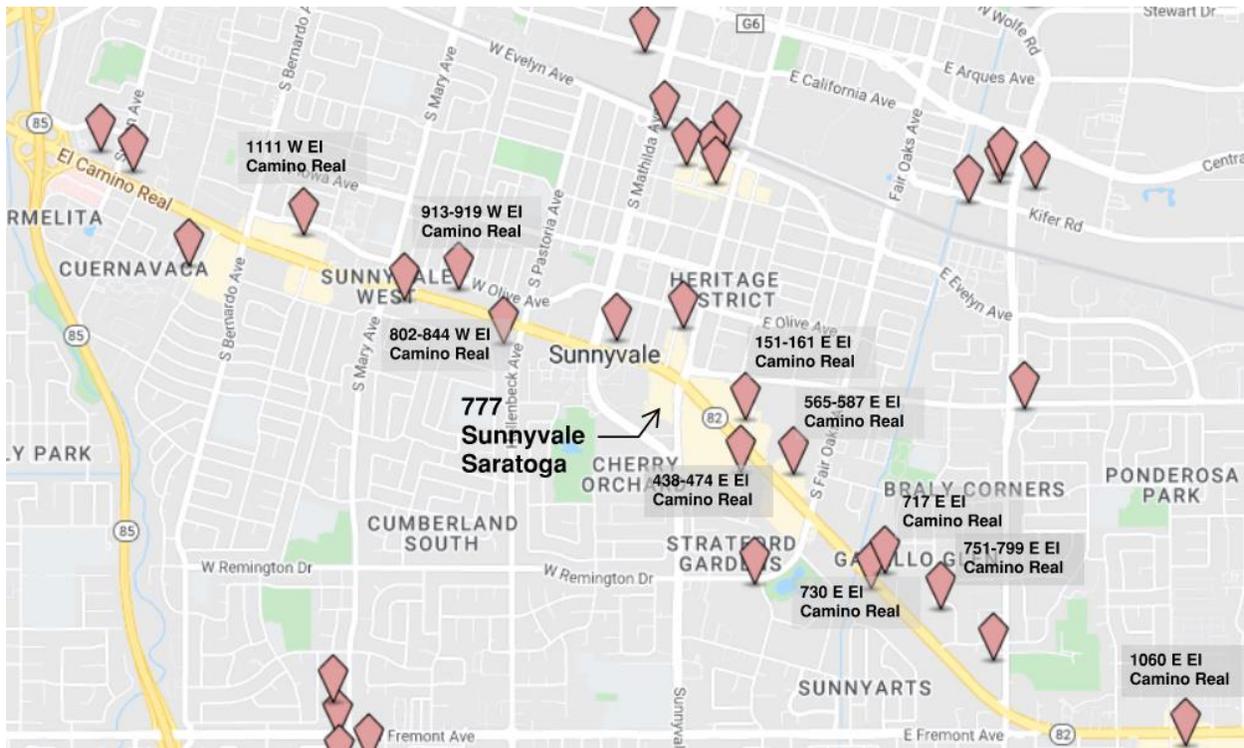
Appendix A

LoopNet is an online marketplace detailing properties for a variety of different commercial property types. Carmel Partners has compiled a list of retail properties which were available for lease on April 5, 2022 and has listed them in the table below and has created a map for context within the ECRSP.

LoopNet Listings as of April 5, 2022:

Address	# Vacant Suites	Vacant Square Footage	Parking Accommodations
751-799 E El Camino Real	15	25,504	Surface
1060 E El Camino Real	4	13,535	Surface
802-844 W El Camino Real	2	13,045	Surface
1111 W El Camino Real	5	6,435	Surface
717 E El Camino Real	1	3,114	Surface
151-161 E El Camino Real	1	3,000	Surface
438-474 E El Camino Real	1	2,038	Surface
913-919 W El Camino Real	1	1,384	Surface
565-587 E El Camino Real	1	1,170	Surface
730 E El Camino Real	1	1,152	Surface

LoopNet Listings Map:



achieve 22,380 square feet assuming 217 feet of frontage, the retail space depth needs to average approximately 100 feet. A depth of 100 feet only works for larger format retail (i.e. “anchor” tenants) like a drugstore or gym. This limits the leasability of the retail space given there are few tenants in this size range and the trade area is saturated with these uses. Furthermore, in a suburban environment and location like the subject property, anchor tenants require surface parking in front of the store at a ratio of 4-5 spaces per thousand square feet of retail space. Parking in front of the store (i.e. not in a garage) in this amount (88-100 spaces) is not feasible in this project. In addition, retail space that is 100 feet deep is not physically feasible given the multi-family design. Larger format tenants will also require direct access to the parking area from Sunnyvale-Saratoga Road, which again does not fit with the design of the project.

What is feasible and recommended is to develop 75% (200 feet) of the street frontage with multi-tenant retail at a depth of 50 feet. This results in a total of 10,000 square feet. Assume an average tenant size of 1,600-2,400 square feet. This equates to 4-6 tenants. This number of tenants provides variety, more visual interest from the street and better serves the residents of the project and the immediate area. The higher rents paid by smaller tenants also provides a better economic contribution to the project to help its feasibility.

It is important to note that post-COVID the size of individual retail tenants, the categories of tenants and the capital available to retail tenants have all compressed. Leasing of retail space in general is challenging in today’s environment and is likely to continue to be so for the foreseeable future. The categories and tenants that will survive tend to be convenience-oriented or personal services businesses that cannot be replaced on-line. Consequently, the tenant mix is most likely to be restaurants (quick-serve in this location), boutique fitness, medical/dental and personal services like salons. These types of tenants cannot operate in spaces that are more than 50-60 feet deep because they need sufficient storefront exposure to maintain visibility to customers and a function floor plan that does not feel like a deep and narrow “bowling alley.”

I recommend that Carmel Partners include 10,000-12,000 square feet of multi-tenant retail at space depths of 50-60 feet in order to ensure the space is leased and the tenants are successful.



BLAKE GRIGGS
PROPERTIES

To: Lisa Phylfe, Carmel Partners
From: Brad Blake
Date: April 5, 2022
Re: 777 Sunnyvale-Saratoga Road, Sunnyvale

This memo addresses the feasibility of developing and leasing ground floor retail in a mixed-use project at the above-referenced location.

Blake Griggs Properties (“BGP”) and its Managing Partner, Brad Blake, has over 30 years of experience developing, leasing and operating retail and mixed-use projects in the San Francisco Bay Area. BGP’s experience and retail expertise allows us to intelligently assess the viability of retail of various types and locations and advise developers and cities on what is feasible in order to help optimize the success of the retail. We often find that cities over-estimate the amount of retail that is viable by mandating that a specific linear footage, percentage of building area or street frontage be built out with retail without regard to what is feasible. Cities also try to create an urbanized environment based upon pedestrian activation in a suburban location that is automobile-dependent. Consequently, it is common to see chronically vacant, never-occupied ground floor retail throughout the Bay Area that ultimately detracts from the mixed-use project and creates a negative image for the neighborhood and the city.

The appropriate amount of retail for a specific location and project type is based upon several factors including: overall area vacancy; type and amount of retail in the immediate area; competitive position; traffic counts (vehicular and pedestrian); visibility; access; parking; “gap analysis” (i.e. retail categories not represented in the immediate area or trade area); allowable configuration of the retail space (i.e. proper depth, frontage and storefront height); rent required based upon the quality and cost of the project; as well as other less important factors.

The subject property is characterized as follows:

- Suburban market
- Nearby anchor-driven retail
- Surrounding “B” retail environment
- Mid-block location
- No storefront parking (garage parking)
- Restricted access
- Good visibility
- Good vehicular traffic counts/unproven pedestrian traffic environment

The City requires a minimum of 10% of the lot area be developed as retail space. This results in 22,380 square feet of retail space. The retail frontage is approximately 290 feet if developed as 100% retail. However, a residential lobby area needs to be included in the frontage so the effective retail frontage is approximately 75% of 290 feet, which equates to 217 feet. In order to



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May 10th, 2022

Jeff Cucinotta
Senior Planner
Community Development Department/Planning Division
City of Sunnyvale

Re: 777 Sunnyvale Saratoga Retail Analysis/Recommendations

The purpose of this letter is to discuss the planned ground floor retail at 777 Sunnyvale Saratoga Rd. in Sunnyvale, CA.

My name is Josh Shumsky, and I am a commercial real estate broker with Newmark specializing in retail leasing and sales. Over the past 10 year, my business has been focused on Landlord leasing, with a specialty in mixed-use. In that time we have worked with such mixed-used developers such as Equity Residential, Sares Regis, Hanover, AmCAL, and others. I have seen projects constructed with well positioned and thoughtful retail amenities that have thrived, truly invigorating a neighborhood and providing an amenity to the project, as well as developments that have pressed to shoehorn retail square footage into low visibility zones with limited accessibility suffer from chronic vacancy, never achieving their intended activation. Based on this experience, there are a number of common factors required to provide the highest probability for success in a mixed-use retail environment.

These include, **Surrounding Co-Tenancy/Synergy, Visibility/Frontage, Adaptability/Flexibility, and Use Type/Tenant Mix.**

Co-Tenancy/Synergy: In order for mixed-use retail to be successful it must be adjacent to existing/successful retail both to provide initial visibility and draw to the retailer and to enhance consistency of customer trips. In this case, the strength of the REI and Grocery Co-Tenancy across Sunnyvale Saratoga Rd, creates the clear retail synergy on this site. This will provide the best opportunity for customer integration to the primary business arterial of El Camino Real.

Visibility/Frontage: In Mixed-Use developments, visibility a paramount. Projects, even those in well trafficked locations with space designed with solely interior visibility/access have consistently underperformed on those units. Within the recommended configuration by which each retailer has signage and frontage along Sunnyvale Saratoga Rd. the project allows the developer to be more strategic in their Tenant mix, bringing in businesses that will be accretive to both the local community as well as to the future residents of the development. It is also important to address the bay depths of the retail space. In order to meet the demand of today's retail users bay depths will need to be 50 - 55 feet for restaurant



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Jeff Cucinotta
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space and approximately to 45 - 50 feet for the retail. This provides a tenant with the frontage they require, typically 20' -30' minimum, at a square footage they can afford. When spaces are designed too deep, they are difficult to demise and can force a Landlord to split them in ways that limit both utility as well as future leaseability. Assuming 220' of frontage on Sunnyvale Saratoga Rd. this would provide $\pm 9,500 - 11,000$ S.F. of ground floor retail space. This principal, while noted for 777 Sunnyvale Saratoga Road, applies more broadly to non-El Camino Real fronting properties, as requirement for projects to include retail space without the necessary frontage significantly reduces the retailer's ability to attract customers and ultimately their likelihood of success.

Adaptability/Flexibility In order to ensure the proposed retail space is designed to stand the test of time, it will need to be constructed with both adaptability and flexibility in mind. This is done by the items addressed in the prior section regarding Bay Depths, demising scenarios, signage, etc. Prior to 2020 many Tenants were looking to take on more square footage, and expand their footprints. Today Tenants are focused on right-sizing their locations to limit unnecessary rental overhead, address the challenging labor market, and overall run a leaner operation. Locations built with 65 – 75'+ bay depths are no longer the focus for many of these groups, and have therefore seen lower demand. In contrast, properties that are well positioned to accommodate smaller format users have received focus from national and local retailers.

Use Type/Tenant Mix: In addition, Mixed-Use success also requires flexibility , regarding the allowable uses within the project. As there are fewer active retail tenant's looking today than there were 2 years ago, it will be critical to ensure that the retail zoning of this projects allows for not only retail, restaurant, personal services/fitness use, but also light/concierge medical uses, who are quickly becoming one of the most active categories in the broader market, taprooms etc. The more these uses can be contemplated in advance, the better a new project can attract those users, who want certainty prior to moving forward with leasing negotiations.

