

From: [Keyon, David](#)
To: [Hill, Shannon](#)
Subject: Fw: DSAP and DTW narrative
Date: Wednesday, March 25, 2020 4:21:53 PM
Attachments: [DTW and DSAP Narrative TR 3-23 clean.docx](#)
[DTW and DSAP Narrative TR 3-23 comments.docx](#)

Hi Shannon,

Here is the narrative for Rosalynn on DSAP capacity.

Thanks,

David Keyon

Planner, Environmental Review
City of San Jose
(408) 535-7898 david.keyon@sanjoseca.gov

From: Rood, Timothy <timothy.rood@sanjoseca.gov>
Sent: Monday, March 23, 2020 4:31 PM
To: Keyon, David <david.keyon@sanjoseca.gov>; Hart, Jared <Jared.Hart@sanjoseca.gov>; Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>
Subject: RE: DSAP and DTW narrative

Hi all, attached (clean and with comments) is revised to clarify Rosalynn's comments based on David and Jared's responses.

Thanks all!
Tim

From: Keyon, David <david.keyon@sanjoseca.gov>
Sent: Monday, March 23, 2020 4:01 PM
To: Hart, Jared <Jared.Hart@sanjoseca.gov>; Rood, Timothy <timothy.rood@sanjoseca.gov>; Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>
Subject: Re: DSAP and DTW narrative

Hello Rosalynn, Tim, and Jared,

With regard to the analysis of General Plan Amendments, the ratios in the General Plan and Downtown are utilized when evaluating General Plan Amendments, including those in Downtown. Most projects in Downtown don't require General plan amendments, so this has only been applied to the Downtown Strategy 2040 EIR.

Thanks,

David Keyon

Planner, Environmental Review
City of San Jose
(408) 535-7898 david.keyon@sanjoseca.gov

From: Hart, Jared <Jared.Hart@sanjoseca.gov>
Sent: Monday, March 23, 2020 12:17 PM
To: Rood, Timothy <timothy.rood@sanjoseca.gov>; Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>; Keyon, David <david.keyon@sanjoseca.gov>
Subject: Re: DSAP and DTW narrative

Hi Rosalynn and Tim -

Please see attached my responses to the comments on the DSAP and DTW narrative. I made one minor change to one of the data points in track changes as well. Please let me know if you have any follow up questions.

Thanks!

Jared

From: Rood, Timothy <timothy.rood@sanjoseca.gov>
Sent: Friday, March 20, 2020 6:52 PM
To: Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>; Hart, Jared <Jared.Hart@sanjoseca.gov>; Keyon, David <david.keyon@sanjoseca.gov>
Subject: RE: DSAP and DTW narrative

Thanks Rosalynn, my responses are attached. There are some questions for Jared and David in the comments that we can follow up on Monday.

There is also a more marked-up and commented staff-level version of this, if you're interested in a deep dive, but I'll wait for your request on that.

Thank you,
Tim

From: Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Sent: Friday, March 20, 2020 6:16 PM
To: Rood, Timothy <timothy.rood@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>; Hart, Jared <Jared.Hart@sanjoseca.gov>; Keyon, David <david.keyon@sanjoseca.gov>
Subject: RE: DSAP and DTW narrative

Hello Tim – THANK YOU! This definitely helps to organize and clarify the capacity issue. I have some edits/comments – see attached. We can discuss Monday.

From: Rood, Timothy
Sent: Friday, March 20, 2020 3:01 PM
To: Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>
Cc: Manford, Robert <Robert.Manford@sanjoseca.gov>; Brilliot, Michael <Michael.Brilliot@sanjoseca.gov>; Hart, Jared <Jared.Hart@sanjoseca.gov>; Keyon, David <david.keyon@sanjoseca.gov>
Subject: DSAP and DTW narrative

Rosalynn, attached please find a clean version of where this effort has arrived as of 3:00. We can follow up as needed after the call.

