SPUR
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Tom Fitzwater, Environmental Planning Manager
VTA Environmental Programs & Resources Management
3331 North First Street, Building B-2
San Jose, CA 95134

March 6, 2017

Submitted Electronically

Re: VTA's BART Silicon Valley Phase II Extension Project

Dear Mr. Fitzwater,

This letter provides SPUR's comments on the Draft Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report.

SPUR is a non-profit urban policy organization with offices in San Francisco, San Jose and Oakland. SPUR promotes good planning and good government through research, education and advocacy. We have thousands of individual and business members in the Bay Area.

Bringing BART to the South Bay is an opportunity of a lifetime. When completed, BART will connect the downtowns of the three largest cities of the Bay Area. The project's actual benefits will depend on decisions made today.

BART Extension Project Definition

- **We encourage VTA to show two sets of ridership forecasts for Diridon Station: one that accounts for BART alone (as it is in the draft EIR/ EIS), and one that accounts for other transportation improvements.** We think that the EIR may underestimate the ridership forecast for travelers coming to and from Diridon Station. It is our understanding that the model does not account for other transit services and station access improvements that will add BART riders, such as VTA's light rail and bus network, which are planned to take effect by the end of 2017. VTA and San Jose have a shared goal to maximize ridership and other benefits of BART.

- **We strongly prefer that the location of the downtown San Jose station be located on Santa Clara between Market St. and 4th Street ("downtown west" option).**[1] Although the east option has fewer construction-related impacts, we think that the decision about where to locate the station should be based on long-term thinking. The decision about where to locate BART will shape the city for the better part of a century.

- **We think that the west option has the potential to generate more riders than the east option.** More riders translate to more operational revenue, lower greenhouse gas emissions, and less roadway congestion. Our analysis suggests that compared to the east option, the downtown west option offers the best opportunity to generate new BART riders:

    - *The west option is closer to future jobs, and the proximity of jobs to the station matters.*
        - The 1/4-mile and 1/2-mile around the downtown west station are more proximate to employers and commercial development. The west station option is closer to existing jobs, and jobs like to cluster together contiguously—it is less likely that jobs will leapfrog several blocks and start growing east of the downtown core.
        - The number of planned jobs near the west option far outpaces the planned jobs and housing close to the downtown east option. San Jose is planning to add 58,500 new jobs and 14,360 new housing units in downtown, but only 795 jobs and 850 housing units in the East Santa Clara Urban Village (between North 7th and North 17th streets).
        - The number of office workers who will ride transit decreases the farther they are from transit. A recent study found that the office mode share drops 1% for every 100 feet that they need to walk.[2] Additionally, the statistical relationship between people who work within 1/4 mile of a rail station and transit ridership was twice as strong than those who worked more than 1/4 of a mile away from the station.[3] Thus, people who work in downtown's growing office district may not walk the extra few blocks to BART if it is to the east.

[1] See SPUR's full position on the BART downtown San Jose station location: http://www.spur.org/news/2017-01-26/where-put-downtown-san-jose-bart-station-go-west

[2] Arrington, GB. "Getting TOD Right: Reflections from 40 Years Doing TOD". Rail~Volution. (March 2016). http://railvolution.org/transit-oriented-development-101/

[3] Cervero, R. and Duncan, R. 2008. "Residential Self Selection and Rail Commuting: A Nested Logit Analysis". http://reconnectingamerica.org/assets/Uploads/604.pdf

- *The west option is more likely to attract employers and more jobs in the future. Employment uses bring more people within walking distance to the station than residential uses, and therefore bring more potential riders near the station.*
    - Large sites are attractive to employers and commercial developers and there are more large development opportunity sites (parcels larger than 1/3 acre) within 1/4-mile of the west option than the east option.
    - Employment uses—clustered near the west option—offer more density and more potential riders. It's not uncommon to have 4 people per 1000 square feet of office than 4 people in a 1000 square foot apartment.
- *The west option offers connections to light rail and buses at the First Street and Second Street transit malls.*
    - The availability of these transit connections makes BART more useful to people in San Jose and Santa Clara County who are already served by VTA's light rail network.
- *The west option is also closer to a variety of round-the-clock activities, which can help bring riders to the station for non-commute trips.*
    - These destinations include the San Jose Convention Center, several hotels, San Pedro Square Market, the SoFa arts district, the San Jose Museum of Art, and more.

- **We ask that VTA analyze the impacts of locational decisions on ridership to support project design decisions.** The draft EIR/ EIS states that the number of riders who will take BART at the downtown station is the same, regardless of whether the station is located to the "west" or "east". We understand that this may be a limitation of the existing model. However, given the preponderance of academic research on the factors that influence ridership (as described above), we think that further analysis is warranted.

- **We encourage VTA to consider the impacts of locating the station portals on Santa Clara Street.** VTA is clearing many portal locations in the EIR/EIS to give as much flexibility to the project as possible, and we support this approach. As the project gets refined, we think it is important to select portals that are most consistent with San Jose's goals for accessibility and placemaking. To that end, we think the portals should be highly visible from main streets and help orient people to nodes of activity. Therefore, we recommend that VTA consider the

following additional locations: 1) a portal on W. Santa Clara Street at Third Street; and 2) a west-facing portal on W. Santa Clara Street between Market Street and Second Street. We suggest keeping: 1) the two portals on Market Street between W. Santa Clara Street and Post Street, 2) the portal at the Mitchell Block on W. Santa Clara between First Street and Market Street. We suggest working closely with a developer to integrate the portal into a new development project at that location.