In conclusion, I believe the proposed Mixed-Use development at 777 Sunnyvale Saratoga has the potential to provide a thoughtful and curated retail mix to benefit the Sunnyvale community, so long as the retail space is designed to leverage the adjacent REI/Grocery co-tenancy, utilize the Sunnyvale Saratoga Rd. visibility/frontage, configured in a way as to ensure future adaptability/flexibility, and designed in partnership with the city ensure zoning flexibility for a myriad of accretive uses that drive a broad Tenant mix. This can be best accomplished by proposed retail space in the $\pm 9,500 - 11,000$ square feet range, assuming 45' – 50' .bay depths.



May 10th, 2022
Jeff Cucinotta
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Should there be any questions on the comments above, I would be happy to connect and further discuss.

Sincerely,

Josh Shumsky
Managing Director
Newmark
Lic # 01883266



May 26, 2022

City of Sunnyvale
456 W. Olive Ave
Sunnyvale, CA 94086

To: Trudi Ryan and Jeff Cucinotta,

We wish to thank the City of Sunnyvale staff and officials for their leadership and hard work in planning for the future of the El Camino Real Specific Plan area. Earlier this month, on May 10th, the city had a Study Session with the Sunnyvale City Council. Staff did a terrific job presenting the current draft to the Council and we believe the Council provided some very clear direction to staff to complete the Plan. In particular, we wanted to follow up on two key items discussed by council to share what we heard, and provide our feedback for revising the requirements for commercial and open space.

Proposed commercial space requirement:

- We heard Council ask for staff to re-consider the amount of commercial at the Osh site. They said that they wanted commercial to be successful and that the site was not suitable for a big box. They encouraged staff to consider the shape of the site and amount of frontage the site has on Sunnyvale Saratoga.
- We ask that staff revise the commercial area calculation to be based on percent of frontage on to Sunnyvale Saratoga (NOT as a% of lot area). Percent and depth should use the same metrics already in the draft plan: 75% of street frontage to a depth of 50 feet.

Proposed open space requirement:

- We heard council ask for staff to reconsider the amount of open space required. They said that a sliding scale would be more appropriate where lower density zoning would have greater open space and higher density zoning would have smaller amount of open space.
- We ask that staff revise the open space requirement. The Sunnyvale Downtown Specific Plan and the Lawrence Station Specific Plan both require 50 SF per unit. We believe that high density zoned sites should have an open space between 50-75 SF per unit.

We believe that with these two changes, the El Camino Real Specific Plan will foster a more active and vibrant district in the future and create a more sustainable and reliable tax and revenue basis for the City of Sunnyvale. We wish to thank the city for all it's hard work and effort in drafting an impressive and well-thought-out specific plan and would welcome the chance to voice our thoughts in meetings going forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Christopher', is placed over a light gray rectangular background.

Greg Christopher
Carmel Partners

Cc: Shawn Mendrin

VIA ELECTRONIC MAIL

April 25, 2022

Chair Daniel Howard
And Members of the Planning Commission
City of Sunnyvale
456 W. Olive Avenue
Sunnyvale, CA94086

RE: Balboa Retail Partners—El Camino Real Specific Plan Comments

Dear Chair Howard and Members of the Planning Commission:

We are writing on behalf of Balboa Retail Partners (“Balboa”), a real estate investment company with over 5.8 million square feet of retail assets and expert experience in the re-leasing, re-developing, and re-positioning of underutilized retail sites across the country. Balboa owns three properties on El Camino Real in Sunnyvale, CA (“City”)—Bell Plaza Center at 1040 El Camino Real, Hacienda Center at 789 El Camino Real, and Cala Center at 1111 El Camino Real (collectively, the “Properties”). We have been following and participating in the El Camino Real Specific Plan (“ECRSP”) update with great interest for the past couple years as the update has substantial consequences for the future viability of our three sites. Accordingly, we offer the following observations about the draft ECRSP and respectfully request proposed changes outlined below which better achieve the community’s goals for retail in the ECRSP

I. Draft ECRSP

The community engagement process for the ECRSP concluded with the following Vision Statement: “The El Camino Real Specific Plan will support and enhance community-serving retail and provide significant new residential options while advancing sustainability and improving transportation safety and mobility choices.” (ECRSP, p.17.) In parallel with the City’s efforts, Balboa has been thoughtfully exploring its re-positioning options for the Properties as potential mixed-use sites and we have waited patiently for the City to adopt its reimagining of the El Camino Real corridor before advancing any plans.

In order to address the dramatically changing retail environment, Balboa has critically evaluated redevelopment plans that would provide a retail facelift to better activate and preserve existing retail uses, while attracting successful, new retail tenants—all supported by replacing obsolete retail spaces with high density housing.

Now, after years of process, the most recent draft of the ECRSP released in 2022 has **drastically reduced density** and residential opportunities along portions of the corridor—including two Balboa properties—in an attempt to support commercial uses and help them thrive. While Balboa has the same goals with respect to preserving commercial uses, the draft ECRSP creates **problematic roadblocks** that make it difficult—if not impossible—for Balboa to

redevelop the Properties to re-invigorate the retail and boost much-needed housing production in the City. For example, the 2022 draft zoning standards restrict residential uses and the applicable densities to specific portions of a site, which effectively cuts the allowable residential density in half from prior iterations of the ECRSP. Moreover, the density per acre has been reduced by 30% from the 2017 City Council Preferred Alternative (“2017 Alternative”), rendering the overall 2022 proposed density less than half of that proposed in the 2017 Alternative, even with the City’s incentive program and State Density Bonus Law applicable to the Properties.

As you are well aware, the State of California is in the midst of an **unprecedented housing crisis**; therefore, residential density can and should be elevated to meet housing targets and it does not have to be at the expense of enhanced retail opportunities. The goals of housing production and robust retail should not be mutually exclusive—yet the ECRSP, as drafted, creates **unintended consequences** that threaten the viability of both of these goals.

We offer the following analysis of the Hacienda Center to illustrate some misguided elements of the draft ECRSP.

DENSITY CALCULATION COMPARISON - CENTER SEGMENT				
	Existing (2007)	2017 Staff Rec	2020 Staff Rec	2022 Proposed ECRSP
Hacienda Site Area	10.56 ac	10.56 ac	10.56 ac	10.56 ac
Hacienda - Applicable Site Area	10.56 ac	10.56 ac	10.56 ac	5.30 ac
Base Density ⁽¹⁾	40 du/ac	36 du/ac	24 du/ac	24 du/ac
Max City's Green Building Program Bonus ⁽²⁾	n/a	n/a	n/a	1 du/ac
Max ECRSP Incentive Program ⁽³⁾	n/a	n/a	n/a	6 du/ac
State Density Bonus Program - 20% ⁽⁴⁾	8 du/ac	7 du/ac	5 du/ac	6 du/ac
Max Total Density	48 du/ac	43 du/ac	29 du/ac	37 du/ac
Total Units - Base Density ⁽¹⁾	425 units	380 units	253 units	127 units
Total Units - City Bonus ⁽²⁾⁽³⁾	n/a	n/a	n/a	38 units
Total Units - State Bonus ⁽⁴⁾	85 units	76 units	51 units	33 units
Max Total Units - Hacienda Only	510 units	456 units	304 units	198 units
Effective Density per Total Property	48 du/ac	43 du/ac	29 du/ac	19 du/ac

Notes:

- (1). There is no Base Density requirement under current zoning and 2007 ECR Precise Plan; for the Existing (2007) scenario, total units was determined based on the current form-based zoning code applied to a project on ~5.30 acres (the proposed Applicable Site Area). The "Base Density" is calculated after application of SDBL.
- (2). City's Green Building Program Bonus = 5% of Base Density.
- (3). ECRSP Incentive Program Max Bonus varies from 6 to 20 additional density points. Max bonus density points assumed.
- (4). Assumes 20% density bonus per SDBL.

As you can see, the base density for the Hacienda Center shifts from 40 du/acre in the current 2007 zoning to 36 du/acre in the 2017 Alternative and then down to 24 du/acre in 2020 and 2022. This surprising decrease becomes alarming in the current draft ECRSP because of the reduction in the applicable site area for the density calculation. This decrease causes the base density to go from 510 units under the existing zoning to 189 units in 2022, because of new

arbitrary restrictions to residential area that ostensibly seek to “protect” existing retail. This new proposed zoning now would allow for a low-density townhome project on half of a site, which eliminates the opportunity for housing-over-retail (or vertical) mixed use. Thus, the consequences of this density and area reduction are two-fold—it impedes the opportunities to consolidate and re-invigorate retail uses, while making options for creating **multi-family residential financially infeasible**. In other words, it completely undermines the vision set forth for the ECRSP update by ignoring the important sustainability and affordability goals of the City that could be accomplished with more holistic planning.

II. Balboa Request

We strongly support keeping existing retail at our Properties and helping tenants thrive and have no intentions of converting any of the Properties to exclusively residential use. To that end, we do not quarrel with the concept of restricting residential uses to a portion of our sites, but we need the flexibility to determine the best location for the development area on each site based on the relative success of existing retail. Additionally, higher density is required to make a mixed-use project actually pencil and allow the remaining commercial redevelopment to flourish.

Accordingly, we request the following changes to the draft ECRSP:

- Retain the proposed zoning densities (with the incentives) but apply them to the entire sites for purposes of base density calculations;
- Restrict residential development to a maximum land area percentage of the Properties, such as 40% of a site, to ensure both viable retail and residential;
- Allow commercial zoning to remain applicable to a whole site until residential uses are proposed;
- Allow more flexibility with commercial uses within the Mixed-Use zoning, such as retaining drive-throughs for more specific retail purposes (i.e. pharmacy).

From a big picture standpoint, we believe the City should look at our Properties and other large commercial sites with obsolete retail space as unique, exciting opportunity sites that can achieve **high density housing and more activated retail**. Therefore, we respectfully request that the Planning Commission consider a residential “overlay” for our three Properties that could essentially “float” over the sites and provide the flexibility necessary to create a **smart ecosystem between new mixed-uses and existing retail**. This approach would help further the City’s vision by allowing retail to evolve with the market, while providing meaningful and viable options for higher density residential that the City and the State desperately need.

We believe the foregoing optionality aligns with the City's goals for the ECRSP and does not in any way threaten the viability of retail revenue along the corridor. Thank you for your consideration.

Sincerely,

Alison Warner
Senior Vice President
Balboa Retail Partners

cc: Trudi Ryan, Director of Community Development
Shaunn Mendrin, Assistant Director of Community Development
Jeffrey Cucinotta, Senior Planner
Joe Fahey, Principal, Balboa Retail Partners
Jennifer Renk, Partner, Sheppard Mullin
Cynthia James, Noble James

VIA ELECTRONIC MAIL

May 9, 2022

Mayor Larry Klein
And Members of the City Council
City of Sunnyvale
456 W. Olive Avenue
Sunnyvale, CA94086

RE: Balboa Retail Partners—El Camino Real Specific Plan Comments

Dear Mayor Klein and Members of the City Council:

We are writing on behalf of Balboa Retail Partners (“Balboa”), a real estate investment company with over 5.8 million square feet of retail assets and expert experience in the re-leasing, re-developing, and re-positioning of underutilized retail sites across the country. Balboa owns three properties on El Camino Real in Sunnyvale, CA (“City”)—Bell Plaza Center at 1040 El Camino Real, Hacienda Center at 789 El Camino Real, and Cala Center at 1111 El Camino Real (collectively, the “Properties”). We have been following and participating in the El Camino Real Specific Plan (“ECRSP”) update with great interest for the past couple years as the update has substantial consequences for the future viability of our three sites. Accordingly, we offer the following observations about the draft ECRSP and respectfully request the proposed changes outlined below, which better achieve the community’s goals for retail along the ECRSP corridor.

