

April 10, 2017
Submitted Electronically

Mr. Michael Brilliot and Mr. Darry Boyd
Planning, Building and Code Enforcement
200 E. Santa Clara Street
San Jose, CA 95113

Re: Notice of Preparation of a Draft Environmental Impact Report for the Downtown Strategy 2040 Project (Revised)

Dear Mr. Brilliot and Mr. Boyd,

Thank you for the opportunity to provide input on the update of the Downtown Strategy. We are glad that the city of San Jose is updating the EIR to continue facilitating growth downtown while acknowledging policy and economic changes at the city and state that have occurred in recent years.

Transportation Mitigations and Improvements

We reiterate our recommendations written in our letter about the Downtown Strategy 2040 Update dated November 10, 2015. We are encouraged by the fact that the city is presently considering moving from Level of Service (LOS) to Vehicle Miles Traveled (VMT) for analyzing the transportation impacts of new development. To that end:

1. **We encourage the city to use VMT** in order to achieve the city's mode shift goals and goals for reducing greenhouse gas emissions, and to alleviate some of the wear and tear on the city's roads. The type of infill, transit-oriented growth that San Jose is planning to build in downtown are intended to reduce the rate of driving and increase transit use, walking, and bicycling, which will have minimal impact to the environment.
2. **We encourage the city re-evaluate some of the auto-oriented mitigation projects that were proposed in the early 2000s** as mitigation for growth in downtown. With the city's shift towards VMT—combined with the billions of dollars of transit investments and the rapid shifts in mobility technology—it is appropriate to rethink big investments in auto-oriented infrastructure such as road widenings and new parking. We encourage the city to undertake a comprehensive assessment of circulation and parking needs for downtown and Diridon as a whole.

Employment Priority Areas

We are thrilled to see that the city is exploring ways to focus employment growth near the downtown BART station and appreciate that our comments from November 2015 were

incorporated into this update. Numerous studies—including of the existing BART system—show that it is critical to locate jobs closest to the station in order to make sure that there are enough people riding the trains, which in turn uses taxpayer dollars responsibly, reduces auto traffic and greenhouse gas emissions. For example, employment density is one of the top two predictors of whether or not people will use transit.¹ A review of forty years of TOD planning found that there is a 1% drop in transit ridership among workers for every 100 feet that they have to walk between the station and their job.²

In addition, improved transit access boosts commercial rents, which would make downtown San Jose more attractive for new commercial development compared to other locations in the south bay. We have to save room for jobs close to transit if we are to make the most of this comparative advantage.

There are two ways to create an employment priority area. First, the surest way is to reserve key unbuilt sites of more than 30,000 square feet for employment through zoning. Second, the city could establish a target share of the future percentage of total new floor area (such as 70%) for employment uses within a quarter-mile of future BART stations. **This is different than using a minimum FAR requirement for commercial in urban villages insofar as housing could move forward prior to the commercial portion (for a horizontal mixed use site), but most of the site would be reserved for employment.** This is the approach that was used around the Transbay Terminal in San Francisco and allows for flexibility but is performance-based.

We encourage the city to move forward with the employment priority areas overlay and look forward to working with the city to develop this approach.

Sincerely,



Teresa Alvarado
San Jose Director

cc: Councilmember Raul Peralez, Reena Brilliot, Jim Ortbal, and Kim Walesh

¹ Chatman, D and Cervero, R. 2014. "Making Effective Fixed-Guideway Transit Investments: Indicators of Success." "Transportation Research Board's Transit Cooperative Research Program Report 167.

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