

To Planning Commission
May 2, 2022 Continued Hearing on the Draft 2040 General Plan
From Lee Quintana

These comments focus on:

- **Land Use Element and Community Development Element¹**
- **Missing Middle Housing - definition of and how it might be implemented**
- **Figures, Illustrations, Tables, Glossary and Acronyms , Key words**

GENERAL COMMENTS:²

Staff Report to Town Council. Please include the following:

- Provide a redline copy of the changes recommended by the Planning Commission
- Provide a separate list of changes not recommended by the Planning Commission.

A Few Comments on Land Use

P. 3-5 Key Terms: Missing Middle Housing. The following is my attempt at a better definition/explanation of Missing Middle Housing. I would prefer the term small unit housing.

Quote from Missing Middle Housing - Big Ideas for **Small** Buildings to Respond to Today's Housing Crisis not by providing "affordable" housing but by providing housing over a greater price range. It is just one piece of the puzzle to respond to today's need for housing. The "missing middle" concept, to me, appears also to be related to the concept of "placemaking", a concept which is more closely tied to economic sustainability and stability. Missing Middle Housing:

- Provides a way to increase density without increasing perceived increase in intensity of development, (invisible density or hidden density) i.e invisible density by regulating the lot size setbacks, % open space, height (to eaves), dimension of structure footprint (depth and width), number of stories and the relationship of structures to each other. While "Missing Middle Housing" does not regulate density it allows for higher density that fits into traditional single family zoning districts.
- Provide a range of affordability (though not necessarily "affordable housing" as defined by the state). Its objectives are many: including walkability to daily needs, reduced use of motor vehicles, reduced consumption of non-renewable resources, an enhanced sense of "community" and providing a greater range of housing opportunities with respect to both size and type.

¹ And hopefully clarify the essence of the meaning of Missing Middle Housing and the need to develop out of the box ideas for how to implement it.

²

- This concept is very similar to the communities that developed in the late 1880' and early 1900's prior to with a variety of housing types and sizes in close proximity commercial and retail uses. and retail areas developed before the introduction of zoning single family home, by providing smaller units parcels accessible to people and families over a price range, in walkable location. It provides a way to increase density without increasing the perceived intensity of development on a parcel.

Missing Middle House is intended to be built on parcels with a General Plan Designation and zoning that allows single family houses in areas with a General Plan Designation of Low Density Residential and Medium Density Residential and a Zoning Designation of R-1, R-1D and R-D.

that allow single family housing in a manner that does not increase the perception of increased development on a site.³ Missing Middle Housing is the name given to a range of multi-unit buildings or a group or clustered of detached housing units located on a single parcel that are compatible in scale, form and mass with existing single-family homes.

The intent is to encourage the development of greater density

The intent is to provide an additional opportunity or pathway to provide a diverse range of housing options which will additional smaller units on parcels that allow single family housing When well-designed the units fit into existing neighborhoods as invisible density, i.e density while maintaining the greater density) without appearing to increase intensity . The forms feel familiar. Most older American cities contain many examples of aesthetically pleasing, small unit buildings such as duplexes, fourplexes, or as detached units granny flats, cottage clusters and bungalow courts, and single family homes that have been divided into multiple units,

A Few Comments on Community Design.

- Most of this Element fits better into the Land Use Element, for example the Community Place Districts which are a type of Special Planning Area.
- The discussion on Community Form is to general to be useful and does not establish standards
- I would recommend going back to the format used in the Community Design Element of the 2020 General Plan.

Figures

- **All Figures:**
 - **Change the color of the Figure Titles and increase the font size so it is immediately clear what the figure is attempting to portray. The subject of a figure should be immediately obvious.**
 - **Where boundary lines overlap separate the lines so they are easily visible**

³.See the Hillside Area Map included in the Hillside Development Standard and Guidelines.