I. Draft ECRSP

The community engagement process for the ECRSP concluded with the following Vision Statement: “The El Camino Real Specific Plan will support and enhance community-serving retail and provide significant new residential options while advancing sustainability and improving transportation safety and mobility choices.” (ECRSP, p.17.) In parallel with the City’s efforts, Balboa has been thoughtfully exploring its re-positioning options for the Properties as potential mixed-use sites and we have waited patiently for the City to adopt its reimagining of the El Camino Real corridor before advancing any plans.

In order to address the dramatically changing retail environment, Balboa has critically evaluated redevelopment plans that would right-size retail to better activate and preserve existing retail uses, while attracting successful, new retail tenants—all supported by the opportunity to replace obsolete retail spaces with high density housing.

Now, after years of process, the most recent draft of the ECRSP released in 2022 has **drastically reduced density** and residential opportunities along portions of the corridor—including two Balboa properties—in an attempt to support commercial uses and help them thrive. While Balboa has the same goals with respect to preserving commercial uses, the draft ECRSP creates **problematic roadblocks** that make it difficult—if not impossible—for Balboa to redevelop the Properties to re-invigorate the retail and boost much-needed housing production in

the City. For example, the 2022 draft zoning standards restrict residential uses and the applicable densities to specific portions of a site, which effectively cuts the allowable residential density in half from prior iterations of the ECRSP. Moreover, at Hacienda Center in particular, the density per acre has been reduced by 30% from the 2017 City Council Preferred Alternative (“2017 Alternative”), rendering the overall 2022 proposed density less than half of that proposed in the 2017 Alternative, even with the City’s incentive program and State Density Bonus Law applicable to the Properties (see Exhibit A).

As you are well aware, the State of California is in the midst of an **unprecedented housing crisis**; therefore, residential density can and should be elevated to meet housing targets and it does not have to be at the expense of enhanced retail opportunities. The goals of housing production and robust retail should not be mutually exclusive—yet the ECRSP, as drafted, creates **unintended consequences** that threaten the viability of both of these goals.

II. Balboa Request

We strongly support keeping existing retail at our Properties and helping tenants thrive and have no intentions of converting any of the Properties to exclusively residential use. To that end, we do not disagree with the concept of restricting residential uses to a portion of our sites, but we need the flexibility to determine the best location for the development area on each site based on the relative success of existing retail. Additionally, higher density is required to make a mixed-use project actually pencil and allow the remaining commercial redevelopment to flourish.

Accordingly, we request the following changes to the draft ECRSP:

- For those limited parcels in the ECRSP area that are split-zoned between Mixed-Use and Commercial designations, we propose that the City Council create a “Commercial Preservation Incentive” (“CPI”) over the portion of the parcel that is zoned Commercial. The CPI would provide an incentive for a project to preserve, enhance, or replace 100% of the existing commercial square feet identified within the CPI area. In exchange for preserving or replacing the designated commercial space in the CPI area, the project would have the opportunity to calculate the mixed-use residential density based on the entire site’s acreage.
- In order to maximize the flexibility for a “Commercial Preservation Incentive” to preserve and/or create the most successful commercial spaces, we request that the City Council also add language to the ECRSP that authorizes the Community Development Department to work with an applicant for a split-zoned site on site plan design through the Site Development Permit process to optimize the locations of residential and commercial uses.
- For these split-zoned properties, the uses and development standards for the commercial zone should apply to the entire site until such time as residential uses are introduced.

From a big picture standpoint, we believe the City should look at our Properties and other large commercial sites with obsolete retail space as unique, exciting opportunity sites that can achieve **high density housing and more activated retail**. Therefore, we respectfully request that the City Council consider this commercial preservation concept for these “split-zoned” sites along the corridor. This will provide the flexibility necessary to create **smart ecosystems between new mixed-uses and existing retail**. This approach also would help further the City’s vision by allowing retail to evolve with the market, while providing meaningful and viable options for higher density residential that the City and the State desperately need.

We believe the foregoing optionality aligns with the City’s goals for the ECRSP and ultimately will help the viability of retail along the El Camino Real corridor.

Thank you for your consideration.

Sincerely,

Alison Warner
Senior Vice President
Balboa Retail Partners

cc: Joe Fahey, Principal, Balboa Retail Partners
Trudi Ryan, Director of Community Development
Shaunn Mendrin, Assistant Director of Community Development
Jeffrey Cucinotta, Senior Planner

EXHIBIT A

DENSITY CALCULATION COMPARISON - CENTER SEGMENT				
	Existing (2007)	2017 Staff Rec	2020 Staff Rec	2022 Proposed ECRSP
Hacienda Site Area	10.56 ac	10.56 ac	10.56 ac	10.56 ac
Hacienda - Applicable Site Area	10.56 ac	10.56 ac	10.56 ac	5.30 ac
Base Density ⁽¹⁾	40 du/ac	36 du/ac	24 du/ac	24 du/ac
Max City's Green Building Program Bonus ⁽²⁾	n/a	n/a	n/a	1 du/ac
Max ECRSP Incentive Program ⁽³⁾	n/a	n/a	n/a	6 du/ac
State Density Bonus Program - 20% ⁽⁴⁾	8 du/ac	7 du/ac	5 du/ac	6 du/ac
Max Total Density	48 du/ac	43 du/ac	29 du/ac	37 du/ac
Total Units - Base Density ⁽¹⁾	425 units	380 units	253 units	127 units
Total Units - City Bonus ⁽²⁾⁽³⁾	N/A	N/A	N/A	38 units
Total Units - State Bonus ⁽⁴⁾	85 units	76 units	51 units	33 units
Max Total Units - Hacienda Only	510 units	456 units	304 units	198 units
Effective Density per Total Property	48 du/ac	43 du/ac	29 du/ac	19 du/ac

Notes:

- (1). There is no Base Density requirement under current zoning and 2007 ECR Precise Plan; for the Existing (2007) scenario, the Total Units were determined based on the current form-based zoning code applied to a project on ~5.30 acres (the proposed Applicable Site Area). The "Base Density" is calculated after application of SDBL.
- (2). City's Green Building Program Bonus = 5% of Base Density.
- (3). ECRSP Incentive Program Max Bonus varies from 6 to 20 additional density points. Max bonus density points assumed to be 6 for Hacienda.
- (4). Assumes 20% density bonus per SDBL.



Hospital Campuses

2500 Grant Road
Mountain View, CA 94040
650-940-7000

815 Pollard Road
Los Gatos, CA 95032
408-378-6131

elcaminohealth.org

April 11, 2022

City of Sunnyvale
Community Development Department / Planning Division
456 W. Olive Avenue
Sunnyvale, CA 94086

RE: Comment on Draft El Camino Real Specific Plan and Draft Sunnyvale Municipal Code Chapter 19.36 - 1027 W El Camino Real Inpatient Rehabilitation Facility

On behalf of El Camino Health, we offer the following comments on the Draft El Camino Real Specific Plan. Specifically, our comments relate to the Draft Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts."

We are requesting that section 12 of Table 19.36.070B be updated to include the rest home/convalescent hospital use designation, also referred to as a rehabilitation hospital, as an auxiliary use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning. This type of use can successfully integrate with the City's vision of housing and retail space along El Camino Real.

The rehabilitation hospital use provides much needed inpatient rehabilitation services for the community. The hospital provides a place where patients can recover from stroke, neurological disorders, orthopedic injuries, and other injuries with the goal of getting them back to their normal lives as quickly as possible. This type of facility allows patients to learn how to speak again after a stroke, strengthen muscles after a broken hip, and regain use of important motor skills, such as cooking and driving. We are looking to bring a state-of-the-art facility offering these critical healthcare services closer to where our patients are – here in Sunnyvale.

El Camino Health opened its doors in 1961 with a mission to heal, relieve suffering and advance wellness in our community. Today, our nationally recognized doctors and care teams remain here for what we have always been here for, delivering the healthcare that our patients and community need. Beyond these healthcare services, El Camino Health and Healthcare District's \$11.3 million annual grant funding fosters collaborative partnerships with local community organizations addressing the health needs of underserved and vulnerable community members.

We aim to partner with the City of Sunnyvale to develop a project that will have a positive impact on the El Camino Real Corridor and be an important healthcare benefit for the Sunnyvale community.

Thank you for your consideration

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Cowan".

Jon Cowan
Senior Director of Government Relations
& Community Partnerships

A handwritten signature in black ink, appearing to read "A.J. Reall".

A.J. Reall
Senior Director of Strategy



April 22, 2022

City of Sunnyvale
Community Development Department / Planning Division
456 W. Olive Avenue
Sunnyvale, CA 94086

RE: Comment on Draft El Camino Real Specific Plan and Draft Sunnyvale Municipal Code Chapter 19.36 - 1027 W El Camino Real

On behalf of PMB, we offer the following comments on the Draft El Camino Real Specific Plan. Specifically, our comments relate to the Draft Sunnyvale Municipal Code (SMC) Chapter 19.36, Table 19.36.070B "Permitted, Conditionally Permitted, and Prohibited Uses in ECRSP Districts" and Table 19.36.100 "Minimum Ground Floor Commercial Area Requirements for Mixed-Use Development."

1. We are requesting that section 11 of Table 19.36.070B be updated to include the residential care facility, 6 or greater residents use designation as a use that can be permitted through the Special Development Permit (SDP) process in the ECR-MU zoning to conditionally permit an independent living, assisted living, and memory care senior housing project. This type of use can successfully integrate with the City's vision of housing and retail space along El Camino Real.
2. We are requesting that Table 19.36.100 be updated to say, "Minimum Required Commercial Area, whichever is lesser" instead of "whichever is greater." The greater ground floor retail requirement is especially challenging for a site like 1027 W El Camino Real, which is a flag lot and has limited frontage on El Camino Real. The ground floor retail is complementary to the project and important to the goals of the Specific Plan, however, it is important to program a feasible square footage of ground floor commercial for financing and leasing purposes.

With an aging population, senior housing is an important use to ensure that residents can remain in their community as they age. The different levels of acuity and housing types (independent living, assisted living, memory care) allow for residents to age in place and receive quality care in their homes. We are looking to bring a high-quality senior housing project to the community, so Sunnyvale residents have a variety of housing options as they begin to require assistance.

We aim to partner with the City of Sunnyvale to develop a project that will have a positive impact on the El Camino Real Corridor and be an important housing & healthcare benefit for the Sunnyvale community.

Thank you for your consideration.

Sincerely,

Mark Toothacre
President | Partner
PMB

Nolan Weinberg
VP Development
PMB



HANDLEY MANAGEMENT CORPORATION

April 14, 2022

Sunnyvale City Council
c/o Mr. Jeffrey Cucinotta, AICP, Senior Planner
Department of Community Development, Planning Division
456 West Olive Avenue, Sunnyvale, CA 94088-3707

RE: 1281-1289 and 1297 West El Camino Real, Sunnyvale, CA and El Camino Real Specific Plan (ECRSP)

Honorable Mayor, Vice Mayor and Members of the Sunnyvale City Council:

Handley Management Corporation is the Manager of the ownership entities for the above-referenced properties situated in the Western Node of the El Camino Real Specific Plan Area. We understand that the City is considering a zoning revision for the ECRSP which would limit the future use of these properties to commercial uses.

