COUNCIL AGENDA: 4/25/23

FILE: 23-585 ITEM: 8.4



# Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Christopher Burton

SUBJECT: CITY-LED ENGAGEMENT PROCESS

**DATE:** April 3, 2023

FOR PLEASANT HILLS GOLF COURSE

Approved Date 4/13/23

**COUNCIL DISTRICT: 8** 

# **RECOMMENDATION**

Accept the staff report on the scope, outreach approach, schedule, and budget for a proposed City-led outreach process for the possible redevelopment of the Pleasant Hills Golf Course property.

# **SUMMARY AND OUTCOME**

Based on City Council direction on December 6, 2022, which stemmed from the approval of the proposed revisions to City Council Policy 5-1, staff is providing the City Council with an outline for the scope, outreach approach, timing, and budget required to undertake a City-led community engagement process for the proposed redevelopment of the former Pleasant Hills Golf Course (PHGC) property. A consultant to lead the project is estimated to cost approximately \$250,000, which is currently not funded in the Planning, Building, and Code Enforcement Department's budget. If City Council accepts this report and directs staff to proceed with a City-led outreach process for the PHGC property, staff will explore the reallocation of available 2022-2023 General Fund savings to provide funding for the consultant as part of the 2022-2023 Year-End Budget process. If approved, City staff will ensure that a community engagement process, including multiple community meetings, is completed within the timeframe of Fiscal Year 2023-2024. This will ensure that this effort is completed prior to the City Council's consideration of the privately initiated General Plan Amendment and proposed development project, and will provide a more robust and transparent opportunity for the community to provide input on a proposed project in which there has already been substantial community interest.

The consultant will produce a policy framework document for the City Council by June 2024. Without the consultant, staff would not initiate a City-led engagement process, and the developer would lead the engagement process for its proposed development, consistent with City Council Policy 6-30 (Public Outreach Policy) and City Council Policy 5-1 (the Transportation Analysis Policy).

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## **BACKGROUND**

On December 6, 2022, the City Council held a hearing on an Update to City Council Policy 5-1, the Transportation Analysis Policy, colloquially known as the "VMT (Vehicle Miles Travelled) Policy." While there were a substantial number of modifications made to City Council Policy 5-1, one significant modification was to allow the City Council to make findings for a Statement of Overriding Considerations for General Plan Amendments for infill market-rate housing projects in areas with immitigable VMT outside of the General Plan Growth areas that had a Private Recreation and Open Space land use designation. Prior to the update to the VMT Policy, the VMT Policy had explicit language limiting infill market-rate housing projects with immitigable VMT to General Plan Growth areas.

A significant portion of the analysis and discussion was driven by the interest in developing one property, the former PHGC. This is a 115-acre site on the northeast corner of Tully Road and South White Road and is currently located in a County of Santa Clara pocket within San José's city limits. (See **Attachment** - Pleasant Hills Golf Course Site Location.) The golf course has been closed since at least 2004 and since then has mostly been used as grazing land. Because of the previous existence of the golf course, the property has a General Plan Land Use Designation of Private Recreation and Open Space. During the year-long process to update Council Policy 5-1, a developer expressed interest in redeveloping the golf course with housing.

As part of the City Council's motion to approve the updated City Council Policy 5-1, staff was directed to come back to City Council with recommendations on how to develop an expedited City/Developer hybrid-led community engagement process to obtain community input in the potential redevelopment of the PHGC in the context of the larger Evergreen area. The direction was also provided that the outreach should include a conversation on the appropriate amount of inclusionary housing to be provided by any proposed project. A discussion of the proposed hybrid City/Developer-led engagement process will be outlined in the analysis section; however, there is a long history of City policy to discuss in order to give background and context for the community outreach proposal. This background is discussed below.

