



COMMITTEE FOR
GREEN FOOTHILLS



Santa Clara Valley
Audubon Society
Founded 1926



SIERRA
CLUB
FOUNDED 1892

Loma Prieta Chapter

Mayor Ron Gonzales &
Members of the Coyote Valley Specific Plan Task Force
San José City Hall
801 North 1st Street
San Jose, CA 95110

July 12, 2004

Dear Mayor Gonzales & Task Force Members:

On behalf of our organizations, the South Bay's four leading conservation groups, we would like to share our views on how two key issues must be treated as the Coyote Valley Specific Plan EIR process moves forward. These issues are the preservation of agricultural lands and balancing housing supply with future job creation in Coyote Valley. Both of these issues are matters of regional significance. The four conservation organizations discuss these two issues not necessarily to address the overall wisdom of planning for development in Coyote Valley. Rather, the purpose of this letter is to point out specific actions that we feel are essential to the Specific Plan process that have not yet been adequately addressed.

Agricultural Preservation

As it exists today, Coyote Valley is one of the last remaining vestiges of Santa Clara County's agricultural heritage. If development moves into Coyote Valley, it will lead to the loss of more than 2,000 acres of agricultural land. Our organizations want to ensure that the City makes every effort possible to preserve agricultural land in the valley through compact and efficient design that minimizes the urban footprint and specific efforts to preserve the Coyote Valley Greenbelt. We firmly believe that failing to analyze how the City can maximize acreage remaining in sustainable agricultural production would violate the City's legal obligations under the California Environmental Quality Act.

From the City's own stated position in support of agriculture, the preservation of farming constitutes a core component of the purpose and need for this project. The Preferred Alternative selected by the City for the EIR, or all the action alternatives, should analyze whether farming can succeed if the City makes a commitment to foster specialty farming that is both economically viable and appropriate for the urban edge. The EIR alternatives should analyze whether encouraging agriculture of this type will contribute to the unique identity of Coyote Valley and help make the future community a desirable place for people to live and work. For details on the urban edge agriculture we propose for incorporation into the EIR alternatives,

please refer to Greenbelt Alliance's vision for Coyote Valley, *Getting It Right: Preventing Sprawl in Coyote Valley*.

The Preferred Alternative and other action alternatives discussing agricultural preservation must do so with sufficient specificity. Just as the creation of a vibrant urban community cannot be left to chance, the establishment of a profitable zone of urban edge farms cannot be achieved simply by blocking an area off on a map. As part of the Preferred Alternative, and other alternatives, resources should be dedicated to drafting an "agricultural preservation element" of the Specific Plan. This element would survey the agricultural lands of Coyote Valley for opportunities, explore the economics of urban edge agriculture and examine the public policy tools that will be necessary to help urban edge agriculture thrive. Key stakeholders including Santa Clara County, existing Coyote Valley farmers, potential future Coyote Valley farmers and other land owners should be engaged in this portion of the planning process.

As part of the environmental review process, a target amount of agricultural land to be maintained should be established. The City of San Jose should examine a policy where for every acre of land that is slated for development, an acre of agricultural land is targeted for preservation. A similar policy was recently adopted by the City of Gilroy. Such a policy would provide a significant incentive to keep development in Coyote Valley to as small a footprint as possible (*Getting It Right* demonstrated that the City's development targets can be met using as little as 2,035 acres).

To help ensure agricultural preservation efforts in Coyote Valley can be successful, we strongly encourage the City of San Jose to immediately impose a development moratorium for acreage within the Coyote Valley Greenbelt that is under the City's jurisdiction. This moratorium should remain in effect until the Specific Plan, and its associated environmental review process, is complete. Such a moratorium, would prevent the approval of development within the Greenbelt that is not compatible with urban edge agriculture while an agricultural preservation plan is being drafted. Considering the vast majority of the Coyote Valley Greenbelt is under the jurisdiction of Santa Clara County, we also recommend that the City work with Santa Clara County to establish a similar moratorium for Greenbelt lands under Santa Clara County's jurisdiction.

Jobs-Housing Balance

On the jobs-housing balance issue, San Jose's plan for 25,000 housing units and 50,000 primary jobs will create demand for more than 10,000 units that will not be satisfied by the planned level of residential development in the Valley. If there is not a plan to accommodate these units in Coyote Valley or elsewhere in San Jose, this "housing deficit" will generate growth pressure on the communities of Morgan Hill and Gilroy, as well as in San Benito and Monterey Counties. The lack of a plan to accommodate these 10,000 units could also cause growth pressure and push housing prices upward in San Jose itself. If San Jose is to meet its commitment of considering methods to minimize sprawl impacts through the Specific Plan process, this matter must be addressed.

San Jose has a well deserved reputation as a regional leader at providing both housing and jobs. The City should endeavor to maintain this reputation. As such, the Preferred Alternative, and other action alternatives in the EIR, must plan for and satisfy all the housing demand generated by industrial development in Coyote Valley. The high level of industrial development will result in demand for over 35,000 dwelling units, when one includes the fact that non-working

households will also result from the industrial development in Coyote Valley, through retirements and transitional unemployment. The EIR review should also consider whether the 1.6 jobs-per-household figure that applies for San Jose as a whole would apply in Coyote Valley, or whether a smaller jobs-to-housing ratio is more realistic.¹ The alternatives proposing housing sufficient to meet all the demand generated could provide that housing either in Coyote Valley or somewhere elsewhere in San Jose. The key aspect of such alternatives is that they actually provide the housing, rather than relying on existing housing stocks to meet increased housing demand.

* * *

Considering that “smart growth” is a central goal of the City’s planning for Coyote Valley, the failure by the City to properly address agricultural protection and housing demand as discussed above would be a significant shortcoming. Adequately addressing these issues also does not, by itself, mean the EIR process will be legally adequate, but we hope through this letter to give the City the opportunity to avoid legal flaws by failing to provide an adequate analysis.²

Sincerely,

<signed>

Tom Cronin
Executive Director
Committee for Green Foothills

<signed>

Tom Steinbach
Executive Director
Greenbelt Alliance

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Craig Breon
Program Director
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Melissa Hippard
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¹ We note the City’s consultant, Doug Dahlin, recently stated that the estimate for the number of schoolchildren expected to reside in Coyote Valley should be adjusted to reflect the different sizes and kinds of dwelling units that will be built. The same type of analysis should be applied to estimating the jobs-per-household ratio.

² The City could choose to at the outset to include the above provisions in its Specific Plan document, not just in the EIR description of alternatives and alternative analysis. Such inclusion would also avoid the legal flaw of failing to consider appropriate and reasonable provisions in its alternatives analysis.