



October 7, 2020

City of San Jose General Plan 4-Year Review Staff
200 E. Santa Clara St.
San Jose, CA 95113

Re: Capacity shifts in the 4-Year-Review process

Dear Planning Staff,

With regard to the jobs capacity shifts to be discussed during the October 29 meeting of the General Plan Task Force, we strongly urge you to consider only areas in the developed footprint of the city and the urban core, and avoid urban-edge areas in the hills or undeveloped land north of highway 237, as sites for where projected jobs may be located.

We support the relocation of all the projected jobs out of Coyote Valley. This is necessary in order to secure the tremendous environmental benefits and green infrastructure that Coyote Valley's open space provides for a resilient future. But we must also be cautious in where these jobs are relocated, especially when considering the undeveloped lands north of 237 as a potential destination for these projected jobs.

Sea Level Rise Hazards Make Development North of 237 Problematic

The climate is changing. Substantial areas north of 237 sit well below sea level under current conditions; with 2018 sea level rise expectations of California's Ocean Protection Council projecting 3 feet or more within 50 years, these areas will be even more at risk. Although a levee will be built between Coyote Creek and the Alviso Marina, this levee will not suffice to protect Alviso from flooding from the Guadalupe River and Coyote Creek. These waterways, which are the two largest streams in the County, cannot be closed off from the Bay or its rising sea levels. During storm events, existing high water levels combined with higher tides will act as a wall of water that will obstruct the flow of Coyote Creek and the Guadalupe River and cause these streams to back up much further and higher than they already do today. A perfect storm combining high tides, flooding, and reduced soil absorption due to high groundwater is likely to result in overtopping the rivers' banks and greater storm water flooding in the heavily subsided lands behind the levees.

Indeed, the Bay Conservation and Development Commission (BCDC) tool [Adapting to Rising Tides](#) shows that much of this area would be under water with just 1 foot of sea level rise during king tides, and would be under water under everyday conditions with 2 feet of sea level rise. It is telling that the lower Guadalupe flood protection project that reduced the risk of flooding in Alviso (completed in 2009, at a cost of \$32 million) is already in need of redesign to protect the Alviso area from Guadalupe River flooding combined with Sea Level Rise, and the Tasman to 880 section (<https://www.valleywater.org/guadalupe-river-tasman-i880>) will now consider "improvements" all the way to Gold Street in Alviso.

Finally, as seas rise and existing tidal marshland becomes inundated, it is critical for the health of the Bay that these marshlands and the species that depend on them be allowed to migrate upland. In the

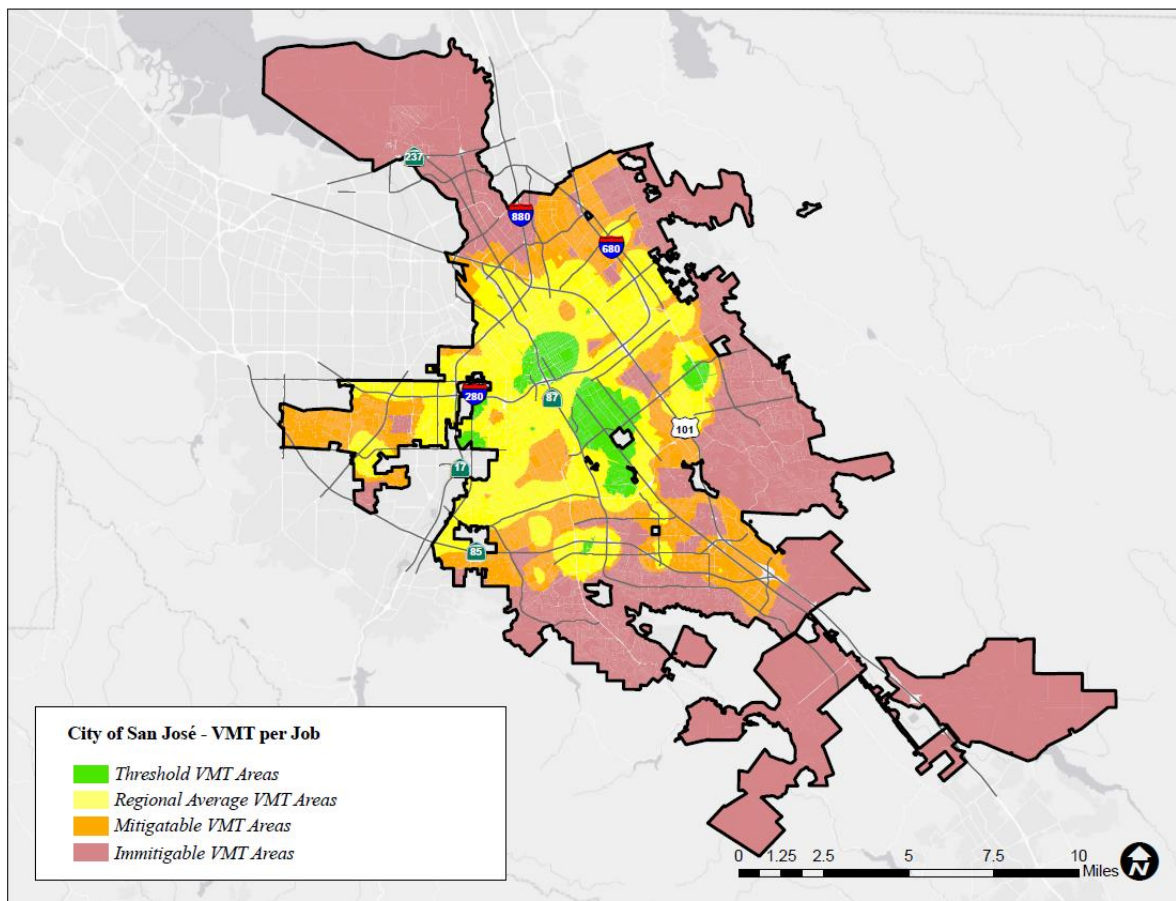
San Francisco Bay Shoreline Adaptation Atlas (2019) produced by SFEI and SPUR, the natural adaptations map #22 identifies substantial Migration Space north of 237. This is existing open space that can serve as refugia for displaced shoreline habitats and wildlife, even if behind levee walls.

