



October 8, 2009

Mr. Andrew Crabtree, Principal Planner
Planning, Building and Code Enforcement
San Jose City Hall
200 East Santa Clara Street,
San Jose, CA 95113

RE: October 19th Envision San Jose 2040 General Plan Task Force meeting on Green Vision

Dear Mr. Crabtree,

Thank you for allowing Greenbelt Alliance the opportunity to comment on the City of San Jose's plans to address climate change as part of the General Plan update process. For over 50 years Greenbelt Alliance has been the Bay Area's advocate for open spaces and vibrant places. At Greenbelt Alliance, we recognize the critical link between land use and climate change and are pleased that San Jose is focusing on infill development near transit stations as part of Envision San Jose 2040. Action is needed at all levels of government, including the municipal level, to reduce greenhouse gas emissions to a safe and healthy level. Greenbelt Alliance would like to see San Jose adopt a climate-friendly General Plan that can be a model to other cities throughout California.

AB 32 and SB 375

The state of California has taken a leadership role with respect to climate change. AB32, the Global Warming Solutions Act of 2006, mandates that the state's greenhouse gas (GHG) emissions be reduced to 1990 levels by the year 2020. The Governor has also issued an Executive Order (S-3-05) calling for reduction of greenhouse gas emissions to 80% below 1990 levels by 2050. In 2008, California passed SB375, which requires that regional transportation plans include a "sustainable community strategy" (SCS) to meet GHG reduction targets from vehicle travel as set by the California Air Resources Board. Because land-use decisions are made at the local level, individual cities must play a significant role in reaching the region's SB375 targets.

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California's Attorney General Jerry Brown has stated that where General Plans have global warming impacts, the California Environmental Quality Act requires that the plans include alternatives or mitigation measures to reduce the effects of global warming, and that those measures should be mandatory rather than discretionary whenever feasible. The Attorney General has been commenting on climate change in local land-use plans and their associated environmental review documents, as well as filing lawsuits and negotiating settlements with local jurisdictions.

The Attorney General's comments have focused on the land-use and transportation sectors for several reasons. Local government is the only level of government that has authority over land-use changes; cities and counties can and must play a critical role in meeting state's AB32 and SB375 goals. In addition, land-use changes are by far the most significant contribution local governments can make to address climate change; in most California cities, transportation accounts for over 50 percent of the city's carbon emissions, whereas the waste sector and city vehicle fleet account for less than five percent. Furthermore, land-use decisions provide lasting, long term impacts to the built environment. Poor choices today lock in unsustainable practices for generations.

Firm Targets to Implement San Jose's Green Vision

Mayor Reed's ambitious and commendable Green Vision calls for adopting a General Plan with measurable standards for sustainable development. **San Jose must set a firm greenhouse gas emission reduction target as part of its General Plan.** It is critical to establish climate targets and policies in the General Plan, rather than in a separate document. The latest report of the Intergovernmental Panel on Climate Change (IPCC), a body of the world's most authoritative climate scientists, suggests that industrialized countries like the U.S. will need to reduce GHG emissions to levels 25-40% below 1990 levels by 2020 and 80-95% below 1990 levels by 2050 in order to achieve a level of climate stabilization that includes relatively minor consequences. The City of Oakland has set greenhouse gas emission reduction targets starting from a baseline year of 2005 that align with these IPCC recommendations.

The City of San Jose should set a reduction target equivalent to 25-40% below 1990 levels by 2020, and also establish a 2040 target that moves the city proportionally towards the science-based goal of 80-95% below 1990 levels by 2050. It is important to regularly measure progress towards targets in order to assess the effectiveness of the current policy environment and make changes as needed to adjust course. Therefore, **San Jose should also set intermediate targets for at least 2015 and 2030 and regularly assess progress toward those targets.**

In addition, **San Jose should set corresponding targets for reduction of Vehicle Miles Traveled (VMT).** The Center for Clean Air Policy has shown that with current development patterns, the amount Californians drive is expected to double over the next twenty years. If this occurs, the increase in tailpipe emissions from increased driving will outweigh any gains from improved vehicle fuel efficiency and alternative fuels. In addition, reducing Vehicle Miles Traveled provides a host of co-benefits, including less traffic congestion, safer streets, reduced particulate pollution, reduced water pollution from oily runoff, and improved public health.

