



**TOWN OF LOS GATOS  
PLANNING COMMISSION  
REPORT**

MEETING DATE: 04/23/2025

ITEM NO: 6

ADDENDUM

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DATE: April 22, 2025

TO: Planning Commission

FROM: Joel Paulson, Community Development Director

SUBJECT: Consider a Request for Approval to Demolish Existing Commercial Structures, Construct a Multi-Family Live/Work Development (55 Units), a Conditional Use Permit for a Live/Work Development, a Condominium Vesting Tentative Map, Site Improvements Requiring a Grading Permit, and Removal of Large Protected Trees, Under Senate Bill 330 (SB 330) on Property Zoned CH:HEOZ. **Located at 15349-15367 Los Gatos Boulevard.** APNs 424-19-048 and 424-19-049. Architecture and Site Application S-24-015, Conditional Use Permit U-24-006, Subdivision Application M-24-008. No Additional Environmental Review is Necessary Pursuant to CEQA Guidelines Sections 15162: Subsequent EIRs and 15168: Program EIR, Since the Proposed Project's Environmental Impacts were Adequately Addressed in the 2020 General Plan EIR and/or 2040 General Plan EIR, as Applicable. Property Owner: Jonathan Peck. Applicant: City Ventures. Project Planner: Sean Mullin.

REMARKS:

Exhibit 17 includes public comments received between 11:01 a.m., Friday, April 18, 2025, and 11:00 a.m., Tuesday, April 22, 2025.

EXHIBITS:

Previously Received with the April 18, 2025, Staff Report:

1. Final Initial Study – March 2025  
(available online at <https://www.losgatosca.gov/DocumentCenter/Index/2223>)
2. Required Findings and Considerations
3. Recommended Conditions of Approval
4. Location Map
5. Project Description Letter
6. Letter of Justification
7. Consulting Architect's Report

PREPARED BY: Sean Mullin, AICP  
Planning Manager

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Reviewed by: Town Attorney and Community Development Director

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SUBJECT: 15349-15367 Los Gatos Boulevard/S-24-015, U-24-006, and M-24-008

DATE: April 18, 2025

8. Applicant's Response to Consulting Architect's Report
9. Letter of Justification for SDBL Concession and Waivers
10. Final Arborist's Report
11. Neighbor Outreach Summary
12. Visual Renderings
13. Objective Design Standards Checklist
14. Site Photos
15. Public comments received by 11:00 a.m., Friday, February 7, 2025
16. Development Plans

Received with this Addendum Report:

17. Public Comments between 11:01 a.m., Friday, April 18, 2025, and 11:00 a.m., Tuesday, April 22, 2025

**From:** Zoha Rousta [REDACTED]  
**Sent:** Monday, April 21, 2025 9:53 AM  
**To:** Planning <Planning@losgatosca.gov>  
**Subject:** Public Comment Regarding 15349-15367 Los Gatos Blvd Project

[EXTERNAL SENDER]

Dear Planning Commission,

I hope this message finds you well. My name is Zoha, and I'm writing on behalf of my daughter, Liana, who is a 3rd grader at an Elementary school in Los Gatos. Liana is deeply concerned about the proposed development on Los Gatos Boulevard, and she has written a letter expressing her thoughts on the project.

As a young resident who loves our town and cares about nature, Liana wanted to share her feelings about the impact this project may have on our community. I hope you'll take the time to read her heartfelt message and consider her perspective as you make decisions about the future of Los Gatos.

Thank you very much for your time and consideration. We appreciate the opportunity to be a part of this important conversation.

Sincerely,  
Zoha

## **Public Comment Regarding 15349–15367 Los Gatos Blvd Project**

**Dear Planning Commission,**

Hi, my name is Liana, and I'm in 3rd grade at a school in Los Gatos. I love our town, and I care a lot about nature and animals.

I'm concerned about the proposed development on Los Gatos Boulevard. Los Gatos is a beautiful, historic town known for its green spaces and old trees. This project doesn't match the small-town needs, and I don't think it's good for our community. The roads and infrastructure weren't made for so many people and buildings.

If the development goes ahead, it could cause a lot of problems. First, there will be more traffic, and that will make it harder for people to get around. It might take longer to get to school or work, and we could even see more accidents because of the extra cars on the road. Also, with more buildings, we may not have enough space for everyone to park. Our town could become crowded, and the charm that makes Los Gatos special could start to disappear.

