SANTA CLARA
Valley Transportation Authority

August 5, 2011

City of San José
Department of Planning, Building and Code Enforcement
200 East Santa Clara Street, 1st Floor
San José, CA 95113

Attention: John Davidson, Senior Planner

Subject: Draft Program EIR for Envision San José 2040 General Plan

Dear Mr. Davidson:

The Santa Clara Valley Transportation Authority (VTA) has reviewed the Draft Program Environmental Impact Report (Draft PEIR) and the draft Envision San José 2040 General Plan. We have a number of comments on these documents, which are included in the attached memorandum. However, I would like to highlight here the key themes from our review.

- First, we strongly support the General Plan objectives that strive to concentrate growth within Downtown and on lands located at the center of regional transportation systems, and to create an interconnected city where activities and services are easily accessible by walking, bicycling and public transit. These General Plan objectives represent a very positive direction for the City in land use and transportation planning. VTA supports policies and projects that target development around the established transportation cores, corridors, and station areas in Santa Clara County. VTA is in the process of making major transit investments in San José over the next 5 to 10 years with the extension of BART and the introduction of Bus Rapid Transit service, and growth should be concentrated more heavily around these investments rather than in outlying areas.
- Second, we commend the City for establishing an objective to design streets for people, not just cars, and for identifying opportunities to modify the City's roadway network to accommodate multimodal travel, such as by defining Grand Boulevards which provide priority for transit vehicles. It is clear that the City has given serious consideration to alternative modes of transportation in the draft General Plan and the Draft PEIR; this emphasis is consistent with the goals of the Santa Clara County Congestion Management Program managed by VTA. VTA has programs that offer grants to help plan and construct multimodal transportation improvements, and we are ready to help the City implement the vision identified in the Plan.
- While VTA understands the City's rationale for emphasizing job growth and the need to create a better balance of land uses to support the provision of services, we believe that the proposed General Plan land uses do not fully support the Greenhouse Gas (GHG) reduction goals established early in the Envision process. The proximity of jobs to transit, and job concentration versus dispersal, are two of the largest factors affecting transit ridership and

mode share. By continuing to disperse significant job capacity in outlying areas such as Alviso, New Edenvale, Evergreen, and North Coyote Valley, the proposed General Plan misses an opportunity to reduce Vehicle-Miles-Traveled (VMT) and GHG emissions. This approach is not fully consistent with the goals established in Senate Bill 375 and regional efforts in the development of the Sustainable Communities Strategy.

- The Alternative scenarios included in the Draft PEIR appear to evaluate only differences in the overall level of population and employment growth in the City, and not the degree to which this growth is concentrated versus dispersed. In our letter on the Notice of Preparation for this Draft PEIR, VTA encouraged the City include a feedback loop in the analysis of land use/transportation scenarios so that stakeholder input could be considered during the refinement of the alternatives. We request that the City consider adding another scenario that aims to achieve larger VMT and GHG reductions – through strategies such as concentrating growth in central, transit-rich areas such as Downtown and North San José, pricing strategies, employer-provided shuttles, and other measures.
- The Draft PEIR states that implementation of the proposed General Plan would have significant adverse impacts on 12 of 14 designated Transit Priority Corridors in the City. The DPEIR classifies this as a Significant Unavoidable Impact because it concludes that there is no assurance that transit priority techniques would reduce impacts to a less than significant level. Given that the draft General Plan's VMT and GHG reduction strategies rely heavily on a mode shift to transit, it is vital that transit remain time-competitive on these key corridors. The draft General Plan should be revised to include stronger policies supporting the implementation of transit priority measures such as signal priority, queue jump lanes and/or exclusive bus lanes on these corridors. VTA stands ready to assist the City in implementing these priority measures, by providing grant funding, inter-agency coordination, and technical assistance.

VTA looks forward to working with the City of San José on the completion and implementation of the Envision San José 2040 General Plan. Please do not hesitate to contact me at (408) 321-5713 or Chris Augenstein at (408) 321-7093 if you have any questions or to discuss how we can work together with you in this process.

Sincerely,

John H. Ristow
Chief CMA Officer

cc: Chris Augenstein, Bijal Patel, Roy Molseed, Robert Swierk, VTA
Hans Larsen, Joe Horwedel, City of San José

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MEMORANDUM

TO: John Davidson, Senior Planner
City of San José Department of Planning, Building and Code Enforcement

FROM: Robert Swierk, AICP
VTA CMA Planning Department

DATE: August 5, 2011

SUBJECT: Draft Program EIR for Envision San José 2040 General Plan

The Santa Clara Valley Transportation Authority (VTA) has reviewed the Draft Program Environmental Impact Report (Draft PEIR) and the draft Envision San José 2040 General Plan. In addition to the key themes raised in our letter from John Ristow dated August 5, 2011, we have the following specific comments based on our review.

