

County of Santa Clara

Office of the County Executive

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Jeffrey V. Smith
County Executive

August 12, 2011

Mr. Joseph Horwedel, Director
City of San Jose
Department of Planning, Building and Code Enforcement
200 East Santa Clara Street, Tower 3
San Jose, California 95113-1905

*RE: Comments regarding the Draft Program Environmental Impact Report and Envision San Jose 2040
General Plan*

Dear Mr. Horwedel:

Please find enclosed comments from the County regarding the Draft Environmental Impact Report (PEIR) and Envision San Jose 2040 General Plan update. These include comments from the Departments of Planning and Development, Parks and Recreation, Roads and Airports, and Public Health.

The attached comments include corrections, requests for clarification, and concerns the County has regarding the PEIR and proposed 2040 General Plan as they relate to County resources, residents, and facilities, including County Parks, roadways, and implementation of the Santa Clara Valley Habitat Conservation Plan (HCP).

If you have any questions regarding coordination of comments on the Revised Draft Program EIR from the County, please contact Rob Eastwood at (408) 299-5792 in the County Department of Planning and Development, Jane Mark at (408) 355-2237 in the Department of Parks and Recreation, Bill Lee at (408) 573-2487 in County Roads and Airports and Martin Fenstersheib MD, in Public Health.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Smith".

Jeffrey V. Smith
County Executive

c: Board of Supervisors

County of Santa Clara

Department of Planning and Development
Planning Office

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August 8, 2011

Joseph Horwedel, Director
City of San Jose
Department of Planning, Building & Code Enforcement
200 East Santa Clara Street, Tower 3
San Jose, CA 95113-1905

SUBJECT: Comments Regarding the Draft Program Environmental Impact Report and the Envision San Jose 2040 General Plan

Dear Mr. Horwedel,

Thank you for the opportunity to comment on the City of San Jose's Envision San Jose 2040 General Plan, the comprehensive update to the City's 2020 General Plan, and draft Program Environmental Impact Report (PEIR). The project proposes an additional capacity of up to 470,000 jobs and 120,000 dwelling units in the City through 2035. We respectfully submit the following comments.

Program Environmental Impact Report (PEIR) Comments:

1. Biological Resources

The PEIR acknowledges (Page 471) that buildout under the proposed 2040 General Plan will result in new vehicle trips, creating new vehicle emissions resulting in nitrogen deposition impacts to serpentine grassland habitat. This indirect impact (vehicle emissions and nitrogen deposition) to sensitive habitat that supports a variety endangered species is one of the main reasons the Santa Clara Valley Habitat Plan was prepared.

In describing this environmental issue, the Draft PEIR concludes that the impacts from buildout of the 2040 General Plan are significant and unavoidable. This conclusion appears to be in direct conflict with the analysis and findings of the Santa Clara Valley Habitat Plan (Public Draft, December 2010). The Habitat Plan, prepared under a local partnership that includes both the County and City of San Jose, evaluates nitrogen deposition impacts to serpentine habitat from future urban development in Santa Clara County and provides programmatic mitigation for the protection of this sensitive resource.

While the Habitat Plan is currently undergoing revisions and several options regarding impact fees and funding for nitrogen deposition impacts are under discussion, there is no evidence that implementation of the Habitat Plan is infeasible. As such, the County suggests that the City carefully reconsider the conclusions in the PEIR regarding this impact, including a consideration of the State mandated CEQA findings that must be made by the City in adopting the 2040 General Plan.

2. Cultural and Paleontological Resources

Section 3.11.1.5 (Identified Cultural Resources): Beginning on page 691, the PEIR refers to the "Santa Clara County Historical Conservation Districts" including the areas New Almaden, Portuguese Ranch, and Rancho Santa Teresa/Rancho Santa Teresa Historic District. These areas are identified in the Santa Clara County Heritage Resources Inventory as "Historic Districts H1, H2, and H4," and not Historical Conservation Districts. These should not be equated or confused with the County "-h" Historic Preservation Combining Zoning Districts, as defined in the County's Zoning Ordinance, Ch. 3.50.

Envision San Jose 2040 General Plan Update Comments:

The Envision San Jose 2040 General Plan is consistent with long-standing countywide growth management and urban development policies as expressed in the County of Santa Clara's General Plan, Growth and Development Chapters. It promotes efficient use of existing urbanized areas, efficient growth patterns for service delivery, and improved jobs-housing balance. As the largest city in Santa Clara County, it is noted and laudable that San Jose is showing leadership and commitment to these joint city-County policies, which are also shared and articulated through the Santa Clara County Local Agency Formation Commission's (LAFCO) adopted policies.