# Evergreen-East Hills Development Policy (1976 – Present)

The PHGC is located within an area covered by the Evergreen-East Hills Development Policy (EEHDP). This policy area is bounded by Story Road to the north, U.S. 101 to the west, the intersection of U.S. 101 and Hellyer Avenue to the south, and the foothills of the Diablo Mountain Range and the Urban Growth Boundary to the east. The predominant land uses within the EEHDP area are single-family residential uses, commercial and retail development, and public uses such as parks and schools. The Evergreen area has historically experienced traffic issues due to physical barriers and land use development patterns resulting in a few ways in and out of the area from and across freeways. This has limited the area's capacity for new growth, particularly residential development.

To address this problem, the City adopted the Evergreen Development Policy in 1976. This policy limited additional residential growth in the area so that the area's traffic circulation system

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remained at an acceptable level of service. This policy was updated in 1991, 1995, and again in 2008.

The 2008 update to the Evergreen Development Policy resulted in the current EEHDP, which added a 500-residential unit development pool, 500,000 square feet of commercial retail, and 75,000 square feet of office development in the policy area. Additionally, the EEHDP allows up to only 35 residential units on any single parcel unless the development incorporates affordable housing, historic preservation, or mixed-use components, in which case a larger number of units could be approved. The EEHDP also established a traffic impact fee program for new projects drawing from the development pool to fund 20 transportation improvements.

# Senate Bill 743 - Environmental Quality: Transit-Oriented Infill Projects (2013)

In September 2013, former Governor Brown signed Senate Bill 743 (Steinberg). Senate Bill 743 directed the State Office of Planning and Research to establish new CEQA guidance for jurisdictions and institute VMT as the metric for transportation analysis under CEQA, or another measure that "promote[s] the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." The intent of this change is to shift the focus of transportation analysis under CEQA from vehicle delay and roadway auto capacity (referred to as Level of Service) to a reduction in vehicle emissions, by reducing the amount and distance people drive, and the creation of robust multimodal networks that support integrated land uses.

The updated State guidelines became effective on December 28, 2018.

#### City Council Transportation Analysis Policy 5-1 – VMT Policy (2018)

In February 2018, Council Policy 5-1 "Transportation Analysis Policy" (the VMT Policy) replaced the previous Council Policy 5-3, "Transportation Impact Policy," (which was based on Level of Service), as the policy for transportation development review in San José. Policy 5-1 aligned the City's CEQA rules and transportation analysis with Senate Bill 743 and with the City's Envision San José 2040 General Plan. The change to a VMT-based metric was intended to:

- Streamline CEQA review for projects that improve infrastructure and safety for pedestrians, bicyclists, and transit riders while reducing the need to travel exclusively by automobile:
- Facilitate residential, commercial, and mixed-use infill projects that improve air quality by reducing the number of miles driven by automobiles; and
- Focus CEQA transportation mitigation on pedestrian, bicycle, and transit facilities, as well as transportation demand management.

The City Council approved Policy 5-1 in 2018 with the direction to return to City Council with potential updates based on lessons learned. In this second phase of work, staff assessed Policy 5-1 and proposed refinements and additional complementary strategies to further implement the Envision San José 2040 General Plan by promoting planned infill growth and completing a

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multi-modal transportation network. This second phase of the VMT policy resulted in City Council approving proposed amendments to the policy in December 2022. These amendments largely were for the purpose of facilitating housing, particularly affordable housing.

Because of the policy shift from Level of Service to VMT, the Environmental Impact Report prepared for the EEHDP can no longer be used for transportation analysis purposes under CEQA for proposed development projects within the EEHDP boundary. All proposed development projects must analyze their transportation impacts consistent with the City's VMT Policy. However, this does not exempt projects with existing entitlements from payment of the Traffic Impact Fee under the EEHDP; the Traffic Impact Fee will be collected from existing entitlements upon issuance of building permits consistent with the Mitigation Fee Act.