It's also very sad that the plan includes cutting down large, protected trees. Trees are important because they help animals live, clean our air, give us shade, and make our town beautiful. It feels even worse that this is happening during Earth Week, a time when we should be caring for nature. Once the trees are gone, we can't bring them back.

I'm also worried about how this might affect our environment. More buildings mean less open space for animals to live, and the construction could harm the plants and trees around. The noise and pollution could make the town less peaceful and healthy.

There are better ways to grow our town without hurting the environment. I hope we can protect our town's special character and keep it beautiful for future generations.

Thank you for listening.

Sincerely,

**Liana**

**From:** Alex Kamas [REDACTED]  
**Sent:** Monday, April 21, 2025 7:02 PM  
**To:** Planning <Planning@losgatosca.gov>  
**Subject:** Public Comment Item #6

[EXTERNAL SENDER]

My name is Alex Kamas and I live near the proposed development at 15349 and 15367 Los Gatos Blvd. This is a well thought out and much needed development.

Not only will the development provide desperately needed housing, but these homes will also give families a way to get access to the great schools in Los Gatos, ensuring that low enrollment doesn't force Los Gatos schools to close. I'm a teacher and I've seen the projected enrollments for districts in our county and they're not optimistic.

According to the California Dept of Education, ten years ago, Los Gatos Union School District had 3,320 students. Last year, it had 2,673. That's a decline of 20% in less than a decade. If that trend continues then Los Gatos might be forced to follow the path of districts like Cupertino which have had to close multiple schools in the last few years due to a 30% decline in enrollment.

Our students and their families are more than numbers though. They're an integral part of who we are. I look at my students and I worry that the place they're growing up in will be inaccessible to them in the future. If we don't build new housing then most of my students will be forced to move far from their friends and families.

I'm excited to meet the people who will become my neighbors. I want to see them enrich our community and fill it with even more character. I'm asking that the Planning Commission vote to approve this project.

Thank you.

From: Des Kam [REDACTED]  
Sent: Monday, April 21, 2025 7:25 PM  
To: Planning <Planning@losgatosca.gov>  
Subject: Public Comment Item #6

[EXTERNAL SENDER]

To the Planning Commission,

I live two blocks from the planned development at 15349 and 15367 Los Gatos Blvd. I'd like to share my wholehearted support and excitement.

This is a great spot for these homes. They would be within easy walking distance of grocery stores, restaurants, two parks, and they aren't far from the creek trail. The site is adjacent to stops for both public transit and tech commuter shuttles.

These homes would benefit anyone from empty nesters looking to downsize, young families needing room to grow and a place to plant roots, and families like mine who want more choices in deciding where they live.

I hope that the commission sees the value in approving this project, and other housing developments, not just for helping Los Gatos achieve its housing goals, but because of the real people that will get the opportunity to live and thrive in this community.

Thank you.

Sincerely,  
Desmond Kamas

**From:** [REDACTED]  
**Sent:** Tuesday, April 22, 2025 9:34 AM  
**To:** Clerk <[Clerk@losgatosca.gov](mailto:Clerk@losgatosca.gov)>  
**Subject:** Subject: PC Meeting 4/23/25 - Item 6 - Objection to Tiering from 2040 General Plan EIR – Application S-24-015 (15349 & 15367 Los Gatos Blvd)

[EXTERNAL SENDER]



**Los Gatos  
Community  
Alliance**

**Date:** April 22, 2025

**To:**  
Chair and Members of the Planning Commission  
Town of Los Gatos  
110 E. Main Street  
Los Gatos, CA 95030

**Subject:** Objection to Tiering from 2040 General Plan EIR – Application S-24-015 (15349 & 15367 Los Gatos Blvd)

Dear Chair and Members of the Planning Commission:

On behalf of the **Los Gatos Community Alliance**, we submit this comment to respectfully object to the Town's reliance on the **2040 General Plan Environmental Impact Report (EIR)** for its CEQA determination regarding **Application S-24-015**, a proposed 55-unit live/work development at **15349 and 15367 Los Gatos Boulevard**. While this project is **not a Builder's Remedy application**, it is being reviewed and processed **in the context of an unprecedented volume of high-density housing proposals**, including a substantial number of **Builder's Remedy projects**, which are changing the development landscape of the Town in a significant and foreseeable way.

