

From: Beth Grimes [REDACTED]
Sent: Wednesday, April 23, 2025 11:26 PM
To: Planning <Planning@losgatosca.gov>
Cc: [REDACTED]; Beth Grimes [REDACTED]; Mark Grimes [REDACTED]
Subject: Input on 15349-15367 Los Gatos Blvd project

[EXTERNAL SENDER]

Hello Planning Commissioners,

Thank you for the discussion around the project for 15349-15367 Los Gatos Blvd at the Planning Commission meeting on 4/23/25. We wanted to provide some feedback both on the meeting accessibility as well as the topic discussed.

As for meeting accessibility, we were tuned in via YouTube but were unable to provide comment because there was no clear Zoom link for this meeting. Then, once in the meeting using credentials from the 03/26/25 meeting, we had the hand raised but were never acknowledged.

As for the development proposal, we are in agreement that this project is so much more considerate of trying to meet the Town's character than other LG Blvd projects. We are however concerned about the following:

1) Parking - The street parking along Garden Lane is often full both during the day and overnight - car wash workers parking for the work day, tree trimmers and lumber companies using this area for staging trucks and vehicles, and others living out of their cars and RVs. We appreciate the enthusiasm for people to use public transit, but this is a massively unrealistic expectation. With 55 units, we can expect there to be at least ~75 cars. Does the proposed parking area adequately cover this expectation? If not, these excess cars will worsen an already problematic parking situation.

2) Neighborhood traffic - We are concerned that this new development will cause a significant increase in thru traffic for our neighborhood. We already experience high-speed cut through traffic on Corinne and Benedict for those looking to avoid lights and congestion on LG Blvd. With this new housing development targeted to families and with access on Garden Lane, we are concerned this will encourage folks to use these alternative routes to bring their kids to school and avoid LG Blvd. Additionally, Corinne, Benedict, and Chiro all lack sidewalks, causing a concern for pedestrian safety and children walking and biking to school.

3) Street Lighting - Garden Lane currently lacks adequate street lighting and request that the Town considers investing in improved street lighting as a part of this project.

Thank you for your consideration.

Best,

Mark & Beth Grimes, Alexandra & Matthew Paras

[REDACTED]
Los Gatos, CA 95032
[REDACTED]

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Thursday, May 1, 2025 9:55 PM
To: Planning <Planning@losgatosca.gov>
Subject: Online Form Submission #15863 for Community Development Contact Form

[EXTERNAL SENDER]

Community Development Contact Form

First Name	<i>Field not completed.</i>
------------	-----------------------------

Last Name	<i>Field not completed.</i>
-----------	-----------------------------

Email Address (Required)	<div></div>
-----------------------------	-------------

Phone Number	<i>Field not completed.</i>
--------------	-----------------------------

Tell Us About Your Inquiry (Required)	Comment Regarding A Planning Project
--	--------------------------------------

Address/APN you are inquiring About (Required)	143-151 E. Main St
--	--------------------

Message (Required)	Letter to Council requesting EIR for SB 330 projects
--------------------	--

Add An Attachment if applicable	scan0789.pdf
------------------------------------	------------------------------

Email not displaying correctly? [View it in your browser.](#)

LAW OFFICES OF
BRENT N. VENTURA
Inactive

LOS GATOS, CA 95032

April 30, 2025

Mayor Matthew Hudes and
Honorable Town Councilmembers
Town of Los Gatos
110 E. Main St.
Los Gatos, CA 95030

**Re: Every SB330 Builders Remedy Projects Currently Pending
Approval in Los Gatos**

101 S Santa Cruz Ave.
14288 Capri Dr.
15300- 15330 Los Gatos Blvd.
14849 Los Gatos Blvd.
15459-16392 Los Gatos Blvd.
15349-15367 Los Gatos Blvd.
15171 Los Gatos Blvd
14917-14925 Los Gatos Blvd
101 Blossom Hill Rd.
16492 Los Gatos Blvd.
143-151 E. Main St.
16250-16270 Burton Road
980 University Ave.
101 S. Santa Cruz Ave.
178 Twin Oaks Rd.
14789 Oka Rd.