As these 60-year-old buildings are in a gateway location to the City of Sunnyvale, we respectfully request that you consider a more flexible zoning designation in the Western Node to increase the likelihood that these properties will be redeveloped in the near term and give prospective buyers more options for redevelopment.

Sincerely,

Handley Management Corporation

Jacob Foraker
President

Jeffrey Cucinotta

From: Josh Rupert <Josh@hunterproperties.com>
Sent: Thursday, April 21, 2022 12:07 PM
To: Jeffrey Cucinotta
Cc: Nivya Sannareddy; Curtis Leigh
Subject: RE: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents

Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Jeffrey – Thanks for providing us the details to review prior to the meeting on Monday with the Planning Commission. We have been reviewing the SP documents and the zoning, and we have a couple of concerns that I wanted to make you aware of which I've outlined below. I know the goal is to maximize residential where able, and a couple of these will make it difficult for us to do that if taken in their current language. I look forward to seeing you on Monday and please let me know if you have any questions or concerns.

Thanks,
Josh

1. Open Space Requirements – Per SMC 19.36.140 we are required to have 380SF/unit. If we're maximizing our acreage by the full density (54+20du/acre) then we would need to provide 8.88 acres of open space on our 13.75 acres. This feels like it's counterintuitive to the goal of maximizing residential, so I suspect there's either a variance or something else we can apply to reduce this to a more achievable number.
2. Commercial Requirements – Per SMC 19.36.100 for lots greater than 400K SF we need to provide 60KSF of retail. To put that in perspective, our Sprouts, Wells Fargo and little shops building that includes the BBQ restaurant combined are only 50K, so we would need to add 10K more to that number to meet the requirement. We're looking at ways to line retail along ECR, but to create leasable spaces we can't have depths greater than 50', so it will be difficult to get to this number.

From: Jeffrey Cucinotta <JCucinotta@sunnyvale.ca.gov>
Sent: Monday, March 14, 2022 5:43 PM
To: Josh Rupert <Josh@hunterproperties.com>
Subject: RE: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents

Hi, Josh.

Yes that is 54.

Thanks.



JEFFREY CUCINOTTA, AICP

Senior Planner

Community Development Department/Planning Division

jcucinotta@sunnyvale.ca.gov

408-730-7424

Sunnyvale.ca.gov

Pronouns: he, him, his

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* The Sunnyvale Planning Division continues to provide virtual services, such as electronic permit submittals and virtual meetings. Limited in-person services are also available at the One Stop Permit Center - <https://sunnyvale.ca.gov/news/topics/coronavirus.htm>. Masks and appointments (pcappointment@sunnyvale.ca.gov) are strongly encouraged. Please note that Olive Avenue is closed and the entry to City Hall and the One-Stop Permit Center is 607 All America Way (one block south of Olive). General zoning information is also available on the Planning Division webpage - <https://sunnyvale.ca.gov/business/planning/default.htm>. Due to high call/email volumes, a Planner will respond to you within four business days. Thank you for your patience during this time.

From: Josh Rupert <Josh@hunterproperties.com>
Sent: Monday, March 14, 2022 5:09 PM
To: Jeffrey Cucinotta <JCucinotta@sunnyvale.ca.gov>
Subject: RE: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Jeff – Can you please confirm that the area I’ve circled in the below image is ECR-MU54 designation? It’s hard to tell from the image the color. Thanks!

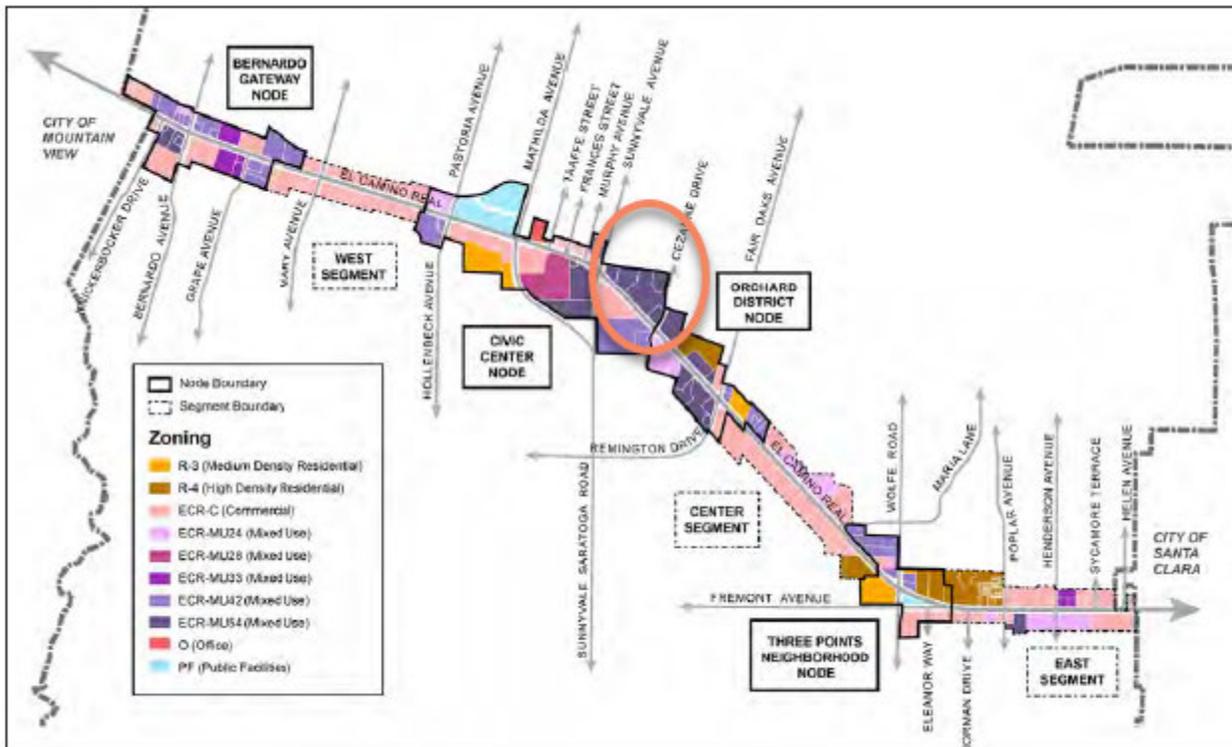


Figure 4-3: Zoning Districts

From: Jeffrey Cucinotta <JCucinotta@sunnyvale.ca.gov>
Sent: Friday, March 11, 2022 9:04 AM
To: Jeffrey Cucinotta <JCucinotta@sunnyvale.ca.gov>
Subject: El Camino Real Specific Plan - Public Draft Review of EIR and Specific Plan Documents

Good Morning,

The City is excited to announce that the following documents are now available for public review:

- Draft El Camino Real Specific Plan Environmental Impact Report (EIR),
- Draft El Camino Real Specific Plan (ECRSP) & ECRSP Draft Chapter 19.36 of Title 19 (Zoning) of the Sunnyvale Municipal Code, and
- Draft Community Benefits/Incentives Program.

These documents, along with the Notice of Availability (NOA) for the draft EIR, are available at:

<https://bit.ly/ECRPlan>. The NOA is also attached to this email. Other general information related to the plan process and updated meeting schedules can be found on the project website at: <http://plansunnyvaleecr.m-group.us/>.

Your views and comments on the Draft EIR for the proposed ECRSP are welcome. **Comments should be provided in writing by April 25, 2022** to Jeffrey Cucinotta, Senior Planner:

- Email (preferred): jcucinotta@sunnyvale.ca.gov
- Mail: City of Sunnyvale, Department of Community Development, Planning Division Attn: Jeffrey Cucinotta, Senior Planner, 456 West Olive Avenue, Sunnyvale, CA 94088-3707

You may also provide public comments on the Draft EIR at several public meetings listed below. Meeting details, including how to view and join the meeting virtually, will be available on each meeting's agenda 72 hours before each meeting on the City's Legislative Public Meeting Webpage at: sunnyvaleca.legistar.com/calendar.aspx

- **Sustainability Commission on Monday, April 18, 2022 at 7:00 P.M.** Meeting Online Link: <https://sunnyvale-ca-gov.zoom.us/j/95835903911>
- **Housing and Human Services Commission on Wednesday, April 20, 2022 at 7:00 P.M.** Meeting Online Link: <https://sunnyvale-ca-gov.zoom.us/j/92867949471>
- **Bicycle and Pedestrian Advisory Commission on Thursday, April 21, 2022 at 6:30 P.M.** Meeting Online Link: <https://sunnyvale-ca-gov.zoom.us/j/97997417379>
- **Planning Commission Hearing on Monday, April 25, 2022 at 7:00 P.M.** Meeting Online Link: <https://sunnyvale-ca-gov.zoom.us/j/91827390357>
- **ECRSP Advisory Committee Meeting: TO BE SCHEDULED**

Public Hearings on the Final EIR: After comments have been received on the Draft EIR, a Final EIR will be prepared that will be considered along with the proposed ECRSP. A separate notice will be sent when the hearing dates with the Planning Commission and City Council are determined (expected in June 2022) to consider the ECRSP project and certify the EIR.

Please feel free to reach out to me with any questions.

Thank you



JEFFREY CUCINOTTA, AICP

Senior Planner

Community Development Department/Planning Division

jcucinotta@sunnyvale.ca.gov

408-730-7424

Sunnyvale.ca.gov

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<https://sunnyvale.ca.gov/news/topics/coronavirus.htm>. Masks and appointments (pcappointment@sunnyvale.ca.gov)

are strongly encouraged. Please note that Olive Avenue is closed and the entry to City Hall and the One-Stop Permit Center is 607 All America Way (one block south of Olive). General zoning information is also available on the Planning Division webpage - <https://sunnyvale.ca.gov/business/planning/default.htm>. Due to high call/email volumes, a Planner will respond to you within four business days. Thank you for your patience during this time.



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Kelly Snider Consulting

Staff
Regina Celestin Williams
Executive Director

TRANSMITTED VIA EMAIL

April 25, 2022

Jeffrey Cucinotta
City of Sunnyvale, Department of Community Development, Planning Division
Attn: Jeffrey Cucinotta, Senior Planner
456 West Olive Avenue
Sunnyvale CA 94088-3707

Dear Mr. Cucinotta,

On behalf of Silicon Valley at Home, we write to you today on the Draft El Camino Real Specific Plan (ECRSP). We commend the City of Sunnyvale's forward thinking vision on transforming this corridor to one that is vibrant, prosperous, accessible, and sustainable while aiming to preserve its current businesses and residential tenants. We think the ECRSP is heading in the right direction with its priorities and we would like to reinforce and supplement those ideas. We would also like to thank staff for their work developing this comprehensive plan that has faced years of unfortunate and uncontrollable delays, including the COVID-19 pandemic and staff turnover.

The ECRSP lays out a vision and guiding principles that serve as the bedrock of the entire plan. We are pleased that they focus on providing "significant new residential options", including a "full range of affordable and marketrate housing," and preventing "displacement of existing residents is a high priority". We commend these goals and want to ensure that we achieve them. Our comments and recommendations are targeted towards helping the City realize this vision and guiding principles.

The ECRSP provides the opportunity to help meet city-wide housing needs. As of January 2021, new anticipated jobs outnumbered the amount of housing units in Sunnyvale, [just under 8 to 1](#). Although Sunnyvale has flourished in job creation, it has lagged in the production of affordable housing to keep up. As of December 2020, Sunnyvale met 8% of its RHNA targets for Very Low-Income units, 7% for Low Income, 30% Above Moderate Income, and 145% of its Above Moderate-Income targets for the current Regional Housing Needs Allocation cycle. It is vital that the ECRSP include a discussion on the pending sixth Housing Element cycle's requirements along with other key regional transportation funding opportunities, such as the One Bay Area Grant through the Metropolitan Transportation Commission's (MTC) Transit Oriented Communities (TOC) Policy.

