



April 8th, 2015

To: Gilroy City Council and Gilroy Community Development Department
Stan Ketchum, Senior Planner; stan.ketchum@ci.gilroy.ca.us

Re: Gilroy General Plan Update

Dear Mayor Gage, City Council and Community Development,

The Sierra Club Loma Prieta Chapter and the Santa Clara Valley Audubon Society thank you for the opportunity to provide input toward the Gilroy General Plan Update. Members of our organizations have an inherent interest in maintaining natural and agricultural features of Santa Clara Valley landscapes, and protecting riparian ecosystems and open space. We are concerned that all of the proposed alternatives expand the City's urban limits.

It is encouraging that the February 2015 Draft Gilroy General Plan Alternatives Report includes a third "Compact Development" alternative in response to community desire for open space. While the pressure to grow and develop in the shadow of Silicon Valley is undisputable, a large part of the attraction of Gilroy and southern Santa Clara County is the rural atmosphere and remaining undeveloped lands.

Of the alternatives presented in the Report, the third alternative is most acceptable for most of the "focus areas". However, a fourth alternative should be included that would maintain more open space. Specifically, this alternative should maintain the current city limits, and should exclude development in oak woodlands, riparian and other sensitive habitats that lie within the city limits; all three of the presented alternatives allow development in these habitats. The report also seems to dismiss impacts to grasslands as insignificant. While grasslands are more common than the other habitat types, grasslands in this area and species dependent upon them are increasingly impacted by development and agriculture. Lands outside the current city limits should be maintained as green belt, and urban development in both native habitats and agricultural lands should be avoided to the extent possible. All alternatives should be designed to ensure highest efficiency of land use utilizing vertical rather than horizontal development.

All of the presented alternatives have build-out capacity for housing, population growth, and job growth that exceed all but the highest projections for Gilroy by 2040. The premise of the planning process seems to be that the General Plan should accommodate any and all potential

development that is proposed. Instead of being developer-driven, the plan should accommodate the wishes and quality of life of the current citizens of the city and its immediate surroundings. The prevalent attitude of planners and politicians that growth and maximum job creation should take priority over other considerations is leading to increased problems of traffic, air, water, and light pollution, water shortages, lack of parklands and outdoor recreational opportunities, loss of prime agricultural land (along with loss of agriculture-related jobs), and rampant destruction of natural lands and wildlife habitat. Gilroy, along with many other California municipalities, needs to consider that bigger is not necessarily better.

Although the Report contains comparisons of estimated vehicle miles traveled (VMT's) and overall greenhouse gas (GHG) generation for build-out scenarios for the three alternatives, apparently none of the alternatives were developed with reduction of VMT's and of GHG as a high priority. Reasonable market-based scenarios need to be analyzed to reduce GHG emissions, with inclusion of transit-oriented development alternatives. Comprehensive and enforceable measures need to be included based on targets assessed from the community greenhouse gas footprint and the CARB assessment of communities' 1990 emission levels in order to meet the goals of AB32, SB375, and S-03-05.¹ Reduction in generation of GHG's contributing to climate change should be included in the list of "Guiding Principles" for the General Plan.

We are concerned that the City Planning Department is currently reviewing an application to add more than 700 acres of agricultural land north of Gilroy to the Urban Service Area for a proposed housing development. In Alternative 3 of the General Plan Alternatives Report this area remains in agriculture and is not in the Urban Service Area. Any consideration of this or other large-scale development projects within the area covered by the General Plan need to be postponed until after the General Plan Update is completed and has gone through the CEQA review process.

We had been encouraged by the City's apparent willingness to include the community's input in the final product through community workshops and an on-line survey. However, we have recently learned that the General Plan Advisory Committee (GPAC) voted on the three alternatives in mid-March, prior to the closing date for the survey. The GPAC voted to support Alternative 2, the highest development alternative, contrary to the support for Alternative 3 and for open space expressed at the community workshop held in February. The on-line survey results show about 75% of participants favored Alternative 3 overall, with as many as 88% choosing Alternative 3 in focus areas that contain open space.

It is apparent that the GPAC does not reflect the sentiment of the Gilroy voters. We hope that the City Council and Community Development Department will go beyond this small group of people in making their final plan. Community meetings, on-line surveys, and other opportunities for involvement should be better publicized. Although the local newspaper, the Gilroy Dispatch, did have a small notice of the February community workshop, it did not carry any article about the outcome of the workshop or information about the on-line survey, deadline for comments, or any other meetings.

Through the workshop and survey process, the citizens of Gilroy have conveyed that maintenance of open space is one of the highest priorities. The Community Development

¹ http://blog.aklandlaw.com/uploads/file/Sierra%20Club%20v_%20County%20of%20San%20Diego.pdf

Department needs to offer additional alternatives that reflect this sentiment, and needs to provide greater outreach to hear from a greater cross-section of the community. The final plan needs to minimize both the City's "carbon footprint" and building footprint by compacting development, maintaining open space, protecting wide riparian corridors, and including access to public transportation as an integral part of the plan.

Sincerely,



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