

August 12, 2011

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City of San Jose
Department of Planning, Building, and Code Enforcement
200 East Santa Clara Street, T-3
San Jose, CA 95113-1905

CITY OF SAN JOSE
DEVELOPMENT SERVICES

SUBJECT: Envision 2040 General Plan Draft Program EIR: Rancho del Pueblo Golf Course

I have the following comments on this Draft Program EIR as it pertains to the proposed closure and residential development of this golf course property.

- The City is moving forward with implementation actions, including this EIR, with inadequate public input regarding alternatives to closure. I am not aware of any meaningful public outreach or project scoping in connection with the shutdown of this golf course. The City needs to seek community input before a decision on policy direction and that should be completed with a report back to the City Council before any further environmental review.
- The guiding concept in analyzing the environmental impacts seems to be that since development capacity is being reallocated from other sites in the general area, there will be minor impacts by allowing additional 600+/- housing units on this site.

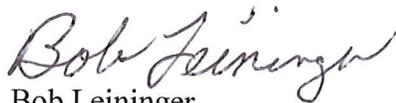
The environmental work completed when the present plans were approved was very clear about the negative impacts on the Eastside communities by going beyond the current densities. The traffic and air quality impacts, and lack of open space and recreation opportunities in this area of San Jose were well documented. To now say that the environmental impacts are much less and the surrounding neighborhood can somehow deal with the added 600+/- DU is at best inconsistent with the analysis already done. The community was promised relief from the effects of excessive residential development, not more of the same.

- The reallocation approach is at odds with the City's goal of fostering higher density development along major transportation lines. The sites from which capacity is being shifted are identified on page 122 of the Draft PEIR as being on Santa Clara Street and Alum Rock Avenue. These corridors are served with major mass transit (or are planned to be so served, i.e. light rail, BART, etc.), and the actual reduction of residential capacity would seem problematic.
- The Draft PEIR states, on page 120, that new infill development designations will help to establish new neighborhoods within a cohesive urban form, or to facilitate new infill development within an existing area that does not have an established cohesive urban character. This is a misunderstanding of the integral role of this golf course in the Eastside Community. Rancho del Pueblo has become a major part of the urban fabric, located as it is between the commercial area of King and Story and the Mexican Heritage Gardens to the north on Alum Rock Avenue. This golf course has helped to establish a cohesive urban character for the area and is recognized as such by the residents.

- Why does more residential development, in an area that already has numerous higher density projects, take precedence over maintaining a reasonable amount of open space and recreation?
- How will the additional 600+/- units, with perhaps as many as 2,000 new residents, impact the remaining park/open space serving the neighborhood?
- The EIR document should make note of the loss of golf facilities in the Eastside over the past few years. Starting with the closure of the 18-hole El Rancho Verde course and driving range on McKee Road in the late 1960s (also for an apartment project), the area has more recently experienced the closure of the 36 hole Pleasant Hills courses on White Road. This property will almost certainly be under pressure for residential development once the current housing market conditions improve. It should also be noted that the Rancho del Pueblo site originally had 18 holes with a driving range.

Please enter this letter as part of the Program Draft EIR process. I expect to have additional comments at a later time and will submit those before the hearing dates for the EIR and General Plan.

Sincerely,



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