More specific comments and questions on particular aspects of policy or explanatory text are listed below, according to the organization of the Draft Envision San Jose 2040 document available for review on the City's website. These documents are generally dated "Draft – 6/17/11," except for Chapter 1, which is noted as "Draft – 4/19/11."

Chapter 1: Envision San Jose 2040

1. Pg. 1-8 contains a statement that City boundaries extend as far east into the Diablo Range as Copernicus Peak, at 4,372 feet, east of Grant Ranch Park. This appears to be a misstatement of fact. This peak is several miles east of the city's Sphere-of-Influence. No city boundary or planning boundary extends to Copernicus Peak.
2. Pg. 1-20 contains discussion of "Grand Boulevard" street concepts within San Jose, which is an extension of the Grand Boulevard Initiative (GBI) for El Camino Real in San Mateo County and Santa Clara County. The section should be expanded to include the work efforts of the Grand Boulevard Initiative and its multi-year planning process, and its particular relevance to the portion of El Camino Real as it extends southward from Santa Clara into San Jose, where it becomes The Alameda.

3. Pg. 1-23 contains discussion of the City's Greenline/Urban Growth Boundary (UGB) and appropriately references mutual, cooperative growth management policies of the incorporated cities and County to maintain rural character of rural areas and to allow urban growth and development only within Urban Service Areas, where it can be safely accommodated and efficiently provided with urban services. In reference to the City's and County's mutual commitment to these policies, it should refer to City-adopted UGB/Greenline policies and to the County's Growth & Development Chapter policies of its General Plan regarding countywide growth management / urban development policies.
4. Pg. 1-68 contains discussion of the city's Focused Growth – Planned Growth Areas strategy. It also includes mention of a “hubs, corridors, and villages” strategy to help preserve neighborhoods, minimize disruption to existing, developed, areas where growth and intensification is not desired, and reaffirms city policy to accommodate all urban job and housing growth within the city's Urban Growth Boundary (UGB). The strategies and policies stated in this section are consistent with County General Plan policies for countywide growth and development. The County would also urge the City to make sufficient allowance and provision for all forms or types of urban uses, including institutional uses within its UGB.

Chapter 2. Thriving Community

Policies for Fiscally Sustainable Land Use Framework, beginning p. 2-16

5. Policy FS-3.8 on p. 2-17 references city policies and correlating County Urban Service Area policies. These policies seek to generally maintain current USAs so as to prevent unwarranted urban sprawl and prevent rural lands generally unsuitable for urban growth and development from being included in city USAs. In this regard, the County concurs with the importance of maintaining existing USA and UGB boundaries, but would advise City to provide sufficient flexibility to allow for minor corrections and adjustments, specifically in regard to small parcels at USA edge that are divided by 15% slope line and current USA. By reference to County mapping and official LAFCO and County Surveyor's Office mapping, there are a small number of parcels that are divided by the USA and subject to both the City's and the County's General Plan for allowable uses, subdivision densities, and lot line adjustments. The County encourages the City to allow for USA adjustments so that such small parcels may be located either in or out of the USA for simplicity and clarity. This should be an explicit implementation measure included in the 2040 General Plan.
6. Policy FS-3.12 on p. 2-18 encourages County and LAFCO to cooperate and promote annexation of county islands (“pockets”). The County and LAFCO have partnered in recent years with various cities, including San Jose, in this regard. The City's General Plan should state that as a general goal and in furtherance of the joint

city-County urban development policies, the cities should assume responsibility for annexing remaining islands. To address future island annexation issues, attendant fiscal issues, and other aspects of island policies, the City's policy(s) should state that it will work cooperatively with the County, LAFCO, and other stakeholders to address the subject and continue the significant progress that has been made to date.