Thanks,
Tim



Timothy Rood AICP, Division Manager
Department of Planning, Building and Code Enforcement
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Diridon and Downtown Development Capacity

The Concerns:

*Google representatives have expressed concerns regarding the **amount and source of General Plan program level environmental clearance (known as “development capacity”)** needed to accommodate the cumulative impact of Google’s Downtown West project, other development in the DSAP, and other Downtown development projects.*

*Concern has also been expressed about the **proportion of that development capacity** that the Downtown West project would need.*

- **There is adequate development capacity in the Downtown Growth Area to accommodate the Downtown West project with the shift of growth capacity analyzed in the Downtown West EIR.**
- **Major office projects within downtown, such as 200 Park Avenue, Adobe, Platform 16 and City View Plaza, are already accommodated with the development capacities in the Downtown Strategy 2040 EIR.**
- **Additional General Plan capacity shifts are needed to accommodate the anticipated amount of additional development in the DSAP, in addition to Downtown West.** These are being evaluated by staff and will be analyzed in the environmental review of the General Plan amendments for the Downtown West project and the DSAP amendments, as well as the General Plan 4-Year Review process.

General Plan Amendment Strategy

Downtown West Project EIR

- The **Downtown Strategy 2040 EIR**, adopted by Council in December 2018 clears development in the General Plan Downtown Growth Area for up 14.2M sq. feet of office, 1.4M sq. ft. of retail, 14,360 residential units, and 3,600 hotel rooms.
- As of March 2020, there is approximately 4.1M sq. feet of office, 994K sq. ft. of retail, 5,236 residential units, and 2,364 hotel rooms of **remaining capacity** under the Downtown Strategy EIR (this includes both approved and pending projects, other than Downtown West).
- The **CEQA analysis for the Downtown West project analyzes increasing the growth capacity in the Downtown by approximately 6M sq ft of office and 10,000 residential units.** This results in approximately **10.2M sq. feet of office and 15,236 residential units** (and 994,000 sq. ft. of retail and 2,364 hotel rooms) that would be available for development in the Downtown.
- **There is adequate development capacity in the Downtown Growth Area to accommodate the Downtown West project with the shift of growth capacity analyzed in the Downtown West EIR.**

DSAP Amendment and 4-Year Review

- **Projects proposed within the Downtown Growth Area, including the Downtown West Project, are considered under the General Plan growth capacity for Downtown.**
- The **DSAP Amendment is analyzing additional growth in the DSAP area** outside of the Downtown West project site; as a result, **the DSAP Amendment and 4-Year Review will contemplate and analyze adding additional growth capacity to the Downtown Growth Area**, in addition to capacity added through the Downtown West project.
- The DSAP Amendment will also clarify capacities assigned to the limited areas of DSAP that fall outside of the Downtown Growth Boundary (“cats ears”).

Jobs and Square Feet

*During these discussions, questions have arisen about **conversion between square footages and number of jobs** for office and commercial space and number of jobs assumed.*

- **The Downtown Strategy 2040 EIR and the DSAP EIR use building square footage, not jobs, for evaluating impacts of commercial uses.**
- **The CEQA documents for the Downtown West project and DSAP amendments will similarly use square footage, not number of jobs, for evaluating impacts of commercial uses.**
- For CEQA purposes, the **Downtown Strategy 2040 EIR** used the ratio of **243 sq. ft. per job** to account for the **transfer of development capacity from the North Coyote Valley Employment Lands** in the 2040 General Plan.¹
- The City’s practice is that these ratios are used for **program-level analysis of any proposed General Plan Amendment to the accommodate the increased development capacity with the updated Downtown Strategy.**²
- Under San Jose’s Transportation Analysis Policy, Council Policy 5-1, individual projects also perform project-specific **Local Transportation Analysis**, which may assume a different ratio of jobs to square feet based on project characteristics.

¹ According to the Downtown Strategy 2040 EIR on page 9 in the project description, this ratio reflects current trends in office space use. Note that these job estimates state that the new development capacity would accommodate “approximately” 48,500 jobs, and is not a definitive number.

² The job/square footage ratios in the General Plan and Downtown Strategy 2040 EIR are utilized when evaluating General Plan Amendments, including those in Downtown. Most development projects in Downtown don't require General plan amendments, so this has only been applied to the Downtown Strategy 2040 EIR.to date.

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