



TRANSMITTED VIA EMAIL

May 8, 2023

Mayor Klein, Vice Mayor Din, Sunnyvale City Council,
and Sunnyvale Planning Commission
456 West Olive Avenue
Sunnyvale CA 94088-3707

**Re: Moffett Park Specific Plan, May 8th Planning Commission and May 16th
City Council Hearings**

Dear Mayor Klein, Vice Mayor Din, Sunnyvale City Council, and Sunnyvale
Planning Commissioners,

On behalf of SV@Home, we write to you today regarding the Moffett Park Specific Plan (MPSP). We would like to commend your leadership and staff's efforts for envisioning a Moffett Park that will transform this underutilized part of the city into an exciting mixed-use, Eco-Innovation District accessible to the full diversity of people who live and work in Sunnyvale. This is the unifying vision we have seen the plan improve over time. SV@Home has been part of this process since the beginning roughly five years ago, and we are excited to reach the end of this long, complicated, and ultimately rewarding undertaking.

SV@Home is committed to the success of this Plan and that is why we are writing to share our remaining concerns. The plan recognizes that expanding access to the opportunities and resources of Moffett Park will require the inclusion of homes affordable to residents of all incomes. We have outlined our core concerns about what we see as limits to the feasibility and the strategies of meeting the Plan's affordable housing targets in multiple letters (please refer to our letters [here](#) and [here](#)), and meetings with Staff, and several City Councilmembers.

Our specific recommendations at this stage can be summarized in four points:

- **Make the 15% affordable target a requirement, with opportunities for deeper levels of affordability, rather than depending on the city's current Inclusionary BMR Rental Housing Program.**
- **Make MPSP the preferred investment area for any Commercial Linkage Fee collected within the MPSP area.**

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- **Prioritize affordable housing and clarify the metrics that will be used to calculate the allocation of the community benefits funded by the commercial density bonus fees.**
- **Reduce the City's development fees for affordable housing within the plan area.**

We would like to raise an additional concern we feel reinforces our earlier comments. The MPSP was developed around the assumption of the attractiveness of commercial office development in a vibrant Silicon Valley economy. In the wake of the COVID-19 pandemic, which actually began prior to the rise of remote work, the demand for office space has been significantly reduced. (See [CBRE 2023 outlook](#), and [here](#) on recent vacancy trends.) In addition, Sunnyvale has a very active pipeline of nine million square feet of office approved or under construction as of our most recent data from January, 2022. (For context — this is an estimated 30,000 new jobs approved, and 3,700 new homes. Roughly nine jobs for every new home).

In the MPSP, affordable housing development is dependent on the Housing Mitigation Fee and the bonus structure of the Community Benefits Program to fund affordable housing, both of which are directly tied to commercial office development.

We believe this makes our recommendations even more important. We have expressed significant concerns that the Plan's dependence on the City's relatively recently adopted 15% Inclusionary BMR Rental Housing Program, which by law must provide alternative ways of mitigating the 15% requirement. Of primary concern is that currently the requirements may be met by paying an in lieu fee, or building/funding affordable housing elsewhere in the city, which will not achieve the stated goal of the Plan. On the other hand, some of the alternative mitigations listed in the program, such as land dedications commensurate in value, would allow for the potential of both more affordable units and deeper levels of affordability in these units. This would allow a mix of inclusionary units integrated into market residential and stand-alone, 100% deed-restricted affordable housing that leverages additional public resources. Without this clear 15% requirement in the Plan, the area may develop without the desired integration of affordable homes.

Similarly the expected limits on commercial fees and the fees from bonus commercial development will mean that these fees will be scarce and of greater importance to the ability to build the desired affordable housing. Prioritizing both will be doing what we can to reach the shared goals. There are many priorities in the Plan, all of which are valuable, but if this is not an economically and racially integrated new community, a significant portion of the Sunnyvale community will be excluded from full enjoyment of the rich resources that are being planned.

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Another tool we have suggested is to reduce city development fees for affordable housing within the plan area. This tool can incentivize developers to build more affordable units by minimizing their permitting costs.

We are excited to reach the completion of this planning process and are hopeful we can be seen as a resource to reach the vision of an inclusive Moffett Park where all Sunnyvale residents have the opportunity to live and prosper in this future Eco-Innovation District. Moffett Park is going to be a magnificent place and it has a huge opportunity to serve as a regional model for inclusiveness and accessibility.

Please do not hesitate to contact us for any questions you may have.

Sincerely,

Regina Celestin Williams

Executive Director

SV@Home

Corey Smith

Executive Director

Housing Action Coalition