

County of Santa Clara

Parks and Recreation Department

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February 14, 2022

Todd Sexauer, Senior Environmental Planner
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

SUBJECT: Notice of Availability of the Draft EIR For the Pacheco Reservoir Expansion Project
(SCH#2017082020)

Dear Todd Sexauer,

The Santa Clara County Parks and Recreation Department's (County Parks Department) has received the Notice of Availability of a Draft EIR for the Pacheco Reservoir Expansion 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 trail routes located in the Project site vicinity:

Benito-Clara Trail (R3): a regional off-street trail route for hiking, equestrian and bicycling along Highway 152 and Kaiser Aetna Road.

Monterey-Yosemite State Trail (R2): a regional off-street trail route for hiking, equestrian and bicycling along Highway 152.

Based on previous correspondence, the County Parks Department understands that the Santa Clara Valley Water District (Valley Water) is no longer considering recreation as part of the project description for the Pacheco Reservoir Expansion.

The County Parks Department requests that the CEQA Initial Study Checklist, under "Land Use and Planning" and "Recreation", incorporate reference to the Santa Clara Valley Water Legislative Act (the

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ACT) language that specifies the powers of District, specifically its authority to acquire, construct, maintain, operate, and install recreational improvements in association with any works owned or controlled by the District (District Act, Section 5, Subsection 16).

Pacheco Reservoir could provide an important piece of regional connectivity for recreation. The Project is well-situated in the Pacheco Valley and could potentially provide trail connections between existing open space, conservation areas, and State parks. In addition, the Santa Clara County Countywide Trails Master Plan identifies two regional trails near Pacheco Reservoir, the Benito-Clara Trail (which includes an existing alignment along a portion of Kaiser Aetna Road and a planned alignment along Highway 152) and the Monterey-Yosemite State Trail (planned alignment along Highway 152), and a planned regional staging area near Bell's Station (at the intersection of Kaiser Aetna Road and Highway 152).

The EIR should analyze and avoid impacts to these regional trails and staging area. In particular, the Benito-Clara Trail and Monterey-Yosemite State Trail share a planned alignment along Pacheco Creek, within the Pacheco Reservoir Expansion Project area, downstream of Pacheco Reservoir. The County holds several trail easements in this area and has been working to plan for implementation of a regional multi-use trail in coordination with the Santa Clara Valley Habitat Agency's restoration work at Pacheco Creek Preserve. The EIR should address impacts to the planned regional trail and existing trail easements along Pacheco Creek, including any changes in flow regime that may lead to increased flooding in this area.

Success of the future regional trails in this area will require development of a safe, multi-use (hiking, bicycling, equestrian) crossing of Highway 152, from the planned shared alignment of the Benito-Clara Trail and Monterey-Yosemite State Trail along the south side of Highway 152 to the alignment of the Benito-Clara Trail along Kaiser Aetna Road to the north of Highway 152, connecting towards Henry Coe State Park. The Highway 152 Access Improvements described as part of the Pacheco Reservoir Expansion Project EIR provide an excellent opportunity to achieve multiple goals and support regional connectivity, as the Project appears to be developing a permanent overpass in a location that would also provide the needed cross-highway connection for the regional trails network. The County Parks Department requests that Valley Water consider incorporation of multi-use public access into the Highway 152 Access Improvements, either through incorporating specific hiking, bicycling, and equestrian amenities into this component of the Project or through allowing the use of the overpass by the public as part of the trail network following Project construction.

While recreation is the not the focus of the Project, the County Parks Department requests that potential opportunities for recreation be preserved for future development and operation. To achieve this, recreation should be considered in design of the Project and analysis under CEQA. These opportunities should include future day use, hiking, equestrian use, mountain biking, camping, fishing, and boating. Many of these recreational opportunities require adequate land or infrastructure that would need to be incorporated into the site design for the Project. If the Project requires acquisitions of real property (fee title or easement), Valley Water should ensure these additional fee title or easement acquisitions specifically allow for public recreation, as specified in the ACT. Absent this assurance that any future land entitlements acquired will allow for this recreational purpose, future planning options for recreation will be unnecessarily limited. Recreation also should be considered during project design to avoid missed opportunities or expensive modifications to infrastructure in the future.

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To consider future recreational recommendations, Valley Water should coordinate with adjacent open space landowners and regional recreation operators to analyze the feasibility for recreation for the Project area. While specific recommendations may not be included as part of the Project, this effort would establish a baseline for recreational opportunities and insight for future coordination on recreational opportunities at Pacheco Reservoir in subsequent environmental analysis.

Thank you for the opportunity for the County Parks Department to provide comments on the Notice of Availability of a Draft EIR for the Pacheco Reservoir Expansion Project. If you have any questions, please email me at kimberly.brosseau@prk.sccgov.org

Sincerely,

Kim Brosseau

Kimberly Brosseau, AICP
Senior Planner



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