



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

October 28, 2022

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

Via email to: Downtown.Transportation.Plan@sanjoseca.gov

RE: Comments for San Jose Downtown Transportation Plan

To whom it may concern,

The Sierra Club Loma Prieta Chapter is an environmental organization that works to protect natural resources and healthy communities and promotes the enjoyment of nature. We appreciate the opportunity to comment on the Draft Downtown Transportation Plan. The DTP project provides a framework for more than 50 new transportation projects, programs, and policies to be implemented by 2040. We like much of the plan put forward but ask for measures to ensure that expressed goals are achieved. Specifically, we ask for California Air Resources Board (CARB) goals on Vehicle Miles Travelled to be incorporated into the plan and a comprehensive response to safety. Please find our comments below.

1. Plan overview

a. Emissions reductions: The plan on page 16 calls for net-zero annual carbon emissions by 2030. The majority of emissions come from transportation according to the city's Climate Smart Plan. There is no indication how this goal will be achieved downtown or how progress on the goal will be reported to help policy makers craft mitigations toward compliance.

b. The plan also works on reducing particulate emissions (page 36). San Jose continues to rank in the top 15 in the State Of the Air report from the American Lung Association for ozone, year-round particle pollution and short-term particle pollution.¹ The plan puts forwards a number of good strategies such as unbundling and charging for parking but there is no indication that they will be implemented to achieve this goal.

c. Vehicle Miles Travelled is not considered in the plan. Vehicle Miles Travelled (VMT) must decrease. In the 2017 Scoping Plan, the Californian Air Resources Board staff is more convinced than ever that, in addition to achieving greenhouse gas

¹ <https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

reductions from cleaner fuels and vehicles, California must also reduce VMT.² CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs) are necessary (page 101). A program to reduce VMT has other co-benefits for achieving the goals in the DTP as will be mentioned in following comments.

d. The plan has a commendable goal of reducing Single Occupant Vehicles use (page 35) by modal conversion to transit. However as noted in the plan and elsewhere, transit has continued to decline³ and is now ranks distantly behind work-from-home as a commute mode. Accordingly, we suggest two additions to realize a goal of modal change to transit.

i- Transit Priority: Travel modes succeed by delivering a Time Advantage via transit priority, for travel **time** and flexibility, from the prevailing land use pattern. Slower transit, which the plan intends to work on by speeding up light rail, results in declining transit. Greg Erhardt reports that lower gas prices and higher fares contribute to lower transit ridership, as do higher incomes, more teleworking and higher car ownership.⁴ The authors suggest rethinking fare policy, giving transit priority, careful partnering with shared-use mobility providers, and encouraging transit-oriented density among the strategies for reviving transit. The plan includes the latter two but not the former two. A goal of VMT reduction to meet the CARB VMT reduction goal would help achieve the plan's goal of mode shift to transit by providing transit priority and rethinking transit fares.

ii- Car free transit corridors. People who own cars are not invested in driving. Higher car ownership results in declining transit.⁵ The UCLA study says "More specifically, the fact that a lot more people who might otherwise ride the bus or train now own cars" accounts for the huge drop in transit ridership. The DTP should make the transit corridor car free to really achieve Transit Oriented Development instead of the current paradigm of Declining Transit Oriented Development. Co-benefits include parking available to build housing, lower cost of housing unburdened with parking and EV-charger costs, decreased danger to pedestrians, decreased air pollution from the downtown, street space available for safe micro-mobility, and increased success potential for shared micro-mobility partners. A goal of VMT reduction to meet the CARB VMT reduction goal would help achieve the plan's goal of mode shift to transit by requiring car free housing within the transit corridor.

e. Broadband for All. One beneficial result of the pandemic was the increase in work from home, healthcare from home, ordering food from home, and doing homework from home. However, these benefits were not equitably available to results. Lower income residents had to sit in McDonald parking lots to do homework or just forgo the ability to be safe at home. The federal government has brought in considerable amount of money for cites in the Infrastructure Act to put in high-speed public broadband for all