We also believe the ECRSP can go further to meet Sunnyvale's housing needs by maximizing the Community Benefits and Incentives Program, reasonably increasing its densities, strengthening its housing policies, and taking advantage of the Affordable Housing and Anti-Displacement Strategy. Please find our detailed recommendations below:

Date
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Page 2 of 5

I. Explicitly Connect ECRSP to the Sixth Cycle Housing Element Update

Given the timing of the ECRSP’s adoption, there is a clear link between the Plan’s housing goals and the City’s creation of a compliant Housing Element. We highly recommend that the sixth cycle Housing Element (hereon as the Housing Element Update) be included and discussed in the ECRSP given that Housing Element Update’s rules are stringent, and, for the first time, include accountability mechanisms from the California Department of Housing and Community Development (HCD).

The City of Sunnyvale’s RHNA target is to build 11,966 new units by 2031 including 6,709 units in the Moderate-Income and Lower-Income categories. At a January 25th, 2022 City Council Study Session on the Housing Element, the Housing Department gave a

[presentation that included the City’s preliminary draft sites inventory](#), which assigned the ECRSP area with building approximately 1,367 Below Market Rate (BMR), 1,176 Lower Income, and 191 Moderate-Income units within the eight-and-a-half-year period (Figure 1). The ECRSP would account for roughly 20% of the entire city’s RHNA targets for Moderate-Income and Lower-Income units that would need to be built within an eight-and-a-half-year cycle. The Housing Element Update is highly dependent on the consistency of the ECRSP with the Housing Element Update, along with the success of the ECRSP’s implementation.

Preliminary Sites Inventory

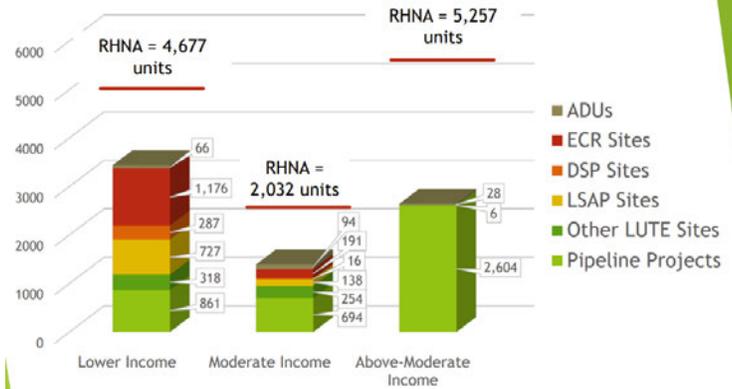


Figure 1 City of Sunnyvale’s Housing Element preliminary sites inventory from 1/25/2022.

Therefore, the ECRSP should include a section that discusses its connection and reflection of the Housing Element Update and generally express that it will conform to its new rules, the pending site inventory, and its policies and programs.

II. Strengthen Community Benefits and Incentive Program, Increase Densities, Consider Varying Funding Sources, and Maximize Housing with Commercial Space

Considering the goal of achieving 1,367 BMR units by 2031, roughly 161 units per year, within the ECRSP area raises the question of whether the proposed incentives program is enough to reach the upcoming RHNA targets, let alone the LUTE targets. **We recommend that the City of Sunnyvale conduct a study that analyzes and helps track likely build-out scenarios, including the minimum and maximum number of units the ECRSP would have with all of its programs and policies (e.g. Housing Mitigation Fees, Direct Public Investments, etc.) for development implementation.** This study would not need to be completed before the adoption of the ECRSP but we recommend that it be an implementation tool to be completed at the start of the planning period (e.g. within the first year of adoption) so that the City can ensure the ECRSP is on-track with its RHNA and LUTE targets for the plan area. This would allow for the ECRSP to accurately pivot as needed throughout the 20-30 year planning period in order to meet its vision for housing.

The Community Benefits and Incentive Program (as it currently stands would grant additional density points if developers build over 15% Very-Low-Income units. The proposed Program, however, is less enticing to developers than the State Density Bonus Law, which allows more flexibility in the variety of affordable units. The focus on the

Date
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Very-Low-Income category alone also undermines Housing Element Update goals for the Plan area. **Therefore, we recommend that a variety of options for incentive points be allowed for mixes of Extremely Low, Very-Low, and Low-Income units. The deeper the affordability mix a developer plans to build, the more incentive points a developer would be given. We also suggest that the City explore reasonable increases of density points for affordable housing in a way that allows for developers to recover their costs through increased densities/market-rate units so that the program becomes viable.**

We also believe there are some missed opportunities in the ECR-MU24, ECR-MU28, R-3 and R-4 zoned sites at each of the nodes. These sites should be opportunity areas to maximize feasible residential density. The current densities of 24 DU/AC and 36 DU/AC under R-3 and R-4, for example, seem much too low since this is an opportunity for the City to rezone these areas for higher densities. [A regionally adaptable study presented by the City of Santa Clara for their Downtown Precise Plan](#) (see page 25) showed that developers would “maybe” consider residential condominiums feasibly developable at 50 or 60 DU/AC, with a definite “yes” at 70 DU/AC. Residential apartments were considered a “maybe” feasible to developers at 60 or 70 DU/AC, with a “yes” at 80 DU/AC. Even with density bonuses, densities that are too low will not be competitive enough to include affordable housing. Moreover, developers we have been in contact with have expressed a preference of residential projects over mixed-use developments. We are aware of the need to retain and encourage commercial development but where there are opportunities to increase residential units to support those commercial uses, we should take advantage of them. Even if the likelihood of redevelopment in these areas are currently low, our intentions of achieving residential development by increasing allowable densities can be shaped and influenced now. A higher residential population along the ECR corridor increases the feasibility of retail continuing to survive and could make it more feasible to include commercial space as part of mixed-use developments as well.

The Metropolitan Transportation Commission will be approving a [Transit-Oriented Communities Policy \(TOC Policy\)](#) in late July that will likely include minimum densities for cities to set in future growth and high-quality transit areas, like the ECRSP area, in order to acquire transportation funding. The TOC Policy currently has minimum densities set at 35 DU/AC for stops with frequent bus services (headways that are at least 15 minutes or below) of which the ECRP area likely falls under. The City of Sunnyvale should take this opportunity to further increase densities to be better aligned with the way TOC development is proceeding across the Bay Area.

The Housing Element Update also requires cities to provide minimum densities of 30 DU/AC for Lower-Income residential projects, along with a minimum of 50-150 units for each project in order to reach financial feasibility for state or federal resources. Given that the ECRSP will provide projects that feed into the Housing Element Update’s site inventory, those projects will be required to fit under specific rules under the state, which again, make them both inextricably linked.

Therefore, we recommend that the City of Sunnyvale make at a minimum the following reasonable density increases at this stage of the planning process:

- **ECR-MU24, ECR-MU28, and R-3 densities to at least somewhere between 30 DU/AC and 35 DU/AC;**
- **ECR-MU33 to at least 35 DU/AC; and**
- **R-4 to at least 42 DU/AC**

Lastly, the Municipal Code Section 19.36.100 edits for minimum ground floor commercial area in mixed-use development did not account for odd-shaped parcels. **We recommend that the required amount of commercial area be consistent with the shape of a parcel to maximize its use, ground-floor activation, and housing units.** There is no

Date
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one size fits all amount of retail for each parcel but this is another opportunity where the number of housing units could be increased.

III. Improve ECRSP Housing Policies and Incorporate the 2020 Housing Strategy and Affordable Housing and Anti-displacement Strategy

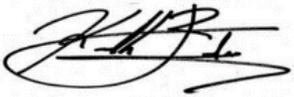
Our overall recommendations on the ECRSP's housing policies are that they be more specific, robust, accountable, and actionable. Other plans in neighboring cities have taken stronger approaches, such as the City of San José's most recently adopted [North 1st Street Urban Village Plan](#) which include not only policies but goals, standards, guidelines, and action items. Below are specific recommendations we have for policies we believe can be strengthened or can be potentially included as an additional policy:

- LU-P9 calls for incentivizing density bonuses to promote development of affordable housing. **We believe the City of Sunnyvale can go beyond being a spectator of development along the ECRP corridor and craft a policy that actively encourages developers to build 100% deed-restricted affordable housing projects so that we can meet required RHNA targets for Lower-Income and Moderate-Income housing units.**
- LU-P10 ensures that relocation commitments are provided to avoid displacement of residents from new development. We are not entirely sure how the City plans to do this without any details of City guidelines, standards, or actionable steps be taken to ensure it. The City of Sunnyvale adopted a cutting-edge [Housing Strategy in 2020](#) that could provide some additional ideas. Moreover, there are some viable policies in the 2016 consultant-prepared Affordable Housing and Anti-Displacement Strategy document that could be considered, including a one-for-one replacement requirement or a rehabilitation assistance program. **We highly recommend that the ECRSP process consider how it can help advance the components of the City's 2020 Housing Strategy. We also recommend that the ECRSP process explore the aforementioned policies included in the consultant-prepared 2016 Affordable Housing and Anti-Displacement Strategy.**
- LU-P11 encourages a diverse housing mix, such as ownership, rental, affordable, and senior housing. We would like to know how the City will implement this policy, while ensuring ECRSP meets its Lower-Income and Moderate-Income housing targets. **We encourage the City to more explicitly pursue policies as part of the ECRSP area to create Permanent Supportive Housing and housing for people with intellectual and developmental disabilities, for example.**
- LU-P16 includes a No Net Loss policy for commercial square footage when parcels are redeveloped with new buildings and uses. **We recommend that the City of Sunnyvale additionally explore options in relocating potentially displaced businesses within the ECRSP area. Separately, we believe another policy should be made to provide No Net Loss of residents as outlined in the 2016 Strategy and currently under SB 330, except without a sunset date.**
- **We recommend the City further explore how housing streamlining laws will help meet the City's goals and consider providing additional streamlining to affordable housing developments in the plan area if it would help increase affordable housing production.**

Date
Re: Subject
Page 5 of 5

We recognize and support staff's hard work in developing the ECRSP over all these years and we are excited about its direction. As the ECRSP moves toward a motion of approval, we think that it can be strengthened to meet Sunnyvale's housing needs. SV@Home looks forward to continuing to work closely with Staff, City Council, and the community to ensure that the ECRSP reflects its multi-generational housing vision of providing diverse housing options and protecting existing residents.

Sincerely,



Kenneth Rosales
Planning Senior Associate

Jeffrey Cucinotta

From: Lillian Tsang
Sent: Wednesday, April 20, 2022 6:13 PM
To: Jeffrey Cucinotta
Cc: Think Le
Subject: FW: ECR SP Bicycle suggestions
Attachments: 03-16-22_18.22.15.png

Categories: El Camino Real Specific Plan Update

FYI, message sent to BPAC Answerpoint.



Lillian Tsang, PE
Principal Transportation Engineer
Department of Public Works

Phone: 408-730-7556
Email: ltsang@sunnyvale.ca.gov

Follow us on:



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From: Ari Feinsmith [REDACTED]
Sent: Wednesday, April 20, 2022 11:26 AM
To: BPAC AP <BPAC@sunnyvale.ca.gov>
Subject: ECR SP Bicycle suggestions

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi Sunnyvale BPAC,

Before your meeting tomorrow, I want to offer my thoughts and suggestions about the ECR Specific Plan:

1) **Increase the density bonus for Caltrain Go Passes to 6 density points** in the ECR [Community Benefits/Incentive Program](#) (see attached). I created a [model](#)* comparing how much it would cost developers to give out VTA Smart Passes compared to the cost of giving out Caltrain Go Passes. Basically, even though Caltrain Go Passes give double the density bonus points (+4 dwelling units/acre) compared to VTA Smart Passes (+2), they cost about 4 times as much per participant (\$342 vs \$82.75-\$90).

