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Tom Fitzwater
SVRT Environmental Planning Manager
VTA Environmental Programs & Resources Management
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(Via E-mail: BARTPhase2EIS-EIR@vta.org

RE: San Jose State University Comments on the Draft Supplemental Environmental Impact Statement & Subsequent Environmental Impact Report for VTA's BART Silicon Valley Phase II Extension Project

Dear Mr. Fitzwater,

On behalf of San Jose State University, I am providing public comments included herein regarding the Silicon Valley BART Phase II Extension Project Draft Supplemental EIS and Subsequent EIR. The University appreciates the opportunity to review and comment on the dual environmental assessment for this incredibly important project that will redefine the future of Silicon Valley, particularly for San Jose, its downtown and the SJSU community.

SJSU's interest in this project is informed by many considerations – some obvious, others perhaps less so. Its main campus is approximately ½ square mile in size and just one block south of the proposed tunnel alignment under Santa Clara Street with a direct connection to the proposed East Option station location. The University has a weekday population of more than 40,000 students, faculty and staff members and visitors. Taking into account the university's large and growing downtown footprint, and the fact that it is the area's largest employer, no other public or private institution will plausibly have greater influence on ridership patterns when BART service reaches downtown San Jose.

We acknowledge that the environmental assessment appropriately identifies SJSU as one of many noteworthy activity areas the downtown BART station will serve. It is unclear, however, that the assessment reflects the university's extraordinary present and future impact. For example, with approximately 6,000 employees, SJSU is and will remain one of downtown San Jose's largest (if not the largest) single employers for the foreseeable future.

It is also important to note that SJSU strategically and energetically encourages members of its community to embrace and utilize sustainable, non-vehicular transportation options. A SJSU study completed last year based on an annual a survey of students indicated that nearly four in ten regularly relied on VTA or other regional transit services to travel to and from the campus.

For these and other reasons, the choice that will be made in the coming months about the location, design and development of the downtown San Jose station are, quite

literally, "100 year decisions." We appreciate the complexity of this challenge and VTA's openness to our input.

In order to more comprehensively examine the BART extension project as it enters the final stages of pre-construction project approval, we have identified what we believe are key criteria to facilitate the University's review, comments and recommendations. We believe the BART extension into and through downtown San Jose, particularly the selection of the station location, should:

- Maximize ridership by placing the station where need and opportunity is greatest.
- Serve the best interests of all greater downtown stakeholders, including SJSU.
- Ensure direct connectivity between the station and the SJSU campus.
- Account for construction feasibility constraints and minimize community impacts.

This letter, including Attachments A & B, constitutes the University's specific comments on the BART Phase II EIR/EIS.

While this dual environmental assessment is indeed an extensive analysis with thousands of pages of material, we are concerned that it lacks a fundamental element which, if addressed, would enhance the public's understanding of the project's potential impacts and its final design. The project "options" -- dual vs. single bore, East vs. West downtown station location, North vs. South Diridon station alignment -- are all incorporated into the project description as project variables to be selected later. Either option is deemed an acceptable project element when, in fact, each could have been studied as distinct alternatives and subjected to independent analysis and comparison. Absent this depth, it is difficult to understand what the specific project is or the particular physical, community, economic and environmental impacts of each option, let alone reach reasonable conclusions about which option is best and would result in a more environmentally superior project.

The ultimate selection of the downtown station location (East vs. West Option) is a good example of this problem. We have separately prepared comments on the downtown station location choice, which we include in Attachment B. You will note that we believe the East option is the environmentally superior option and best meets all the criteria on which we based our assessment.

Should you have any questions about these comments, please do not hesitate to contact me directly.

Sincerely,

Charlie Faas
Vice President/CFO
Administration & Finance Division
San José State University

ATTACHMENT "A"

BART Silicon Valley Phase II Extension Project

Draft Supplemental Environmental Impact Statement & Subsequent Environmental Impact Report

San Jose State University Comments

Preferred Downtown Station Location - East Option

See Attachment B for commentary on why San Jose State University supports the East Option for the downtown station location.

Preferred Tunneling Method – Single Bore Option

Based on the information available in the EIR/EIS, we believe the single bore option should be selected as the preferred tunneling method. The construction-related impacts arising from the dual bore tunneling method and the associated station box cut and cover construction approach appear insurmountable and many businesses will likely find it difficult to remain viable through the project's completion. Many of these same physical impacts will negatively affect the university campus. Furthermore, the additional truck traffic required to off haul the excavation spoils from the dual bore option for the downtown station box will create significant traffic impacts in the downtown core and for the University campus.