Transportation Analysis – Model Conformance

As described in the Envision San José 2040 Draft PEIR, the travel demand methodology used by the City of San José to determine transportation impacts is based on the use of the VTA Countywide model, adjusted and validated to more refined local conditions within the City of San José . City staff has worked in coordination with VTA modeling staff and has developed the model to be consistent with the methodologies used by the VTA and has provided detailed documentation of the base year 2008 model validation. VTA modeling staff has reviewed the City model documentation and has found that the model meets the CMA Local Model Consistency Guidelines adopted by the VTA Board of Directors in May 2009 in terms of methodologies and quality of the base year model validation. Subsequent to VTA staff review, the model consistency finding was adopted by the VTA Systems Operations Management Working Group and the VTA Technical Advisory Committee. The model consistency finding is expected to be approved by the VTA Board of Directors at the August Board meeting. City of San José staff is to be commended for preparing comprehensive model documentation facilitating VTA staff review of the modeling assumptions and base year validation, as this improves the credibility of the model results described in the Transportation section of the Draft PEIR.

Transportation Analysis – Description of Model Methodology

There are inconsistencies in the description of model methodologies in Section 3.2.3.2 of the Draft PEIR and those reported in Appendix B. As an example, the process for distributing excess growth to outlying jurisdictions is more concise in Section 3.2.3.2 than the process described in the Appendix. Please ensure consistent wording between each section to minimize confusion.

Transportation Analysis – Testing of Pricing Strategies

The preferred General Plan alternative has been shown to increase VMT per service population compared to existing conditions. Under proposed policies and actions that reduce or avoid adverse impacts from increased VMT, there is no direct mention of parking pricing strategies in the shorter term that may be adopted to decrease VMT. Pricing and availability of parking is a

strong factor in reducing automobile travel and is also a variable that can be tested within the framework of the models. Therefore increased parking costs could be a factor in helping meet the Plan's VMT reduction goals, and can be tested in a variety of manners including increasing long and short term parking costs for specific areas of the City or through congestion cordon pricing strategies for the downtown district. As noted in our letter from John Ristow dated August 5, 2011, we recommend that the City consider adding another scenario that aims to achieve larger VMT and GHG reductions; pricing strategies would be a key part of this scenario.

Transportation Analysis – Mode Share Impact

In the Transportation section of the Draft PEIR (p. 270), daily BART boardings by the San José service population are reported to be 198,000. This value appears to be too high and it is recommended that staff verify this value.

Transportation Analysis – Roadway Congestion and the CMP

The Draft PEIR states that implementation of the proposed General Plan would result in significant increases in congestion on already congested roadways crossing identified screenlines (Impact TRANS-3), adverse impacts on designated Transit Priority Corridors (Impact TRANS-4), and increases in congestion on congested roadways in neighboring cities and on County and Caltrans facilities (Impact TRANS-5). While the Draft PEIR does not call them out as such, many of these impacted roadways are Congestion Management Program (CMP) facilities. Per state Congestion Management Agency legislation, the City will need to prepare one or more Deficiency Plans in accordance with VTA's Deficiency Plan Requirements to address these congestion impacts as they arise. Deficiency Plans can be prepared in conjunction with Area Development Policies and must contain a list of actions to help offset the vehicular level of service impacts, and an implementation plan with specific responsibilities and a schedule.

The preparation of a Deficiency Plan can be an opportunity to implement multimodal (non-automotive) transportation improvements as off-setting measures. As noted in Policy TR-5.3 of the draft General Plan, these off-setting improvements can include improvements to transit, bicycle, and/or pedestrian facilities. They may also include the implementation of transit priority measures such as signal priority, queue jump lanes and/or exclusive bus lanes, or developer funding of shuttles to connect employment or residential sites to the regional transit system. VTA recommends that the discussion of roadway congestion impacts and mitigation measures in Section 3.2 of the Draft PEIR be revised to reference the VTA Congestion Management Program Deficiency Plan process.

Description of Proposed Transit Improvements – BART Extension

The description of the planned BART extension to Silicon Valley in Section 3.2 of the Draft PEIR is out of date and should be replaced by the following:

> "As shown on Figure 3.2-8, the BART system is proposed to extend 16 miles from the planned terminus at the Warm Springs station in Fremont (currently under construction by BART) to Santa Clara via Downtown San José. The extension through San José is being implemented by the Santa Clara Valley Transportation Authority and will be constructed in phases. The 10-mile first phase, currently in design, will commence construction early in 2012 with service expected to begin in 2018. This first phase will include two stations, one

in Milpitas and the other in the Berryessa community of San José. The remaining segment is planned to include stations at Alum Rock, Downtown San José, San José Diridon, and Santa Clara. The route will be fully grade-separated including a subway through Downtown San José. Trains are expected to arrive on this extension every 7.5 minutes initially, increasing to one train every six minutes in the future, and would serve the routes to Daly City via San Francisco and to Richmond via Oakland. The 16-mile extension is estimated to have approximately 90,000 riders per day on an average weekday by 2030."

Land Use and Transportation Diagram – Designation of Former UPRR Corridor South of US101
The VTA Silicon Valley Rapid Transit (SVRT) Program Office will submit specific comments on the designation of former Union Pacific Railroad (UPRR) lands south of US 101 in a subsequent comment letter.