² https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

³ <https://www.governing.com/next/calif-bay-area-transit-has-uncertain-post-pandemic-future.html>

⁴ <https://www.trb.org/Main/Blurbs/182505.aspx>

⁵ <https://www.governing.com/archive/gov-los-angeles-transit-ridership-study.html>

networks.⁶ San Jose can ensure that the transportation benefits of the pandemic are equitably available to others by securing funds for public broadband. A goal of VMT reduction to meet the CARB VMT reduction goal would help achieve the plan's goal reduced congestion and emission as a way of reducing travel equitably.

f. The shared mobility aspects of the DTP are excellent. We only ask that they be equitable, including electric tricycles for disabled and elderly in the shared micromobility programs. Bloomberg reports that e-bike sales are booming again.⁷ A successful program in Colorado provided e-bikes to low-income residents.⁸ The New York Times featured an opinion piece calling for cities to give away free e-bikes and shut down streets for their use to reduce emissions.⁹

g. Strategies around parking in the DTP are also excellent. Including unbundled parking and pricing parking are good strategies to reduce emissions. Robert Cervero reports that commuters going to priced parking destinations used more transit and at a higher rate if carshare was conveniently available.¹⁰ Priced parking and free bikes would be a faster way to shift modes from single occupancy vehicles and reduce VMT per CARB's recommendation.

h. Develop a measure to equalize travel time across all modes. Currently driving is two to three faster than other modes, the slowest of which is transit. This is a disincentive to use other modes and reduce VMT. The time advantage needs to be equalized across modes.

2. Pedestrian fatalities and building safety into the DTP

Pedestrian fatalities have been increasing¹¹ post-pandemic despite existing fatality inequities noted on page 13. Virtually the entire increase in pedestrian fatalities occurred in urban areas according to AAA.¹² Residents are less likely to use transit if they don't feel safe as noted in the plan on page 16. To encourage transit mode shifts and walking the DTP should consider additional safety measures.

a. Slow Streets. The DTP is commendable in looking to extent a network of 100 miles of low stress bicycle streets (page 17). San Jose's version of Slow Streets is essential because it provides an alternative for bicyclists and a safe option to crowded

⁶ <https://www.uschamber.com/technology/broadband/broadband-funding-in-the-infrastructure-investment-and-jobs-act>

⁷ <https://www.bloomberg.com/news/articles/2022-03-18/electric-bikes-are-booming-again>

⁸ <https://www.ksut.org/environment-climate/2022-01-24/a-successful-colorado-program-gets-ebikes-to-low-income-essential-workers>

⁹ <https://www.nytimes.com/2021/11/22/opinion/free-ebikes-climate.html>

¹⁰ <https://www.accessmagazine.org/fall-2009/tod-carsharing-natural-marriage/>

¹¹ <https://www.axios.com/2022/04/13/pedestrian-fatalities-rose-post-pandemic-lockdown>

¹² <https://aaafoundation.org/examining-the-increase-in-pedestrian-fatalities-in-the-united-states-2009-2018/>

sidewalks.¹³ San Jose should look at a partnership with local home and business owners to monitor the streets with private cameras¹⁴ for driver compliance with the “low stress” criteria with a goal toward “[a]pplying enforcement efforts and appropriate technology that effectively target crash-producing speeders and deter speeding”.¹⁵ We have developed a Slow Green Streets program¹⁶ that looks to reduce flooding and improve pollinator function in the urban area.

b. Lane reductions. The DTP does not make use of road diets. A road diet is generally described as removing vehicle lanes from a road to allocate extra space for other uses such as sidewalks, bicycle lanes, and turn lanes. The main purpose of a road diet is to improve pedestrian and traffic safety, especially for minority victims of crashes,¹⁷ and they can be relatively low cost if planned correctly.¹⁸ Road diets are a functional response to the rising number of deaths, instead of toothless PSAs to drive safe or risk a ticket. In addition, micro-mobility functions as a separate mode. These electric vehicles can go much faster than bikes. They should have their own lane to the left of bike lanes which requires space on the road.