Since ECR is served more by VTA buses than Caltrain, it makes sense to prioritize VTA Smart Passes by making them more profitable for developers. However, I am worried that the Caltrain Go Passes incentive is too low to even be considered by developers, especially for smaller parcels. This is why I suggest increasing the incentive to +6 points.

2) **Increase the maximum number of incentive points for the Transportation Category to at least 8 points** (or 10 points if the Caltrains Pass incentive is increased to 6 points). To get people out of cars, they need cheap transit and convenient bike/ped facilities for the last mile leg of trips. Transit passes incentives and bicycle/ped infrastructure incentives go hand and hand together, and should not be pitted against each other.

3) My understanding is that when developers redevelop or renovate a parcel, they will have to build bicycle facilities on their street frontage (or pay the city to do it later). As these start to happen, the city will look for funding to fill in the gaps in the bike lanes along ECR. However, the section about bicycle network policies in the [ECR SP Draft](#) (pg 75) does not explicitly state that. I'd like to see language in one of the **BN-P policies that states something like "Look for funding sources to install Class IV separated bikeways one El Camino Real."**

4) I am worried it will be a long time until we have continuous protected bike lanes on ECR. Given that money is often the limiting factor in these sorts of projects, I encourage you to **investigate getting ECR Transportation Impact Fees (TIF) to go towards building the Class IV bike lanes ECR.** The goal of the ECR [Appendix D - Transportation Impact Analysis](#) is to list all of the current TIF projects needed to reduce new congestion caused by new development. All of these projects are primarily about reducing vehicle trip times. However, we all know that building more protected bike lanes on ECR would lead to a significant mode shift, and therefore taking cars off the road and reducing traffic.

I hope this is helpful.

Ari Feinsmith
Team Leader of [Bike Sunnyvale](#), SVBC

*If you click on [this link](#), you will get a graph I made, where the x-axis is the number of units and the y-axis is the cost to the developer. I assumed that every additional dwelling unit built will bring in \$150,000 in profit to the developer. Red line = Caltrain Go Pass total cost, Blue line = VTA Low Income Smart Pass total cost, Blue Dashed = VTA market rate total cost. Even if you change the assumed number of participants per unit (p) or the acres of the development (a), it is always twice as profitable to give out VTA Smart Passes.

Table 3: Residential Mixed-Use Development – Defined Incentives

Incentive Category	Provision	Potential Additional Density Points ¹	Maximum Permitted Points per Incentive Category	Zoning District Availability (ECR-MUXX)				
				24	28	33	42	54
Public Art	Provision of public art valued at 1% of the project construction valuation, or payment of public art in-lieu fee	1	1			◆		
Sustainability ⁴	Installation of Level 2 Electric Vehicle Charging Stations	2	6			◆		
	Zero Energy/Zero Carbon Buildings	4				◆		
Transportation	Public Bicycle/Pedestrian Pathways with Signage, Privately Owned Publicly Accessible	2	6			◆		
	Annual Transit Passes for Residents of Rental-Only Residential Projects	Caltrain		4			◆	
		VTA		2				

Jeffrey Cucinotta

From: Ari Feinsmith [REDACTED]
Sent: Monday, April 25, 2022 11:59 PM
To: Jeffrey Cucinotta
Subject: ECR SP suggestions from a developer
Attachments: Commercial Pages from SMC Chapter 19.36 - DRAFT - notes.pdf
Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi Jeffery,

A developer mentioned to me one of the challenges with the ECR SP draft about commercial requirements. I thought you might want to know about it. See below and attached.

Quote:

The two issues are:

- Retail experts have been very clear with us that this space will not be leasable; we will be building commercial space and parking that will be dark
- There is a limited amount of land area and building volume on any property; building commercial takes up a fixed volume that could otherwise be used for residential

-Ari

19.36.100. Minimum ground floor commercial area in mixed-use development.

- (a) Each mixed-use development (including both office and residential mixed-use developments) shall be subject to devoting a portion of the ground floor area to a commercial use.
- (b) The minimum ground floor commercial area requirements for mixed-use developments are listed in Table 19.36.100.

**Table 19.36.100
Minimum Ground Floor Commercial Area Requirements for Mixed-Use Development**

Lot Size	Minimum Required Commercial Area, whichever is greater ^[1] ^[2]	
≤ 50,000 sq. ft.	7,000 sq. ft.	
50,001-100,000 sq. ft.	10,000 sq. ft.	75% of El Camino Real frontage length x 50
100,001-150,000 sq. ft.	20,000 sq. ft.	
150,001-200,000 sq. ft.	30,000 sq. ft.	
200,001-300,000 sq. ft.	40,000 sq. ft.	
300,001-400,000 sq. ft.	50,000 sq. ft.	
≥400,000 sq. ft.	60,000 sq. ft.	

^[1] If the floor area values/calculations presented above yield a value that is over 20% of the lot size, a commercial area capped at 20% of the lot size shall also be permitted.

^[2] If a property has no frontage along El Camino Real, a commercial area capped at 10% of the lot size shall also be permitted.

19.36.110. Development requirements.

- (a) Development requirements for commercial development are listed in Table 19.36.110.

**Table 19.36.110
Development Requirements for Commercial Development**

Standard	Requirement
Maximum Building Height	Node Properties: 75 feet Segment Properties: 55 feet
Maximum Lot Coverage	60%
Minimum Front Yard Setback	15 feet

- (b) Development requirements for mixed-use development are listed in Table 19.36.110 and depicted in Figures 19.36.110A through 19.36.110C, as identified by the numbered/lettered standards that are associated with the table and figures.

Jeffrey Cucinotta

From: Ari Feinsmith [REDACTED]
Sent: Monday, April 25, 2022 11:54 PM
To: Jeffrey Cucinotta
Cc: SVBC Sunnyvale Team; Kenneth Rosales; elcaminoREAL@bikesiliconvalley.org
Subject: ECRSP Comment Letter - Bike Sunnyvale

Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Mr. Cucinotta,

We are writing to you on behalf of Bike Sunnyvale, the local chapter of the Silicon Valley Bicycle Coalition. We are a group of over 150 local residents and neighbors who share a common passion and focus on making it safer and more convenient to walk, bike, and take other modes of active transportation in Sunnyvale.

We are taking this opportunity to comment on the draft El Camino Real Specific Plan before it is finalized. First, we congratulate the city staff on a well-written draft plan.

In general, we are very supportive of the draft El Camino Real Specific Plan. Its adoption and implementation will make Sunnyvale a better community in line with our goals. We are happy to see the draft plan supports making many changes to make the El Camino Real plan area more walking, bicycle riding, and public transit-friendly while also making it a more pleasant place to live, shop, and visit. We are very supportive of the Bicycle Network goals outlined in the plan (BN-Gx, BN-Px, PP-Gx). We support the shared mobility policies as outlined in SM-Px and the three midblock crossings to ECR as shown in Figure 6-5: Recommended Mid-Block Crossings.

Here are specific items we would like to see improved.

1) Please **add a mid-block crossing on ECR between Hollenbeck ave and Mary ave** to the Specific Plan for consideration. This block is approximately 0.4 miles long, so residents would greatly benefit from being able to cross mid-block.

2) SD-P2 currently states: "Consider phasing out and removal of all on-street parking along El Camino Real by 2032."

We think the SD-P2 should state the intended goal as listed in the 2020 Active Transportation Plan instead of simply stating to 'consider' it. **SD-P2 should be strengthened** by rewording and adding specific deadlines: "The majority (over 80%) of on-street parking shall be removed by 2028 and all on-street parking along El Camino Real should be removed by 2032."

3) We want to see the city develop a plan for **implementing the class IV protected bikeways along ECR in a more timely and comprehensive manner**. Currently, the plan depends on waiting for each property to redevelop, then having the city look for funding to fill in the gaps.

We propose that the City of Sunnyvale use its stellar credit rating to take out infrastructure loans to implement the protected bikeways on ECR all at once in places where there are not too many driveways. Afterwards when a parcel is redeveloped, the developer would reimburse the city with however much it cost the city to build the protected bikeways on their street frontage. This program

would not be applicable to developments happening before the city's 'all out once' bike lane is built out, meaning developers in the short term would still have to install protected bike lanes as they redevelop, as stated in the current draft.

4) In Appendix A of the ECR SP draft, we request the following changes that will **make these intersections safer for everyone**.

On Knickerbocker, Grape, Maria, Norman, Poplar, Henderson, Sycamore, Helen: add the removal of the on-street parking within 50' of the ECR intersection to improve visibility.

Add changes to Helen and Sycamore Terrace to make them Class III or Class IIIB facilities instead of N/A.

5) In the COMMUNITY BENEFITS/INCENTIVES PROGRAM - DRAFT, there need to be stronger incentives for active transportation.

Transportation	Public Bicycle/Pedestrian Pathways with Signage, Privately Owned Publicly Accessible		2	6
	Annual Transit Passes for Residents of Rental-Only Residential Projects	Caltrain	4	
		VTA	2	

-
-
- The 'Public Bicycle/Pedestrian Pathways with Signage, Privately Owned Publicly Accessible' incentive
 - is great. However, parcels on ECR have a variety of shapes, including some that are long and skinny. Therefore,
 - **this incentive should be a function of the length of the path, not just a flat rate.** We propose that the developer should get 1 incentive point for the first X linear ft, then an additional incentive point for every Y linear ft. The exact numbers should be determined by the planning department. The benefit of this is that it incentivizes parcels that have to make a larger path to do so.
 -
 -
 -
 - Developers are unlikely to participate in giving out transit passes for 10 years because there is a lot of uncertainty about what could happen over 10 years after the project is completed. We propose
 - **lowering the requirement to 5 years for VTA Smartpasses and Caltrain Go Passes.** Additionally, Caltrain passes cost 4 times as much as VTA Smartpasses, so if you want them to be equally appealing, you should increase the Caltrain Go Pass to 8 incentive points.
 -
 -
 -
 -

- The maximum points that can be earned from transportation-related incentives should not be a limiting factor for developers. Transit passes and bicycle/pedestrian infrastructure go hand and hand together. These incentives should not be pitted against each other.
-
-
-
- We would like to see “Bicycle Parking, Publicly Accessible: At least 20% more Class I spaces and 10 more Class II spaces beyond minimum requirement” increased to 2 points from 1 point.
-

6) There needs to be higher bicycle parking requirements. The current requirements for residential developments are:

Table 19.36.130B
Unassigned Bicycle Parking Requirements

	Class II	Class I
Residential Uses ^[1]		
General	1 space per 15 units	1 space per 4 units
Low-income housing	1 space per 15 units	1 space per 3 units
Senior housing	1 space per 15 units	1 space per 20 units

^[1] Minimum of 4 unassigned Class I bicycle parking spaces shall be provided for each residential development.

Everyone living along ECR should be able to use a bicycle for frequent local trips. Lugging a bicycle up multiple flights of stairs to one's home is not an acceptable method to provide secure parking. Therefore, we suggest changing the bicycle Class I parking requirements to 1 Class I space per 1 bedroom for General and Low-income housing. For Senior housing, it should be at least 1 space per unit. This matches the [VTA Bicycle Technical Guidelines](#) and ‘Best’ values as listed in the Silicon Valley Bicycle Coalition’s [Bicycle Friendly Development Guidelines](#) (see below). We encourage you to adopt the ‘Best’ values for the other bicycle parking criteria, as listed below.