West Option Station Location Description & Street Improvements

We note that the East Option includes as part of the project description a commitment to make streetscape improvements to create a connection between the station location and San Jose State University. However, the West Option description does not include any such element. The need for this connection with streetscape improvements is even greater from the West station location proposed so should be extended to this option as well in the project description.

Trucks & Traffic Safety Issues

With the closure of Santa Clara Street for station construction, we are concerned that there may be a need to rely on San Fernando Street as an alternative route for trucks and automobiles. We note that one of the primary truck traffic routes is along 10th and 11th Streets. While the Draft EIR/EIS does not directly address truck staging and should, our presumption is these same streets would be utilized. However, they are directly adjacent to our campus and utilized by thousands of students each day that must cross these major traffic routes on foot to get to the campus. We are concerned about the basic safety challenge created by placing such a large number of trucks as well as redirected automobile traffic currently served by Santa Clara Street in a highly used pedestrian area.

We also question the air quality impacts associated with idling trucks as well as the airborne dust and contaminates coming from excavation spoils the trucks will carry being so close to such a large activity center as the university campus. SJSU would like the project to include a detailed construction management program to address these issues before the VTA Board makes any final decisions. If this cannot be provided prior to project approval, performance standards should at least be adopted as part of the project to ensure the construction challenges identified are properly addressed by any future contractor. As an example, it would be prudent to start the Downtown Station as soon as SJSU classes

end for the summer which is likely also when downtown business traffic is likely lightest and dry to accomplish as much of the heavy construction work for the station over the summer months.

Potential Impacts on University Parking Supply

With the increase in ridership to the BART system created by the Phase II extension, there will be a demand for daytime parking at all new BART stations, including the downtown location, from new riders. However, VTA is not proposing to provide any new parking supply to serve this likely demand. The University's two primary parking garages are located within walking distance of both station options. Given these parking assets are open to the public, within walking distance of the stations and offer one of the cheapest parking alternative downtown, we are concerned that the BART station options as currently designed could severely impact the parking supply for our students, faculty and staff. In addition, it is not clear where construction workers will park, and they may also make use of these parking opportunities to the detriment of our students for years during the construction process. The project should account for these potential parking impacts and propose adequate mitigation.

Transit Oriented Development Exhibits Inaccurate

The environmental document includes a number of exhibits which depict ¼ mile and ½ mile radius circles for TOD walking distances and development opportunities. They do not appear to use the middle of the intended BART box location as the center point for purposes of measurement which makes it difficult to understand realistic coverage areas and how station location options relate to the similar Diridon Station location radius circles.

ATTACHMENT "B"

BART Silicon Valley Phase II Extension Project &
VTA's Downtown Station Location Choice

San Jose State University Supports East Option

Summary

The BART Silicon Valley Phase II Extension Project will materially influence the future of Silicon Valley, particularly for San Jose, its downtown, and the San Jose State University community. SJSU believes the interests of greater downtown San Jose, including the University, would be best served by placing the downtown San Jose station between 3rd Street and 6th Street (East Option) along Santa Clara Street.

Over many generations, experience affirms that it is best to maximize BART ridership where need and opportunity are the greatest. A preponderance of the greater downtown San Jose area will be better served by the East Station Option. Sites near this station can be developed at greater density without airport height restrictions, maximizing employment opportunities and ridership. With approximately 6,000 employees, SJSU is one of downtown San Jose's largest (if not the largest) employers, and will be for the foreseeable future. With a daily concentration of 40,000 daytime visitors, many of whom are already committed to mass transit use, SJSU will perennially be the downtown's greatest single generator of BART ridership in this corridor; that alone suggests that the station should be located as close as possible to the campus.

In the short term, the East Option is also a more feasible option for construction, and will have far less community impact on the downtown core. The West Option would require that downtown San Jose VTA light rail service be severed and reconstructed—a process that would take many years and irreparably damage the service while negatively impacting current users. Constructing the station at this site, closer to the center of the current downtown core, is far more challenging due to existing development, as well as likely impacts to businesses and current traffic flow. The East Station Option obviates all of these impacts to a lesser degree.

Why is the downtown station location important to the University?

SJSU is a "city within a city" and a major hub of daily activity in the greater downtown area. With 35,000 enrolled students, more than 6,000 faculty and staff members, more than 4,000 campus residents, activities that attract countless visitors each year to the campus, and an increasingly visible footprint throughout downtown, SJSU will both benefit from and be significantly impacted by this project. The University is downtown San Jose's largest single employer. We consider the proper planning, design, construction and operation of the BART extension -- particularly the selection of the downtown station location -- to be one of the most significant opportunities and challenges for downtown San Jose and our institution since its founding.

How has the university analyzed the downtown station location choice?

