



COMMITTEE FOR
GREEN FOOTHILLS

September 27, 2004

Members of the San Jose Planning Commission
Department of Planning
Building and Code Enforcement
City of San Jose
801 N. First St., Rm 400
San Jose CA 95110-1795

Fax (408) 277-3250

Dear Members of the Planning Commission;

The Committee for Green Foothills submits these comments regarding the August 2004 Recirculated Draft Environmental Impact Report for the McKean Road Sports Complex. CGF supports the comments submitted on behalf of the South Almaden Valley Rural Alliance (SAVRA) regarding the RDEIR. SAVRA's comments point out numerous flaws in the RDEIR that make it an inadequate basis for proceeding with the Sports Complex. We wish to emphasize the following points:

- Characterizing the Sports Complex as an "interim" use when it will be used for a minimum of 20 years disguises the long-term nature of the facility. The "interim" characterization is hiding a decision that aids the permanent development of the entire area. Any such decision to permanently develop Almaden Valley should be made openly, with full consideration of the consequences.
- The terms "open space" and "569-car parking lot" are not synonymous. Intensive, developed recreation is generally incompatible with open space and should be avoided in areas like Almaden Valley where open space still exists.
- The City asserts that the "Coyote Valley Master Plan" (presumably the Coyote Valley Specific Plan) does not currently provide sufficient information to accurately project traffic counts from Coyote Valley development. RDEIR at 225. In fact, the City's CVSP traffic consultants have been working for nearly a year on describing traffic impacts. While they have not made their results public, their data is in City's possession or in the possession of the City's agents, so their data must be incorporated into the cumulative impacts analysis for the Sports Complex. The City should at least be able to project a minimum level of increased traffic, which would be more accurate than its refusal in the RDEIR to describe the impact as anything more than "cumulative."
- The growth-inducing impacts are not analyzed adequately, and the true threat of bringing sprawl to Almaden Valley is both real and a sufficient reason for rejecting this project. Converting farmland and adding traffic will exacerbate existing pressure to stop farming in the area. This attempt to provide large-scale urban recreation without urban services will immediately create pressure to provide those services and extend them elsewhere. As with the "interim" designation, the City is hiding from itself and from the public the true effect of what it is doing – the permanent alteration of Almaden Valley. Any suggestion that this 20-year project

will not have permanent effects is disingenuous. If the City wants to develop Almaden Valley, the Planning Commission and the public deserve to see an overall plan and determine whether the development plan is advisable.

Simply put, this massive urban project does not belong in its rural area. As just one example, the project threatens to permanently expel children for the crime of walking or bicycling to the sports complex, instead of being driven to the area. RDEIR at 117. The concept of smart growth involves encouraging bicycling and walking. For this project to go to the opposite extreme only shows it to be the opposite of smart growth. Heavily-used facilities belong in population centers, not on their far outskirts. Dispersing a massive project like this into smaller urban parks (something that is not adequately considered in the RDEIR) would be a far better choice that fulfills the same mission as the Sports Complex without its impacts.

Please contact us if you have any questions.

Sincerely,

<signed>

Brian A. Schmidt
Legislative Advocate, Santa Clara County