

TRANSMITTED VIA EMAIL

October 22, 2018

Darryl Boyd and Jenny Nusebaum
 City of San Jose
 200 East Santa Clara Street, 18th Floor
 San Jose, CA 95113

Dear Mr. Boyd and Ms. Nusebaum

RE: Downtown Strategy 2040 – DEIR

On behalf of SV@Home and our members, we are pleased to have the opportunity to comment on the Draft EIR for the Downtown Strategy 2040 General Plan Update. SV@Home supports the expanded Downtown frame, particularly as we begin to envision development in the Diridon Station Area Plan and surrounding neighborhoods. We are also very supportive of any action that adds residential dwelling unit capacity to the Downtown. A vibrant downtown needs both residents and employees.

We do, however, have three concerns about the underlying assumptions of the EIR.

- 1) **We do not agree with the strategy of shifting growth allowances from other Urban Villages to Downtown.**

While we agree that we need more housing in the Downtown, and appreciate the efforts to expand these allowances, we should not be reducing the opportunities for residential growth in other parts of the City. We simply need more housing everywhere.

- 2) **We believe that the additional 4000 dwelling units proposed by the Downtown Strategy 2040 General Plan Update, and reflected in the EIR, is insufficient based on plans for new employment growth in the Plan Area.**

With the Diridon Station Plan underway, and plans for as many as 20-30,000 new jobs, more housing is needed. Members of the SAAG have consistently placed the importance of housing, and affordable housing in particular, at the top of the priority list for the Station Area.

We understand that the GP 2040 was designed as a “Jobs-First” General plan. But our housing needs have become significantly more acute since the Plan was adopted in 2011, even as the City has made strides in acknowledging the challenge and working to bring more residential development on line.

When originally adopted, the San Jose General Plan contemplated the development of 48,659 new jobs and 11,160 new homes within the Downtown and Station area plans (which have now been combined to include both sides of Highway 87, as far west as the Caltrain tracks) by 2040. This can be translated as 4.36 new jobs per new dwelling unit.

Ron Gonzales, Chair
*Hispanic Foundation
 of Silicon Valley*

Janice Jensen, Vice Chair
*Habitat for Humanity
 East Bay/Silicon Valley*

Kevin Zwick, Treasurer
Housing Trust Silicon Valley

Kathy Thibodeaux, Secretary
KM Thibodeaux Consulting LLC

Shiloh Ballard
Silicon Valley Bicycle Coalition

Bob Brownstein
Working Partnerships USA

Gina Dalma
*Silicon Valley Community
 Foundation*

Katie Ferrick
LinkedIn

Amie Fishman
*Non-Profit Housing Association of
 Northern California*

Javier Gonzalez
Google

Poncho Guevara
Sacred Heart Community Service

Nathan Ho
Silicon Valley Leadership Group

Janikke Klem
Technology Credit Union

Jan Lindenthal
MidPen Housing

Jennifer Loving
Destination: Home

Mary Murtagh
EAH Housing

Chris Neale
The Core Companies

Andrea Osgood
Eden Housing

Kelly Snider
Kelly Snider Consulting

Jennifer Van Every
The Van Every Group

Staff

Leslye Corsiglia
Executive Director

The proposed GP update would add 10,000 jobs and 4,000 dwelling units to the anticipated amount of development by 2040, which represents a ratio of 2.5 jobs per dwelling unit added to the amount of anticipated development.

However, if you take the total into account (58,469 new jobs and 15,160 new units) and subtract out what has already been permitted (estimate based on City of San Jose Planning, Building, and Code Enforcement data and staff), 48,569 jobs and 7,190 dwelling units remain-- or 6.77 new jobs per new dwelling unit.

We believe that these remaining 7,190 residential units will not provide the allowance necessary to accommodate expected growth, and that if residential development is constrained by these allowances, the resulting jobs per housing ratio will set back our collective efforts to respond to the housing needs of our city.

- 3) **We are also concerned that the new expanded Downtown Planned Growth Area boundaries, which are bounded to the west by the Cal Train tracks, are not coterminous with the boundaries of the original Diridon Station Area plan, which includes territory on both sides the Cal Train tracks.**

The proposed amendment to the General Plan that is covered by the pending EIR would take all the planned growth capacity (both jobs and housing) that was included in the Diridon Station Plan and assign them all to Downtown. Thus, the areas west of the tracks that are planned for higher density residential development in the Diridon Station Area – 1) the NW corner of Stockton & Julian; 2) the area bounded by the tracks to east, San Carlos to the south, Sunol St. to the west, and Park Ave. to the north (which includes the 300-unit all-affordable project proposed by First Community Housing); and (3) some residual sites on the south side of San Carlos between the tracks and Sunol St. – would apparently be left with no development capacity, which could amount to several hundred planned units that would no longer be in a Downtown Planned Growth Area.

If it is determined that this is indeed the case, this issue will need to be addressed in the pending EIR, or General Plan amendments for residential development expected for these areas will lack necessary CEQA clearance.

This is an exciting time for San Jose and the future of its Downtown. That said, it is important that the Downtown Strategy 2040 recognize the increased demand for housing to ensure that every job has a home.

Sincerely,



Leslye Corsiglia
Executive Director