7. Policy FS-3.13 on p. 2-18 promotes and encourages other jurisdictions to take on a greater share of the region's housing needs to promote jobs-housing balance for San Jose and the region as a whole. While the County agrees that each city in Santa Clara County should provide its fair share of urban housing need, the County itself would not have a role in taking on greater shares of regional urban housing needs. This policy should be directed towards the other cities, consistent with joint city-County policies for urban growth management. In Santa Clara County, the cities are responsible for planning for and accommodating future urban growth and development needs.
8. Policies FS 5.9 and FS 5.10, on p. 2-20 under the heading of Fiscally Sustainable Service Delivery, prescribe that the city's USA not be expanded to include Coyote Urban Reserve (CVUR) or South Almaden Valley Urban Reserve (SAVUR) in the 2040 plan horizon and to maintain rural character of those areas. The County agrees with intent and policy as stated, and proposes to maintain existing County General Plan Land Use designations currently applicable to those areas, consistent with the Envision San Jose 2040 General Plan.

Chapter 5: Interconnected City – Land Use and Transportation Diagram

9. Pg. 5-3 contains discussion regarding the city's UGB and related policies, under the heading "Establish Fixed Urban Growth Boundary." This discussion explains that with state of the art topographic mapping and data, it is possible to firmly establish the 15% slope line and show it on a Land Use / Transportation diagram. It further asserts that the City should not expand UGB beyond this 15% slope line. The County is in general concurrence with this component of the City's growth management policies, but urges the City that such policies not be interpreted or written so rigidly as to preclude a minor adjustments to address small parcels split by the USA. If parcels with a majority of land area above the 15% slope line should be removed from the USA for consistency with this policy, the County would encourage coordination of such modifications with LAFCO and the County when potential retractions of the USA are appropriate.

Land Use Designations – Open Hillside

10. The description and policies found on pages 5-16 to 5-18 for the Open Hillside land use designation are generally consistent with County Land Use designations of Hillside and Ranchlands applied to non-urban areas outside the USA in San Jose's (SOI). The Open Hillside designation policies for residential use and densities are generally consistent with those of the County's General Plan, except

that in the County's Hillside designation, where the 20-160s slope density formula may only apply where residential subdivision is proposed as a cluster subdivision, preserving no less than 90% of the land in permanent open space.

For Open Hillside Non-residential uses, the City's General Plan allows rural institutional uses that are of an appropriate non-urban form and character, with reference to County General Plan policy language for such uses from County GP policy R-LU 18. That County policy (and related policies R-LU 25-27) allow for certain low intensity institutional uses that require a remote, rural settings or that support the recreational, productive use, study and appreciation of the natural environment. In a similar way, the City General Plan also refers in this section to allowing "conference, retreat, and rehabilitation centers." The County concurs with need for policy consistency for these areas and land use matters, and urges the City to re-emphasize the importance of allowing only low intensity, non-urban forms of these institutional uses by means of this and related policies. Conference centers, retreats, and rehabilitation centers are often conceived as being allowed by the City and by the County in non-urban areas regardless of size or use intensity, which is not the case.

Chapter 6: Land Use and Transportation

11. Under the heading of Urban Agriculture, beginning p. 6-17, the City 2040 Plan promotes various means of allowing new and varied forms of urban agriculture. This effort includes city Zoning Ordinance amendments to foster urban agriculture in appropriate urban zoning districts. Policies for Urban Agriculture also refer to preserving agricultural lands and prime soils in non-urban areas. The County concurs with these and other policies LU-12.1 through LU-12.11, including the "Actions" policies. The County encourages San Jose and other cities to coordinate in this regard in the development of a County General Plan Health Element, which is in the early stages of development. Also, Policy Action statement LU-12.10 appears to be referring primarily to the County's Public Health Department, rather than the County's Department of Environmental Health, although each may have a role to play in the educational efforts addressed in this policy "action" statement.
12. P. 6-33 to 6-34, under Goal LU-20 Rural Agriculture, the plan presents a series of policies LU-20.1 to 20.9 on the subject of preserving rural agriculture and promoting sustainability goals for local food production. The County supports these policies as being consistent with the County's General Plan policies on the subject, and encourages appropriate coordination with the County and other stakeholder organizations, including the Open Space Authority, among others, to these ends.

The County appreciates your time and attention to the foregoing comments. If you have additional questions regarding these comments, please do not hesitate to contact Rob Eastwood (408-299-5792) or Bill Shoe (408-299-5749).

Sincerely,

A handwritten signature in black ink that reads "Jody Hall Esser". The signature is written in a cursive style with a large, looping initial "J".

