



COMMITTEE FOR
GREEN FOOTHILLS



August 15, 2011

Mr. Andrew Crabtree, Envision Team Leader
Planning, Building and Code Enforcement
San Jose City Hall
200 East Santa Clara Street
San Jose, CA 95113

Dear Mr. Crabtree,

On behalf of Greenbelt Alliance, the Loma-Prieta Chapter of the Sierra Club, San Jose Cool Cities, Silicon Valley Leadership Group, Committee for Green Foothills, Working Partnerships, USA, and The Health Trust, we are writing to thank the City of San Jose for this opportunity to comment on the Draft Program Environmental Impact Report (DEIR) for the Envision San Jose 2040 General Plan.

In many ways, this General Plan is a model that focuses on urban villages and corridors, infill development near transit, ambitious mode split targets and improved public health. Our comments below reflect our desire to strengthen Envision 2040 even more and support San Jose on its path to becoming a more sustainable, equitable and healthier City.

Jobs-Housing Ratio

The environmental review acknowledges that significant environmental impacts result from the possibility of a Jobs to Employed Residents Ratio that exceeds 1:1 (see, e.g., Impact PH-1 and Impact TRANS-1, among others). The City has acknowledged that one reason for these impacts is not that it intends and prefers the highest possible J:ER ratio, but that it seeks to maximize the jobs capacity to increase the current J:ER ratio which is significantly below 1:1.

Accordingly, our organizations jointly recommend an additional mitigation: for purposes of avoiding environmental impacts or delaying environmental impacts, the City should require orderly development that prioritizes a J:ER ratio of 1:1 as long as housing is available to match job growth. We recognize that ultimately job growth could exceed housing capacity, but this

mitigation would at least postpone the impacts associated with the excess of jobs over housing, and postponing the impacts are feasible means of partially reducing their scale.

As a result of pursuing a J:ER ratio of 1.3:1, more people will be commuting into San Jose for work, exacerbating a regional housing problem. This combined with the fact that the DEIR shows a decrease in the percentage of jobs within walking distance of transit has a significant impact on Vehicle Miles Traveled (VMT).

Additionally, San Jose proposes to expand vehicle capacity on a number of roadways which makes driving more convenient, inducing demand for more drivers on the road. This works directly against the City's goals of reducing automobile emissions.

Our organizations jointly recommend mitigation that prioritizes transit friendly job development and thereby provides limits on development in areas that do not have transit. Such prioritization of development in transit friendly areas over areas that do not have transit yet have agricultural value, such as Coyote Valley, also functions as mitigation that reduces the impacts on open space and prime farmland by reducing the pressure for immediate development of those areas.

The Jobs to Employed Resident ratios in the environmental review, for the highest ratios at least, are not intended results so much as foreseeable impacts described in the document. The environmental protections described in the document, by contrast, are expressly intended and planned. We urge the City to reaffirm these environmental protections and we will work to assist and ensure that the City is able to fulfill its commitment to put these policies in place.

Housing

We applaud the plan for establishing social equity as a planning goal including promoting quality job opportunities and an equitable park system. However, more can be done to support the plan's guiding principle of social equity.

The DEIR seems to treat lightly the potential for voluntary displacement as a result of new development at transit stations driving up prices. People will move further afield to places like Tracy in search of more affordable homes. This in turn forces people to commute back to the community in which they may work. It is therefore critical that San Jose has strong affordable housing policies. San Jose has an excellent record in building affordable homes and we recognize that the future is uncertain when it comes to building more homes affordable to a range of incomes. That said, Envision 2040 is planning out to the year 2040 and the economy will go through many cycles.

We jointly recommend that strong protections are in place to preserve the existing affordable housing stock in transit zones, which provides people with access to opportunity. We also recommend that as large planning projects move forward, such as Diridon Station, that the affordable housing requirements are met on site, including for rental affordable housing.

Transportation

Envision 2040 has very ambitious mode split goals, proposing that the percentage of trips made by bicycle will increase from 1.2% in 2008 to at least 15% in 2040 while the number of those driving alone will decrease from 78% to no more than 40%. San Jose should be applauded for pursuing these goals. However, Table 3.2-14 on page 270 shows that with the proposed Envision 2040 General Plan policies, the percent mode share increase in bicycle trips is 1% for a total of 2% of all trips made by bike. This is evidence that stronger, more holistic balanced transportation policies are necessary. As such, we support policies that prioritize walking, cycling and riding transit.

Our organizations recommend pursuing more aggressive complete streets and parking policies as a way to achieve the commendable and ambitious mode split targets, including a 40% reduction in VMT. This includes expanding the Protected Intersections Policy to all Planned and Identified Growth Areas and reducing the number of streets slated for expansion. Also, we encourage the consideration of Parking Benefits Districts that establish performance pricing of street parking and then return the revenues to the neighborhood.

Public Health

We commend San Jose for its leadership in including community health as a major theme in the draft General Plan. Recognizing the growing body of evidence showing the link between land use patterns and health outcomes, this plan lays out a strong commitment to promoting community health as San Jose grows over the next 30 years. In particular, the Plan's emphasis on improving access to healthy food in low-income neighborhoods and access to medical services is thoughtful and visionary and can serve as a model for other communities looking to address health challenges as they grow.

We appreciate Envision 2040's support for the development of a Community Risk Reduction Plan that will reduce air pollution exposures in communities located near busy roadways and industrial sources and inclusion of specific health-protective mitigation measures for development in those areas.

The General Plan is an opportunity to build healthy, livable complete neighborhoods, communities that intentionally support the well-being of all ages, strengthen families and enable seniors to remain in their homes as they age with independence, dignity and the ability to remain engaged in their community.

We support the village concept that is the cornerstone of the draft General Plan. We strongly encourage the Task Force to include language in the General Plan that prioritizes development of village plans for low-income neighborhoods, oftentimes those with the greatest need for increased access to walkable communities, safe streets, physical activity opportunities, and healthy food.

Additionally, we also support policies to review and revise diesel truck routes to minimize exposure of harmful diesel exhaust to sensitive receptors, including children and the elderly.

Open Space

For lands outside the Urban Growth Boundary (UGB), it is important that they remain as undeveloped open space. Lands outside the UGB play an important role as natural infrastructure, cleaning our air and water.

For non-agricultural uses, our organizations support minimal disturbance to lands located outside the UGB so as to preserve the rural nature of this greenbelt and to provide a viable wildlife corridor.

Conclusion

Overall, the Envision San Jose 2040 General Plan update has set exceptional economic, environmental, and social equity goals for the City of San Jose thanks to the hard work of dedicated task force members and city staff. We hope decision makers honor this hard work as they implement the General Plan over the next 10-20 years.

San Jose can be a better city tomorrow and the General Plan sets the framework to do so. Once the plan is passed, our organizations will support the City in its implementation. Thank you for the opportunity to make public comment.

Sincerely,



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