County of Santa Clara

Parks and Recreation Department

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July 19, 2021

Metropolitan Transportation Commission Public Information 375 Beale Street, Suite 800 San Francisco, CA 94105

Subject: Notice of Preparation of a Draft Program Environmental Impact Report for the Plan Bay Area 2050

The County of Santa Clara Parks and Recreation Department ("County Parks Department") is in receipt of a Notice of Preparation for a Draft Program Environmental Impact Report (DEIR) for Plan Bay Area 2050, an update to the previous Plan Bay Area; which includes the area Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). As stated in the NOP, the overarching goal is to develop, "a long-range plan that balances future mobility and housing needs with other economic, environmental, and public health goals" for the nine Bay Area counties.

The County Parks Department's comments are primarily focused on potential impacts related to land use policies, regional parks, natural and cultural resources, recreation and recreational facilities, and countywide trail routes identified in the *Santa Clara County Countywide Trails Master Plan Update ("Countywide Trails Master Plan")*. The County Parks Department, in partnership with Cities and other public agencies, is charged with implementing the *Countywide Trails Master Plan*, a component of the Parks and Recreation Element of the County General Plan that the Board of Supervisors adopted on November 14, 1995. Major national, state, and regional trail routes identified in the *Countywide Trails Master Plan* provide recreational opportunities and habitat, but also provide alternative non-motorized transportation routes for commuters, and safe routes to schools.

The Santa Clara County Parks system consists of over 50,000 acres of regional parklands, open space, lakes, streams, creeks and trails in 28 parks. These regional parks, trails and open space areas provide 'green' infrastructure and resource preservation/protection of critical importance to the County and the greater Bay Area and afford residents substantial public health benefits that should be recognized in the Plan Bay Area 2050 update. The importance of these resources to residents of the region was demonstrated by recent election results wherein natural resource funding Measure A in Santa Clara County and Measure AA in the greater San Francisco Bay Area passed with resounding support.



Board of Supervisors: Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S.Joseph Simitian

As addressed in Plan Bay Area 2050, transportation and land use policies have the potential to either significantly impact open space and park resources or to seamlessly connect these critical infrastructures. As such, the County Parks Department respectfully requests that Plan Bay Area 2050 builds on and extends the conceptual integration reflected in Priority Development Areas and Priority Conservation Areas. We recommend an in-depth discussion and proposed framework that seeks to better incorporate work undertaken by agencies and organizations like ours (open space preservation, access for recreation, provision of regional trail connections, cultural and natural resource protection, etc.) into the larger long-range regional vision for transportation and general land use policy and development. The One Bay Area Grant program should continue to grow to make additional funding available for land acquisition and development projects that protect undeveloped open space and agricultural land in outlying areas, and to support the development of regional trails and connectivity to these areas and throughout the broader region. Further, Plan Bay Area 2050 should ensure that the quantity and quality of public transit and other clean-air connections to open space, trails, and parks is identified as a priority.

Related to the above, the DEIR should include quantitative and qualitative criteria for evaluating how the implementation of an integrated land use and transportation framework (especially one absent a focus on green infrastructure) would impact and/or degrade recreation, open space, conservation and related public services. The document should consider how increased usage (based on population growth projections and the Plan's Sustainable Communities Strategy) of regional parkland and Countywide trail routes will help meet Plan goals, and include a strategy for the long-term management and maintenance of these important systems.

Lastly, the DEIR should include general analysis of a variety of potential impacts of the Plan to the Santa Clara County Parks system and regional trail routes including, but not limited to, the following areas of concern: aesthetics and visual resources; agriculture and forestry resources; air quality; biological resources; cultural resources; hydrology and water quality; land use and planning; noise and vibration; population and housing; public services and recreation; and traffic and transportation.

The Santa Clara County Parks Department appreciates the opportunity to comment on the Notice of Preparation for a Draft Program Environmental Impact Report for the update of Plan Bay Area 2050. Please add our contact information to your distribution list for future notifications. If you have any questions regarding these comments, please feel free to contact me at (408) 355-2230 or via email at kimberly.brosseau@prk.sccgov.org.

Sincerely,

Kímberly Brosseau

Kimberly Brosseau, AICP Senior Planner

cc: Annie Thomson, Deputy Director Don Rocha, Director



Board of Supervisors: Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S.Joseph Simitian

County Executive: Jeffrey V. Smith