Dear Mayor Hudes and Honorable Councilmembers,

Please accept this communication as a respectful plea to the Council to adopt a much more aggressive posture in reviewing all of these SB 330 applications. The current cautious and conservative review process, will fail to fully inform yourselves as decision makers of all the impacts and health and safety risks that these projects will impose on our community, especially when evaluated .cumulatively

The Town should demand and insist that an EIR be conducted to identify all the impacts posed by these projects, whether in reviewing each individual application, especially the more massive developments, or at a minimum, preparation of an EIR to review the cumulative impacts all these projects will impose on a community such as ours with very limited resources.

Some of the impacts that are not being reviewed in any depth at all during the current review process include the impacts on the Town's ability to fight urban wildfire, wildfire evacuation ability, building beyond the capacity of our urban waters supply system to sustain firefighting against wildfire, building beyond the capacity of our sewage system, building in known floodzones, cumulative impacts on our the capacities and service levels that can be sustained by our educational, roadway, emergency responders ,and capital improvement systems.

These items address health and safety issues directly affecting current residents and the Town as a whole. Health and safety issues as Town wide objective review standards. These are not issues affecting design or building standards. Health and Safety issues are protected review issues under the language of SB330 . That statutory language recited protects the Town in taking action to gain information to promote public health and safety.through the environmental review process.

SB330 does not preclude a California jurisdiction from requiring EIRs for builder remedy projects. I have completed some research, and I am unaware of any subsequent legislation that has been adopted by the State that specifcally prevents jurisdictions from requiring Environmental Impact Reports on any SB 330 development application. If I am misinfomed here, I apologize, But what I have heard is that the Governor's Emergency Declaration relating solely to the affected LA wildire area, somehow, now prohibits agencies from demanding EIRs be prepared for any builders remedy projects. I strongly disagree. I believe the legal representatives of these applicants are attempting to intimidate and threaten our elected officials by claiming legal rights that have not yet been granted.

So unless there is specific legislation changing the original scope and rights specified in SB 330, this Council should and must proceed to demand EIRs to protect public health and safety. I firmly believe whatever financial risks you fear, will be acceptable to your constituents. The people of this community want to protect our unique quality of life, and insure the ongoing health and safety of all residents. The very people you represent would rather the Town fight these projects undermining public health and safety, than have its elected leaders throw its hand into the air, saying "there is nothing we can do."

It is a time for strong leadership and accepting some risks for the future well being of all. Courage not fear. The people of this community will rally behind you!

Respectfully submitted,

A handwritten signature in cursive script, reading "Brent N. Ventura".

BRENT N. VENTURA

BNV/bt

LAW OFFICES OF
BRENT N. VENTURA

Inactive
[REDACTED]
LOS GATOS, CA 95032
[REDACTED]

RECEIVED

MAY 02 2025

**TOWN OF LOS GATOS
PLANNING DIVISION**

May 1, 2025

Mayor Matthew Hudes and
Honorable Town Councilmembers
Town of Los Gatos
110 E. Main St.
Los Gatos, CA 95030

**Re: Every SB 330 Builders Remedy Projects Currently Pending
Approval in Los Gatos**

101 S Santa Cruz Ave.
14288 Capri Dr.
15300- 15330 Los Gatos Blvd.
14849 Los Gatos Blvd.
15459-16392 Los Gatos Blvd.
15349-15367 Los Gatos Blvd.
15171 Los Gatos Blvd
14917-14925 Los Gatos Blvd
101 Blossom Hill Rd.
16492 Los Gatos Blvd.
143-151 E. Main St.
16250-16270 Burton Road
980 University Ave.
101 S. Santa Cruz Ave.
178 Twin Oaks Rd.
14789 Oka Rd.

Dear Mayor Hudes and Honorable Councilmembers,

Since the filing period for SB 330 projects has terminated, and while the review process has commenced and is underway, there have been two critically significant changes to the health and safety, as well as the sustainability of residential habitation in identified portions of Los Gatos. Both of these critically significant public health and safety changes occurred after January 1, 2025.