c. Charge higher prices for larger vehicle parking spots. Pedestrian fatalities fell by more than a third in a decade in Europe and by more than half since 2000 in Japan because of restrictions on large SUVs.¹⁹ In 2020, British lawmakers began debating banning the import of U.S.²⁰ SUVs because the built-in risk was too great. Additionally, since 1997 in Europe and 2003 in Japan, vehicles have also been tested and rated for how safe they are for pedestrians, should the driver hit someone. None of these restrictions and testing occur here, with the result that large vehicles with impaired visibility prowl our streets causing double the number of crashes²¹ with vulnerable pedestrians. To make the streets safer, separate parking spots by small and large, and charge much higher prices on for large vehicles parking in the DTP. Even safer, on slow streets, reallocate parking to other modes.

d. Close off streets for events like Halloween. It’s not just any driver who makes Halloween so deadly for kids, it’s

¹³ <https://www.thecity.nyc/2022/10/25/23421919/complaints-ebikes-scooters-bicycle-sidewalk-dangerous-safety-pedestrians-311-nypd-city-council-study>

¹⁴ <https://www.bloomberg.com/news/articles/2022-08-25/houston-mandatory-security-camera-law-raises-surveillance-fears>

¹⁵ <https://www.nhtsa.gov/risky-driving/speeding>

¹⁶ <https://www.sierraclub.org/sites/default/files/sce/loma-prieta-chapter/SLU/Policy%20-Green%20Streets%20-%20Sierra%20Club.pdf>

¹⁷ <https://usa.streetsblog.org/2021/06/23/stats-show-blacks-and-indigenous-people-suffer-disproportionate-road-deaths/>

¹⁸ <https://catsip.berkeley.edu/news/road-diet-case-studies>

¹⁹ Angie Schmitt, “While Other Countries Mandate Safer Car Designs for Pedestrians, America Does Nothing,” Streetsblog USA, December 7, 2017

²⁰ Angie Schmitt, “While Other Countries Mandate Safer Car Designs for Pedestrians, America Does Nothing,” Streetsblog USA, December 7, 2017

²¹ <https://www.iihs.org/topics/bibliography/ref/2249>

specifically commuters. When you look at FARS data, the deaths remain high year to year but go down when Halloween is on the weekend, as it has been the case for the last two years. This year Halloween is on a Monday again. Closing streets for events is an essential safety strategy.

e. Prevent police violence downtown by eliminating the reason to stop people using with slow streets. The Los Angeles Times found eleven incidents over a fifteen-year period where a bicycle stop escalated to the police killing the person on a bike²² — all the victims were Black or Latino. Similar results are found in cities across the country, from Oakland to New Orleans to Washington, DC. Eliminating the reason for the police to stop pedestrians and cyclists with streets designed to be car free and slow will reduce fatalities.

f. Consider more affordable housing. Residents of affordable units own fewer cars and are more likely to take transit and walk. Residents of market-rate units typically travel twice the distance by personal vehicle compared to those in low-income units.²³ Since they walk and take transit, low-income residents are more likely to be victims of drivers, rather than the cause of crashes. Increasing the number of affordable housing is a strategy that reduces greenhouse gases and improves safety.

Thank you for the opportunity to comment on the Downtown Transportation Plan. We look forward to working with you to make it a success.

Please do not hesitate to contact us if you have questions.

Respectfully submitted,



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²² <https://www.latimes.com/california/story/2020-10-16/examining-dijon-kizzee-bike-stop-police-shootings>

²³

https://connect.ncdot.gov/business/Transit/Documents/Travel%20Behavior%20and%20Society_Bardaka_TBS_2019.pdf