Jody Hall Esser Director
Planning and Development

County of Santa Clara

Parks and Recreation Department

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Reservations (408) 355-2201
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August 9, 2011

Joseph Horwedel, AICP
Director
City of San Jose
Planning, Building and Code Enforcement
200 East Santa Clara Street
San Jose, CA 95113

SUBJECT: Draft Program Environmental Impact Report (PEIR) for the Envision San José
2040 General Plan

Dear Mr. Horwedel:

Please find below comments from County of Santa Clara, Parks and Recreation Department, on the Draft PEIR for the Envision San José 2040 General Plan.

Section 2.5 Consistency with Adopted Plans

The Draft PEIR should include the County of Santa Clara General Plan and *Santa Clara County Countywide Trails Master Plan Update* (which is an adopted section of the General Plan's Park and Recreation Element) as relevant land use plans for the Draft PEIR discussions related to consistency of applicable plans for PEIR Sections 3.9 Public Facilities and Services and 3.2 Transportation.

Section 3.1.1.3 Existing Land Use (Agriculture/Farmland)

Table 3.1-1 (Prime Farmland within the City of San Jose UGB) on page 142 should be corrected for "Lands of Lester – Branham and Snell." The land is no longer owned by Mr. Lester. The land is jointly owned by the County of Santa Clara and the State of California. The property is known as Martial Cottle Park, not "Lands of Lester" since the property transferred in 2004.

Section 3.1.3.6 Impacts to Agricultural Resources

The Draft PEIR describes the former Lester site (now the Martial Cottle Park site) as the following on page 176.



Board of Supervisors: Mike Wasserman, George Shirakawa, Dave Cortese, Ken Yeager, Liz Kniss
County Executive: Jeffrey V. Smith

Lester (Edenvale Planning Area) – The County is planning a future park for the site. A house on the property may still be occupied. Land does not appear to still be under cultivation.

The above description should be revised with the following information:

Lester Martial Cottle Park (Edenvale Planning Area) – Martial Cottle Park is a County park and State Park jointly owned by the County of Santa Clara and the State of California. The County of Santa Clara Board of Supervisors approved a Master Plan for Martial Cottle Park on February 8, 2011, and the California State Park and Recreation Commission approved a General Plan for the park on March 2, 2011. The site will be developed as a public historic agricultural park which will continue agricultural uses in perpetuity to comply with deed restrictions associated with the property transfer from the donor, Mr. Walter Cottle Lester. Land continues to remain under cultivation.

Section 3.2.1.7 Pedestrian and Bicycle Circulation

Under the Trails and Pathways section, the Draft PEIR does not include adequate discussion of the Bay Area Ridge Trail and Juan Bautista de Anza National Historic Trail which are part of the City's Coyote Creek Trail and Bay Trail system. In addition, the Draft PEIR should also discuss how the Citywide trails system integrates into the Countywide (regional) trails system within Santa Clara County, where the *Santa Clara County Countywide Trails Master Plan Update* map (1995) provides the overall framework for the regional trails system which guides the citywide trails such as Coyote Creek Trail, Los Gatos Creek Trail, Guadalupe River Trail, and etc.

The Draft PEIR does not adequately identify the future need for expanding regional park resources in the Almaden Planning Area. In 2009, Calero County Park was expanded with the addition of the 966 acre Rancho San Vicente property. This expansion of Calero County Park now provides potential for future public access to Calero County Park from McKean Road within the City's Urban Growth Boundary.

County Parks supports the City's Parks, Recreation and Neighborhood Services and the Department of Transportation's recommendations to propose inclusion of Fortini Road in south San Jose as a planned bikeway to serve as a preferred connecting route between Santa Teresa County Park and the newly acquired Calero County Park parklands fronting McKean Road. Inclusion of Fortini Road as a planned bikeway in the City's Bikeways Plan 2020 would facilitate cross valley connections to the Bay Area Ridge Trail, Juan Bautista de Anza National Historic Trail, the Countywide Trails Master Plan's Sub-regional Trail Route S6, West Valley Trail, and the City's Los Alamitos Creek Trail.

Section 3.9.1.4 Parks and Recreation

The Draft PEIR states that, "...the City is deficient in school recreation and City-owned Citywide/regional parkland," as demonstrated in Table 3.9-3 (page 599) with a current deficiency of 5,449 acres of City-owned citywide/regional parkland. In addition, the Draft PEIR states that, "[i]n order to meet the 2020 General Plan service level objective of 7.5 acres per 1,000 population for citywide/regional parklands within the City's boundaries, the City partners with the Santa Clara County Parks Department and the Santa Clara County Open Space Authority and

Board of Supervisors: Mike Wasserman, George Shirakawa, Dave Cortese, Ken Yeager, Liz Kniss

County Executive: Jeffrey V. Smith



the Don Edwards National Wildlife Refuge to provide such regional parks and open space lands.”