## Residential Projects under VMT Policy vs. EEHDP

The VMT policy adopted in 2018 supported the Envision San José 2040 General Plans strategy to focus new development into urban villages and other growth areas supported by transit. Like the EEHDP, the VMT Policy did not support significant new market-rate residential development in the Evergreen area, outside its urban villages. This was because the area currently has high VMT, and new development in the area would result in a significant level of VMT that could not be mitigated. Much like the EEHDP, the VMT Policy did, however, support smaller-scale residential projects in high VMT areas like Evergreen. Residential housing development of up to 15 single-family units or 25 multifamily units can be developed in most of the Evergreen-East Hills area on sites where residential uses are allowed by the General Plan. The amendments to the VMT Policy were approved by the City Council in December 2022, however, City Council made a policy shift by allowing significant new market-rate residential development to occur on land designated with a Private Recreation and Open Space land use designation, which would include the PHGC.

## Transition to the VMT Policy for Growth Control and Close Out the EEHDP (2021)

In December of 2021, the City Council adopted amendments to the Envision San José 2040 General Plan to continue to support high- and medium-density housing development in infill locations along transit, consistent with the General Plan. This General Plan amendment stemmed out of recommendations of the General Plan Four Year Review Task Force.

As part of the Four-Year Review, the City Council approved General Plan Amendments to effectively retire the EEHDP for new development. The rationale for this decision was first that all proposed development in Evergreen now had to use, pursuant to state law, the VMT Policy and its VMT metric for its CEQA analysis. The second rationale for retirement was that this VMT Policy supported the intent of the EEHDP by continuing to prevent significant new market-rate housing outside of growth areas. Although the VMT Policy did not establish a development cap for the Evergreen-East Hills area, the policy included requirements that strictly prohibit market-rate housing in high VMT areas outside of the eight urban villages within the EEHDP. Closing out the EEHDP does not exempt existing entitlements from payment of the

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Traffic Impact Fee under the EEHDP, whereas new development projects are subject to the requirements of the VMT Policy.

While the City Council Four-Year Review actions removed the EEHDP from the Envision San José 2040 General Plan, no modification was made to the actual policy document or its references in the San José Municipal Code at this time. Staff is working to amend the policy and the San José Municipal Code to "retire" the policy, similar to the way the North San José Development policy was closed out. Staff anticipates bringing these proposed policy and code revisions to City Council by June of this year.

## **Amendments to Policy 5-1 and City Council Direction (December 2022)**

Based on City Council direction when Policy 5-1 was first adopted in 2018, staff worked on updating and revising Policy 5-1, specifically focusing on amendments to facilitate housing, particularly affordable housing. In December 2022, the City Council approved amendments proposed by staff, with one exception. City Council agreed with one recommendation of the Transportation and Environment Committee and approved a policy amendment that would support the City Council making a Statement of Overriding Considerations, as part of the CEQA process, for housing proposals that have the following characteristics:

- The proposal is for market-rate housing and requires a General Plan land use amendment.
- The proposed General Plan Amendment is located in an area where a market-rate housing project will generate levels of VMT that cannot be mitigated to less than an environmentally significant level (immitigable VMT).
- The proposal is located on a site that currently has a Private Recreation and Open Space General Plan land use designation.

This amendment allows City Council to consider the redevelopment of the PHGC with marketrate housing by effectively relaxing some of the restrictions for significant new housing development in Evergreen that had been established by the EEHDP and then continued with Policy 5-1.

When making this amendment, City Council stated that any redevelopment proposal on the PHGC should also include more than the minimum amount of affordable housing required by the City Inclusionary Housing Ordinance; however, it left the question of how much more for future City Council discussion. The City Council also modified Policy 5-1 to require that any proposed General Plan Amendment with the above characteristics would have to also submit a project for concurrent processing, and consideration by the Planning Commission and City Council. City Council then directed staff to return with recommendations for a hybrid City/Developer-led public engagement process.

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The City Council approved amendments to Policy 5-1 which relate to housing projects with the above characteristics and will not become effective until City Council approves amendments to the General Plan that are consistent with these Policy 5-1 amendments. Staff anticipates bringing these amendments back to City Council in June 2023.

