



Moreland West Neighborhood Association

Serving the area of San Jose and Campbell bordered by
Hamilton Ave, Campbell Ave & San Tomas Aquino Rd

Department of Planning, Building, and Code Enforcement

Attn: Maira Blanco, Planner II

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San José, CA 95113

Via email: Maira.Blanco@sanjoseca.gov

November 29, 2021

**Re: Draft Environmental Impact Report for the
1312 El Paseo & 1777 Saratoga Avenue Mixed-Use Village Project**
File No. PDC19-049
State Clearinghouse #2020090521

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 since it was first proposed. Thank you for letting the community respond to the Draft Environmental Impact Report for the proposed expansion project.

Moreland West residents look forward to an exciting project in a commercial area crucial to adjacent neighborhoods, as well as the entire West Valley region. We commend the Sand Hill Property Company for including below-market-rate units on site (though 20% BMR would be better) and for seeking a grocer tenant. We like the project's overall aesthetic and the tiered design that locates the tallest buildings away from the Baker West neighborhood. We're glad Sand Hill has taken the "educational option" off the table.

After reviewing the DEIR, we have the following main concerns:

- **We believe the project is too dense and the buildings too tall:** Given the lack of major transit in the area, we recommend closer to 600 units instead of the 994 proposed, which is far above the already dense 55 units/acre city minimum for Urban Villages. Similarly, we believe a building height maximum of 8 stories is more appropriate for the area rather than the 12 stories proposed.

- **We believe the traffic analysis fell short on critical details**, failing to adequately spell out vehicle, bicycle, and pedestrian improvements.
- **We believe the developer's Transportation Demand Management plan is inadequate** and will not result in a project that meets the city's Vehicle Miles Traveled standards.
- **We find the DEIR's response to Moreland Middle School overcrowding to be inadequate.**

Following are our specific issues brought up by the DEIR:

Cumulative Impacts

- The cumulative projects considered in the analysis (Table 3.0-1) do not include the newly proposed, 160,000-square-foot Costco in Westgate West. We realize this project likely wasn't known when the DEIR was written, but this huge project should be addressed in the cumulative impact discussions throughout the document.

Section 3.17, Transportation

Roadways and Intersections

- It is nice to see a new northbound left-turn lane from Saratoga Avenue into the 1777 Saratoga site, and a second left-turn lane from Saratoga to southbound Quito, but why would that require removing another traffic lane? Do we want to remove traffic lanes in this already congested area slated for much higher density, with the El Paseo project as the area's trend-setter?
- The Lawrence/Prospect intersection will remain at LOS E, even with this project, but again, we anticipate potential major redevelopment at Westgate West and wonder what improvements are planned for this intersection?
- The traffic analysis indicates the project will add two more vehicles in the already over-capacity left-turn lanes from southbound Lawrence onto eastbound Prospect. Why does that not require some mitigation?
- It seems it was not within the scope of the DEIR, but we'd recommend a traffic study on the segment of Prospect-Campbell between Lawrence and Hamilton. Already congested and the cause of neighborhood cut-thru traffic, the increased densities ahead warrant close study and some action.
- Saratoga Avenue is a City-designated "Grand Boulevard", for which the City is developing a Multimodal Transportation Improvement Plan. Should that plan be completed before ratifying any El Paseo project, given the project's major impact on Saratoga Avenue?

- The Lawrence/I-280 southbound intersections will fall to LOS E and D in the a.m. and p.m. peak hours with El Paseo and other planned projects. What improvements does the city anticipate for this intersection, and what will be the El Paseo developer's obligation?
- Several other intersections will fall to a LOS of D or E in either the a.m. or p.m. (or both) peaks. These include Lawrence/Bollinger-Moorpark and Campbell/San Tomas Aquino. Are any improvements planned here and will the El Paseo developer have any obligation to help fund any improvements?
- Another intersection falling to LOS E is Lawrence-Quito/Saratoga. The DEIR talks about requirements to remove "pork chop islands" here and create an 8-way signal. We'd like more information on how that will improve traffic flow here and how eliminating the islands improves the Vehicle Miles Traveled (VMT) numbers.
- Same for eliminating a "pork chop island" at Campbell/Hamilton (MM TRN-1.1). How will that reduce VMT? We also would like more information on the exact plans for that intersection and what the recommended 5-way signal will do to traffic flow?
- The DEIR discusses considerable impact on the Quito/Northlawn intersection but recommends no specific improvements, merely suggesting more study post-pandemic. But the DEIR is already talking about LOS F at this intersection, so are any improvements anticipated there? Also, a traffic study on Northlawn is apparently not within the DEIR's scope, but when will that be studied?

Mitigation Measure MM TRN-1.2

- Unbundling parking for residents (parking spots billed separately only for residents who want a parking spot) is interesting, but we'd like to see projections on how that would reduce VMT and details on ways to discourage tenants from simply parking elsewhere.

Mitigation Measure MM TRN-2.1

- The DEIR calls for a Transportation Demand Management (TDM) plan for the commercial component of El Paseo expansion to get VMT below standards. The TDM requirement does include monitoring and some potential penalties, but we'd like to see more data on expectations for the TDM plan. For example, how does the developer encourage office tenants to encourage employees to telecommute or work alternative schedules? Also, will office tenants get free or reduced-cost Clipper passes?

Bicycle and Pedestrian Facilities

- Class IV bike lanes are planned for the major streets that front this project, but we'd like to know how this will be done on those busy streets and if this is required as part of the El Paseo project? Also, will this and other area developers contribute to the creation of

longer Class IV bike lanes apparently in the works for Saratoga Avenue and other major streets?

- Will the developer be required to pay for any studies that look at extending the Saratoga Creek Bike Trail? Are there any plans to extend that trail?
- The much wider sidewalks surrounding the project are great, but it's unclear how that will reduce the project's VMT.

Section 3.15, Public Services, Schools

- Schools have experienced a recent decline in enrollment, but El Paseo and other big projects could reverse that trend. The DEIR, in fact, anticipates this project could result in Moreland Middle School exceeding enrollment maximums. The DEIR says the impact on Moreland Middle School would be less than significant because the school could meet demand by "setting up portable buildings on-site." That seems to put quite an onus on the school district. Do they know this is the case and do they support this proposed response to overcrowding?

Thank you for your consideration of our comments.

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City Council Members