- Add major roadways to all figures.. For example for Figure 2-7 add Main Street and Highway 9. Enlarge the fonts so they are readable in the printed 8 by 11 format
- Figure 1-1: Change title to Regional and Local Context and add Campbell, Saratoga, and Monte Sereno
- Figure 1-2: In the legend and on the figure differentiate between areas within the Town Limits and within the County so it is easier to understand the relationships between areas. Also see comment Los Gatos Planning Boundaries
- Figure 3-6 Land Use Diagram:
 - Move the title (and increase font) either to the center of the page above the box or to the upper right corner within the box.
 - Divide and label the legend for Figure 3-6 to match the divisions used in Table 3-2. At a minimum provide visual space between the land use divisions - this helps the reader immediately to understand what information the figure wants to convey.
- Figure 3-7:
 - I am not sure what this figure is trying to convey.
 - Add all General Plan Land Use Designations within the Downtown Area If that is what this figure is trying to convey. If not then clarify the purpose of the figure.
 - It is not clear what the boundary is based on. I think most residents would include the area to the west (to the Town Limits) as part of the Downtown Area.
- Figure 3-8:
 - Include the underlying Land Use for the Specific Plans: Mixed Use of the North 40 and Light Industrial for Albright.
 - Why not add the district names directly on the Figure and eliminate in the legend,, as was done for Figure 3-10. It makes the intent of the figure immediately apparent.
 - Also see comments under 3.6 Special Planning Areas
- Figure 4-10:
 - This is a duplicate of Figure 3-9
 - Suggest deleting one of the figures and referring to it where needed.
- Figure 4-44:
 - This is essentially a duplicate of Figure 3-10 are both needed?
- Figure 4-12, 4-13, 14-16, and 4-18 through 4-22:
 - It is not clear what information these figures are trying to convey.
 - If they are trying to convey the relationships of the land uses within the districts to those adjacent to the districts then the areas around districts should not be half-toned - Of the two choices I think it is important to understand the land use relationships of the Land Use Designations.
 - If the intent is just to highlight the uses within the districts rather than the relationships with the area outside the districts then the area outside the

district should be grayed.should be grayed *and* the land use designations outside the district should be deleted from the legends. At least in the printed version the half-toned open space appear similar to Agriculture, it is difficult to distinguish between the area of Vasona (Open Space), Albright Specific Plan is hard to differentiate from Medium Density Residential and Low Density Residential is more similar to Hillside Residential.

- **Figure 4-16:** Again, on the printed copy, the North Santa Cruz District matches Community Commercial rather than Neighborhood Commercial. Is that the intent?
 - Where two districts are within the same Figure both should be labeled on the map itself.
- **Figures 4-18 (Winchester District) and Figure 4-19 (Lark District):**
 - On the General Plan Land Use Map the area to the east of the Albright Specific Plan is shown as Open Space but on Figure 16 it appears to be either agricultural or the North r0 Specific Plan (again in the print copy of the 2040 Draft GP).
 - Figure 4-18 extends the Albright Specific Plan beyond its boundary and splits it between the Specific Plan between Winchester Boulevard District and the Lark District. The 85 Freeway splits the North and South parts of the Winchester Blvd. District. The configuration of the Winchester District if questionable given that during the approval process for the Albright PD (turned Specific Plan) it was determined that it would be extremely difficult to provide a safe pedestrian/bike connection on the east side of Winchester over the 85 Freeway
 - In addition Figure 4-18 incorrectly shows the Albright Specific Plan extending beyond the Plans Boundary. The area at the bottom of this figure should be shown as Light Industrial. This is correctly shown in Figure 4-19 Lark Avenue District.
- **Figure 7-1 Open Space, Parks and Recreation Facilities within Town Limits:**
 - For ease of use suggest numbering Kennedy Loop Trail and the Open Space Preserves.
 - Delete “....within the Town Limits from the Title. Areas of the Open Space Preserves are within the Town Limits.
- **Figure 8-4: Planning Watershed and Figure 8-3: Wellands and Water Habitats:**
 - Both identify Lexington and Vasona as Lakes rather than as reservoirs
 - It is hard to see the red lines of the Riverine areas and it is not clear that the light green lines are Freshwater Forested Shrub Wetlands or something else.
- **Figure 8-5 Future Noise Contours:**
 - The scale of this make hard to read. Is it possible to increase the scale by turning it on its side even if it did not include the total Planning Area?
 - Add Highway 17 and Highway 85
- **Figure 9-1 Fire Hazard Severity Zone:**
 - Move the Note up and increase the font size.

- This is a truly scary map!
- Add a figure showing the Dam Inundation Zone for Lexington and Vasona

Illustrations and Photos:

- Re label as Illustrations rather than figures. Figure 4-1, through Figure 4-9, , 4-14 to 4-15, 4-17 and 4-23
- Identify the photos within Community Design Element
- The Community Design Element is the only Element that contains illustrations and photos and they are significantly different from Figures.