The first of these was two urban wildfires in the Los Angeles metropolitan area that manifested current Fire Codes and Standards are inadequate for emergency responders to save life or property. Firefighting resources proved woefully inadequate, and the urban/municipal water supply was exhausted briefly after the conflagration commenced. Also, the rapid spread of wildfire in the urbanized, densely populated areas, which occurred in quarter mile leaps, by windblown embers illustrated the extreme risk of wildfire spreading from wildfire risk zones into heavily urbanized, densely populated areas, once thought completely safe from the threat, creates entirely new threats and health and safety issues when considering community development.

The second critical change after 1/1/25 occurred when CALFIRE finalized its maps identifying in Los Gatos the zones of severe wildfire risk. As you are well aware, the land area of Los Gatos at risk of severe wildfire was greatly increased than what previous analysis had predicted. There are some SB 330 projects proposed that are either within, adjacent to or within a half mile a severe wildfire risk zone. The idea of greatly intensifying residential densities in areas identified as subject of severe wildfire risk is objective grounds to question the health and safety of proceeding with these projects.

Whether these facts alone give the Town valid legal grounds to deny these projects, is an open legal question. But it does seem prudent for the Town to make inquiry, and require the State and/or HCD to issue clear guidance to jurisdictions reviewing these projects, as to whether public health and safety are protected and satisfied by allowing the construction of high density residential towers immediately adjacent or within a half mile of severe wildfire risk zones. If the State mandates these projects despite the patent and severe risks, than at least the Town should be indemnified from liability. The State should immunize jurisdictions for compelling them to approve high density residential projects under SB 330 when doing so clearly raise very significant health and safety risks to both current and future residents of the community.

Regardless, while the Town seeks to gain clarity from HCD, the State or the Courts on these health and safety concerns. Los Gatos as an independent government entity in California can proceed independently without any prior authorization, to act, on an Emergency basis, and immediately protect the health and safety of its current residents

by enacting a new Fire Building Code.

My legal research indicates that the Town as its own independent legal government entity in California has the right to enact and adopt its own, specific fire building codes that reflect the specific risks, geography, climate, and topography of our jurisdiction. Los Gatos is not obligated to adopt and implement any national or Statewide Fire Code. The Town has the legal authority to draft, adopt, and implement its own Fire Code reflecting the very specific Firefighting risks facing the hillside community with 3 different severe wildfire risk zones within our borders.

The Town is currently endangering the health and safety of its citizens, to whom they have a sworn duty to protect, by delegating the Building Fire Permit authority to a Central Fire clerk, working with an outdated Fire Code that was drafted and implemented without absolutely any consideration of the health and safety issues::

- The zones of severe wildfire risk coming down from the hillsides directly into Downtown Los Gatos;

- That the LA wildfires showed the urban water supply system failed leaving firefighters without sufficient water pressure and adequate water supply to fight the wildfire;

- That emergency evacuation Notices failed, and first responders were unsuccessful in evacuating in the region exposed to fire resulting in extremely high deaths and injuries;

- That the Los Angeles conflagration was spread from burning areas to areas up to a half a mile away that were uninvolved in the initial firestorm by windblown burning embers which firefighters had no ability to contain;

- That to now build very high density, high rise residential towers within, adjacent to, or within a half mile of severe wildfire risk zones presents an imminent, clear and present danger to public health and safety;

Los Gatos needs to immediately adopt a new, current Fire Building Code that

incorporates and mitigates the harsh realities and lessons from the tragic LA wildfires, as well as the large area of the community identified as being located within a severe wildfire risk zone.

If Los Gatos does not act independently and immediately, it will take years for the administrative process to collaborate and develop a new statewide firefighting building code to incorporate the recent lessons learned. Los Gatos needs to immediately take the leash of this beast, and on an emergency basis, in light of the imminent and present threat to public health and safety, adopt a new Fire Building Code that all new construction projects in Los Gatos must satisfy in order to obtain necessary permits before any construction can commence.

