

September 9, 2014

San Jose Planning Commission
San Jose City Hall
200 East Santa Clara Street
San Jose, CA 95113

Submitted via email

Dear Commissioners Kamkar, Yob, Abelite, Bit-Badal, Kline, O'Halloran and Pham:

SPUR is pleased to provide comments on two of the General Plan Amendments proposed on your September 10, 2014 agenda. SPUR is an urban policy civic organization with offices in San Jose and San Francisco. We recently published major reports on urban design in San Jose ("Getting to Great Places"), achieving a more successful and active downtown ("The Future of Downtown San Jose") and opportunities ahead for the Santa Clara Valley Transportation Authority to improve transportation options ("Freedom to Move").

Our comments are directed to the following two proposed amendments:

1. GPT14-006 proposes to increase the Downtown density cap from 350 dwelling units per acre to 800 dwelling units per acre. This is a good idea. We would suggest that the best practice is actually to regulate buildings through height and bulk controls, rather than having density controls at all. But in practice, 800 dwelling units per acre will effectively remove density limits in most cases. We recommend that Council approve this amendment.
2. GPT14-004 is more complicated. The third point recommended by Council ("*This General Plan's job first principles apply to Urban Villages and residential conversions are not allowed to proceed ahead of the job creation that is necessary to balance the residential elements of the Village Plan*") proposes new language intended to promote job-generating land uses instead of housing. We understand and support the overall need for San Jose to attract more jobs and to have land use policies in support of that goal. We believe this amendment may not be effective and has the potential to cause unintended consequences.

The difficulty faced by the City in urban village implementation is that not all seventy (70) of the urban villages can be treated the same way. Some of them are potentially significant locations for employment or for retail—and we would support the idea of

prioritizing jobs or shopping in these locations. But other urban villages are essentially neighborhood commercial locations, which are not likely to be attractive to employers and are not likely to gain major retail. In these locations, the push for “jobs” is really a push for ground floor retail as a neighborhood amenity and a way to activate the pedestrian experience.

Given this distinction we would offer the following suggestion:

- a) Adopt the proposed staff language for General Plan section IP-5.5, number 3 (*“This General Plan’s Jobs first principles apply to Urban Villages and the development of new residential development should support and advance the development of new employment uses within the Village and not preclude the achievement of a given Village’s planned employment capacity”*). This language is essentially consistent with the overall intent of the 2040 plan and does not represent a change of direction.
- b) Following this action, staff should develop a system for categorizing the seventy (70) urban villages into three (3) groups:
 - a. Urban villages that are potentially viable for significant employment concentrations
 - b. Urban villages that are potentially viable for significant retail establishments
 - c. Urban villages that are potentially viable for small-scale, neighborhood-serving retail

We would then propose that the City come back with a further set of General Plan amendment that establishes distinct guidelines for each of these categories. We stand by ready to assist the City if this direction is of interest.

Thank you for the opportunity to provide comments on the proposed amendments to the General Plan. Please feel free to contact me with any questions (415-644-4884 or kwang@spur.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'KWANG', with a stylized flourish at the end.

Kristy Wang
Community Planning Policy Director