

Submitted Electronically

August 10, 2015

San Jose Mayor and City Council  
City of San Jose  
200 E. Santa Clara St.  
San Jose, CA 95113

**Re: Letter Requesting Deferral of Item 9.1B Until the Downtown Strategy 2000 EIR Traffic Impact Analysis is Completed**

Dear Mayor Liccardo and Councilmembers Herrera, Carrasco, Jones, Kalra, Khamis, M. Nguyen, T. Nguyen, Oliverio, Peralez, and Rocha:

**SPUR recommends that the City postpone the transfer of any properties associated with the Autumn Parkway Phase II extension until City Council has had the opportunity to determine whether or not this project is still needed to mitigate transportation impacts of downtown development.**

In recent years, San Jose has adopted a number of sustainable transportation policies, which have prioritized transit, walking and cycling—particularly near Diridon Station, the transit hub of the South Bay. For example, the *Envision 2040* General Plan includes robust mode-shift goals that decrease driving alone, from 80% to 40%, by increasing walking, bicycling and transit use. The San Jose Bike Plan 2020 creates a core, bike-friendly network of connections near downtown, strengthening the fabric of central San Jose. Most recently, San Jose adopted Vision Zero, a commitment to making San Jose’s streets safer for all users. We are supportive of these steps and encourage San Jose to continue working towards a sustainable urban transportation system.

SPUR has expressed its concern for the expansion of Autumn Parkway Phase II on several occasions, including in our report, *The Future of Downtown San Jose* and in comments on the Diridon Station Area Plan.<sup>1</sup> Our three primary concerns with the extension of the Parkway from W. Julian Street to Santa Clara are:

- The high level of existing and future pedestrian, bicycle and transit investment in downtown and particularly at Diridon Station. Making it easier to drive to and through Diridon contradicts the city’s stated goals of reducing vehicle miles traveled and encouraging non-auto modes of travel. Instead, the focus should be to maximize the combined billions in transit investment that will bring BART to Diridon and upgrade Caltrain and the bus network, providing increasingly better transportation options to access the SAP area, downtown and surrounding destinations.

<sup>1</sup> SPUR. May 16, 2014. Re: Diridon Station Area Plan, File No. PP09-163.  
[https://www.spur.org/sites/default/files/publications\\_pdfs/SPUR\\_DSAP\\_City\\_Council\\_Comments.pdf](https://www.spur.org/sites/default/files/publications_pdfs/SPUR_DSAP_City_Council_Comments.pdf)

- We are concerned that the design of the street will not promote walkability. The current design of Autumn Parkway prioritizes auto throughput and speeds. The newly rebuilt street would feature four lanes, a 12-foot median (including left-turn lanes) and no on-street parking. This approach is more common for a suburban expressway than an urban street in a dense, walkable downtown.
- The street design and straight alignment would destroy some of the surviving traditional street grid in the area. The straight alignment requires demolishing existing properties in the blocks north of the San Jose Arena. The new street would cause a number of historic streets to become cul de sacs, and the essence of the old grid would be lost. Too much of the historic fabric of downtown has already been lost.

**We reiterate these concerns and urge San Jose to evaluate whether or not the Autumn Parkway Phase II extension is still needed to mitigate the effects of downtown development.** The Autumn Parkway project was identified as mitigation to the downtown development proposed in the Downtown Strategy 2000 and cleared in the corresponding Downtown Strategy 2000 Environmental Impact Report (EIR). Since the Downtown Strategy 2000 was adopted, a sea change has occurred in the practice of analyzing the transportation impacts of new development. Previously, transportation impact analyses focused almost exclusively on auto delay, with intersection level of service (LOS) as the critical metric. Senate Bills 375 (2008) and 743 (2014) move away from this metric and signaled the state of California's commitment to encouraging land use and transportation decisions that reduce greenhouse gas emissions and vehicle miles traveled (VMT). New California Environmental Quality Act (CEQA) Guidelines direct cities to replace LOS with VMT as the primary metric for considering the transportation impacts of new development. The Autumn Parkway project was proposed as mitigation to development under the outdated level of service framework. It is possible that some projects that were proposed as solutions to problems defined by Level of Service are no longer necessary or can be configured differently when transportation impacts are measured as a function of greenhouse gas emissions or vehicle miles traveled.

A memorandum dated May 28, 2015 specifies that the Downtown Strategy EIR Update will evaluate the project-level transportation impacts of development over two time horizons, the first of which is 2015-2025.<sup>2</sup> This is an opportunity to assess whether or not the Autumn Parkway project is still needed to mitigate downtown development. The Department of Transportation will be working over the next several months to complete this first phase of the transportation impacts analysis, which will evaluate whether and what type of mitigation might be necessary using new metrics. For these reasons, **we recommend that the City postpone the transfer of any properties associated with the Autumn Parkway Phase II extension until the Department of Transportation concludes its traffic impact analysis for the Downtown Strategy Environmental Impact Report (EIR) Update.**

Thank you for the opportunity to provide comments on the Compensation Agreement with the County of Santa Clara for the Autumn Street Extension in the context of the Autumn Parkway

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<sup>2</sup> Toni J. Taber. May 28, 2015. Status Report on the Downtown Strategy 2000 EIR.

Phase II Extension. Please feel free to contact me with any questions at 408-638-0167 or [ltolkoff@spur.org](mailto:ltolkoff@spur.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Tolkoff', with a stylized, cursive script.

Laura Tolkoff  
San Jose Policy Director

Cc:  
Jim Ortbal, SJDOT  
Paul Smith, SJDOT