



Moreland West Neighborhood Association

Serving the area of San Jose and Campbell bordered by
Hamilton and Campbell Avenues & San Tomas Aquino Road

City of San Jose
Department of Planning, Building, and Code Enforcement
200 East Santa Clara Street, 3rd Floor Tower
San Jose, CA 95113-1905
Attn: Maira Blanco
Via email: Maira.Blanco@sanjoseca.gov

October 27, 2020

Re: Notice of Preparation of a Draft Environmental Impact Report
El Paseo & 1777 Saratoga Avenue Mixed Use Village Project
PDC19-049 and PD20-006
State Clearinghouse #2020090521

Dear Ms. Blanco:

The Moreland West Neighborhood Association represents the area in San Jose and Campbell bordered by Hamilton Avenue, Campbell Avenue and San Tomas Aquino Road. Our neighborhood is located immediately to the east of the Westgate Center and the El Paseo de Saratoga shopping malls.

We have been monitoring the proposed El Paseo & 1777 Saratoga Avenue Mixed Use Village Project for several months, and our residents have a number of issues that we would like to see analyzed in the Draft EIR. Our specific comments are as follows:

Project Description, Population & Housing

- We would like to request a complete and thorough project description. Both proposed development options should be analyzed in equivalent detail.
- When will we know whether the developer plans to pursue the School or the Non-School Option? We would prefer that one option is selected earlier in the process, so our neighborhood has less uncertainty about the proposed uses. If the applicant is not going to select an option before the environmental review process is complete, please explain that process in the DEIR.
- Please describe in the DEIR the number of residents under both options (~740 dwelling units under the School Option and ~1,100 under the Non-School Option): What total residential population would result under both scenarios? How many beds would be in each dorm unit, and what is the breakdown of apartment sizes?

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- What is the accurate gross acreage for this site? Why does it appear in application documents as 10.76 and 10.86, but then switch to 32.53 and 33.48 acres? Please clarify this information in the DEIR.
- How does this project meet Community Development Policy CD-1.1 to support the “enhancement and development of community character,” when the surrounding community overwhelmingly thinks the project is too dense and tall, and that it isn’t the proper location for a 2,500-student K-12 school? Please include this issue in your discussion of the consistency with plans and policies in the DEIR.
- For the School Option, the plan states that the 194 dorm rooms will house up to 524 students. Will the school cap the live-in student population to that amount? If not, where would other students live?
- What’s the breakdown of daily commute students and live-in students?
- The plan includes residential units for 23 faculty. What is the total expected number of faculty/staff at the school?
- How many people will be employed by the international K-12 boarding school? How many new job opportunities will it create for local residents? How many new residents will be brought in from outside the area to fill the positions?
- How many Below Market Rate units will there be with the School Option and the Non-School Option? Of these, what will the affordability levels be?

Signature Project

- We would like the requirements and restrictions of the Signature Project clearly described and analyzed in the DEIR, with comparisons of the School Option and Non-School Option to other similar projects in the City.
- Should we expect the heights and density allowed for this Signature Project to set the standard for future development of the surrounding Paseo de Saratoga Urban Village?
- A Signature Project is required to have "more than its fair share" of "housing density at 55 dwelling units per acre or higher". The total required dwelling units for this site is 597. Building 1,100 residential units under the Non-School Option would nearly double that number at 102 du/acre. What are the dwelling units per acre for other Signature Projects?
- Are there any other Signature Projects not located near a transit center or along a major transit corridor with 102 du/acre?

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- The project calls for five buildings, the shortest of which is seven stories. How many other Signature Projects have building heights that start at seven stories?
- Are there any other Signature Projects not located near a transit center or along a major transit corridor with building heights that start at seven stories?
- Signature Projects are required to have publicly-accessible open space. If a large private school has priority access to the park area, when exactly will the public -- including several hundred new apartment dwellers -- be allowed to use it?
- How does this project meet Community Development Policy CD-1.6 to provide “publicly accessible spaces that encourage gathering and other active uses” if the public has very limited access to the park space?
- The massive wall formed by the two, 7-story private school buildings along Quito Road seems inconsistent with the following policies:
 - Community Development Policy CD-1.8’s goal to “create an attractive street presence with pedestrian-scaled building and landscaping elements...”
 - Community Development Policy CD-1.11’s goal “to create a more pleasing pedestrian-oriented environment, for new building frontages, include design elements with a human scale, varied and articulated facades using a variety of materials, and entries oriented to public sidewalks or pedestrian pathways. Provide windows or entries along sidewalks and pathways; avoid blank walls that do not enhance the pedestrian experience. Encourage inviting, transparent façades for ground-floor commercial spaces that attract customers by revealing active uses and merchandise displays.”
 - Community Development Policy CD-4.9’s goal “to ensure the design of new or remodeled structures is consistent or complementary with the surrounding neighborhood fabric (including but not limited to prevalent building scale, building materials, and orientation of structures to the street).