I make note that from my review of some of the revised development plans submitted for some of the taller projects (6-13 story towers), to supply only that towers fire suppression needs, will significantly lower the water pressure available to the surrounding neighborhood!. The plans also indicate the specifics on their Fire suppression plans will be "deferred" until the time of submittal of the permits.. This appears to be an obfuscation and misleading the Town and Central Fire of the wildfire and firefighting risks addressed in this correspondence.

There is no requirement under state law that existing homeowners and neighborhoods should have their emergency water pressure reduced in order to facilitate these SB 330 projects. In fact, the underlying guidance in SB 330 is that these projects should proceed only where consistent with insuring the general health and safety of current residents.

While these residential towers with their fully sprinkled fire suppression systems and metal facades may be immune from wildfire risks, they accomplish same only by compromising the water pressure and water supply available for firefighters to suppress fire in the surrounding neighborhoods.

I urge the Town Council to immediately address this issue. From my limited research and without any specific expertise, can advise that the following measures must be incorporated into Los Gatos' new Fire Building Code

- Every new construction over 35' in height located within, or within one-half mile of any severe risk wildfire zone, must have an independent water supply system on site such that its fire suppression system is independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.
- Every new construction over 55' in height, more than one-half mile away from any severe wildfire risk zone, must have an independent water supply system on site such that its fire suppression system is independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.

Thank you for your courteous consideration of this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Brent N. Ventura", written in a cursive style.

BRENT N. VENTURA

BNV/bt

From: Shirley Reekie <[REDACTED]>

Sent: Sunday, May 4, 2025 5:30 PM

To: Planning <Planning@losgatosca.gov>

Subject: Objection and request re proposed development at 15349/15367 LG Blvd

[EXTERNAL SENDER]

Please see my attached letter detailing my objection and request regarding this development.

If it would also help my case to speak at the meeting, please advise.

Thank you for listening--I hope.

Shirley Reekie

[REDACTED]
Los Gatos, CA 95032

May 3, 2025

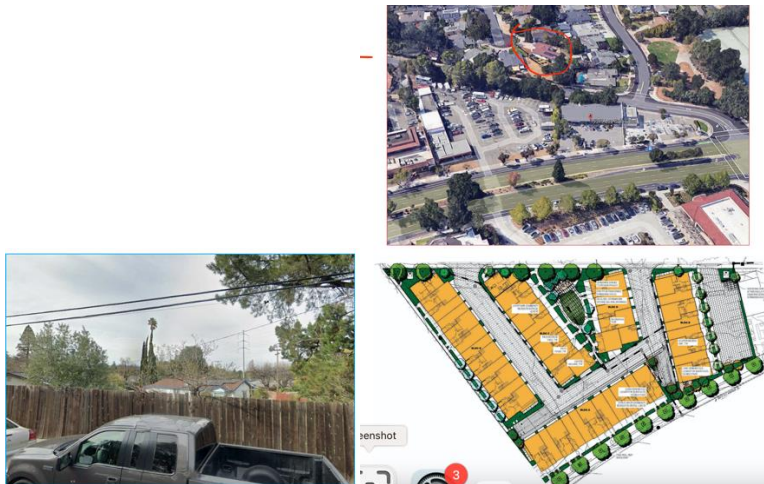
Objection and request regarding proposed new development at 15349 and 15367 Los Gatos B'd

As you will clearly see from these pictures/schematics provided by you, my property will be very much overlooked by this proposed new development. I request that the “large protected trees” that currently border the NW of this site (along Garden Lane) NOT be removed. If they are, my property will be very much overlooked by the second and third floors of these proposed buildings.

I am not against the development—people have to live somewhere—(although people in my neighborhood have endured far more development than those living to the south end of Los Gatos, primarily with the North 40 building, and with more to come there) but I fear that the proposed removal of the “large protected trees” along Garden Lane, and their eventual replacement by (obviously) much smaller trees, will greatly impact my enjoyment of my property. As you will see below, I have several windows that face Garden Lane and I also have a yard that I work in and enjoy, currently unoverlooked by anyone. An alternative would be to reduce the size and number of windows on the buildings that will overlook me, but the easier and better answer is surely to leave the trees.