Under Table 3.9-5 (page 616) City Parkland Requirements for ESJ 2040 General Plan, the projected deficiency of Citywide/Regional Parkland (City-owned) is 8,005.1 acres. Since the City already has a current parkland deficiency of 5,449 acres based on the existing 2020 General Plan goals, as shown in Table 3.9-3 (page 599), the Draft PEIR should address the impacts related to the additional increased parkland deficiencies of the 2040 General Plan goals. The 2040 General Plan goals identify an additional 2,556.1 acres of projected parkland deficiency above the current 2020 General Plan goals, which the Draft PEIR does not adequately address as a significant impact.

As stated in the Draft PEIR, “the proposed General Plan would result in an estimated population of 1,313,811 by 2035. Residential development allowed under the proposed General Plan would increase the demand for park and recreational facilities and exceed the previous estimates for parkland acreage identified in the Greenprint.” (Section 3.0, page 616) The PEIR is based on a Preferred Scenario which provides growth capacity for development of up to 470,000 additional jobs and 120,000 new dwelling units through 2035. In addition to an increased residential population, the City will be anticipating an increased workforce population which will need park and recreational facilities to serve them.

Consequently, the Draft PEIR is inadequate in addressing the following Parks impacts related to the identified parkland deficiencies for the 2040 General Plan goals:

- The Draft PEIR does not adequately address the significant impact levels associated with the overall parkland deficiency of 8,005.1 acres, specifically the additional 2,556.1 acres of projected parkland deficiency above the current 2020 General Plan and 2009 Greenprint goals. The PEIR identifies proposed General Plan policies and actions that may reduce or avoid adverse impacts to parkland and community recreational facilities on pages 617-619. However, the PEIR does not quantify or demonstrate how these policies and program-level mitigation measures are able to adequately address the significant levels of park impacts related to projected parkland deficiencies associated with the 2040 General Plan goals. For example, the PEIR does not discuss is the amount of new urban open space and parkland recreation areas that would be provided with the implementation of Policy PR-1.9, which states, “As Village and Corridor areas redevelop, incorporate urban open space and parkland recreation areas through a combination of high-quality, publicly accessible outdoor spaces provided as part of new development projects; privately, or in limited instances publicly, owned and maintained pocket parks; neighborhood parks where possible; as well as through access to trails and other park and recreation amenities.”
- The existing regional parklands within the Urban Service Area/Urban Growth Boundary will be adversely impacted by the increased demand for park and recreational facilities, which include Citywide regional facilities (Almaden Lake Park, Alum Rock Park, Lake Cunningham Park, etc.) and County-provided regional park facilities within the City’s USA/UGB (Almaden Quicksilver, Alviso Marina, Calero, Coyote Creek Parkway, Joseph D. Grant, Hellyer, Martial Cottle Park, Penitencia Creek Parkway, and Santa Teresa County Parks). The Draft PEIR does not address the increased impacts to existing

Board of Supervisors: Mike Wasserman, George Shirakawa, Dave Cortese, Ken Yeager, Liz Kniss

County Executive: Jeffrey V. Smith



citywide and countywide regional parks nor provide program-level mitigation for addressing these regional park impacts. In addition, the PEIR does not specify how the City would partner with other regional park providers such as the County of Santa Clara Parks and Recreation Department, Santa Clara County Open Space Authority and other agencies in the provision of regional parks and open space to fulfill the 2040 General Plan goals.