Land Use and Transportation Diagram - Designations at Park & Ride Lots and Transit Centers
As a general comment, VTA is pleased with the collaborative effort the City of San José has made to intensify land uses around transit and promote transit-oriented development along the light rail, Bus Rapid Transit and future BART corridors. There are very few VTA Park & Ride lots and transit centers that are not designated with a Village overlay or a compatible land use designation. However, we would like to point out a few remaining properties that merit attention:

- Cottle LRT Station and Park & Ride is a potential transit-oriented development site and is designated as a potential joint development in VTA's Joint Development Portfolio. The majority of the Park & Ride is designated as Neighborhood Community Commercial but not its entirety. In addition, the areas to the north and south of the Park & Ride have a Village overlay but the VTA Park & Ride does not. (DPEIR Figure 2.2-22)
- It is our strong preference to have a Village overlay at the VTA-owned parking lot adjacent to the Capitol Caltrain station (DPEIR Figure 2.2-22)
- The Tamien Specific Plan area is not updated per the agreed changes related to the VTA sale of 3.5 acres of the station to City of San José for use of a park (DPEIR Figure 2.2-22)

VTA requests that the City make the relevant changes to the designations in the Land Use/Transportation Diagram in the Draft PEIR as well as in the draft General Plan document.

Land Use and Transportation Diagram – Residential Densities and Commercial Intensities
VTA supports the proposed intensification of land use in core areas and near existing and planned transit stations as outlined in the land use designations in Chapter 5 of the draft General Plan. It is not clear from these descriptions which of these land use categories would include residential density minimums and commercial Floor Area Ratio minimums, and whether these would be binding or advisory. VTA recommends including density and intensity minimums in key areas of the City near transit stations and corridors, such as near the planned Berryessa BART station and Diridon Station. Implementing density minimums in the General Plan and the zoning code would acknowledge the important role of these lands in generating transit ridership and contributing to VMT and GHG reduction goals, and ensure that these lands are utilized to the greatest extent possible.

Land Use and Transportation Diagram – Multimodal Streets and Roadway Network Changes
VTA commends the City for including specific actions to retrofit existing streets to accommodate multimodal travel options including bicycle lanes and wider sidewalks, as summarized in Table 3.2-9 of the Draft PEIR. We encourage the City to identify other streets that may be candidates for these 'Group 3 Actions', particularly near transit stations and corridors and in Village areas, and include these in the Draft PEIR and draft General Plan. In addition, we encourage the City to reconsider the proposed widening of Zanker Road from SR-237 to Montague Expressway, as noted in Table 3.2-10 of the Draft PEIR. We believe that widening Zanker Road to 6 travel lanes will create an unnecessary barrier to pedestrian travel in an area with thousands of recently constructed and planned residential units, and discourage walk access to nearby light rail stations. In addition, we believe that the proposed widening is inconsistent with the proposed Village designation for these areas which is intended to create walkable, human-scale neighborhoods. We encourage the City to coordinate with VTA and other stakeholders regarding re-designation of Zanker Road in the draft General Plan.

Land Use and Transportation Policies - Connectivity
VTA supports the inclusion of roadway network changes that improve the connectivity of the transportation system, such as the extension of Chynoweth Avenue from Almaden Expressway to Winfield Boulevard and the extension of Charcot Avenue from O'Toole Avenue to Oakland Road, as identified in Table 3.2-10 of the Draft PEIR. Improving the connectivity of the transportation system can have a number of benefits, providing connections for automobiles, pedestrians, and bicyclists between residential areas, jobs, transit, shopping and services, schools, trails, and bicycle lanes. Improving connectivity in this way is likely to reduce the overall length of automobile trips, ease the burden on already-congested intersections and ultimately reduce vehicle-related emissions.

In addition, VTA recommends that the City consider including locations for new crossings (either roadway or bicycle/pedestrian-only) over freeways at key locations around the city. These crossings, such as a potential extension of Branham Lane over US 101, can help reduce congestion at key interchanges by diverting local vehicular and non-vehicular traffic away from freeway facilities, thereby reducing turning movements at ramps and improving operations and safety.

Land Use and Transportation Policies – Regional and State VMT Reduction Efforts & Intelligent Transportation System
VTA commends the City for including policies in the draft General Plan supporting congestion pricing as well as toll lanes on all major freeways and expressways in Santa Clara County (Policies TR-11.2 and TR-11.3). These policies are consistent with the objectives of VTA's Silicon Valley Express Lanes Program, which aims to maximize the efficiency of the roadway network, improve travel time reliability and commuter options, and create a source of revenue for operations and maintenance and transit improvements. We recommend that these General Plan policies be modified to specifically reference the "Silicon Valley Express Lanes Program." VTA also supports High Occupancy Vehicle (HOV) Lanes and Ramp Metering as means for managing traffic congestion on the freeways and expressways, and we recommend that "HOV Lanes" and "Ramp Metering" be noted under Goal TR-11 or Goal TR-12.