If trees are protected how can, or indeed should, they be removed?

Please reconsider the “large protected trees” removal so that those of us who live in properties that will be overlooked by this proposed development will not have their properties so adversely impacted. See attached to view the obvious impact—these pictures are from your plan.



My house is circled in red and shown

Shirley Reekie, Owner [REDACTED]
[REDACTED]

From: Brent Ventura [REDACTED]
Sent: Monday, May 19, 2025 2:57 PM
To: Council <Council@losgatosca.gov>
Subject: Attached Letter on need for Town to Consider adopting New Fire Building Code for projects exceeding 35; and 55'

[EXTERNAL SENDER]

Different code requirements depending upon building height and proximity to wildfire severity zone as determined by CalFire earlier this year.

--

Law Offices of BRENT N. VENTURA
[REDACTED]

[CONFIDENTIALITY NOTICE: THIS E-MAIL IS INTENDED ONLY FOR THE USE OF THE PERSON TO WHOM IT IS ADDRESSED. IT MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL, PRIVILEGED OR EXEMPT FROM DISCLOSURE. ANY UNAUTHORIZED DISCLOSURE OR DISSEMINATION OF THIS E-MAIL IS PROHIBITED. IF YOU HAVE RECEIVED THIS E-MAIL IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY RETURN E-MAIL OR PHONE.]

LAW OFFICES OF
BRENT N. VENTURA
Inactive



May 13, 2025

Mayor Matthew Hudes and
Honorable Town Council Members
Town of Los Gatos
110 E. Main St.
Los Gatos, CA 95030

**Re: Every SB 330 Builders Remedy Projects Currently Pending
Approval in Los Gatos:**

101 S Santa Cruz Ave.
14288 Capri Dr.
15300- 15330 Los Gatos Blvd.
14849 Los Gatos Blvd.
5459-16392 Los Gatos Blvd
15349-15367 Los Gatos Blvd
15171 Los Gatos Blvd

14917-14925 Los Gatos Blvd
101 Blossom Hill Rd.
16492 Los Gatos Blvd.
143-151 E. Main St.
16250-16270 Burton Road
980 University Ave.
101 S. Santa Cruz Ave.
178 Twin Oaks Rd.
14789 Oka Rd.

Dear Mayor Hudes and Honorable Council Members,

Since the filing period for SB 330 projects has expired and the review process has first of which was two urban wildfires in the Los Angeles metropolitan area that manifested current fire codes and standards that identified inadequacies for emergency responders to save life and property. Firefighting resources proved woefully inadequate and the urban/municipal water supply was exhausted briefly after the conflagration commenced. The extreme risk of wildfire spreading in wildfire risk zones can be seen in the rapid spread of wildfire in the urbanized and densely populated areas that occurred in quarter-mile leaps by windblown embers. These areas, once thought completely safe from the threat, helped with the

consideration of community development by illustrating entirely new threats to health and safety issues.

The second critical change after 1/1/25 that occurred was when CALFIRE finalized its zone maps, identifying Los Gatos zones to be at severe wildfire risk. As you are well aware, the land area of Los Gatos indicated to be at risk for severe wildfire has greatly increased from what previous analysis had predicted. There are some SB 330 projects proposed that are either within, adjacent to, or within a half mile of a severe wildfire risk zone. The idea of greatly intensifying residential densities in areas identified as subject to severe wildfire risk is objective grounds to question the health and safety of proceeding with these projects. commenced, there have been two critically significant changes to the health and safety and the sustainability of residential habitation in identified portions of Los Gatos. Both of these critically significant public health and safety changes occurred after January 1, 2025.

Whether these facts alone give the Town valid legal grounds to deny these projects is an open legal question, but it does seem prudent for the Town to make inquiry and require the State and/or HCD to issue clear guidance to jurisdictions reviewing these projects. It must be brought into question and consideration whether public health and safety is protected and satisfied by allowing the construction of high density residential towers immediately adjacent to or within a half mile of severe wildfire risk zones.

