

May 2, 2014

San Jose Planning Commission
200 East Santa Clara Street
San Jose, CA 95113

RE: **Diridon Station Area Plan**
File No. PP09-163

Dear Commissioners Kline, Yob, Bit-Badal, Kamkar, Cahan, Abelite and O'Halloran:

SPUR is pleased to share comments on the Diridon Station Area Plan (DSAP). The Diridon Station Area is an opportunity to implement the vision and policies set forth in the City's Envision 2040 General Plan, including strengthening and expanding the city's downtown and achieving the ambitious target to grow walking, cycling, transit and carpools to 60% of all commute trips. It is an area of regional and statewide significance given the large transit investments planned. What happens at Diridon could become a model for effective long-term transit-oriented planning and development throughout California.

SPUR is an urban policy organization and civic group with offices in San Jose and San Francisco. We recently published major reports on urban design in San Jose ("Getting to Great Places") and achieving a more successful and active downtown ("The Future of Downtown San Jose"). That report includes discussion of the Diridon area and other recommendations about downtown. Later this year we will release a long-term strategy report about the Valley Transportation Authority (VTA). These reports inform our comments below.

On February 13, 2014, we submitted a letter to the Planning Department responding to the DEIR. SPUR continues to be supportive of the broad outlines of the draft plan. Of primary importance is ensuring significant and high-quality development in the station area to achieve high transit ridership while successfully implementing the placemaking and transportation policies in the plan.

We support many aspects of the plan:


- The overall land use plan and proposed amount of development is appropriate.
- The land use controls in the central area should focus on commercial or job-generating uses and restrict residential development. The central area will be one of the most transit-rich places in the state. As a result, we agree with the Plan's limit on housing within the immediate zone around the station and support the proposal to focus the housing development in the southern portion of the plan area.
- We support the goal to require transportation demand management (TDM) for future development. We would go a step further to establish an area-wide transportation management association (TMA) to implement TDM for future visitors and users. A parking management district managed by the TMA should be considered.
- We appreciate the updated bicycle and pedestrian routes depicted in Figure 2-10 of the First Amendment to the DEIR, which is consistent with natural travel patterns. These connections are key to providing safe, continuous routes to the station from all directions.

The following are areas for improvement or continued attention:

- More attention should be paid to the land ownership and management structure. Realization of the DSAP vision and related Envision 2040 goals will require a high level of continuous cooperation among public agencies, private land owners, facility operators, and the community. Establishing a Joint Powers Authority or similar authority is necessary to streamline decision-making.
- The physical connection between the station and Santa Clara Street is the key to connecting Diridon to the rest of downtown. Planning for Diridon must come from the perspective of the pedestrian, particularly the transit passenger who arrives at Diridon and exits the station heading downtown. Orienting the development in front of the station to enhance this connection is important—we suggest that new development projects in the area create a bike/ped/transit context map (sim. to Figure 2-10 of the DEIR).
- The station area should have seamless integration between all transit operators: BART, Caltrain, BRT, and Light Rail as well as Bike Share, shuttles, taxis, etc. In particular, the BART station should be immediately within the station without street crossings or great distances to arrive at the Caltrain and High Speed Rail platforms.
- There should be a goal and commitment to shift towards a shared parking model where not every building is self-parked. In addition, while we do not dispute the need for increased parking in the station area, we do not support the notion of mandating parking minimums and suggest these be reconsidered.
- Befitting the area's significance in the transit network and the downtown, buildings in this area should be held to the highest standards of urban design, with active frontages along streets and open spaces and no exposed parking. The most important buildings for defining an integrated pedestrian and intermodal experience are those in the immediate vicinity of the station, fronting adjacent public spaces, and along Santa Clara Street. The shared parking concept is especially important at these sites, to limit the impact of parking on the activation and maximum utilization of the area with the greatest transit adjacency.
- The minimum FAR for the Central Zone should be higher than 2.0 to ensure that the build-out does not underutilize the land around the station.
- Demolition of existing properties should be minimized. Building on existing urban fabric, not entirely replacing it, enhances authenticity of place. There should also be greater protection of historic resources, particularly pre-WWII housing north of the station area.
- The plan should protect more intersections from requiring expanded roadway due to growth in auto demand. Implementation plans should prioritize people-throughput, not auto-throughput, through the station area.
- The city's new policy framework requires rethinking of the design of Autumn Parkway and the street should not be built south of Julian, at least until significant development in the area takes place. Autumn Parkway should also be designed as a multi-modal street.

In sum, we support much of what is included in the DSAP and appreciate the opportunity to engage in this planning process. We look forward to ongoing collaboration with the City and other stakeholders on plan implementation.

Regards,



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SPUR San Jose