



COMMITTEE FOR
GREEN FOOTHILLS



January 26, 2018

Ms. Kerrie Romanow
Director, Environmental Services Department
City of San Jose
200 E. Santa Clara St.
San José, CA 95113

RE: Comments on the CSSJ Draft

Dear Kerrie:

We thank you for the opportunity to provide the following comments regarding the Climate Smart San Jose (CSSJ) Plan. Our hope is that we can contribute to Environmental Services (ESD) staff making this report as robust as possible as ESD prepares its staff report and continues its progress towards meeting the targets set forth in the Paris Climate Accords. As requested by ESD staff, we have provided in this letter a detailed set of comments that are referenced to specific pages of the CSSJ plan.

General Comments

We continue to support San Jose's effort to achieve Paris-level goals for net carbon reductions by 2050. At the January 18th workshop, ESD's consultants emphasized the importance of reaching this difficult goal. We believe the City has successfully completed the *Urban Infill* component of the Climate Smart San Jose Plan. But, San Jose must reach beyond the Urban Infill and analyze the Natural and Working Lands (NWL), providing the information the City needs to determine its pathway to Paris.

We appreciate your frankness at the January 18th workshop in acknowledging "some things we put forward probably are not going to work." As it currently stands in the CSSJ analysis, all of the Plan's policies need to be fully implemented and function as expected to achieve Paris goals. It is reasonable to expect that not all of the policies included CSSJ will either be fully implemented nor work as expected. Thus, CSSJ appears to leave no room for a margin of error. San Jose needs to consider a NWL analysis -- using geospatial methods -- in order to best understand the climate change benefits that will provide San Jose a clear path to the Paris goals.

It should be noted that these comments are provided with the caveat that the underlying appendix of assumptions to the CSSJ Plan has yet to be made public. Without this appendix, the current draft of the plan remains opaque and our support of this Urban Infill portion should be regarded as qualified.

Since the Plan is a thorough presentation of a strategy for the urbanized portions of San Jose, our recommendation is to label this draft the “Urban Infill Analysis” component of the Climate Smart San Jose Plan to reach Paris.

Specific Comments

As we have previously discussed, geospatial analysis is important for both an accurate projection of emissions and for determining which policies will work to reduce emissions. For this reason, geospatial analysis is at the core of our following specific comments.

On page 30, we see a need to revise the bullet point regarding "Carbon sequestration" to include firm language regarding Natural and Working Lands contribution to carbon sequestration and GHG reduction. As you have identified in your leading paragraph on page 30, "there are a number of areas that may be valuable to consider in future iterations" and further go on to state that the "future iterations of the Plan will include review of the following plans and policies", including [California's 2017 Climate Change Scoping Plan](#) ("Scoping Plan"). The text states that this plan is currently being developed; however, the Scoping Plan was adopted in December of 2017 and includes clear-cut language on California's climate objective to maintain natural and working lands as a carbon sink, not simply as an afterthought as could be perceived by the current language included. As stated on page ES13 in the Scoping Plan regarding NWL, "they are often the first to experience the impacts of climate change, and they hold the ultimate solution to addressing climate change and its impacts on order to stabilize the climate -- natural and working lands must play a key role".

Given this clear direction provided by a plan noted as advisory to CSSJ, we recommend that the bulleted "Carbon sequestration" paragraph change its heading from “Carbon sequestration” to “Carbon and natural and working lands.” We further recommend the last two sentences of that paragraph ("While, based on...Once data is available...") be removed and replaced with “Regarding carbon sequestration, technological advances may present further climate-smart opportunities as data and technology evolves. Once data is available, it can be considered for incorporation during the regularly planned updates to this Plan. All aspects of natural and working lands relevance to net carbon emissions, including avoided emissions, will be considered in the subsequent Natural and Working Lands analysis portion of CSSJ.”

Page 116 has an inconsistency and lacks demonstrated analysis discussing Natural and Working Lands and “avoided ‘operational’ energy use.” There is no indication that an analysis was actually done of avoided emissions from not developing NWL during the time period leading up to 2050. Completion of a Phase 2 NWL analysis would provide the needed analysis regarding avoided emissions, leading to the most informed policy decisions. The inclusion of

this analysis would identify incorrect conclusions, like the one on Page 116, where it's stated that 19% VMT reductions are due to "regionally accessible jobs" when jobs in Coyote Valley would likely increase VMT.

Also on page 116, regarding reduced VMT and whether it is included in the plan, we suggest changing the green section from "Yes," to "Yes - will be included in Phase 2 NWL analysis." Regarding carbon sequestration, rather than saying "No," meaning not included, it should say "Possible inclusion in Phase 2 pending further analysis".

Page 141 discusses how local jobs reduce VMT, with a text discussion focusing on transit-oriented jobs development while the accompanying map identifies North Coyote Valley as a major employment center. It is clear that development of North Coyote Valley will not be transit-oriented. San Jose's own DOT identifies North Coyote Valley as an area above the threshold of significance for high VMT. As the need to reduce emissions increases over time, and transit-oriented employment with lower VMT becomes a higher percentage of San Jose employment over time, North Coyote Valley will actually become increasingly more of a detriment to San Jose's effort to lower emissions. This discussion on page 141 does not demonstrate how North Coyote Valley development will reduce VMT.

Also on page 141, we recommend the title be changed to read "Strategy 3.1: Create Local Transit-Oriented Jobs to Reduce VMT." The first sentence in the text on the page should read "In addition to its effect on VMT, the Plan also assumes that transit-oriented development will occur with the deployment of accessible jobs *within the already-developed urban footprint.*" (Italicized text represents changed language). Given the need and value of the subsequent NWL analysis, we recommend for completeness that a new sentence be added here saying "For lands outside the already-developed urban footprint, the effect of new development, including jobs development, will be examined in the Natural and Working Lands Analysis portion of CSSJ." Lastly on this page, the note regarding "regionally accessible jobs" should say "accessible jobs within the already-developed urban footprint."

Moving Forward

We stand ready to publicly support a recommendation by ESD for a Phase 2 with partial funding by San Jose and partial funding from other sources that would constitute the NWL component of CSSJ and the effort to achieve the Paris goals. The Phase 2 would allow the city to spell out the assumptions used on NWL and VMT emissions on a spatial basis.

We also continue to encourage ESD to work with sister agencies, such as the Santa Clara Valley Open Space Authority, for both potential assistance in doing this research and help in verifying the accuracy of the related works and models used. With the completion of both an Urban Infill and a Natural and Working Lands component, San Jose will have the needed tools to make robust conclusions and determine whether or not the policies outlined are sufficient to reach Paris goals.

We are happy to answer any questions.

Sincerely,

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Open Space Committee Chair
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