In order to more comprehensively examine the proposed BART extension as it enters into the final stages of pre-construction approval, we have identified key criteria to facilitate the University's review of the project and downtown station location choice. The University believes the BART extension into and through downtown San Jose, and the selection of the station location, must:

- Maximize ridership by placing the station where need and opportunity are the greatest.
- Serve the best interests of all greater downtown San Jose stakeholders, including SJSU.
- Ensure direct connectivity between the station and the SJSU campus.
- Account for construction feasibility constraints and minimize community impacts.

#1 Maximize ridership by placing the station where need and opportunity is greatest.

Founded in 1857, San Jose State University is the oldest public institution of higher education on the West Coast. The main campus, located in downtown San Jose, occupies an approximately 1/2 square mile urban footprint, boundaried by San Fernando Street (North), San Salvador Street (South), 10th Street (East) and 4th Street (West). Its northern boundary is located just one block south of the planned BART tunnel alignment under Santa Clara Street, nearest to the proposed downtown East Station Option. The larger campus environs and sphere of influence encompass a much wider geographic area.

In choosing between the East and West Station options, decision makers must recognize that the University is an institutional anchor, unrivaled in size and activity density in downtown San Jose and among the busiest areas that will be served by the expanded BART system. SJSU has a weekday population of 35,000 students, 6,000 faculty and staff members, more than 4,000 residential beds, and thousands more who live within walking distance of the campus. SJSU is also a year-round destination for academic, cultural and athletic events staged in multiple venues on campus and downtown. (The university operates the Hammer Theatre Center under an agreement with the City of San Jose.) It is often overlooked, but SJSU is actually one of downtown's biggest (if not the biggest) employers, and will remain so for the foreseeable future.

Most important, SJSU will continue to be the single largest source of ridership on BART and other transit systems operating in the greater downtown San Jose area for generations. We understand downtown San Jose currently has fewer than 40,000 daytime workers, with a stated goal of increasing the daily workforce to approximately 90,000 by the year 2040. By comparison, San Jose State's current daytime population is roughly equivalent to the rest of downtown San Jose combined, and would still be approximately half the size of the city's downtown employee base whenever it reaches its planned build out.

BART and VTA seek to increase ridership and create a truly integrated transit system, primarily by placing infrastructure and services in locations where there is the greatest need and opportunity. The BART downtown East Station option best fulfills this goal, ensuring that the largest, densest activity area in downtown will be more directly and easily served by BART while continuing to provide opportunities for increased ridership throughout the traditional downtown core.

San Jose State University students already embrace mass transit opportunities and are a model for the rest of the Bay Area when it comes to alternative transit use and mode shift behavior. A SJSU study completed last year revealed that approximately 64% of students regularly travel to and from campus in some manner other than a single occupant vehicle. Of those relying on non-vehicular alternatives, 36% use VTA or regional transit, and 20% bike, walk, skateboard or scooter. Over the last 15 years, the percentage of students reliant on single occupant automobile trips has dropped from approximately 60% to 36%.

With transit users already comprising more than 12,000 students, faculty and staff; more than 5,000 students already commuting to San Jose from the East Bay; and many students of limited economic means traveling an average of more than 13 miles to reach the campus, there is a compelling argument

that placing the downtown San Jose BART station as close as possible to the campus will fuel and maximize ridership for the system.

#2 Serve the best interests of all greater downtown San Jose stakeholders, including SJSU.

The City's present conception of downtown San Jose largely (and somewhat oddly) excludes the San Jose State University campus and much of the rest of the larger frame that more accurately reflects what downtown will look like in the decades ahead. We believe it is critical to take a "one hundred year view" in deciding where to locate the downtown station, while focusing less on the perceived immediate benefits of serving today's relatively limited downtown employment district.

There is a strategic advantage to selecting the East Station Option, which will be closer to the edge of the downtown frame and thus can serve a wider area, especially in conjunction with the BART Diridon Station location. The latter station, which will also serve downtown, is strategically located nearly adjacent to the Diridon Transit Center and SAP Center, two of the largest activity areas on the West side of the city center, and proximate to a future employment center as well as traditional residential neighborhoods.

The East Station option best meets these objectives, given its proximity to San Jose State University, City Hall, and central employment center in the core, plus traditional neighborhoods and employment opportunities to the East. With the East Option and the Diridon Station locations approximately one mile apart, they will serve much more of the greater downtown frame area within a ½ mile radius circle of each station. The West Option, which has considerable cross over with the Diridon Station's ½ mile radius circle, serves only a smaller section of SJSU's campus environs.

Given that the East side of the greater downtown area offers unrecognized employment development potential, the East Option will support a much wider, high-density development footprint over future decades. The downtown core's traditional employment district has received significant attention for future job creation potential that is critical to the success of BART, and some presume the West Option station location will better serve this goal. However, the East Option does not disadvantage existing downtown businesses or potential development sites in the immediate environs identified by the City--all of which would remain within ½ mile of one of the two BART stations serving downtown.