- **We strongly recommend that ventilation and ancillary structures be placed underground in order to create a vibrant and pleasant public realm.** We appreciate that VTA analyzed putting ventilation and ancillary structures below ground. These will diminish the quality of the walking environment if placed above ground.

Transit Oriented Joint Development (TOJD)

- **We applaud VTA for producing a project that does not have any parking at or around the downtown San Jose station.** The key purposes of extending BART to downtown San Jose are to give commuters an alternative way to get to jobs and to support the urban, compact growth occurring in downtown San Jose. Prioritizing walking, biking and transit use for station access is the right approach to achieve these goals. A shared and distributed parking approach is more appropriate for these urban locations.

- **We appreciate that VTA is considering unbundled parking in the TOJD sites.** It is important to minimize the availability and physical footprint of parking in order to create walkable communities that support transit usage. In addition, charging for parking separately from rent can help lower overall housing costs for transit users that live in these locations.

- **We think that VTA should plan and clear more growth on the proposed TOJD sites.** The amount of office, retail and housing proposed as part of the TOJD program is relatively small and does not make best use of some of the most transit-accessible parcels in the city. TOJD projects are meant to be catalytic and should plan for more growth.

- **There are at least 238 unneeded parking spaces proposed for the TOJD sites. We encourage VTA to remove this excess parking from the draft plans and draft EIR/EIS.** With better transit and autonomous vehicles, we are on the verge of a paradigm shift in transportation that should reduce (or negate) the

need for private auto parking. Parking decisions should be made carefully and conservatively.

SPUR used GreenTRIP Connect[4], an online tool that calculates how much parking demand will be generated at the parcel level based on actual parking utilization rates in the area. For both of the TOJD sites that include parking (Alum Rock and Santa Clara), the proposed parking is much higher than the estimated parking demand.

- Alum Rock: We found that a 275-unit housing project with the program described in Table 3-40 on the TOJD parcel would only need 311 parking spaces—89 fewer parking spaces than proposed. This is a conservative estimate; it does not account for the addition of new, high-quality rapid transit, which should replace car trips and reduce parking demand.

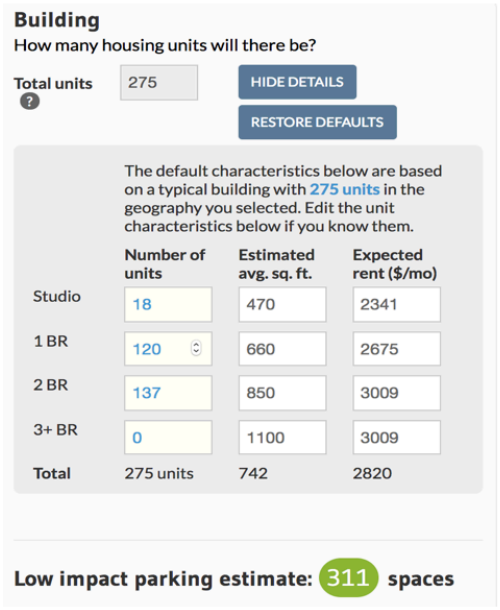
- Santa Clara Station: The proposed TOJD calls for 400 parking spaces for 220 units of housing. This not only exceeds the amount required by the city of Santa Clara (380 spaces), but the GreenTrip Connect tool estimates that this development program in this location would only generate demand for 251 parking spaces—149 fewer spaces than proposed.

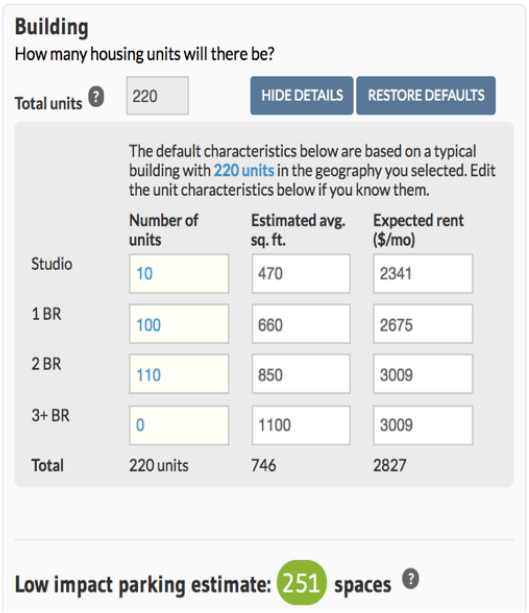
  The screenshots below show the estimated parking demand reports from GreenTrip (Left Alum Rock Station, Right: Santa Clara Station),

  Additionally, a 2010 study by VTA and San Jose State University looked at 12 transit-oriented residential properties in Santa Clara County and found that 100% of them were overparked. The average parking supply was 22% higher than needed.[5] These findings suggest that the amount of parking at TOJD sites is far too high.

[4] See TransForm California's GreenTRIP Connect: http://connect.greentrip.org/map-tool.php?addr=95116

[5] VTA and SJSU. 2010. A Parking Utilization Survey of Transit-Oriented Development Residnetial Properties in Santa Clara County. http://www.sjsu.edu/urbanplanning/docs/VTA-TODParkingSurveyReport-VolI.pdf





Thank you for the opportunity to provide input on the environmental analysis. Please feel free to contact us with any questions you may have at 408-638-0083.

Sincerely,

Teresa Alvarado
San Jose Director

cc: Mayor and VTA Board Chair Jeannie Bruins, Mayor Sam Liccardo, Grace Crunican, Nuria Fernandez, Harry Freitas, Jim Ortbal, Kim Walesh