



August 21, 2009

Mr. John Baty, Project Manager
City of San Jose
Planning Division
200 East Santa Clara Street
San Jose, CA 95113

RE: Notice of Preparation of a Draft Program Environmental Impact Report for the
Envision San Jose 2040 General Plan Update

Dear Mr. Baty,

Thank you for allowing Greenbelt Alliance the opportunity to provide comments for this proposed project and for the City's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of San Jose is updating the General Plan which was last comprehensively updated in 1994. The horizon for the update is 2040. The update will address a number of issues including Land Use, Housing, Sustainability and Transportation.

To assist the City of San Jose in its analysis and evaluation of this project, and aid in the determination of the adequacy of the Draft Environmental Impact Report (DEIR), Greenbelt Alliance requests that the following comments be addressed in the DEIR under preparation by the lead agency.

Climate Change

Climate change is perhaps the most serious environmental threat facing California, and as the City of San Jose looks to 2040, it must plan to accommodate all projected new growth in a sustainable manner. Transportation accounts for nearly 42% of the region's

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greenhouse gases as people commute to jobs in Silicon Valley from as far as the Central Valley.

The Draft Environmental Impact Report should include context setting around climate change. This should include background on climate change impacts on the state, region and City of San Jose. There should also be background on state and regional regulations, targets and inventories such as AB32, SB375, the Mayor's Climate Protection Agreement and the recent settlement between the City of Stockton and the Attorney General on that City's General Plan.

The Draft Environmental Impact Report should analyze the projected greenhouse gas emissions and vehicle miles traveled (VMT) from the plan as well as the cumulative impacts. The analysis should include the greenhouse gas impacts of the following variables:

- Residential density
- Mix of uses
- Levels of housing affordability
- Proximity to transit
- Bicycle and Pedestrian amenities
- Decreased parking requirements
- Jobs/ Housing ratio

Then the Draft EIR should propose mitigations, including on-site mitigations, such as increasing density, decreasing parking, ensuring new development is within a half mile of a fixed transit station, etc.

Additionally, the analysis of land use scenarios should include the analysis of the true alternative. For example, if Scenario 1 includes 1000 new homes and Scenario 2 includes 700 new homes, the analysis of Scenario 2 must also analyze the impacts for where the additional 300 homes would be developed if not in the City, such as the associated greenhouse gas impacts.

Transportation

The Draft EIR should study the impact of widening roadways on greenhouse gas emissions. Adding lanes to roadways will increase total greenhouse gas emissions over the long term, even if it reduces congestion over the short term. A critical question the General Plan must address is whether the City can achieve a net reduction in total VMT within San Jose below current levels while accommodating the City's reasonable share of the region's population growth.

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The Draft EIR should also look at whether the methodology for evaluating mobility on streets- automobile LOS- is the correct metric to use as it accommodates drivers over all other road users. Since San Jose has set a goal of becoming a sustainable city, then the Draft EIR should look into the benefits of using a multi-modal LOS. Recognizing that people will still drive, a multi-modal LOS would encourage a street classification system that measures the importance of any given street to pedestrians, cyclists and cars and then prioritizes appropriately. If a particular street is an important bicycle corridor, adjustments are made to the roadway to improve bicycle LOS. If another street makes sense primarily for cars, then automobile LOS takes precedence. If the General Plan update accommodates all road users- cyclists, the elderly, children, transit riders- it will facilitate other modes of travel and help the City reach its greenhouse gas emission reduction targets. Automobile LOS is an outdated metric. Greenbelt Alliance encourages San Jose to study multi-modal LOS.

Biological Resources

Greenbelt Alliance commends San Jose for pursuing infill opportunities first in Envision 2040. Holding off on the planning and development of the Coyote Valley and South Almaden Valley urban reserves makes sense from a fiscal and environmental perspective.

Students from the Environmental Studies Department at De Anza College have been engaged in a Wildlife Corridor Project for over two years. They have been counting bird and mammal species that use Coyote Valley to cross between the Mt. Hamilton Range and the Santa Cruz Mountains. They have counted over 171 bird species alone. With contiguous development all along the Highway 101 corridor from San Francisco to just before Coyote Valley, this crossing represents one of the few opportunities for birds and mammals to freely roam, mate and find food.

Greenbelt Alliance encourages San Jose to study the value of Coyote Valley as a wildlife corridor- especially as most of the land is within the Urban Growth Boundary.

Hydrology and Water Quality

San Jose should demonstrate a commitment to recycled water and low impact development when it studies water supply and quality in the Draft EIR. Infill development uses less water than sprawling low-density development, but further mitigations can be made to ensure San Jose prepares itself well for a growing population in a region prone to droughts. The value of Coyote Valley and South Almaden Valley as part of a larger watershed plan must not be overlooked. Their roles in groundwater recharge are significant.

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Other

In addition to planning for air quality, traffic and noise impacts, San Jose should also study where the food will come from to feed a growing population. This is often overlooked as cities grow and pave over farmland to accommodate growth. We live in uncertain times as fuel costs rise, droughts become more frequent, and population around the world grows. San Jose is already taking steps in the right direction by accommodating its share of the region's growth through infill development. However, it is still worthwhile for San Jose to consider the value of its last remaining farmland as well as the benefits of promoting more community gardens.

If you have any questions regarding these comments, please contact me at 408.983.0856. Again, thank you for your consideration of these comments.

Sincerely,



Michele Beasley
Senior Field Representative

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