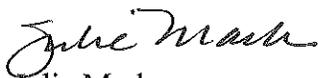
- The Draft PEIR does not specifically address the increased demand for park and recreational facilities for new residential and workplace populations projected in Urban Villages and Planning Areas located adjacent to the unincorporated, urban pockets such as the Burbank area, Cambrian area, and other large, unincorporated areas within the City's Sphere of Influence, which are currently not being served by existing park and recreational facilities since the unincorporated pockets are anticipated to be annexed to the City at a future time in accordance to the City and the County's respective General Plan policies.
- The Draft PEIR identifies nine key Employment Land Areas which are defined as non-residentially designated lands supporting private sector employment. With the additional jobs generated in these areas, the projected workforce would demand parks, open space and trails as part of the 2040 General Plan's goals for "...the development of walkable neighborhoods and vibrant urban places strategically located throughout the city and which is environmentally sustainable, is fiscally responsible, and makes prudent use of existing public transit facilities and other infrastructure." (Section 2.0, page 34). Since the project objective is to facilitate access to parks and recreation, the PEIR does not address the future park and trail needs of the employers and workers in these Employment Land Areas.
- As discussed in the Draft PEIR, "Floating" Park Site Designations in Land Use/Transportation Diagram identify, "...cases where a park is needed, or will be needed in the future based on planned residential growth (such as the Villages), but where no specific site has yet been identified or where details of surrounding development have not been finalized." In addition, this land use designation would not require a General Plan amendment to modify the general location, size or configuration of such park sites which would be finalized only through acquisition of a particular parcel (Section 2.0, page 100). However, the Draft PEIR does not provide assurances that these floating park sites would be developed in the event that the City were unable to secure these acquisitions and develop the new park facilities at these potential sites. For example, in the Berryessa Land Use/Transportation Diagram, there are fourteen (14) "floating" park site designations identified within Urban Village and Neighborhood/Community Commercial land use areas. The City's Greenprint 2009 identified the Berryessa area as currently underserved with neighborhood/ community serving parklands and the City would need an additional 32.9 acres of neighborhood/ community serving parkland to meet the service level objective of providing 3.5 acres/1,000 population in the year 2020; however the Draft PEIR does not discuss assurances that the 2040 General Plan goals would be achievable to address the future parkland needs in the Berryessa area with these floating park site designations. The Draft PEIR should discuss the potentially significant impacts associated with parkland deficiencies if these floating park sites are not acquired and developed.

Board of Supervisors: Mike Wasserman, George Shirakawa, Dave Cortese, Ken Yeager, Liz Kniss

County Executive: Jeffrey V. Smith



Sincerely,



Julie Mark
Acting Director

CC: Jody Hall Esser, Director, County Department of Planning & Development
Rob Eastwood, Senior Planner, County Department of Planning & Development
Jane Mark, Senior Planner, County Parks and Recreation Department



Board of Supervisors: Mike Wasserman, George Shirakawa, Dave Cortese, Ken Yeager, Liz Kniss

County Executive: Jeffrey V. Smith

County of Santa Clara

Roads and Airports Department



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August 8, 2011

Joseph Horwedel, Director
City of San Jose
Department of Planning, Building & Code Enforcement
200 East Santa Clara Street, Tower 3
San Jose, CA 95113-1905

SUBJECT: Comments Regarding the Draft Program Environmental Impact Report - Envision San Jose 2040 General Plan

Dear Mr. Horwedel:

The County of Santa Clara Roads and Airports Department has reviewed the Draft Program Environmental Impact Report – Envision San Jose 2040 General Plan and Section 3.2 "Transportation" of the Draft Program Environmental Impact Report (PEIR). The Roads and Airports Department is responsible for the operation and maintenance of the County Expressway System and unincorporated road system. As noted in the PEIR, this includes five expressways which operate within City of San Jose as well as three other expressways that would be affected by *Envision San Jose 2040*. In addition, the County operates nearly 600 centerline miles of unincorporated roads, including roads in large unincorporated pockets within San Jose's sphere of influence and roads that connect San Jose to other cities/counties. Listed below are the County's comments on Section 3.2 of the PEIR:

1) Page 227, Figure 3.2-4 – The map of "Existing Bicycle Facilities" indicates there are Class III Bicycle Routes on Almaden, Capitol, Lawrence, Montague, and San Tomas Expressways. There are no designated, signed Class III Bicycle Routes on these expressways. The County's policy is to accommodate bicyclists on the shoulders of all expressways by providing shoulders that are consistent with bicycle lane width and striping but not to designate as a Class II Bicycle Lane or Class III Bicycle Route. The function of the expressways within the transportation network are such that expressways should only be used by advanced-skilled bicyclists, not by children or novice bicyclists. Figure 3.2-4 should be revised to remove the Class III designation for expressways.