The East Station Option also creates new development opportunities within ½ mile of a station with considerably higher-density development potential. As has been widely noted in city development studies, height restrictions in the downtown area, arising from San Jose International Airport operational safety constraints, severely limit building heights in much of downtown--particularly on the West side. As development moves East, however, construction will not be subject to these height restrictions, improving building floor area ratios for each new development--the single greatest factor in determining potential employment capacity for any site, including downtown.

In looking at recent downtown development proposals, the true impact of this development potential is readily apparent. The SJSC Towers on a 1.4 acre site adjacent to East Option location will soon obtain approvals for two 28-story residential buildings at 286 feet-- significantly taller than the residential tower approved for the Trammel Crow project on Delmas at Santa Clara Street near the Diridon Station (12 stories and 126 feet due to airport height restrictions).

#3 Ensure direct connectivity between the station and the SJSU campus.

Because San Jose State is the major institutional anchor downtown and the largest activity center to be served by BART, it is critical that the nearest station physically "connect" to the campus from an urban planning perspective to encourage optimal ridership at all hours. The East Option project description acknowledges the need for this kind of connectivity, and ready opportunities exist given the short distance (one block) and the potential for a direct line of sight link between the two venues. The West Option lacks both features. It is also more than three urban blocks from the campus, separated by two major traffic arterials and a challenging pedestrian experience. These impediments eliminate this connectivity potential and will likely diminish ridership, particularly during non-weekday hours, compared to the East Option.

No matter which station location is selected, the campus/station connectivity implies and requires appropriate station naming, street signage and wayfinding, and a recognizable and inviting pedestrian paseo that is well lighted and safe to support the many thousands of riders likely to use BART to travel to SJSU.

#4 Account for construction feasibility constraints and community impacts.

VTA currently presumes that costs to develop East and West Options will be comparable and that impacts will be relatively similar. However, the agency has not yet assessed or compared in any significant way the construction feasibility constraints and community impacts of station alternatives.

One significant distinction is that the West Option will require the VTA Light Rail line to be severed in both directions and reconstructed across Santa Clara Street, irreparably damaging and disrupting the future viability of this transit service. The costs and impacts of this construction challenge have not been assessed, but they undoubtedly will be significantly higher for the West Station Option. Furthermore, interruption of light rail service--potentially for years--will eliminate access between south San Jose neighborhoods and the Golden Triangle jobs center to the north. It will also interrupt service to thousands of SJSU students currently relying on light rail to get to the University each day.

The construction related impacts to the downtown community from selecting the West Station Option will likely be much more devastating over many years than the East Option, simply because of the former's proximity to the city's current employment center with larger buildings housing more tenants. No matter which tunneling construction option is selected, the challenges of building the West Option site pose significantly greater challenges proximate to the current downtown core, including likely utility line relocation, business interruption problems, historic building impacts, and traffic gridlock.

The dual bore construction option (the only present method for BART demonstrated to be feasible) with its 1,500 foot station box cut and cover method would be significantly more impactful to the center of the current downtown core in an area much larger than the Market/3rd Street station box. Many more buildings and businesses will be impacted by construction at the West Option than the East Option area, which, by comparison, is currently less maturely developed. For the larger community, the number of additional truck trips necessary to off-haul excavation spoils associated with dual bore would be staggering. The challenges of moving a ten-fold number of trucks through the downtown core for the West Option station location cut and cover dig is logistically far more difficult than the East Option, which is six urban blocks closer and half the distance to the designated truck route on 10th/11th Streets.

Conclusion

SJSU believes the VTA Board should approve the East Option for the downtown station location between 3rd and 6th Streets along Santa Clara Street. In the long run, it clearly is the best choice to increase BART ridership where need and opportunity are the greatest. SJSU is the largest institutional anchor downtown and one of the densest activity centers in close proximity to the BART system with 40,000 daytime visitors who are already committed to mass transit use. The university is also likely the largest employer in greater downtown San Jose with approximately 6,000 employees. There is a clear justification for providing direct service connectivity as close as possible to the campus, maximizing daily ridership.

The East Option also will best serve the interests of greater downtown San Jose. A larger portion of downtown can be easily served with both of the Phase II BART stations located a mile apart closer to the edge of the downtown frame. Employment development potential would be enhanced with the East Option for the station as job sites near the current downtown core will still be served and others on the East side with greater density development potential will be included within a ½ mile radius of a BART station. The East Option creates the only opportunity for direct connection to the University campus just one block away while avoiding many of the construction feasibility challenges and community impacts associated with the West Option.