Tables

- Table 3.1 General Plan Residential Buildout. Update and move to Appendix in Final Approved GP
- Table 3.2 General Plan Land Use Designations and Development Standards:
 - Provide more information regarding allowed use in the description of each Designation.
 - For Designations that allow ADU's move the information regarding ADU's to the end of the description and indicate that ADU's do not count towards density.
 - Delete mention of Missing Middle Housing (See comments under Implementing Missing Middle Housing.

Chapter 12 Glossary and Acronyms

- I came across numerous differences in definitions between Key Terms and the definitions in the Glossary. Please verify that definitions are the same.
- Verify that all Acronyms are included in Chapter 12.
- Gross Acre and Net Acre: There is an inconsistency between the definitions of Net and Gross Acres.
- Archaeological Resources: Differentiate between historic and prehistoric archeological resources
- Add :Below Market Price (BMP)
- Add: Below Grade Square Footage
- Building Coverage: Is this based on net or gross lot:
- Add CPTED and define
- California Points of Historical Interest: What criteria is used to identify these for Los Gatos? This appears to go beyond pre 1941 homes.
- Add: Capital Improvement Program
- Community Place District: What is the relationship between Community Place District (CPD?) and Placemaking?

Comments on Chapter 3 Land Use Element:

Section 3.2 Implementing Missing Middle Housing

- This whole section needs revision. It talks about Missing Middle Housing but there is little in it that relates to how to implement it. It is not until the last sentence that one of the essential points of Missing Middle Housing as intended by Daniel Parolek is even mentioned, i.e. the development of smaller units. It is interesting to note that the title of his book Missing Middle Housing is subtitled “Thinking Big and Building Small to Respond to Today's Housing Crisis.
- Consider that the term Missing Middle Housing has become almost a buzzword or jargon that no longer clearly represents the meaning given to it by Daniel Parolek who popularized the term.
- The concept of Missing Middle Housing is only one aspect of the solution to today's housing crisis.
- Missing Middle Housing does not promise housing at a density defined as “affordable housing” by the state, rather it is intended to
 - Provides an opportunity for greater range of unit size and price, both rental and for purchase, therefore making housing more accessible to a greater number of people and provides the basis for creating a more inclusive community. For example:
 - seniors looking to “downsize” or because their income “downsized” and they may no longer be able to afford their larger homes.
 - professionals, teachers, police, fire fighters, young adults (including our children) and people employed by local businesses who may not qualify for “affordable housing” but who may not be able to afford the cost of larger market rate housing.
 - It means greater walkability, reduced reliance on cars, an opportunity to increase interaction with neighbors and build “community”

The following comments focus on:

- Introduction.
- Land Use Element and Community Development Element⁴
- Missing Middle Housing - definition of and how it might be implemented
- Figures, Illustrations, Tables, Glossary and Acronyms , Key words
- A better understanding of the interconnectedness of the entire General Plan
- What I don't cover here I will follow up with comments to the TC.

⁴ And hopefully clarify the essence of the meaning of Missing Middle Housing and the need to develop out of the box ideas for how to implement it.

GENERAL COMMENTS:⁵

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https://www.mml.org/pdf/resources/publications/decade_of_placemaking_in_Michigan_book_final_2017.pdf

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⁵ I have tried to organize my comments, unsuccessfully, to avoid overlap but in the end after many tries I gave up on that approach given that the GP Draft itself has many overlaps without providing links between them.

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From: Jean-Marc F. Blanchard
Sent: Monday, May 2, 2022 6:25 PM
To: GP2040
Cc: Planning Comment
Subject: Draft 2040 General Plan comments

Dear Members of the Los Gatos Planning Commission:

I am writing to share some thoughts about the Los Gatos 2040 General Plan ("2040 GP"). I wanted to do so many months ago, but work commitments precluded me from doing so. First, I want to thank all of you for volunteering for this major undertaking. Your public service is appreciated. Second, the 2040 GP is quite impressive in its breadth of coverage and policy recommendations. In any event, I would like to make some suggestions as well as note various concerns about the 2040 GP. I apologize for sending this to two separate emails, but it was not clear from the Town of Los Gatos newsletter which would be appropriate.

