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*Comment Received From: County of Santa Clara Parks and Recreation Department
Submitted On: 4/28/2020
Docket Number: 19-SPPE-04*

Incorporation of Proposed Trails into Project Description

Additional submitted attachment is included below.

County of Santa Clara

Parks and Recreation Department

298 Garden Hill Drive
Los Gatos, California 95032-7669
(408) 355-2200 FAX 355-2290
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www.parkhere.org



Submitted via e comment system

April 28, 2020

Lisa Worrall, Project Manager
Siting, Transmission and Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

SUBJECT: State of California Energy Commission Notice of Committee Conference and Orders on Headers for Docket Number: 19-SPPE-04 Project Title SJ2

To Whom It May Concern:

The County of Santa Clara Parks and Recreation Department (Department) submitted comments in June 2016 on the City of San Jose's Notice of Preparation and in July 2017 on the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) for the 237 Industrial Center Project located at APN 015-31-054 (CP15-054, SP16-053). The comments in this letter supplement our previously submitted comments (see attached).

According to the most recent NOA, the project includes two development options for a light industrial development, as well as a trail that would connect the proposed project site to Coyote Creek/Llagas Sub-Regional Trail (S1) to the east and the San Francisco Bay Trail (Route R1-B) to the north.

The Department is charged with the planning and implementation of *The Santa Clara County Countywide Trails Master Plan Update (Countywide Trails Plan)*, an element of the Parks and Recreation Section of the County General Plan adopted by the Board of Supervisors on November 14, 1995. Although responsibility for the construction and long-term management of each individual trail varies, the Department provides general oversight and protection for the overall trail system, including the Coyote Creek/Llagas Sub-Regional Trail (S1) and the San Francisco Bay Trail (Route R1-B).

Board of Supervisors: Mike Wasserman, Cindy Chavez, Dave Cortese, Ken Yeager, S. Joseph Simitian

County Executive: Jeffrey V. Smith



In addition to the comments previously provided, the Department requests that the construction of the proposed Coyote Creek/Llagas Sub-Regional Trail is included as part of the California Energy Commission project.

The County Parks Planning team is available as a resource regarding the Trail Element of the Parks and Recreation Chapter of the 1995 County of Santa Clara General Plan. We appreciate the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the 237 Industrial Center Project (CP15-054, SP16-053). If you have questions related to these comments, please call me at (408) 355-2228 or e-mail me at Cherise.Orange@prk.sccgov.org .

Sincerely,

Cherise Orange
Associate Planner

County of Santa Clara

Parks and Recreation Department

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July 17, 2017

Kieulan Pham
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San Jose, CA 95113 - 1905

SUBJECT: Notice of Availability of a Draft Environmental Impact Report (DEIR) for the 237 Industrial Center Project (CP15-054, SP16-053)

To Whom It May Concern:

The County of Santa Clara Parks and Recreation Department (County Parks) submits these comments in response to the City of San Jose's Notice of Availability of a Draft Environmental Impact Report (DEIR) for the 237 Industrial Center Project located at APN 015-31-054 (CP15-054, SP16-053). These comments supplement our previous scoping comments in June 2016 in response to the City's Notice of Preparation.

According to the Notice of Availability, the project includes two development options. Option 1 proposes approximately 1,197,700 square feet of light industrial development and Option 2 proposes an a 436,880 square foot data center (49.5 megawatts) with a PG&E substation to provide electrical needs for the data center on approximately 26.5 acres of the site and approximately 728,000 square feet of light industrial development. The project includes developing a trail that would connect through the project site to the Coyote Creek/Llagas Sub-Regional Trail (S1) to the east and the San Francisco Bay Trail (Route R1-B) to the north.