### **ANALYSIS**

Regarding further consideration of the redevelopment of the PHGC property, City Council's direction to staff in December 2022 was to "return to City Council with recommendations on the parameters of policy and policy exceptions on a hybrid engagement process led by developers and City staff and allowing for an expedited process still guided by City-determined guidelines, including a conversation on the appropriate amount of inclusionary housing." In this section, staff proposes a scope, outreach approach, schedule, and budget for this City-led process.

City Council direction on the engagement process for the redevelopment of the PHGC will be timely, because, on December 5, 2022, a General Plan Amendment, File No. GP22-010 was submitted for this property by Lakeside Community LLC. This General Plan Amendment proposed to change the land use designation on the 115-acre site from Private Recreation and Open Space to Mixed Use Neighborhood (on approximately 62 acres of the site) and Mixed Use Commercial (on approximately 51 acres of the site). Another roughly two acres of the site would be used for right-of-way. No proposed project, annexation, or pre-zoning application was submitted along with this amendment.

#### **Proposed Scope of Work**

With the goal of achieving meaningful community input, but on an expedited timeframe, staff proposes a process that consists of three to four community workshops that would occur over a six-month timeframe. To facilitate this expedited process, staff would hire a consultant team from the Planning, Building, and Code Enforcement Department's pre-qualified list of consultants. The consultant team would work with staff to plan and conduct the community workshops, conduct all outreach efforts, and develop the final products resulting from the process.

The final product of this engagement process would be a set of guiding principles for the redevelopment of the PHGC that would identify key objectives that a redevelopment project should achieve, as well as conceptual public improvements and amenities that would need to be built by or included in the redevelopment project. The document would reflect community input on the redevelopment of the PHGC, as well as the City's identified needs and the Goals and Strategies in the General Plan. The guiding principles document would be used by staff in its review of the project and in developing its recommendation. The intention is that the document would also be used by City Council in its consideration. The document would provide clarity to the developer on the community's desires and the City Council's objectives for the redevelopment of the PHGC, providing them with guidance as it develops its proposed project.

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Staff is not proposing an urban village planning process or a specific plan type process, as these are not needed for the intended purpose of this outreach (to inform a pending development application), and such planning processes are resource intensive, resulting in a much longer timeline to complete.

Given the timeline for the pending General Plan Amendment and anticipated project, staff proposes inviting the developer and its consultant team to participate in this process. (For more discussion of the anticipated timeline for the proposed entitlements on the PHGC see the Schedule section below). The workshops would be designed such that the developer and its consultants could use a portion of the workshop to present its concepts and plans as it develops and receives community feedback. The discussions on the developer's concepts and plans could not only be informed by the discussion on guiding principles but could also inform the development of these principles. Given the proposed expeditated timeframe of the City-led engagement process, the developer would have the opportunity to develop and refine its project proposal based on community input as part of this process.

Below is a discussion of the primary topic areas upon which community input would be solicited and would be the focus of the Guiding Principles.

# Community Amenities

As part of the engagement process, the staff and consultant team would solicit community input on what amenities are lacking in the area and what amenities they would desire if the PHGC property was to redevelop. These types of amenities could include, for example, improved access to Lake Cunningham Park, local-serving retail, or neighborhood-serving parks and plazas.

#### Circulation and Multi-Modal Improvements

With community input, staff would identify conceptual circulation improvements in the area surrounding the PHGC to serve both the new potential neighborhood, but also the existing neighborhoods. While these conceptual improvements would be identified in the context of the PHGC being redeveloped, the circulation system would also be evaluated in the larger context of the Evergreen area and consider potential longer-term circulation improvement that could be needed or desired should the Reid-Hillview airport redevelop. The scope would primarily focus on bicycle, pedestrian, and micro mobility (e.g., electric scooters) improvements but could also evaluate conceptual circulation improvements for motor vehicles.