Criteria	Residential, Commercial or Retail	Metrics	Not recommended	Good	Better	Best
Bike storage and parking (continued)						
Residential: Tenant/Resident secure bike parking (Class 1)	Residential	Long-term bike parking spaces per bedroom		Meets city's building code/parking requirements.	Association of Pedestrian and Bicycle Professionals (APBP) guidelines: [.5] bike space per bedroom or [1-4 bike spaces] per [4] homes	1 bike space per bedroom or more
Residential: Guest parking (Class 2)	Residential	Short-term bike parking spaces per bedroom	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [.05 bike space] per bedroom or [1 bike space] per [20] homes	1 bike space per 10 homes or more
Commercial: Tenant/employee secure bike parking (Class 1)	Commercial	Long-term bike parking spaces per square feet		Meets city's building code/parking requirements.	APBP: [1-1.5 bike spaces] per [10,000] sq.ft. of floor area.	1 bike space per 5,000 sq ft or better
Commercial: Guest parking (Class 2)	Commercial	Short-term bike parking spaces per square feet	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [1 bike space] per each [20,000] sq.ft. of floor area.	1 bike space per 10,000 sq ft or better
Retail: Tenant/employee secure bike parking (Class 1)	Retail	Long-term bike parking spaces per square feet		Meets city's building code/parking requirements.	APBP: [1 bike space] per [10,000-12,000] sq.ft. of floor area	1 bike space per 5,000 sq ft or better
Retail: Guest parking (Class 2)	Retail	Short-term bike parking spaces per square feet	Substandard short-term bike rack design that only allows wheels to be locked (See VTA Bicycle Technical Guidelines 10-1)	Meets city's building code/parking requirements.	APBP: [1 bike space] per each [5,000] sq.ft. of floor area.	1 bike space per 2,500 sq ft or better
Alternative bike storage	All	Cargo, family, recumbent bikes space	No bike parking provided that would accommodate oversized bicycles.			At least one Class 1 bike parking space for oversized bicycles per every twenty Class 1 bike parking spaces.
	All	Electric bike (e-bikes) space with charging stations	No charging stations for e-bikes.			At least one Class 1 bike parking space with charging station per every fifty Class 1 bike parking spaces.

7) Appendix D of the ECR SP has a list of projects to address congestion caused by future development on ECR. We are particularly concerned about the project planned for Fair Oaks & ECR (intersection #8, pg xii), which will widen ECR to add second left turn lanes, increasing exposure time for peds and bikes crossing the street to save cars an average of just 5 seconds during AM rush hour. We should not be increasing exposure to peds and bikes crossing the street just so cars can go faster. That will make our city less walkable and bikeable, which goes against our city goals of reducing emissions, reducing VMT, and making active transportation more appealing for all. Please reevaluate or cancel this project.

Thank you for this opportunity to comment on the draft El Camino Real Specific Plan. Please let us know if you have any questions about our input. We would be more than happy to meet with anyone who has questions.

Sincerely,

Ari Feinsmith & John Cordes on behalf of [Bike Sunnyvale](#), SVBC

Jeffrey Cucinotta

From: Ari Feinsmith [REDACTED]
Sent: Monday, May 9, 2022 12:15 AM
To: Council AnswerPoint; OCM AP; Trudi Ryan; CDD-Admin AP
Cc: Jeffrey Cucinotta
Subject: Please Use VTA County Bicycle Guidelines for Minimum Bike Parking in ECRSP

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Kent Stephens, Trudi Ryan, and Sunnyvale City Council,

I want to bring your attention to a problem with the minimum bicycle parking requirements in the ECRSP draft.

The context: Here are the current minimum bicycle parking requirements in the ECRSP draft. For reference, Class II Bike Parking = short-term bike parking (ex: bike racks), and Class I Bike Parking = long-term bike parking (ex: bike lockers).

Table 19.36.130B
Unassigned Bicycle Parking Requirements

	Class II	Class I
Residential Uses ^[1]		
General	1 space per 15 units	1 space per 4 units
Low-income housing	1 space per 15 units	1 space per 3 units
Senior housing	1 space per 15 units	1 space per 20 units

^[1] Minimum of 4 unassigned Class I bicycle parking spaces shall be provided for each residential development.

[Source:](#) SMC Ch 19.36, pg 18

The Problem: The minimum requirements for Class I long-term parking are much too low. The requirements in the [VTA Bicycle Technical Guidelines February 2022](#) (section 10-13) state that all residential units should have at least 1 Class I long-term bike parking spot per unit, and the gold standard is 1 per bedroom.

Table 10-3
Bicycle Parking Supply Recommendations

Use	Recommended Long-Term Spaces	Recommended Short-Term Spaces
	Minimum: For communities with bicycle commute rates less than 2% Goal: For communities with higher mode shift goals	
Residential (such as apartments, condominiums & townhouses)	Minimum: 1 per unit Goal: 1 per bedroom	Minimum: 1 per 20 units

These guidelines are used in the rest of the city, except in the ECRSP Draft for some reason. I am concerned that unless this is changed, developers along ECR won't build enough long-term bike parking, forcing residents to lug their bicycles up the stairs or through the elevator (if it fits) to store them in their apartments. This will make cycling very inconvenient for residents living along ECR. We should be making it easier for people to use their bicycles, not harder.

The Solution: Please change the Class I long-term bicycle parking requirements in the ECRSP draft to match the VTA Bicycle Technical Guidelines.

As for the Class I short-term requirements, the VTA Bicycle Technical Guidelines suggest a minimum of 1 Class I parking space per 20 units. This is actually not as good as the current draft's recommendation of 1 Class I short-term parking space per 15 units. Therefore, the current draft's minimum requirement for Class I bike parking is preferred.

I hope this change can be implemented. I have other suggestions for the ECRSP as well, which I will send in another email.

-Ari Feinsmith
Team Leader of [Bike Sunnyvale](#)

Jeffrey Cucinotta

From: Lillian Tsang
Sent: Tuesday, May 10, 2022 4:27 PM
To: Jeffrey Cucinotta
Subject: FW: Bicycle Related Improvements for ECRSP

FYI



Lillian Tsang, PE
Principal Transportation Engineer
Department of Public Works

Phone: 408-730-7556
Email: ltsang@sunnyvale.ca.gov

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From: Ari Feinsmith [REDACTED]
Sent: Tuesday, May 10, 2022 2:27 AM
To: Council AnswerPoint <council@sunnyvale.ca.gov>
Cc: BPAC AP <BPAC@sunnyvale.ca.gov>
Subject: Bicycle Related Improvements for ECRSP

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Sunnyvale City Council,

Here are my suggestions for improving the ECRSP. Please advocate for these changes at tonight's study session.

1. **Make bike parking standards match with VTA Bicycle Technical Guidelines Feb 2022:** The current Class I (aka long-term) bike parking requirements in the ECRSP draft require only 1 long-term bike parking space (ex: bike locker or secure room) per 3-20 dwelling units. This is much too low, and unless this is changed, developers along ECR won't build enough long-term bike parking, forcing residents to lug their bicycles up the stairs or through the elevator (if it fits) to store them in their apartments. The city should use the VTA Bicycle Technical Guidelines Feb 2022 standards, which require 1 long-term bike parking space per dwelling unit.
2. **Add a mid-block crossing on ECR between Hollenbeck ave and Mary ave** for consideration in the plan. This block is 0.4 miles. This means if you want to walk from mid-block on one side of ECR to the other side, it will take $0.2 \times 2 = 0.4$ miles, which is too long.
3. **Ped/Bike pathways incentive program:** Developers along ECR with frontages onto multiple streets can build +2 additional dwelling units/acre (aka density bonus point) if they make a public bike/ped trail connecting the 2 streets through their property. However, due to the diversity of parcel shapes, 2 properties that are the same size may need differing lengths in pathways. Therefore, I propose to make the incentive based on a sliding scale (rather than a flat +2), where developers get an additional density bonus point for every x number of linear ft of pathway built, up to 4 points.

4. **Strengthen SD-P2:** This policy currently says to consider removing on-street parking everywhere by 2032. Instead, it should say "Consider removing on-street parking on Auto row and commit to removing parking everywhere else by 2032."
5. **Prioritize getting continuous bike lanes on high-development segments.** As parcels redevelop, developers must install protected bike lanes on ECR along their frontage. The city should evaluate which segments or blocks are getting high levels of development, and prioritize installing bike lanes on the frontage of the non-developing parcels in these blocks to fill in the gaps.
6. **Intersection improvements for small streets** (see [slides 9 and 10](#))
7. **ECR & Fair Oaks project from [Appendix D Transportation Impact Analysis](#):** This project will widen ECR to add 2nd left turn lanes on both sides. This will require new right-of-way, which will cost lots of money, and increase bike/ped exposure to traffic while crossing the street. It will only reduce driver delays at the intersection by 5 seconds during rush hour. It would increase vehicle throughput capacity, which encourages more people to drive. This goes against the city's goals of decreasing VMT.
8. **Wolfe & Kifer project from [Appendix D Transportation Impact Analysis](#):** This project will widen Kifer and require new right-of-way, which will cost lots of money, and also make it more dangerous and unfriendly for cyclists and pedestrians to cross Kifer. The city doesn't even know how much this will reduce delays! It also plans to widen some travel lanes from 11 ft to 12 ft, which encourages speeding [according to NACTO](#).
9. **Fair Oaks & Arques project from [Appendix D Transportation Impact Analysis](#):** This project requires swapping the bike lane and the right turn lane on the westbound approach of E. Arques Ave and Fair Oaks. As drivers on Arques approach the intersection, the through travel lane transitions into a right-turn-only lane, which is dangerous [according to NACTO](#). Besides, this project will only save 2.5-6 seconds, which is not worth the added danger.



Let me know if you have any clarifying questions.

-Ari



Virus-free. www.avg.com

Jeffrey Cucinotta

From: Brent Miller [REDACTED]
Sent: Sunday, March 20, 2022 3:05 PM
To: Jeffrey Cucinotta
Subject: comments on Draft EIR project no. 2014-7432

Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hello Mr. Cucinotta,

I am a Sunnyvale Resident with comments on the El Camino Real Specific Plan (Sunnyvale Planning Project 2014-7432).

I have lived in Sunnyvale starting in 1982 and consider myself to have a well-informed, balanced view of the area's challenges. In particular, I use mixed methods of transportation including (from most frequent to least frequent) cycling, walking/jogging, and driving motor vehicles (passenger and multi-axle). I encourage for my family a preference of non-motored transportation within practicality.

I have two comments:

(1) Please increase the setback for buildings farther than has been allowed between Hollenbeck and Mathilda. Chick-Fil-A has proven that the setback is insufficient for any highly frequented establishment. While pedestrians' ability to access the building from the sidewalk is good, the setback is too small, creating a blind approach for drivers leaving the lot and cyclists/pedestrians on the highway. Worse yet, because of the small setback, there is no option to widen pavement for a turn lane or a bicycle lane. This location has become utterly unsafe as a transportation corridor for cyclists and pedestrians--anyone traveling this route must effectively stop at this location. Furthermore, the eastbound right-hand driving lane of El Camino Real is rendered unusable, creating hazards for drivers approaching and intending to turn right onto Mathilda or any upcoming business. There is near-uniform frustration among residents in the neighboring communities south of El Camino Real. I believe this pattern should not be repeated.