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#### **Project Context – Not a Builder's Remedy Project, But Part of a New Development Pattern**

Application S-24-015 seeks approval to:

- **Demolish existing commercial structures**

- **Construct a 55-unit multi-family live/work development at 35/DU per acre**
- Obtain a **Conditional Use Permit** and **Condominium Vesting Tentative Map**
- Complete **grading, site improvements, and removal of large protected trees**
- Be reviewed under **SB 330**, which limits local discretion in project approvals

Although **this project is not proceeding under the Builder's Remedy provision of state housing law**, it is one of many current proposals that reflect a **material departure from the development patterns and assumptions studied in both the 2020 and 2040 General Plans and their respective EIRs**.

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### **Tiering from the 2040 EIR Is Inappropriate**

CEQA Guidelines **Section 15162** prohibits tiering from a previously certified EIR when **substantial new information or changed circumstances** arise. Since the certification of the 2040 General Plan EIR in 2022, the Town has received **at least a dozen Builder's Remedy applications**, many of which propose:

- **Much higher densities** than what was studied in either General Plan
- **Clustering along Los Gatos Boulevard**, compounding localized and cumulative impacts
- **Minimal inclusion of below-market-rate units**, potentially triggering further rezoning

This volume and concentration of development is **new information of substantial importance** under CEQA Guidelines §15162(a)(3)(B), and it was **not contemplated by the 2040 General Plan EIR**. Therefore, it is **legally inappropriate to rely on tiering** from that document to assess this or similar projects.

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### **Cumulative Impacts & Net Loss Concerns Not Evaluated**

The Town has not conducted a **cumulative environmental impact analysis** of the collective effects of these concurrent projects, including Application S-24-015. Impacts related to **vehicle miles traveled (VMT), greenhouse gas emissions, infrastructure capacity, tree removal, noise, and neighborhood compatibility** cannot be properly understood when each project is reviewed in isolation.

Furthermore, the **Builder's Remedy application for Phase II of the North 40** is likely to **trigger the "No Net Loss" requirements** under **Government Code §65863**. This will obligate the Town to **rezone additional sites to meet low- and very-low-income housing targets**, creating another foreseeable layer of environmental consequences that remain unstudied. Please refer to the attached No Net Loss Analysis.

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### **Conclusion**

Even though **Application S-24-015 is not a Builder's Remedy project**, it is being processed **amid a wave of high-density housing proposals that cumulatively alter the Town's planning and environmental baseline**. These changes **invalidate the assumptions of the 2040 General Plan**



**EIR**, and CEQA **does not permit the Town to rely on tiering** from that document under **Section 15162**.

We therefore urge the Planning Commission to reject the conclusion that no further environmental review is necessary, and to require that the Town conduct a **Subsequent or Supplemental EIR** to properly evaluate the cumulative and foreseeable impacts of current development pressures.

Sincerely,

*Los Gatos Community Alliance*  
*Facts Matter; Transparency Matters; Honesty Matters*  
[www.lgca.town](http://www.lgca.town)



No Net Loss Analysis of Pending and Approved Projects	VL	L	M	A	Total
Total Units - Table 10-3 RHNA Credits and Sites Strategy	694	421	411	845	2,371
6th Cycle RHNA	537	310	320	826	1,993
Surplus Above RHNA	157	111	91	19	378
Net Site Impact from Proposed and Approved Projects					
>50 Los Gatos-Saratoga Road (Los Gatos Lodge)	(86)	(70)	(52)	103	(105)
>15349-15367 Los Gatos Blvd	(19)	(5)	(5)	38	9
>North 40	(184)	(11)	(92)	274	(13)
>ADU actual production 2023 and 2024 adjustment	6	4	(15)	(5)	(10)
Total Adjustments	(283)	(82)	(164)	410	(119)
Remaining Housing Element Site Inventory Surplus/(Deficit)	(126)	29	(73)	429	259

**Note:**

This analysis is conservative with regard to the remaining surplus because there is no evidence the Housing Element assumed unit production of 2,371 will be distributed by income as planned. The Housing Element Site Inventory assumes 47% (694+421/ 2371) of the total units will be very-low and low income units. Actual production has shown that no more than 20% of the units produced will be very-low and low income units. If this analysis was adjusted to reflect "realistic development by income category" the remaining surplus would be less. Or stated another way the net loss numbers would be even greater.