

County of Santa Clara

Parks and Recreation Department

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February 4, 2022

California Energy Commission
Attn: Lisa Worrall, Project Manager
715 P Street
Sacramento, CA 95814

SUBJECT: Notice of Availability of a Draft EIR for San Jose Data Center Project

Dear Ms. Worrall,

The Santa Clara County Parks and Recreation Department (County Parks Department) has received the Notice of Availability of a Draft Environmental Impact Report (Draft EIR) for the San Jose Data Center Project (Project).

The County Parks Department functions to provide a sustainable system of diverse regional parks, trails, and open spaces that connects people with the natural environment and supports healthy lifestyles while balancing recreation opportunities with natural, cultural, historic, and scenic resource protection. The County Parks Department is also 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). The Countywide Trails Plan indicates the following planned trail routes located adjacent to the Project site:

Juan Bautista de Anza National Historic Trail (R1, Anza Trail): a national and regional hiking and bicycling trail route along the margins of the San Francisco Bay, which shares a planned conceptual alignment with the San Francisco Bay Trail adjacent to the project site, along Alviso Milpitas Road and a portion of Zanker Road.

San Francisco Bay Trail (R4, Bay Trail): a regional off-street hiking and bicycling trail route circling San Francisco and San Pablo Bays, linking nine Bay Area counties and forty-two shoreline cities. The Project site is adjacent to the planned Bay Trail alignments along Alviso Milpitas Road, shared with the planned Highway 237 Bikeway Trail, and along a portion of Zanker Road, as most recently revised in the "Highway 237 Bikeway Trail Feasibility Study & SF Bay Trail Alignment Confirmation" (Highway 237 Bikeway Study), prepared by LPA, Inc. for the City of San Jose (March 3, 2020). The Project site is also adjacent to the site of a proposed pedestrian and bicycle bridge across Highway 237, linking multiple trails with shared or intersecting alignments in this area (Bay Trail, Anza Trail, Coyote Creek/Llagas Creek Trail, Highway 237 Bikeway Trail).

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Existing segments of the Anza Trail, Bay Trail, and Coyote Creek/Llagas Creek Trail (S5) are also located near the project site.

The map showing nearby existing and planned regional trail alignments provided as part of the Draft EIR (Figure 4.16-1) appears to be somewhat out of date. The more recent planned Bay Trail alignments are reflected in the Highway 237 Bikeway Study, mentioned above. Updated data associated with the Countywide Trails Plan can be found on the County Parks Department's website or through contacting us. The City of San Jose's Trails Program also maintains GIS data for planned and existing trails in this area.

The figure showing the proposed Class I bike trail, referenced as Figure 4-4 (page 4.16-5), appears to be missing or simply mislabeled (Figure 3-4 shows the proposed Road and Bike Improvements).

The Project should avoid impacts to the existing and planned regional trail routes in this area and should explore opportunities for implementation of portions of the planned Anza Trail, Bay Trail, and/or Highway 237 Bikeway Trail as part of Project construction. The County Parks Department appreciates the inclusion of a proposed Class I bike trail as part of the project along a portion of Zanker Road and recommends that the Project coordinate with the Metropolitan Transportation Commission – Bay Trail Project and the National Park Service on designation of this Class I trail as part of the Bay Trail and Anza Trail, respectively. The Parks Department also recommends that the Project coordinate with the City of San Jose's Trails Program regarding the potential for incorporation of an off-street trail that meets Bay Trail standards along the Alviso Milpitas Road frontage of the Project site (where bicycling and pedestrian use is currently on the road), or to allow for construction of such a trail in the future. The design of the Project's access points should also take public trail use into consideration, to minimize safety conflicts with pedestrians and bicyclists. The Project might also explore additional opportunities identified in the Highway 237 Bikeway Study for this area, such as supporting improvement of pavement markings, wayfinding, and interpretive signage along Alviso Milpitas Road.

Thank you for the opportunity for County Parks Department to provide comments on the NOA of a Draft EIR for the San Jose Data Center Project. If you have any questions, please email me at Kimberly.brosseau@prk.sccgov.org

Sincerely,

Kimberly Brosseau

Kimberly Brosseau, AICP
Senior Planner



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