(2) The state has been removing "corner pedestrian islands" along the El Camino corridor. I would like the city to resist these changes and reverse them if possible. Removing the dedicated turn lanes with corner pedestrian islands has created much higher contention between motorists and pedestrians. A single car proceeding forward now blocks all other right-turning vehicles, and when a green light becomes available the drivers are often impatient to go, failing to recognize as they accelerate from behind the straight-proceeding vehicle that their path to turn right is now blocked by pedestrians. At this point a single right-turning vehicle blocks all forward-proceeding vehicles. Sometimes only a single vehicle succeeds in proceeding during a green cycle, worsening congestion and worsening the patience of commute drivers. Often, right-turning drivers fail to merge to their right, creating a hazardous predicament for cyclists. Furthermore, as a parent shepherding children, removal of the pedestrian islands puts me in a position of needing to watch for traffic approaching from both ahead (vehicles turning left) and behind (vehicles turning right). I don't know if the city plan has any interaction with state projects, but I mention this comment anyway because they do affect each other and the state activities are undermining the goal of cooperative mixed-mode transportation.

I hope my comments are useful. Thank you for reading.

Yours,
Brent Miller
563 Crawford Drive
Sunnyvale, CA 94087

Jeffrey Cucinotta

From: [REDACTED]
Sent: Monday, April 25, 2022 8:01 PM
To: Jeffrey Cucinotta
Subject: SIGNIFICANT SPELLING ERROR FIXED: Additional El Camino Questions and Comments

Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

SIGNIFICANT SPELLING ERROR FIXED--spell checking replaced "anti" with "ant" in [B]. I fixed it below. Now it reads "anti displacement" as originally intended.

Additional El Camino Questions and Comments:

E.I.R.:

[A]

Perhaps I overlooked it... What are the underlying assumptions of the Hexagon traffic analysis? For instance, did they assuming some level of mode shift to alternative transportation?

[B]

C.E.Q.A. requires the examination of greenhouse gas omissions. Yet what isn't examined in the E.I.R., is the increased omissions from new longer trips needed to make up for lost stores and services. For instance, the lands under Michaels and Dollar Tree are to be rezoned for redevelopment. The nearest Michael's is in Cupertino. The nearest Dollar Tree is in Santa Clara. On page 1-6 of the E.I.R., it states, "ways in which the significant effects of the proposed project might be avoided or mitigated", yet identifying the impact wasn't performed and no anti displacement strategy was set forth for the new development. Simply allocating floor space for retail in new buildings is not an anti displacement strategy. What goes in might not be reflective of what was there pre-redevelopment. Consequently, people may find themselves compelled to drive significantly more, exacerbating traffic and greenhouse gas emissions which the analysis is wanting on.

[C]

Perhaps I am overlooking it... On page 3.7-17, a "December 14, 2020" Hexagon e-mail was explicitly cited. I don't recall seeing it.

[D]

Page 1-2, Under 1.2.2 Scoping Results header, "The City received 17 comment letters on the Notice of Preparation for the project's Draft EIR. A copy of each letter is included in Appendix A." They all don't seem to be there.

[E]

As El Camino becomes more congested, in part because of the project, traffic may find it faster to route around El Camino Real onto neighborhood side streets such as Henderson, Iris, and Old San Francisco to avoid stretches of El Camino. Or another example; Wolfe to Gary to Gail to Linden to Maria to El Camino to dodge the El Camino/Wolfe intersection. Is congestion avoidance part of the analysis beyond just some percentage growth in counts? I believe the Henderson/El Camino intersection had some projections.

Specific Plan:

[1]

Are the landscaping standards somewhere else? I didn't find much dealing with standards apart from 35 foot tree spacing. Singapore is trying to recover from earlier poor planning. They have a program called LUSH (Landscaping for Urban Spaces and High-Rises). A pavement sea with and the occasional hole with a tree popping out is poor design in some people's minds.

--Zach--

May 8, 2022

El Camino Real Specific Plan

Mayor Klein and City Councilmembers,

After reading the 2022 El Camino Real Specific Plan, I am left with two questions:

Where are the trees and landscaping?

How wide is the sidewalk?

The El Camino Real Specific Plan is an opportunity to form a cohesive aesthetic for El Camino Real. Bike lanes and wide sidewalks are important components. Trees are also an important component.

Trees soften the visual impact of large buildings, shade the bike lanes and sidewalks, slow traffic, reduce stormwater runoff and filter pollutants. Trees help mitigate the heat island effect caused by paved surfaces and the urban canyon effect caused by large buildings.

The financial and environmental benefits of trees are increasingly recognized. Trees are important to a city striving to meet green environmental standards.

Many sections of El Camino Real contain a parkway strip, which is a landscaped area next to the sidewalk that includes trees. For maximum visual and environmental benefit, the parkway strip should be continuous and permeable to prevent stormwater runoff. Trees should be planted at regular intervals and should be large enough to match or exceed the height of the buildings. A 15-foot-wide parking strip is typical along major roads.

Parkway strips are impactful and should be required of all developments.

The 2007 Precise Plan for El Camino Real recognized the value of landscaped parking strips and trees and provided guidance to ensure that the community benefitted from well-maintained landscaping.

Reference: 2.4.6 – Public Streetscape (page 27), 4.1.2 – Provide Landscaped Setbacks At All Street Edges (page 33), 4.5.1 – Provide Landscape Setbacks From The Street (page 49)

In a major departure from the 2007 plan, the 2022 El Camino Real Specific Plan does not include a parkway strip.

The 2022 El Camino Real Specific Plan de-emphasizes trees. Instead of a dedicated parkway strip, trees have been relegated to the “furniture zone” which they will share with streetlights, bicycle parking, trash cans, bus shelters, street furniture, planting strips, wayfinding elements and public art (page 88).

Not enough space has been preserved for trees. Trees are expected to be planted in pits with grates. This will not reduce the heat island effect, prevent stormwater runoff, reduce the urban canyon effect, or look very pleasant. Trees may not survive this environment, as they need space to grow. A parkway strip with adequate permeable materials will support the trees and provide benefits for the community. Support for tree plantings provides a strong message about the city's commitment to the environment.

The plan states that tree branches should not obstruct building or wayfinding signage and may be pruned (page 96). Inappropriate pruning will affect the benefits the trees provide and change the aesthetic of the area, possibly negating the intent of the El Camino Real Precise Plan. A more appropriate action is to design signs that don't affect trees.

The plan needs more landscaping and accommodations for the trees.

Another concern is the width of the sidewalk. The plan shows the Through Zone (sidewalk) and Furniture Zone (everything else), which are a combined 13-foot-wide section of paved surface. The space set aside for sidewalks (Through Zone) is not large enough to account for all the items in the Furniture Zone. The drawings in the document are deceptively simple and do not provide dimensions. The width of the Through Zone will be reduced by bus shelters, bus pullouts, trees, and other items within the Furniture Zone. Final dimensions were not given, but the Through Zone near a bus stop might be reduced by five feet or more. The plan should ensure a wide, consistent, Through Zone, regardless of what is in the Furniture Zone. A wide Furniture Zone would allow placement of the trees, bus shelters, benches, and other items without interfering with the Through Zone.

The plan should be updated to show a realistic Furniture Zone (preferably a wide parking strip) and a realistic Through Zone with dimensions. Building designs and setback should be adjusted accordingly.

Thank you,
Mary Brunkhorst

Jeffrey Cucinotta

From: Yoo-Yoo Yeh [REDACTED]
Sent: Monday, May 2, 2022 7:03 PM
To: Guia Sharma
Cc: Planning AP; Jeffrey Cucinotta
Subject: Re: Zoom ECR Corridor Meeting - needs passcode

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi Guia,

Thank you very much for helping to remedy the situation, much appreciated, technology is a challenging obstacle in these times.

I unfortunately won't be able to stay until the public comment section at the end, but I had submitted some comments on the ECR Corridor website. I am hoping that we can increase tree count on the open space areas, and along the roadways if possible. Trees provide water filtration, prevention of run-off, shade for pedestrians, reduction of air pollution, reduction of urban heat islands during our increasingly hot summer heat waves, and habitat for native birds and animals. Thank you very much.

best,
Yoo-Yoo

On Mon, May 2, 2022 at 6:48 PM Guia Sharma <GSharma@sunnyvale.ca.gov> wrote:

Good evening Yoo-Yoo,

Thank you for bringing this issue to my attention. I extend my deepest apologies for this inconvenience. The passcode requirement for the meeting has been removed and the meeting has restarted from the beginning.

Best,



Guia Sharma

Administrative Aide

Community Development Department

Follow us on:

Email: gsharma@sunnyvale.ca.gov



Phone: (408) 730-7432

Sunnyvale.ca.gov

* The Sunnyvale Planning Division continues to provide virtual services, such as electronic permit submittals and virtual meetings. Limited in-person services are also available at the One Stop Permit Center - <https://sunnyvale.ca.gov/news/topics/coronavirus.htm>. Masks and appointments (pcappointment@sunnyvale.ca.gov) are strongly encouraged. Please note that Olive Avenue is closed and the entry to City Hall and the One-Stop Permit Center is 607 All America Way (one block south of Olive).

General zoning information is also available on the Planning Division webpage - <https://sunnyvale.ca.gov/business/planning/default.htm>. Due to high call/email volumes, a Planner will respond to you within 4 business days, please be patient with us during this time.

From: Yoo-Yoo Yeh [REDACTED]
Sent: Monday, May 2, 2022 6:14 PM
To: Guia Sharma <GSharma@sunnyvale.ca.gov>; Planning AP <planning@sunnyvale.ca.gov>
Subject: Zoom ECR Corridor Meeting - needs passcode

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Hi,

I'm trying to call into the Public ECR Study Session this evening, but both the Zoom and the phone number require a passcode.

This is supposed to be a PUBLIC meeting, but those of us in the public are blocked from joining by this passcode. Please let us in! This is very frustrating.

best,

Yoo-Yoo Yeh

Sunnyvale resident

Jeffrey Cucinotta

From: Ed Gocka [REDACTED]
Sent: Tuesday, April 26, 2022 4:51 PM
To: Jeffrey Cucinotta
Subject: ECR Specific Plan DEIR Comment
Categories: El Camino Real Specific Plan Update

ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

April 26, 2022

Mr. Jeffrey Cucinotta

Senior Planner

Sunnyvale, CA

Dear Mr. Cucinotta,

First, I will start out with a comment: As a participant in the public outreach programs for ECRSP from 2015-2017, I am very frustrated with the changes made to option Alternative R Plus, as selected by the City Council in August 2017, when compared against what is proposed in the DEIR. It took a lot of time to get to the August 2017 consensus, and, even though it was not exactly what I personally wanted, I could live with it. Given the proposed changes, I feel that I wasted a lot of time from 2015-2017 participating in the public outreach.

Regarding the changes since 2017, made to the East Segment of El Camino, east of Henderson Ave (south-side): I don't understand why property zoned for Commercial has been converted to Mixed-Use. Ostensibly, the changes are being driven by new state laws, but I don't see how the new state laws would drive these specific changes. The Commercial zonings on El Camino are very important, because the city does not have much of it, so it serves the entire city, plus surrounding cities. If the Commercial zoning is converted to Mixed-Use zoning, it cannot easily be changed back to Commercial zoning, which makes the changes more or less permanent. Even though Commercial land use has struggled recently, that can easily change, especially with the population influx to the region. Keeping the Commercial zoning, and then revisiting the zoning in 10 years would be a more prudent approach.

I also believe that the Commercial component of the Mixed-Use developments will mostly serve the residential portion, which is fine for most Mixed-Use developments, but not when replacing Commercial zoning on El Camino that is a regional destination.

Regarding the Mixed-Use developments, I want to see a maximum building height and maximum # of units/acre, if all of the bonuses are realized. Reading the DEIR, I don't get a sense of what the possibilities are in terms of height or density. Without this information, it is difficult to reason what the proposed Mixed-Use developments might look like against the adjacent single family home neighborhoods.

Thank you,

Ed Gocka

Sunnyvale resident