Currently, there is very limited Santa Clara Valley Transportation Authority (VTA) service down White Road (30 minute intervals, or more), and a new dense development at the PHGC site would not have good access to transit with the current VTA service. As part of the process, staff would work with VTA to evaluate whether new development in this location could spur changes to transit services in the vicinity. While significantly more transit exists and is planned in the vicinity of Eastridge and Reid-Hillview, this effort could also help inform how future resources could best be directed to support vibrant transit and multi-modal services in the area.

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The community is likely to have an interest in the design of the street network of any project proposed at the PHGC site. In particular, staff anticipates the community would be interested in how a new development on the PHGC would connect with the existing street network. As part of the process, the team would solicit input on how a new development road network should be integrated with the surrounding network, as well as the design of the street network internal to the site. As part of this process, the team would also solicit input on the conceptual design of new public rights of way.

## Land Use and Urban Design

As part of the proposed engagement process, the team would solicit input from the community on the general mix and type of uses at the project's site, as well as how, overall, such a development could successfully be integrated into the Evergreen area. In addition to land use, the team would discuss and obtain community input on urban design concepts and goals for new development. This discussion would not result in Urban Design Standards or Guidelines for the PHGC (the City already has City Council approved citywide Design Standards and Guidelines document which would apply to new development on the PHGC). Instead, the discussion and input sought would be more on the overall character of development.

## Affordable Housing

In the City Council motion to approve the updated VMT Policy, a required percentage of affordable units was not specified, only that it should be above the City's current inclusionary housing requirement of 15%. This process would be used to obtain community input on what level of affordability should be provided by a redevelopment project on the PHGC. The City Council could consider this input as it considers whether and how to amend Policy 5-1 to provide clarity on the requirements for affordable housing for projects proposed under the Statement of Overriding Consideration Criteria for land designated Private Recreation and Open Space.

## Proposed Outreach Approach

To facilitate participation from the surrounding communities, staff would work with existing neighborhood associations and groups, and City Council Offices 5 and 8, to identify an outreach strategy that would most effectively inform interested community members of the workshops. Because of the significance of the site and the proposed General Plan amendment, staff would recommend establishing a mailing noticing radius of 2,500 feet of the property, which would extend to a large swath of the local community; the City Council Policy on Public Outreach has a minimum requirement of 1000 feet noticing for projects of significant community interest.

In addition to the standard mailings, staff would conduct outreach using social media and anticipate the need for targeted media outreach, as well as partnerships with existing community organizations, to reach out to often difficult-to-reach communities. Based on staff analysis, the predominant languages in the area are Spanish and Vietnamese, in addition to English. Outreach and the workshops themselves would be conducted in all three languages. To more effectively include non-English speaking communities, as well as non-homeowners and other underrepresented groups, staff would, as part of its request for bids, require that the consultant

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team include staff with multilingual and underrepresented outreach skills and experience. Furthermore, the consultant would be encouraged to include a community-based organization with deep connections and experience working on the Eastside.

#### Schedule

If the necessary funding is secured, staff anticipates that the whole engagement process could be completed by June 2024 under the following schedule:

- Summer 2023 Select and onboard the consultant team using the department's prequalified list of consultants
- October 2023 Hold first community workshop
- January through April 2024 Hold between two and three additional workshops
- April through May 2024 Complete summary of the engagement process and Guiding Principles document for City Council consideration
- June 2024 Present Guiding Principles to City Council

The above schedule will allow for the development of guiding principles that would inform the development of the proposed project on PHGC. As a result of City Council action in December 2022, the applicant for the General Plan land use amendment will now have to submit a project for concurrent review by staff and consideration by the Planning Commission and the City Council. The applicant will also now need to prepare an environmental impact report for both the General Plan Amendment and a proposed project. Because for the timeline to develop a project and complete an environmental impact report, the earliest that City Council would consider a redevelopment proposal would be in the Fall 2024 Annual Review; however, the Fall 2025 Annual Review may be a more realistic timeframe for City Council consideration given the work involved.