The County Parks Department is charged with the planning and implementation of *The Santa Clara County Countywide Trails Master Plan Update (Countywide Trails Plan)*, an element of the Parks and Recreation Section of the County General Plan adopted by the Board of Supervisors on November 14, 1995. Although responsibility for the actual construction and long-term management of each individual trail varies, the County Parks Department provides general oversight and protection for the overall trail system. The Countywide Trails Plan indicates the following regional trail routes are located immediately adjacent to the project site:

Board of Supervisors: Mike Wasserman, Cindy Chavez, Dave Cortese, Ken Yeager, S. Joseph Simitian

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- ***Coyote Creek/Llagas Sub-Regional Trail (S1)*** – The partially completed trail follows Coyote and Llagas Creeks from the San Francisco Bay to Gilroy. This trail bounds the project site to the east and to the south as the Highway 237 Bikeway. As a regional off-street trail per the *Countywide Trails Plan*, the trail exists along Alviso-Milpitas Rd/Ranch Road. The proposed entrance for the development intersects this route. In both the long-term use of the development and during Project construction, the Project should not impede use of the S1 Trail Route. Every effort should be made to keep the off-street route open for recreational use at all times, and users made aware (via signage and other tools) of scheduled construction activities.
- ***San Francisco Bay Trail (Route R1-B)*** – This partially completed trail provides a regional connection along the San Francisco Bay shoreline and runs along the eastern portion of the project site boundary on the west side of the Coyote Creek Riparian. As described above, an existing constructed portion follows the Coyote Creek Sub-regional Trail alignment and then connects to the Highway 237 Bike Path; this route is designated for hiking and cycling. Additional proposed segments of the Bay Trail are located to the north and west of the proposed Project site.

In our June 2016 memorandum, the Department recommended a variety of items be addressed in the DEIR, including items related to aesthetics and visual resources, hydrology and water quality, biological resources, transportation and circulation, noise, and public service impacts to the Coyote Creek/ Llagas Creek Sub-Regional Trail and San Francisco Bay Trail.

Recommendations included:

- Evaluating the potential impacts to the Coyote Creek riparian corridor. Specially evaluating the potential for light or glare from the Project to impact the riparian ecosystem including reproduction, foraging and migration.
- Evaluating the potential impact the Project may have on regional trails and minimizing impacts to the trail routes and users by incorporating complete streets designs to the proposed new public streets.
- Evaluating stormwater runoff and other drainage from the proposed Project and ensuring that excessive off-site flows are fully eliminated.

In addition to the comments previously provided, the Department also recommends:

- Notify trail users of construction and any re-routes through positing of sign notices. While building new trail segments, the existing trails should remain open for recreational use.
- The DEIR identifies that traffic on Ranch Drive related to the proposed project would be limited to emergency vehicle access only. Alternative mode commuters as well as

recreational users actively use the Highway 237 Bike Path, San Francisco Bay Trail and Coyote Creek/Llagas Creek Sub-Regional Trails. The existing trail should remain open for recreational use.

- The additional trails proposed as part of the project should be constructed in accordance with current and existing design guidelines and recommendations for multi-use (hiking and bicycling) trail construction.
- Maps in the EIR should identify the trails that are located within the project vicinity. The Highway 237 Bike Path and the Bay Trail connects to the Coyote Creek/ Llagas Sub-Regional Trail and is located immediately to the South of APN 015-31-054.

The Department would like clarification of the following:

- Table 3.2-4: Bay Area 2017 Clean Air Plan Applicable Control Measures, under Bicycle and Pedestrian Access and Facilities states: “due to the location of the project site and the nature of the project, improved pedestrian access is not proposed as part of the project.” However, according to the DEIR: “the proposed project includes a Class I trail connection on the south side of the site, along Alviso – Milpitas Road to provide a trail connection to the Coyote Creek Trail on the east side of the creek.” The trail is also depicted in Figure 2.0-6. Please provide additional information regarding these conflicting points.

The County Parks Planning team is available as a resource regarding the Trail Element of the Parks and Recreation Chapter of the 1995 County of Santa Clara General Plan. We appreciate the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the 237 Industrial Center Project (CP15-054, SP16-053). If you have questions related to these comments, please call me at (408) 355-2228 or e-mail me at Cherise.Orange@prk.sccgov.org.

Sincerely,



Cherise Orange
Associate Planner