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Sent: Friday, June 29, 2007 2:56 PM
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Subject: Coyote Valley Specific Plan Draft EIR

Follow Up Flag: Follow up
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 28 June 2007

Dear Mr. Hart and San Jose City Staff Involved in Reviewing the Coyote Valley EIR:

As a resident of and voter in San Jose, I write to comment on the Coyote Valley Specific Plan EIR.

1) The EIR fails to address several specific unavoidable, unmitigatable environmental impacts of the proposed Coyote Valley project. Among the most important of these are the following:

- * The proposed Coyote Valley project poses an extreme danger of ammonia (NH₃) accumulation in the surrounding ecosystems, especially the ridge areas to the east of 101. The additional 270,000 daily automobile and light truck/SUV trips forecast by the EIR would dramatically increase this ammonia "dumping" on fragile ecosystems containing numerous species--plant and animal--that are either endangered, threatened, or of concern. This increase in ammonia accumulation, added to the already forecast increase in nitrogen oxide accumulation could create a "perfect storm" of destruction for Coyote Valley and adjacent ridge ecosystems, including plants and animals already endangered, threatened, or of concern. Yet the EIR is silent on the danger of ammonia pollution.

- * The proposed Coyote Valley project will have a severe impact on the animal populations of both the Sierra Azul (southern Santa Cruz) and Diablo mountain ranges since it would destroy the only animal-movement corridor existing between the two ranges from the bottom of San Francisco Bay in north San Jose all the way south to below Gilroy. Yet the EIR ignores the danger of the destruction of this unique and therefore essential wildlife corridor.

- * The proposed Coyote Valley project will have dangerous, perhaps even catastrophic impacts on groundwater in Coyote Valley and therefore in the entire South Bay region. Though the EIR does discuss this issue, its review of potential groundwater depletion and contamination inherent in the proposed Coyote Valley project is incomplete and entirely inadequate.

Clearly, the EIR process must be reopened to study these, and other, environmental impacts not addressed, or inadequately addressed, in the current EIR.

2) In addition to the inadequacy of issue coverage in the current EIR, I would like to note that several of the unavoidable/unmitigatable environmental impacts noted in the EIR are catastrophic.

- * The EIR states that the proposed Coyote Valley project would have an unavoidable impact on regional air quality. No wonder. The EIR projects 270,000 daily automobile and light truck/SUV trips generated by the project with 70% of these going north, to or through the Santa Clara Valley. The smaller, alternative proposal for development involves far fewer daily trips, and therefore far less air pollution; the no-build scenario involves no additional trips and no additional air pollution.

- * The EIR notes that were the proposed Coyote Valley project to be built, there would be a significant, unmitigatable loss of both open space and agricultural land. In fact, 2,270 acres of prime farmland would be lost and a total of 2,400 acres of farmland including a number of acres designated as of "statewide importance," "local importance," and "unique" significance. The 2,270 acres of prime farmland lost is 50% more prime farmland than exists in the Greenbelt (only 1,501 acres) south of the proposed Coyote Valley development. In other words, the proposed development would represent the loss of over 60% of all prime farmland in Coyote valley. The City of San Jose has, of course, already allowed the development and destruction of nearly 100% of prime farmland within city boundaries in the Santa Clara Valley.

- * The EIR details ways in which the proposed Coyote Valley project would have unavoidable and unmitigatable impacts on several freeway segments, not only in Coyote Valley but also in the Santa Clara Valley.

- * The EIR explains that the proposed Coyote Valley project would result in substantially increased gasoline use--an unmitigatable energy loss, especially since nearly 90% of trips generated by the project would be by private vehicle and not by public transportation or bicycling or walking.

- * The EIR states that there would be unavoidable and unmitigatable impacts to all five areas of visual and

aesthetic aspects of the project studied. In other words, the viewshed would be destroyed; Coyote Valley would no longer be visually or aesthetically pleasing.

* The EIR studies the unavoidable negative impact of the proposed Coyote Valley project on burrowing owl habitat and on trees--including the loss of 800 or more mature trees including walnuts.

As the EIR makes clear, the smaller project reviewed for comparison would have far fewer and far smaller environmental impacts. The no project alternative would have no environmental impacts--unless, of course, Coyote Valley were designated by the City of San Jose exclusively for a combination of farm and park land, in which case, the environmental impacts would be positive instead of entirely negative.

I have made no effort here to comment on the economic impacts of the proposed Coyote Valley project since they are not covered in the EIR. But it has become increasingly clear that the proposed project, rather than improving the tax situation of the rest of San Jose, would do precisely the opposite. In a time of budget shortfalls, why build an environmentally disastrous project which would cost the taxpayers of San Jose more in services than it would generate in tax revenues? The answer is clear: if this project is built, it will be because it serves the economic interests of certain politically powerful private developers and labor unions. The greed of a few would triumph over the health of our regional environment and of our City economy. This would be a shameful result.

Sincerely, John Engell englfish@pacbell.net 456 South 14th Street San Jose, CA 95112