Even based on a very optimistic timeline for the PHGC redevelopment proposal, a public engagement process that extends through the spring of 2024 would be completed in sufficient time to inform the proposal. It should be noted that staff are not proposing or anticipating a concurrent process where a City-led engagement strategy is first completed and then the input obtained from this process is used by the developer to inform the development of its proposal. As discussed above, the proposed engagement strategy would allow for the developer to develop and refine its proposal as part of this engagement process, such that it would obtain community input that could help inform the development of its proposal concurrently.

# Budget

Staff anticipates that to conduct a community engagement effort of this magnitude, a budget of upwards of \$250,000 would be needed. The majority of the budget would be used to pay the consultant team, with a relatively small portion being used for outreach-related costs including meeting notice mailings. An existing Citywide Planning staff person would manage the process, so no additional funding would be needed for staff time. To complete the proposed scope of work on the proposed schedule, staff would need to have the funding budgeted by July 1, 2023.

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# Advantages of a City-Led Process

The advantage of conducting a City-led engagement process, versus a developer-led process, is that the primary purpose of a City-led process is to identify the community's desires and needs, and what City needs that should be met, if the PHGC is to be redeveloped. The proposed process is also proactive, allowing the community to establish guiding principles before the proposed project is "fully baked." These guiding principles could then inform the development of a proposed project on the PHGC. In contrast, in a developer-led outreach process, the developer would be driving the outcome, and community meetings would be focused specifically on its proposal and what the developer hopes to achieve. This process would be, at least typically, reactive, whereby the engagement process starts with the developer presenting its proposal to the community, and then answering questions, responding to comments, and listening to feedback.

The City-led process could result in a smoother entitlement process for the developer in the long run, with less community opposition when its project goes to hearing. By providing an opportunity for the community to identify its desires and needs for the site, prior to reacting to a specific development proposal, the community is more likely to feel that its concerns and desires have been considered as part of the development of the proposed project. Through a City-led process, that included developer participation, there could also be less mistrust of the developer in the end, and many in the community could feel that they had an active role in shaping the ultimate proposal.

Another advantage of a City-led engagement process, is that it would allow for deeper community outreach than would occur as part of the developer-led process. The number of community meetings, the level of outreach to get participation from hard-to-reach and under-represented communities, and a commitment to conduct at least a tri-lingual engagement process are typically beyond the scope of the developer-led process.

A City-led process also provides an opportunity to consider the redevelopment of the PHGC in the larger context of the Evergreen area. Though the main focus of the engagement effort would be on the PHGC property, there are some other large nearby sites that have the potential to redevelop in the next decade or so. The Reid-Hillview Regional Airport is located at the northwest corner of Tully Road and Capitol Expressway, roughly three-fourths of a mile west of the PHGC site. The airport is anticipated to be closed around 2031. With the closure, the redevelopment of the roughly 180-acre site would produce significant opportunities in the area. Immediately to the south of Reid-Hillview Airport across Tully Road is the roughly 113-acre site of the Eastridge Mall. Being located within the flight path of the Reid-Hillview Airport has significantly restricted redevelopment opportunities at the mall, but the closure of the airport would open up significant possibilities for more intense development on the site. While the potential redevelopment of these sites is likely well over a decade away, a City-led process could consider how the PHGC could redevelop in the context of these other sites, and conceptually identify what type of improvements may be needed, particularly circulation and multi-model improvements.

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Because of the long and complicated history of large and often failed development proposals in Evergreen, and because of the significant community interests already expressed on the potential redevelopment of the PHGC, it is critical that any engagement process be transparent, provide meaningful and multiple opportunities for the community input, and build trust with the community. The City-led process outlined in this memorandum can achieve these ends more effectively than a developer-driven process.

