



**SPUR**

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San Jose City Council  
200 E. Santa Clara Street  
San Jose, CA 95113

February 27, 2018

Re: Agenda Item 10.2 (General Plan Text Amendment and Related Changes: Transportation Analysis to Comply with SB 743)

Dear Honorable Mayor Liccardo, Vice Mayor Carrasco and Councilmembers:

For decades, we have built out our city with buildings that put cars before people, and built the parking lots, eight-lane roads and speedways to serve them. During this time, San Jose - like all California cities - analyzed the environmental impacts of growth with a flawed, auto-centric metric known as Level of Service (LOS). Today, we are suffering for it. Families spend too much time apart from each other, stuck in congestion. Unable to walk or bicycle for our daily needs, our health, air, climate and quality of life are declining. Shifting from LOS to Vehicle Miles Traveled (VMT) will help San Jose understand the true environmental impacts of growth, and new mitigations will help grow the types of communities that attract residents and employers and support walking, biking and transit use.

**SPUR strongly supports San Jose's citywide shift to vehicle miles traveled (VMT) as a way to measure transportation impacts of projects under CEQA.** This is more than a technical tweak—it is a policy shift that will have lasting benefits for San Jose. This significant improvement should come into effect as soon as possible, so we support the staff proposal to implement this policy effective at the end of March 2018.

We support the city's screening criteria that preferences and streamlines projects including small infill development, affordable housing, projects in areas with high-quality transit, local-serving retail, and transportation projects that reduce VMT. A few key considerations have the potential to make the streamlining process particularly successful.

- **Projects must be located near transit and designed to be transit-supportive in order to qualify for an exemption.** Locating jobs and housing in areas well-served by regional transit helps to support transit use, but is not enough to promote walking and biking. Research has shown that the most important factor is a densely interconnected network of streets and paths. We applaud staff for including this test in the screening criteria as it incentivizes developers to help create the vibrant, walkable and accessible neighborhoods San Jose hopes to achieve.

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• **Transportation projects that reduce or do not affect VMT such as those that enhance the pedestrian, bike, or transit infrastructure without adding any new automobile capacity are the only transportation projects that are not required to perform a detailed VMT analysis.** This is an appropriate distinction to make in order to advance the city’s mode shift goals. We now know that adding auto capacity induces car demand on our streets. We support staff’s efforts to make this distinction and encourage the inclusion of supportive research such as Robert Cervero’s California-specific study. It will also be important to revise existing area plans that include roadway expansions and auto-oriented projects in support of this citywide policy shift.

The following policy components are critical to achieving San Jose’s transportation, economic development and sustainability goals and should be considered for incorporation in the current policy or as a part of a Phase 2 policy revision period.

• **Provide a clearly defined framework that identifies the thresholds at which a project offers "extraordinary benefit" to the city even if it exceeds VMT thresholds after mitigation.** This should not be limited to anticipated tax revenues. The framework should weigh factors such as: jobs per acre (a higher density of jobs gets San Jose closer to its jobs goals), the benefits provided by the land prior to development (such as habitat or recreational value), and the value of public improvements to be provided as mitigations (such as providing publicly-available electric vehicle charging infrastructure). Without a clear policy framework, the city runs the risk of inconsistent application of the policy and introducing unnecessary political turmoil into land use decisions.

• **Provide a way to fund multimodal improvements for projects at or near city boundaries.** A key challenge is how to fund multimodal improvements for projects that are on or near city boundaries or that benefit multi-city travelers if different cities use different metrics, thresholds and fees. San Jose’s recommended timeframe is structured to reflect outcomes of VTA-led countywide efforts in future policy updates. We suggest working with VTA to create a consistent countywide policy that promotes growth in the right places and in the right format.

We greatly appreciate staff’s thorough work and outreach. Staff presented the draft policy to SPUR several times, including at a joint SPUR/Urban Land Institute (ULI) forum for developers in June 2017 and have been very communicative throughout the policy development process.

Thank you for the opportunity to provide input on the city’s policy shift toward vehicle miles traveled.

Sincerely,

Jaclyn Tidwell  
San Jose Policy Director