If the State mandates these projects despite the patent and severe risks, then the Town should be indemnified from liability at least. The State should immunize jurisdictions for compelling them to approve high-density residential projects under SB 330 when doing so clearly raises very significant health and safety risks to both current and future residents of the community.

Regardless, Los Gatos as an independent government entity in California can proceed independently, without any prior authorization, to act on an Emergency basis and immediately protect the health and safety of its current residents by enacting a new Fire Building Code.

My legal research indicates that the Town, as its own independent legal government entity in California, has the right to enact and adopt its own specific Fire Building Codes that reflect the specific risks- geography, climate, and topography- of our jurisdiction. Los Gatos is not obligated to adopt and implement any national or Statewide Fire Code. The Town has the legal authority to draft, adopt, and implement its own Fire Code reflecting the very specific firefighting risks facing a hillside community with 3 different severe wildfire risk zones within its borders.

The Town is currently endangering the health and safety of its citizens, to whom they have a sworn duty to protect, by delegating the Building Fire Permit authority to a Central Fire Clerk working with an outdated Fire Code that was drafted and implemented without absolutely any consideration of the health and safety issues pertaining to:

- The severe wildfire risk zones coming down from the hillsides directly into Downtown Los Gatos;

- The LA wildfires that showed the urban water supply system failure, leaving firefighters without sufficient water pressure and adequate water supply to fight the wildfire;

- The emergency evacuation Notice failure and first responders being unsuccessful in evacuating the region exposed to fire, thus resulting in extremely high deaths and injuries;

- That the Los Angeles conflagration spread, burning areas up to a half a mile away that were uninvolved in the initial firestorm by windblown burning embers, which firefighters had no ability to contain;

- That building very high density high rise residential towers within, adjacent to, or within a half mile of severe wildfire risk zones presents an imminent, clear and present danger to public health and safety.

Los Gatos needs to immediately adopt a new Fire Building Code that incorporates and mitigates the harsh realities and lessons from the tragic LA wildfires. It must also account for the large area of the community identified to be located within a severe wildfire risk zone.

If Los Gatos does not act independently and immediately, it will take years for the administrative process to collaborate and develop a new statewide Firefighting Building Code to incorporate the recent lessons learned. Los Gatos needs to immediately take the leash of this beast on an emergency basis. In light of the imminent, clear, and present threat to public health and safety, Los Gatos should adopt a new Fire Building Code that all new construction projects in Los Gatos must satisfy in order to obtain necessary permits before any construction can commence.

From my review of some of the revised development plans submitted for some of the taller projects that are 6-13 story towers, they indicate that the supply of water is only to that tower's fire suppression needs and will significantly lower the water pressure available to the surrounding neighborhood. The plans also indicate the specifics on their Fire Suppression Plans will be "deferred" until the time of submission of the permits. This appears to be an obfuscation and is misleading the Town and Central Fire of the wildfire and firefighting risks addressed in this correspondence.

There is no need or requirement under state law that existing homeowners and neighborhoods should have their emergency water pressure reduced in order to facilitate these SB 330 projects. In fact, the underlying guidance in SB 330 is that these projects should proceed only where consistent with insuring the general health and safety of current residents.

While these residential towers, with their sprinkler fire suppression systems and metal facades may be less prone to wildfire risks, they compromise the water pressure and water supply available for firefighters to suppress fire in the surrounding neighborhoods.

I urge the Town Council to immediately address this issue. From my limited research and without any specific expertise, I can advise that the following measures must be incorporated into Los Gatos' new Fire Building Code:

- Every new construction over 35' in height, located within a half mile of any severe risk wildfire zone must have an independent water supply system on site. Its fire suppression system must be independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on-site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.
- Every new construction over 55' in height, more than a half mile away from any severe wildfire risk zone must have an independent water supply system on site, such that its fire suppression system is independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.

Thank you for your courteous consideration of this matter.

Respectfully submitted,

BRENT N. VENTURA

BNV/bt