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Subject: Draft Envision San Jose 2040 General Plan PEIR, File #PP09-011 and GP2040 (6/17/11 Draft)

Mr. Davidson and City Planning Staff:

GP2040's most significant achievement is in broadening and boldly stating San Jose's definition of *sustainability* to include the primacy of fiscal and economic considerations in addition to those of our environment. Driven by eleven consecutive years of budget deficits, San Jose will now have a General Plan that charts a path to aggressive corrective action on the cost and revenue sides of its balance sheet.

Importantly, we're now requiring scheduled Major Reviews. This powerful new approach will greatly enhance our chances of success in implementing a broadly shared vision for San Jose's future by (1) keeping us focused on GP2040 achievement; (2) performing periodic comprehensive review of progress and the effectiveness of prescribed actions in attaining its goals and policies; and (3) when appropriate, making mid-course corrections to goals, policies, and actions to reflect changing needs.

**Jobs:** We know that jobs bring money to cities. GP2040's emphasis on jobs growth is our key to revenue enhancement for our city and a better life for its residents. We know that housing costs cities money. Sharing with other jurisdictions the responsibility of providing housing is our key to cost reduction. Both approaches will add to an improved bottom line for our city, enabling it to restore and, we all hope, eventually surpass the quality-of-life services San Joseans deserve and have grown to expect.

Growing jobs in San Jose will bring other benefits: more employment options and shorter commutes (fewer VMT--vehicle miles traveled) for our residents; travel time savings; reduced energy consumption and costs; less air and heat pollution; a more realistic possibility of walking, biking, and/or using public transit; and the likelihood of greater sales tax proceeds from San Joseans who will live, work, and spend here in our city.

**Housing:** Sharing the responsibility of providing housing with other jurisdictions will offer some of the same benefits to them, but it will also shift to their municipal balance sheets the negative cash flow housing represents. San Jose has too long been the bedroom community for Santa Clara County and the Bay Area. If we citizens hold our City Council to achieving them, GP2040's goals will at last bring us to parity in jobs/housing. A better and more balanced metropolitan environment will result from San Jose's broadened focus on fiscal and economic sustainability.

**Regional Obligations:** Meeting "regional housing obligations" must also be considered in this context: San Jose is struggling to correct the long-term effects of providing housing for other city's jobs. The result is a relatively poor tax base that leaves us short of revenue to even provide maintenance, let alone needed infrastructure expansion. Regional government is preparing to impose increased housing requirements on us (and reduce our jobs allocation), but has never adequately addressed our need for funding. On a per capita basis, we do not get our fair share. The results include crumbling infrastructure, perennial traffic congestion and related environmental degradation, and declining public services.

Even if regional government gave us the funding we need and deserve to build supporting infrastructure, it's clear that money alone cannot buy us out of the dire fiscal, economic, and environmental consequences of following their jobs/housing dictates. We need to stop the one-way outflow of traffic each day to jobs (and merchants) in other cities. We need to build jobs in San Jose. We need to catch up, to reach aggressively beyond parity in our J/ER goal in order to have some assurance of achieving at least one job per employed San Jose resident by 2040 This is a target we've strived for with limited success since the 70s.

GP2040 is an attempt to address these issues—we must stand resolutely in its defense and implementation.

**General Plan Impacts:** The DEIR identifies numerous significant unmitigated impacts associated with the proposed GP2040. Chief among these is a forecasted increase in traffic congestion and related noise and pollution (ref: Impacts TRANS-1, TRANS-3, TRANS-4, TRANS-5; NV-3; AQ-1, AQ-8; BIO-2; PH-1; GHG-2; C-TRANS-2; C-NV-3; C-BIO-4; and C-PH-5).

These impacts are largely related to ambitious goals for job growth, a higher than average housing growth rate, and non-conservative assumptions regarding our success in reducing VMT.

Failure to meet GP2040 job goals will worsen San Jose's fiscal condition. Failure to meet its housing goals could help fiscally, but could also negatively impact our economic growth. Transportation is a critically important factor. Unless more street and road capacity is built and more people walk, bike, and/or use public transit, our plans are doomed; failure to increase capacity or drastically reduce VMT will make matters worse fiscally, economically, and environmentally. As is admitted in the PEIR (ref: pg. 19), rigorous pursuit of VMT reduction could become a substantial disincentive to job growth in our city. Careful monitoring and mid-course correction will be needed.