After establishing GHG and VMT targets, San Jose should implement policies and land-use changes in its General Plan to meet the targets. These policies should include:

- “Road diets” and halting road expansion. According to the Sightline Institute, each extra lane-mile built will increase emissions of carbon-dioxide by more than 100,000 tons over 50 years.
- Parking programs, including shared parking, reduced parking requirements, and pricing strategies. VMT reduction: 15-30%.
- Transit-Oriented Development, or TOD: moderate to higher density development, located within an easy walk of a major transit stop, generally with a mix of residential, employment and shopping opportunities designed for pedestrians, but without excluding the auto. VMT reduction: 20-30%.
- Prioritizing infill development and avoiding greenfield development. VMT reduction: 15-50%.
- Pedestrian-oriented design and Complete Streets. VMT reduction: 1-10%.
- Bike network and amenities. VMT reduction: 1-5%.

(VMT reduction numbers from the Center for Clean Air Policy,
http://www.ccap.org/images/guidebook/CCAP_Transportation_Guidebook_Part1.pdf)

On the surface, it may look like adding more office space, shops, and homes in San Jose will by definition increase the city’s greenhouse gas emissions and VMT, and that an alternative with less development will be better for the climate. However, greenhouse gas emissions are not bounded by the city limits. As the city calculates the emissions and VMT impacts of different General Plan land use scenarios, it is essential to compare apples to apples within the broader regional context. The city must model where growth would *otherwise* occur if it does not happen in San Jose.

For example, when comparing greenhouse gas impacts of Scenario K (158,970 new homes) vs. Scenario J (88,650 new homes), it is essential to consider where the homes not built in San Jose under Scenario J will otherwise be built. If the shortfall of 70,320

homes were built in Dublin, Livermore, Gilroy, and Morgan Hill, an additional 80,000 tons of GHG would be generated annually. This increase results because households in those communities drive 2,000 - 4,000 miles more per year than San Jose residents. To help put things in perspective, 80,000 tons of GHG is equivalent to the annual emissions from 14,500 cars. It is imperative that San Jose take advantage of this unique opportunity to accommodate growth that minimizes GHG emissions.

Benefits of Smart Infill

New growth also helps existing residents reduce their carbon footprints by driving less. More homes means more demand for shops and services in existing neighborhoods, and more amenities within walking distance for current residents. Adding jobs and homes to the city will increase demand for transit service, leading to more frequent and convenient service for everyone.

Accommodating growth in a climate-friendly fashion is in San Jose's best interest fiscally as well. New growth will not only provide additional property tax revenue, it will also increase sales tax revenue by providing a larger customer base for San Jose's large and small businesses. In addition, we are seeing a sea change in terms of how California's limited resources are being allocated. MTC's Transit-Oriented Development policy set the stage by requiring cities to plan for minimum thresholds of homes near proposed transit expansions in order to receive transit funding.

The state is taking its climate change responsibility very seriously and will invest appropriately to meet AB32 goals. Funding for public agencies may well be tied to how those agencies perform in terms of addressing climate change. SB375 starts the process of linking transportation funding to land-use planning that meets climate change goals. The Strategic Growth Council is charged with ensuring that the state's infrastructure funding decisions meet our climate and other goals. Cities and counties that are at the forefront of climate-friendly planning and development will be in a much more competitive position to receive funding.

With space for tens of thousands of homes and jobs near transit, San Jose has more potential than any other city in the region to undertake a dramatic transformation into a community designed for people, not cars. Done right, Envision San Jose 2040 can make San Jose the regional leader in setting the standard for climate-friendly development under SB375.

Greenbelt Alliance has been impressed with the level of discussion at Envision San Jose 2040 task force meetings. Staff has provided the community with excellent reading


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materials and brought in knowledgeable speakers. Already, the City is moving in the right direction by not including the Coyote Valley and South Almaden Valley Urban Reserves in any of the growth scenarios. There is still more work to be done. The critical issue is to ensure that great policies are implemented and that benchmarks are in place to move San Jose towards firm targets. Greenbelt Alliance will continue to work with San Jose to help craft a model climate-friendly General Plan that guarantees San Jose as one of the great and green cities of the 21st century.

Sincerely,



Michele Beasley
Senior Field Representative

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