



CITY OF CAMPBELL
City Manager's Office

August 5, 2022

Housing Elements Team
State Department of Housing and Community Development
C/O Land Use and Planning Unit
2020 W. El Camino Ave., Suite 500
Sacramento, CA 95833
HousingElements@hcd.ca.gov

**RE: HCD Submittal Draft of Campbell's Plan for Housing
(2023-2031 Housing Element)**

Dear Housing Elements Team,

This letter serves to transmit the City of Campbell's draft sixth cycle Housing Element ("Campbell's Plan for Housing") that encompasses the 2023-2031 planning period.

As an introduction to the document, we wanted to emphasize several guiding principles and focus areas within Campbell's Plan for Housing that we believe are important for Housing and Community Development's (HCD's) review and consideration.

First, we want to assure HCD that Campbell has recognized the housing challenges that currently exist within California that are acutely prevalent within the San Francisco Bay Area and within Santa Clara County. As Campbell currently has a jobs / housing ratio of 1.62 (number of jobs per housing units), and a median home price which is over \$1.4 million, we acknowledge the need to intentionally implement land use changes, programs, and policies to address housing affordability challenges and provide the tools necessary to exceed the City's Regional Housing Needs Allocation (RHNA). In addition, Campbell has embraced the need to implement housing policies that affirmatively further fair housing by increasing outreach to all members of the community and implementing programs that allow equitable access to housing and resources among different populations while addressing legacy issues associated with concentrations of affluence and poverty.

The following key areas of the update process have represented this focus:

- **Outreach** – Campbell conducted an extensive public outreach effort to facilitate broad stakeholder engagement as part of "Campbell's Plan for Housing", which includes

- Postcard mailings to all addresses in Campbell.
 - Advertisements on the front page of Campbell's newspaper (The Campbell Press) over a two-month period and within the Campbell Recreation Guide which is distributed to every household in Campbell.
 - Pop-up booths at Campbell's Farmer's Market and seasonal festivals (Octoberfest) that included engaging mapping exercises for the community to participate in.
 - Distribution of flyers in English and Spanish.
 - Creation of an Online Housing Survey completed by over 425 respondents.
 - Targeted email messaging campaign (with opt in lists) that sent email updates to over 4,000 contacts.
 - Five Community Outreach meetings, eight Meetings with Community Groups and Service Providers, and four Roundtable meetings with Affordable and Market Rate Developers.
 - Facilitation of over 20 meetings with the public and developers through an advertised online appointment system.
- **Residential Density** – Recognizing that sufficient affordable housing can only be achieved through higher density development, Campbell has significantly increased its residential densities. Prior to this Housing Element, Campbell's high density residential districts were planned for 27 dwelling units per acre. Under Campbell's Plan for Housing, Campbell has created three new high density residential districts, including the new Transit Oriented (75 du/acre), Commercial Corridor (60 du/acre), and High Density (45 du/acre) districts. Campbell's Transit Oriented designation surrounds the three light rail stations in the city and aligns with regional and state principles regarding Transit Oriented Development.
 - **Housing Opportunity Site Buffer** – Campbell's assigned RHNA for the 2023-2031 cycle is 2,977 units. As an initial target, Campbell has identified potential Housing Opportunity Sites and residential densities that would allow for the development of up to 6,640 units, a target that is over two times higher than the City's RHNA. As discussed further below, Campbell expects to further reduce this target, prior to final adoption of the Housing element, to be closer to the City's RHNA plus a 30% buffer as recommended by HCD (approximately 3,870 units). In achieving this target, the City appreciates HCD's assistance and feedback.
 - **Affirmatively Furthering Fair Housing (AFFH) and Housing Opportunity Sites** – Campbell wants to ensure that residents of new housing development planned under the Housing Element have equal access to resources (schools, transportation, shopping, parks). For this, Campbell conducted extensive AFFH mapping of these resources to guide the placement of Housing Opportunity Sites in the city.
 - **Close Engagement with Service Providers** – Campbell staff conducted multiple meetings with known service providers in the city to identify the needs of special needs populations and under-represented groups, in order to ensure that new housing and housing policies to be implemented under Campbell's Plan for Housing meet the needs of these groups.

- **Objective Standards and Test fits of Housing Sites** – In tandem with the preparation of Campbell's Plan for Housing, Campbell is also developing Objective Standards to apply to the new high density residential districts and all other residential development, in compliance with the Housing Accountability Act. As development of the objective standards includes the creation of test fits of the zoning standards on identified housing sites, we anticipate this process (which will occur in the late summer / fall 2022) will help demonstrate the development feasibility of Campbell's Housing Opportunity Sites and ultimately streamline housing development once adopted.

Coordination with HCD Staff and Feedback

Prior to submitting Campbell's Plan for Housing to HCD for review, Campbell staff proactively contacted HCD staff several times for initial feedback and direction on key elements of the Housing Element, including a video-conference meeting and subsequent emails between Campbell and HCD staff. HCD staff was very responsive and constructive in providing feedback, including a reference of other Housing Elements as case studies. We deeply appreciate this initial guidance and have incorporated this feedback into Campbell's Plan for Housing.

Public Review and Revisions

Consistent with State Law, the City distributed Campbell's Plan for Housing for a 30-day public review between June 9, 2022, and July 11, 2022. Public notification including social media posting, notifications to over 4,000 individuals through emails, and notices on the front page of Campbell's local newspaper (The Campbell Press).

The City received thirteen (13) comments with feedback on areas such as enhanced renter protections, modifications to parking standards, and individual Housing Opportunity Sites. At its meeting of August 2, 2022, the City Council reviewed these comments closely and made several modifications to the Housing Element in response, including the creation of new programs and modifications to proposed programs and actions.

HCD Review and Next Steps

We look forward to working closely with your staff on their review of Campbell's Plan for Housing to ensure that Campbell exceeds HCD's expectations and standards.

As noted above, Campbell intends to further evaluate the Housing Opportunity Sites to be included in the Final Campbell's Plan for Housing document. As the initial list of Housing Opportunity Sites provides for residential development that is double the City's assigned RHNA, we intend to further evaluate any necessary reductions, based on public feedback, further technical analysis of Housing Opportunity Site development feasibility, and environmental issues as identified in the Environmental Impact Report (EIR) that is currently under preparation. The City anticipates conducting this review in the fall and winter of this year, following completion of the EIR process and after receiving HCD's feedback from this initial 90 day review.

The City would appreciate any direction and feedback from HCD that would assist the City in this evaluation and decision making process. Questions or comments on the HCD Draft may be directed to the following City contacts:

Rob Eastwood, Community Development Director
rob@campbellca.gov | 408-866-2141

Stephen Rose, Senior Planner
stephenr@campbellca.gov | 408-866-2142

On behalf of the City of Campbell, thank you for the review of this draft Housing Element. We look forward to receiving your feedback.

Sincerely,



Brian Loventhal
City Manager
City of Campbell