Traffic and Circulation

- Other current development projects in the area include the Avalon Expansion project along Saratoga Avenue, which will add 307 more residential units, and the Quito Village Development project on Cox Avenue, which will add 90 townhomes. Please ensure that these projects are included in the cumulative traffic analysis.
- The DEIR should include a cumulative traffic analysis for the entire Urban Village area (El Paseo, Westgate, Westgate West and Prospect between Saratoga and Lawrence) at full buildout at the same density as the proposed project.

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- What street improvements do you plan to accommodate traffic generated by a large school or over 2,000 new residents? Please describe proposed traffic mitigation measures in the DEIR.
- The traffic analysis should clearly show traffic calculation differences between the School Option and the Non-School Option.
- One big issue is the need to move vehicular traffic through the busy intersections of Prospect/Saratoga, Prospect/Lawrence, Campbell/Hamilton, and Saratoga/Quito/Lawrence. The DEIR should look at possible road improvements to ease traffic flow at these intersections. Two ideas come to mind: A dedicated right-turn lane from westbound Campbell Ave. into Westgate Mall; and some "cutouts" to enable buses to pull off the road to pick up or drop off passengers.
- What is the current morning drive time for Prospect High School's 1,500 students within a 1.5-mile radius? How many Prospect High School students currently cut through neighborhoods to avoid delays at major roads and intersections? How will the additional drop-off of nearly 2,000 students at El Paseo affect morning drive times?
- The School Option envisions a 2,500-student K-12 school tenant. Even with good physical design and active management, drop-off and pick-up at smaller, nearby public and private schools brings vehicular traffic to a crawl. What specific physical elements (e.g. large and/or multiple drop-off and pick-up zones, signage) and management provisions (e.g. morning and afternoon traffic managers, crossing guards, car placards for pick-up identification) will be in place at the project site to mitigate traffic and ensure student safety at school drop-off and pick-up times?

Bicycle and Pedestrian Facilities

- Please describe in the DEIR the bicycle facilities provided by the project, including bike lockers and racks, bicycle lanes, etc.
- Please describe in the DEIR the improvements planned to make the area more bicycle and pedestrian-friendly, including safe pedestrian connections to the site. Please discuss connection improvements between El Paseo de Saratoga and 1) Westgate Center, 2) the Moreland West neighborhood, 3) the Baker West neighborhood, 4) the El Quito neighborhood, and 5) the Saratoga Woods neighborhood.

Transit Facilities

- Please describe the distance from the site to light rail, BART, bus rapid transit, and other public transit in the DEIR.
- Please describe bus and shuttle service to the project site, and VTA's plans for serving and expanding transit to the area.

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Parking

- Does 1.5 parking spots per unit work for dwellings of 2 or more bedrooms?
- How many charging stations for electric vehicles will be included?
- There does not appear to be sufficient parking at the 1777 Saratoga Avenue site: 342 stalls required, but only 331 stalls proposed.
- There will be insufficient parking at the 1312 El Paseo site under the Non-School Option, which includes 1,100 residential units. What is the plan for providing more parking?
- Some of the students who live in the school dorms will be old enough to have cars, yet there is no parking planned for them. How can we ensure that they won't park their cars in the adjacent neighborhood?

Green Building

- Please describe the project's green building features, its consistency with the City's green building requirements, and its LEED certification goals.
- The San Jose Reach Code requires solar-readiness on nonresidential buildings, and requires electric vehicle (EV)-readiness and EV equipment installation. Will any of the five buildings have solar panels and electric vehicle stations? Will all five buildings be solar- and electric vehicle-ready?

Thank you for your consideration of our comments.

Regards,

Amy Cody, President
Moreland West Neighborhood Association
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