2) Page 240, Figure 3.2-5 – The "Proposed Network Changes" map should include new interchanges/grade separations on Montague Expressway similar to how the interchange reconfigurations are shown for I-880/Montague and I-680/Montague. According to a November 16, 2006, settlement agreement between the County and City, the City will

construct a Trimble flyover ramp and complete the McCarthy-O'Toole interchange as part of implementation of the North San Jose Plan. These improvements should be included in Figure 3.2-5 and in the list of proposed roadway network changes as they represent significant changes to Montague Expressway.

3) Pages 244-245, Table 3.2-10 – At the bottom of page 244, the table indicates that Santa Teresa Boulevard will be expanded to 6 lanes from Bayliss Drive to Laguna Avenue. At the top of page 245, the table indicates that Santa Teresa Boulevard will remain at 2 lanes in *Envision San Jose 2040* from Laguna Avenue to the City boundary.

According to our records, Santa Teresa Boulevard changes from a City to County road 0.18 miles north of Laguna Avenue, which overlaps slightly with the Bayliss to Laguna section. Please clarify the City's intent in terms of number of lanes for Santa Teresa Blvd. In addition, explain the meaning of the asterisk attached to Laguna Avenue.

4) Page 254, Figure 3.2-9 – "Future Bicycle and Pedestrian Facilities" map needs to be revised to remove the Class III Bicycle Route designation for the expressways.

5) Page 288, Section 3.2.4.5 Impacts to Adjacent Jurisdictions – The third paragraph on this page includes the following sentence: "Minor arterials were also analyzed to determine the impacts identified in Table 3.2-16." Table 3.2-16 is the "Transit Priority Corridor Impact Summary" which is part of Section 3.2.4.4. How does the minor arterials analysis of adjacent jurisdictions relate to San Jose's Transit Priority Corridors?

6) Page 289, Section 3.2.4.5 Impacts to Adjacent Jurisdictions – Page 260 of the PEIR states: "...expressways operated by the County of Santa Clara are included in this analysis as "adjacent jurisdictions" because they are not within the City's control, even though the roadway segments evaluated may be within the City of San Jose." On page 289, the list of Santa Clara County facilities evaluated as part of adjacent jurisdictions includes six of the eight expressways. The two expressways missing are Almaden and Capitol Expressways. Almaden and Capitol Expressways should be included in the adjacent jurisdiction impacts analysis and added to the results in Table 3.2-17.

7) Page 289, Section 3.2.4.5 Impacts to Adjacent Jurisdictions – The expressways are not the only County-operated roads that should be included in the analysis of impacts to adjacent jurisdictions. The Draft PEIR does not adequately analyze impacts on County unincorporated roads. On page 288, the PEIR lists Monterey Street for Gilroy and Morgan Hill. The County operates Monterey Hwy between these two cities and the County's segment of Monterey should be included in the impact analysis. In addition, there are two other north-south routes operated by the County that connect the South County to San Jose: Santa Teresa Boulevard and the Uvas/McKean corridor. With San Jose's plans for a 1.3 jobs/employed residents ratio, the in-commute from other counties will likely increase significantly. When US 101 becomes highly congested from South County into San Jose, spillover traffic usually occurs on three parallel roadways: Monterey Hwy, Santa Teresa Blvd, and the Uvas/McKean Road corridor. The PEIR

should analyze the congestion impacts on the County's segments of these three parallel roadways.

8) Page 238, Section 3.2.2 Thresholds of Significance and Page 288, Section 3.2.4.5 Impacts to Adjacent Jurisdictions – Page 238 lists “Substantially increase hazards due to a design feature or incompatible uses” as a threshold of significance. The application of this threshold was too narrowly applied by focusing only on the City’s roads and, thus, the analysis for this threshold was inadequate. This threshold should also be applied to adjacent jurisdictions in terms of impacts on safety from increased congestion. The County operates many rural roads that lead into City of San Jose. These roads are proving to be of increasing popularity with bicycle riders from San Jose; however, many of these roads have inadequate shoulders to accommodate both bicyclists and motor vehicles. Some of these roads (e.g., McKean Road, Uvas Road, Santa Teresa Boulevard) will likely see greatly increased traffic volumes from the growth projected in *Envision San Jose 2040* creating operational and safety concerns for both motor vehicles and bicycles. In addition, the city-bound traffic using rural farm-to-market facilities will aggravate pavement deterioration and accelerate the need for surface and structural improvements to support safe operations of the roads. The PEIR should include an analysis of the impacts of increased traffic demand on these rural roads related to “substantially increase hazards due to a design feature or incompatible uses.” Mitigation measures that call for General Plan policies and/or actions to support safety improvements on rural roads should be considered. These safety improvements include design features such as adding/widening shoulders and structural improvements to support increased traffic loads.