The open space north of 237 offers a rare and irreplaceable location where we do not yet have continuous development right up to the Bay. As it is, San Jose will already be facing costly and difficult capital improvement projects to protect the existing residential community of Alviso and the other existing development that is at risk from sea level rise. It would be foolish for San Jose to allow new development that will similarly need to be protected and that, even with such protection, is still likely to suffer all the impacts detailed above.

San Jose’s VMT Policy Strongly Discourages Development on the Urban Edge

In addition to being central to San Jose’s effort to adapt to climate change, both the open space north of 237 and the urban-edge areas in the hills function as key locations in San Jose’s effort to avoid contributing to excessive climate change. The key, relevant indicator for greenhouse gas emissions under San Jose and California policy is Vehicle Miles Travelled (VMT), measuring the miles travelled per job. Areas requiring workers to travel long distances by car generate high VMT and more emissions, and San Jose’s Climate Smart goals rely on reducing those emissions.

The VMT for any new job-related development from relocating Coyote Valley jobs to the undeveloped hills or north of 237 would far exceed the VMT from relocating development nearly anywhere else in the City. This fact is clearly indicated in the City’s own VMT policy documents:



Green areas are generally below the threshold of significance for VMT while red areas generally cannot be reduced to below the threshold of significance, even with mitigation. The areas north of 237 and in the undeveloped hills are not only “immitigable”, they are the furthest from the low VMT areas and likely have the highest VMT and associated emissions if they were to be developed.

The San Jose City Council January 22, 2019 Study Session on Coyote Valley specifically identified the excess VMT from jobs development in that area as a key reason for why development of Coyote Valley is infeasible. San Jose would be contradicting itself to relocate jobs away from Coyote Valley, now being done in significant part because of the high VMT and emissions from developing that area, and then imposing that development in areas that are almost as problematic.

As discussed and approved in the Task Force’s September meeting, the need to further reduce VMT is critical as the City enters the next phases of greenhouse gas emission reductions. Reducing VMT by avoiding relocating jobs and inappropriate development north of 237 and in the undeveloped hills best fits San Jose’s policy for a climate-smart future.

Thank you for considering these comments in developing the staff recommendations for relocating prospective jobs away from Coyote Valley.

Sincerely,

Alice Kaufman, Legislative Advocacy Director
Green Foothills

Shani Kleinhaus, Environmental Advocate
Santa Clara Valley Audubon Society

Justin Wang, Advocacy Manager
Greenbelt Alliance

Eileen McLaughlin, Board Member
Citizens Committee to Complete the Refuge