#### **EVALUATION AND FOLLOW-UP**

If staff is given the direction and funding to move forward with this community engagement process, staff can immediately begin work to on-board a consultant to lead the process by the beginning of fiscal year 2023-2024. Based on the general proposal discussed in the Analysis section, staff anticipates that the process of community engagement can be concluded in just under a year, with City Council considering the Guiding Principles by June of 2024. This will allow adequate time for any development proposal to incorporate these recommendations into its design since, as discussed earlier, the earliest a development proposal could move forward would be in the fall of 2024.

### **COST SUMMARY/IMPLICATIONS**

The estimated cost to obtain a consultant to lead the community engagement process is \$250,000, which is currently not included in the budget. Staff explored the use of the Citywide Planning Fee Fund to allocate full funding of \$250,000 for the consultant, but the fund is restricted. These funds are collected from a fee attached to building and planning permits and the nexus for this fee supports these funds being used for planning work that could result in area-wide or City-wide benefit but not for work that could result in the benefit entirely for an individual property owner or development. Since funding for this consultant is currently not budgeted and if City Council accepts this report and directs staff to proceed with a City-led outreach process for the PHGC property, staff will explore the reallocation of available 2022-2023 General Fund savings to provide funding for the consultant as part of the 2022-2023 Year-End Budget process.

#### **COORDINATION**

This report has been coordinated with the City Attorney's Office, City Manager's Budget Office, and Department of Transportation.

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# **PUBLIC OUTREACH**

This memorandum will be posted on the City's Council Agenda website for the April 25, 2023 City Council meeting.

# **COMMISSION RECOMMENDATION AND INPUT**

No commission recommendation or input is associated with this action.

# **CEQA**

Not a Project, File No. PP17-007, Preliminary direction to staff and eventual action require approval from the decision-making body.

## PUBLIC SUBSIDY REPORTING

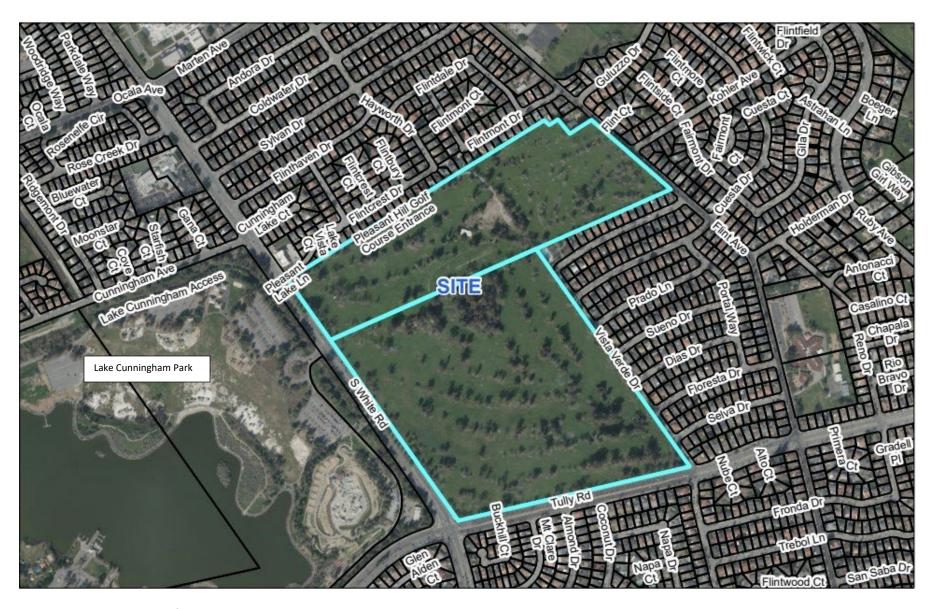
This item does not include a public subsidy as defined in section 53083 or 53083.1 of the California Government Code or the City's Open Government Resolution.

/s/
CHRISTOPHER BURTON
Director, Planning, Building and Code Enforcement

For questions, please contact Michael Brilliot, Deputy Director, at michael.brilliot@sanjoseca.gov or (408) 535-7831.

#### **ATTACHMENT**

Pleasant Hills Golf Course Site Location



**Pleasant Hills Golf Course Site Location**