**A Preferred Alternative:** Owing to its reduced scale, the *Scenario 1: Low Growth Alternative*, is shown in subject PEIR to be "environmentally superior to the proposed" GP2040 (ref: pg. 22). It reduces the number of new jobs and dwelling units, but achieves a very desirable Jobs/Employed Resident (J/ER) ratio of 1.2; a level that is consistent with the basic objectives of GP2040. Its total number of housing units and rate of development is closer to our ten-year average production, a more reasonable target (especially since each unit represents a net cost to our city).

Except for the *No Project* alternative, Scenario 1's year 2035 VMT is lowest among those studied (ref: Table 8.5-1). There is no good reason why "villages" and all other GP2040 concepts couldn't be incorporated.

*Scenario 1* would result in greatly improved economic and fiscal sustainability with less uncertainty and less risk of environmental damage. As such, it is the most desirable alternative and should be given serious consideration for adoption by our Planning Department and the San Jose City Council.

**Periodic Review:** If at any point a scheduled Major, Annual, Horizon, or any other public review discloses that we are not meeting GP2040 goals, mid-course corrective action must be undertaken. This could mean one or a combination of changes to the extent of stated goals, to transportation policies, to job or housing targets, or to the timeline for build-out. What should never be allowed is degradation of public services or our quality of life in San Jose.

Continued growth of our city makes sense only if it gets measurably better as growth occurs. Fiscal, economic, and environmental *improvement* is what San Joseans desire; it's an implicit assumption in GP2040.

**Coordinate Growth with Certainty of Supporting Infrastructure:** Development must not be allowed to proceed until plans are approved and related funding is secured for near-term supporting infrastructure and urban services. This strategic alignment is essential to end our history of prolonged lag time between the occurrence of growth and the completion of mitigation needed to maintain an acceptable quality of life.

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The following comments refer to cited pages in the 6/17/11 Draft Plan:

Page 1-73 (and page 7-14, IP-5.1.3) Village Boundaries and Land Uses: This discussion must include consideration of interface issues relating to existing adjacent uses, especially residential neighborhoods. There needs to be assurance that these Villages will not result in adverse impacts on levels of service for existing residents. (Again, continued growth of our city makes sense only if it gets measurably better as growth occurs.)

Page 2-2 (third paragraph): Creativity also drives/thrives in high tech and businesses, not just in arts and entertainment—high tech creativity is what our *Silicon Valley* area is best known for!

Page 2-16, FS-2.8, Cultivate Fiscal Resources: Add: "Encourage our residents to buy in San Jose and implement plans to make it easier and more attractive to do so."

Page 2-21: Add a Goal FS-7 that addresses fiscal sustainability in transportation, a focus that (like transportation itself) is vital to success in growing our economy while supporting our quality of life. We have serious prob-

lems in transportation funding today; our General Plan should acknowledge and set a cautious course toward solution of this problem, gauging progress and making mid-course corrections whenever needed.

Page 4-50, 6-55 (TN-2.3, TN-2.4) and elsewhere: Trails must be designed with appropriate consideration for the privacy and security of adjacent homes and businesses. Police and emergency vehicle access is important.

Page 5-27: Virtually all San Jose streets are already “complete”. Although some do not have designated bike lanes, it’s a credit to our city that they all accommodate walking, biking, driving, and public transit.

Pages 5-27, 5-28, 6-37: Where will the money come from to provide/maintain the amenities described for Grand Boulevards and Main Streets? Although it would be very desirable to have such facilities, it’s important to note that, a couple of years ago, our city imposed a tear-out policy for city street landscaping; unless citizens volunteer or are willing to pay an assessment for ongoing maintenance, landscaping is removed. We have an enormous city-wide backlog in street pavement repair. Because we’re constantly told there is no money to fix what we already have, grandiose plans for Grand Boulevards and Main Streets seem, at best, overly optimistic.

Page 6-14, LU-9.14: Concentrations of residential care and service facilities, etc. in a given neighborhood or area of our city should be discouraged.