As for writing issues, the 2040 GP could be far more concise. While I realize there is much to cover, there should be a serious effort to remove repetition. For example, in the Community Design section, the discussion for almost all the Districts ranging from Los Gatos Boulevard (p. 4-24) to Union Avenue (p. 4-42) repeatedly discusses the need for mixed-use developments, setbacks, pedestrian activation, parking relocation, connectivity, better landscaping, and mid-block crossings. All these common recommendations could be consolidated on to 1-2 pages with District-specific goals, policies, and programs highlighted separately. In addition, definitions could be moved into footnotes. Finally, the report should have active hyperlinks throughout (especially the Table of Contents) to allow readers to easily shift to other relevant sections of the report and to locate other materials (e.g., the Background Report and the EIR) mentioned in various places. A more succinct, fluid, and easily used 2040 GP is essential to facilitate community participation and encourage a thorough reading.

It seems to me that the 2040 GP could be more focused. It is not clear, for instance, why the Town of Los Gatos should be working on promoting safe and clean water (RSEJ 5.2 on p. 2-6), promoting the acceptance of EBT in order to facilitate the use of SNAP/WIC food programs (RSEJ 4.1 on p. 2-5), or running climate change, zero waste, low water landscaping, and limited pesticide application education programs (see the sections on Public Facilities, Services, and Infrastructure and Environmental and Sustainability). The point is not that these are undesirable goals or programs. The point is that it may be better for other government bodies or non-government organizations to run such programs/undertake such initiatives. A 2040 GP that has too many goals, policies, and programs risks stretching Town staffing and financial resources too thin to the detriment of accomplishing other more pressing and realistic goals.

The 2040 GP mentions many of the ways that the Town encourages participation with respect to the 2040 GP. These include hearings, booths, online and print reports, and standing and ad hoc commissions. More may not be better. The Town should seriously consider if the length of hearings, the form and length of reports (the 2040 GP is a vivid example of the length problem), and terms associated with being a commissioner discourage participation by a diverse set of Los Gatos community members in shaping the 2040 GP and associated materials.

The 2040 GP has very little to say about how the Town will get developers to advance all the goals and policies enumerated in the 2040 GP. The Town certainly can implement new zoning requirements,

require Planning Commission approvals, and the like, but it is entirely possible that developers will go elsewhere where they deem it less burdensome and/or more profitable to build. As part of its arsenal of policies and programs, the Town needs to consider more incentive schemes that can motivate developers to build in Los Gatos on 2040 GP terms.

The role of the Police Department in facilitating the realization of the 2040 GP's Mobility element receives scant attention. As a regular walker and biker around our Town, I am always struck by how many people speed or drive dangerously on many Town streets including the usual suspects such as Lark Avenue, Los Gatos Boulevard, and Highway 9, but also unlikely candidates like Santa Cruz Avenue between Highway 9 and Main Street, Main Street between Santa Cruz and Los Gatos High, and so on. Enforcement, of course, is not the only answer, but it has to be part of the answer. Many so-called traffic calming measures like signs indicating car speed are not working. I see this weekly on Lark Avenue.

The discussion in the Land Use and Community Design sections emphasizes setbacks, step backs, and so on as ways to make bigger buildings conform to the look and feel of Los Gatos. These are not the only ways. Buildings that integrate clever architectural (non-box) designs, have balconies, and/or embedded greenery throughout can be taller while having a reduced effect on views, climate change, and water runoff. These possibilities do not appear to be discussed in the 2040 GP. On a related matter, encouraging solar power is recognized in various places in the 2040 GP, but the report does not seem to incorporate an accompanying set of specific policies and program to drive increased solar usage.

Lastly, none of the policies or programs listed in the 2040 GP mention requirements for any new expenditures or staffing or an awareness of the possibility that the 2040 GP policies and programs may require one or both. If new expenditures or staffing will be needed, then this should be mentioned in the 2040 GP in the interest of full disclosure. If they will not require new staffing or expenditures, then this is worth highlighting, too. If such discussion is outside the scope of conventional General Plans, then it should be made clear at what stage such expenditures or staffing would be considered so readers are aware of potential tradeoffs.

Thank you for your time and consideration.

Jean-Marc F. Blanchard, Ph.D.