If you have any questions, please contact me at (408)573-2465

Sincerely,

A handwritten signature in cursive script, appearing to read "Dawn Cameron".

Dawn Cameron
Consulting Transportation Planner
County of Santa Clara – Roads & Airports Department

County of Santa Clara

Public Health Department

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August 10, 2011

Mr. Andrew Crabtree, Envision Team Leader
Planning, Building and Code Enforcement
San Jose City Hall
200 E. Santa Clara Street
San Jose, CA 95113

Dear Mr. Crabtree:

Thank you for the opportunity to comment on the Envision San Jose 2040 General Plan Draft EIR. The Santa Clara County Public Health Department commends the San Jose Envision 2040 Task Force for addressing goals, strategies and policies that help to foster a healthier community.

In particular, we commend the Task Force's plans for the built environment that include the reduction of dependency on automobiles, promotion of biking and walking and the use of transit, development of greater neighborhood connectivity, provision of services and facilities in neighborhoods, particularly health care facilities, schools, parks, retail, and the development of locations for locally grown produce. All of these efforts will help to prevent chronic diseases such as asthma, cardiovascular disease, cancer, and obesity. They will also enhance social cohesion and a sense of community, help to reduce mental health stresses, and reduce injuries, leading to an overall improvement in the health status of our community.

The Santa Clara County Public Health Department recommends the following additions to the Envision 2040 General Plan Update:

- Address the provision of safe public drinking fountains in neighborhoods, recognizing the importance of water in human nutrition, the role of bottled water in the production of waste, and the need to promote healthy alternatives to sugar-sweetened beverages, particularly for children.
- Emphasize the role of the built environment in the prevention of violent crime and the development of community cohesion. Violence can lead to physical injuries, depression, anxiety, and substance abuse. The design of neighborhoods can be conducive to crime or help to prevent it. Foot traffic and homes and businesses that face the street can help to prevent crime.
- Strengthen the discussion of the negative health consequences of increased vehicle miles travelled (VMT) by addressing the connection between long driving hours and reduced physical

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County Executive: Jeffrey V. Smith

activity (which is a risk factor for obesity) and the increased incidence of musculoskeletal pain and stress; long hours in the car can also lead to reduced social connectedness.

- Include full discussion of the health effects of climate change and the heat island effect, stressing the consequences for the most vulnerable populations (young children, elderly, people with chronic disease, mentally ill, disabled, and the poor) and strengthen mitigation measures. Although the report states that San Jose's location near the coast would limit health effects, studies have shown that cities in cooler climates have higher numbers of heat-related deaths than those in warmer climates where there is greater use of air-conditioning and acclimatization to heat.¹
- Ensure that affordable housing is included in new transit oriented design (TOD) developments to mitigate any displacement of existing low-income populations in surrounding neighborhoods. This is particularly important as low-income populations are less likely to own a car and are more likely to depend on public transportation.
- Explore limiting the number of alcohol and tobacco outlets, particularly in neighborhoods with a high density of outlets, or in close proximity to schools and youth-populated areas. The saturation of alcohol and tobacco outlets can lead to higher use rates and higher incidence of violent activity, particularly with alcohol.
- Address the importance of smoke-free policies in reducing exposure to toxic air contaminants, particularly in multi-family residences. Frequent and recurring exposure to secondhand smoke can cause health problems such as asthma, heart disease, cancer and Sudden Infant Death Syndrome (SIDS), as well as worsen a chronic illness.

Thank you for your consideration of these recommendations. We look forward to continued cooperation toward the creation of a healthier San Jose.

Sincerely,



Daniel Peddycord, RN, MPA/HA
Public Health Director



Martin Fenstersheib, MD, MPH
Health Officer

¹ A Human Health Perspective on Climate Change: A Report the Research Needs on the Human Health Effects of Climate Change, The Interagency Working Group on Climate Change and Health, Environmental Health Perspectives and The National Institute of Environmental Health Sciences, U.S. Department of Health and Human Services, April 22, 2010. http://www.cdc.gov/climatechange/pubs/HHCC_Final_508.pdf