

Robin Roemer  
Member of the VTA Citizens Advisory Committee  
Vision Zero Advocate

**Dear Members of the Envision San José 2040 4-Year Review Task Force,**

Please allow me to share a few short remarks regarding your discussion of the City's VMT policy and General Plan update proposal.

### **I. Staff recommendations 4d and 4e**

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Staff recommendations 4d and 4e are broad and could potentially open back doors to continue pursuing projects that increase VMT. For example, the still in effect North San José Area Development Policy and North San José Area Deficiency Plan include transportation projects that will more than likely increase VMT. Pursuing these older area transportation plans as they stand today, could lead to actions that conflict with the City's VMT goals.

#### **Suggested edits for recommendations 4d) and 4e) to include a reference to reducing VMT:**

- d) Develop a citywide transportation plan that identifies, prioritizes, and monitors the City's near-term transportation investments **reflecting the General Plan goal of reducing VMT.**
- e) Develop area transportation plans that identify, prioritize, and monitor long-term transportation projects and programs in the City's Growth Areas in alignment with General Plan **VMT** goals and policies.

### **2. Equity considerations**

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Historically, low-income neighborhoods have borne an oversized burden of impacts from the transportation system which includes not only impacts from GHG emissions, but also safety issues and local air pollution.

**Staff should develop a recommendation that explicitly incorporates equity considerations into the VMT policy** especially in terms of mitigation measures and the proposed regional VMT bank.

Otherwise, it could easily be possible that a project causing traffic issues in a low-income neighborhood in San José could offset these impacts by contributing to a bike project in Cupertino.

### 3. Relationship between GHG emissions and VMT

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The main purpose of reducing VMT is to reduce GHG emissions. That is why the San José Climate Smart plan has aggressive VMT reduction goals. Unfortunately, some are contesting this positive relationship:

For decades, traffic engineers have argued that widening of roads and intersections, adding lanes to a highway will reduce greenhouse gas emissions. By easing congestion, the argument goes, new lanes will reduce the amount of fuel that vehicles waste in stop-and-go traffic, leading to lower releases of climate-warming gases from cars and trucks.

Despite overwhelming evidence that most of the benefits from such congestion improvement projects are, if at all, short term and quickly more than outweighed by the negative impacts of the additional traffic induced by these projects, the above stated arguments continues to persist; even San José City staff has brought them forth as recently as June 2020 in the context of the Charcot Avenue Extension Project (see sidebar).

**We cannot reduce GHG emissions by encouraging people to drive more.**

#### **Charcot Avenue Extension Project:**

This recently approved project of building a new road in a congested area will increase VMT in the range of 2,300-15,700 miles/day, yet in the Statement of Overriding Considerations, the City argues:

*“The Project will result in a reduction of greenhouse gas emissions due to the reductions in congestion and improvements in operational efficiencies associated with a new east-west connection across the I-880 corridor.”*

If GHG emissions could be reduced while increasing VMT, Climate Smart VMT goals would become meaningless.

**Recommendation: As a matter of policy, the City should reject any environmental analysis that suggests anything but a positive correlation between VMT and GHG emissions.**

### 4. Will the General Plan 2040 including the proposed policy changes lead to San José reaching its ambitious Climate Smart goals?

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The latest transportation analysis for the General Plan 2040 that is available on the City’s website (dated: October 2016) shows that VMT per capita is expected to increase to 15.1 by 2040.<sup>1</sup> Far off from the City’s newly proposed goal of 8.0 VMT/capita.

The traffic model used for the analysis has several limitations, but the just magnitude of the difference between goals and projections alone is concerning.

Staff has stated:

“Climate Smart San Jose (Climate Smart) builds on and furthers the General Plan’s vision. It assesses the climate implications of building out the General Plan and finds that the General Plan alone is not enough

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<sup>1</sup> <https://www.sanjoseca.gov/home/showdocument?id=22021>

to meet the [City’s or] State’s carbon commitments, let alone align with the decarbonization rates implied by the Paris Agreement.”<sup>2</sup>

**Table 3**  
**Daily Vehicle Miles Traveled Per Service Population**

	Projected 2015 Conditions	Adopted 2040 General Plan Conditions	Proposed 2040 General Plan (4-Year Review) Conditions
Citywide Daily VMT	20,588,249	33,271,346	31,152,540
Citywide Service Population	1,385,030	2,153,261	2,065,461
- Total Households	318,686	429,350	429,350
- Total Residents	1,010,805	1,313,811	1,313,811
- Total Jobs	374,225	839,450	751,650
Daily VMT Per Service Population	14.9	15.5	15.1
<b><i>Increase in VMT/Service Population over Baseline Conditions</i></b>		<b>0.6</b>	<b>0.2</b>
<b>Significant Impact?</b>		<b>Yes</b>	<b>Yes</b>
<b>Note:</b> Service Population = Residents + Jobs			

There seems to be a significant gap between the City’s high-soaring aspiration, the currently planned implementation, and the magnitude of change necessary.

It took us 10 years to reduce VMT by 4%. If this were a marathon, one could say, it took us a third of the time we have to run just the very first mile.

**Question: Has there been any analysis done that shows that the General Plan and the here proposed policy changes will bring the City close to achieving the proposed VMT and mode share goals?**

<sup>2</sup> <https://sanjose.legistar.com/View.ashx?M=F&ID=7740265&GUID=BDA753CC-B484-4112-BA30-0F346E4D1F96>