Page 6-15, LU-10.3: Is there any statistically valid evidence that high density residential and mixed uses built near transit facilities encourages its use? After decades of emphasis on public transit in our city and county, has any survey of those who live in such facilities demonstrated that their use of public transit is greater than that of the public as a whole? If this is an anecdotal supposition, we must proceed with caution in much of what is proposed in this General Plan.

Page 6-35, 6-45, 6-48 Transportation Policies: How will the stated goals for VMT reduction, parking limitations, etc. impact San Jose’s chances for economic development in a fiercely competitive local, regional, statewide, national, and international market for employers and employees? What happens if we pursue those goals and they don’t produce the desired results—or—if they succeed at the expense of our dreams for economic and fiscal sustainability? Will we make appropriate mid-course corrections at Major GP reviews? If so, this should be clearly stated.

Page 6-37, TR-1.17: Cost-reduction (as well as new revenue sources) must be included as a focus in funding transportation maintenance. Reducing VMT, improving automobile fuel efficiency, and high oil prices will continue to aggravate maintenance funding deficiencies.

Page 6-43, TR-5.3 Vehicular Traffic Mitigation Measures: Add the word “denial” in the opening statement, “Review development proposals for their impacts on the level of service and require denial or appropriate mitigation if development of the project has the potential to reduce the level of service to “E” or worse.” That was the intention of our original transportation level of service policy in the ‘70s; if it had been followed, we would have far fewer transportation and related environmental/quality of life problems today.

Page 6-43, TR-5.3 Small Projects: Prohibit breaking large parcels into “small projects” in order to gain exemption from traffic analysis.

Page 6-44 (top): Are newly added “Corridors and Villages, Transit Station Areas” being included in “Special Strategy Areas” where intersections are “protected” from mitigation requirements? If so, this important fact should be made clear in sections describing Corridors and Villages, and Transit Station Areas. What will the impact be on traffic congestion in adjacent neighborhoods?

Page 6-46, TR-8: Can parking strategy implementation requirements be made permanent (irrevocable) so that, in 2040, our city streets won’t be cluttered with double-parked cars as they are in San Francisco?

Page 6-47, TR-8.12: Are we really advocating the conversion of open space/recreation areas into formal parking if strategies in TR-8 don’t work? A more careful approach must be taken to avoid this possibility. Appropriate mid-course corrections must be made at Major GP reviews if TR-8 goals are falling short, threatening space/recreation areas or thwarting economic development.

Pages 6-48, 49, 50 Reduction of VMT: Can incentives be offered to employers instead of just requirements?  
Why is VMT reduction their job? What incentive will they have to come to or stay in San Jose if faced with these requirements?

Unless and until federal, state and/or local law is changed, transportation is primarily funded by fuel taxes. Fuel taxes are per gallon; the number of gallons used depends on vehicle miles traveled. So, transportation money declines as VMT is reduced. This is aggravated by very desirable increases in automotive fuel efficiency and the advent of electric vehicles. Currently proposed as an alternative to fuel taxes, the efficacy of VMT taxes, unless draconian, would be threatened if VMT is reduced. How will we pay for transportation repairs, improvements, maintenance, and (especially) amenities?

How will we grow our economy without supporting, high quality transportation? Transit is still a relatively poorly developed alternative in San Jose—and struggling against the prospect of further service cut-backs. If transportation costs are significantly increased here, how will less affluent people be able to live/work and get around—will they be forced out of their automobiles?

Deficiency in transportation funding is not a problem San Jose can solve on its own. Any attempt to would put us at a serious competitive disadvantage. We can be careful, though, not to make matters worse—and must participate proactively in finding solutions.

A cautious approach must be taken to avoid this possibility. Appropriate mid-course corrections must be made at Major GP reviews if VMT and other transportation goals are not on track to success or if they're threatening economic development, fiscal sustainability, environmental/quality of life degradation, and social equity.

Page 7-13, IP-5.1.1 Urban Village Planning: There is too much focus here on typically low-paying retail jobs. Can Villages be encouraged (by zoning or other means) to include higher-paying industrial/commercial employers? Our General Plan must strive to achieve our city's and our residents' economic and fiscal sustainability.

Page 7-14, IP-5.1.7 Financing: Village planning must prioritize its net benefit to our city's fiscal sustainability.

Thank you for considering my comments.

Sincerely yours,



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