

Response to County of Santa Clara Parks Letter dated December 14, 2016:

The County of Santa Clara Department of Parks and Recreation commented that the Mitigated Negative Declaration (MND) did not include a discussion of the *Santa Clara County Countywide Trails Master Plan Update* (1995). They noted that the route for the Juan Bautista de Anza National Historic Trail runs along Santa Teresa Boulevard as an on-street bicycle route within the road right-of-way and the MND should describe the route in relation to the project and evaluate the potential impacts to this trail, such as aesthetic/visual impacts and increase in use from data center workers. The letter also incorrectly indicates that the data centers site is located on Santa Teresa Boulevard.

Juan Bautista de Anza Historic Trail Route

Envision San José 2040 General Plan Policy TN-2.6 calls for trails as transportation to integrate and connect trail and pathway networks, including the Juan Bautista De Anza Trails, to allow for a broad base of opportunities and linkage with the greater Bay Area. As noted on page 120 of the Initial Study/draft MND, there are existing Class II bicycle lanes (striped lanes on roadway) on Santa Teresa Boulevard in the project vicinity. These City of San José facilities are located ½ block (approximately 600 feet) to the southwest of the data centers project site and are along the route identified in the County of Santa Clara Trails Master Plan as an on-street bicycle route of the Juan Bautista de Anza National Historic Trail.

Project effects on bicycle facilities and site access are described on pages 125 and 126 of the Initial Study. Public vehicular access to the project site would be provided via a main entrance on Great Oaks Boulevard, and a secondary entrance on San Ignacio Avenue. A service entrance for trucks would be located mid-block on Via Del Oro. The project site for the data centers does not have frontage on Santa Teresa Boulevard and would not physically affect bicycle facilities at this location.

Each data center is anticipated to have an estimated 19 employees and 66 client visitors at buildout (255 employees and visitors total for the three buildings) and the project would provide 19 bicycle parking spaces for employees and visitors to use, consistent with the City's Bicycle Parking Standards described in the Municipal Code. The data centers would operate 24 hours per day and trips to and from the site generally would be spread out throughout the day. Based upon the proposed use and estimated employees and visitors, implementation of the project is not anticipated to effect the functioning of bicycle lanes on Santa Teresa Boulevard due to substantial use or bicycle congestion.

The project area is relatively flat and the proposed data center buildings would primarily be visible from the on-street bicycle lanes by bicyclists traveling the block between Great Oaks Boulevard and San Ignacio Avenue. The currently vacant site with grassland and scattered trees is bordered by urban, industrial office development on three sides. A remaining vacant area of the block, including several mature native oaks, is located between the project site and Santa Teresa Boulevard. The three proposed data center buildings would be approximately 50 feet in height and setback from Santa Teresa Boulevard by 600-700 feet or more. While the proposed project would change the visual character of the site, it would not substantially effect aesthetics or views considered scenic in the City's General Plan at this urban infill location.

Views from Santa Teresa County Park

The County of Santa Clara Department of Parks and Recreation also commented that the aesthetics/visual impacts of the project, particularly effects on public views from higher elevation trails (Vista Loop, Joice Trail, Bernal Hill Trail, and the Pueblo Trail) of Santa Teresa County Park (approximately 3,000 feet southwest of the project site) were not addressed. A concern regarding glare (reflective windows) and the provision of vegetative screening was also raised.

Effects on public views were addressed on pages 27-31 of the Initial Study/draft MND, consistent with Envision San José 2040 General Plan policies outlined on pages 25-26. The City's General Plan Scenic Corridors Diagram identifies Gateways and Urban Throughways where preservation and enhancement of views of the natural and man-made environment are crucial. The site is located within the City's Urban Growth Boundary and development is subject to the City's development standards and industrial design guidelines and review process. The data centers site is not located along a designated gateway or along a scenic road.

Views of the data centers and substation sites from Santa Teresa County Park trails were reviewed in response to the County's concerns. Two photos from viewpoints along each of the following trails (Joice Trail, Vista Loop, Bernal Hill Trail, and the Pueblo Trail) follow and are shown in Figures 1-4. The views show that the vacant block bordered by Santa Teresa Boulevard is visible from some locations along the trails. Views of the project area from Santa Teresa County Park trails are of a mosaic of urban development within the City's Urban Growth Boundary. The proposed development would incrementally increase the coverage of the valley floor with structures and the data center buildings may be large enough to be discernable from some locations. The proposed substation would be visible from some locations along the listed trails; however, existing development in the project area would make the substation indiscernible from surrounding development. They would not directly alter scenic resources identified in the City's General Plan or substantially modify views of hillsides on the east side of the Santa Clara Valley. As noted in the Initial Study/draft MND, the proposed project would be subject to adopted policies and regulations (such as the Building Code) pertaining to light and glare impacts and glare from reflective surfaces is not anticipated to be a substantial visual effect at this location.

The issues raised in the comment letter from the County of Santa Clara Department of Parks and Recreation do not change the conclusions in the Initial Study/draft MND regarding the significant effects of the project.



PHOTO 1



PHOTO 2



PHOTO 1



PHOTO 2

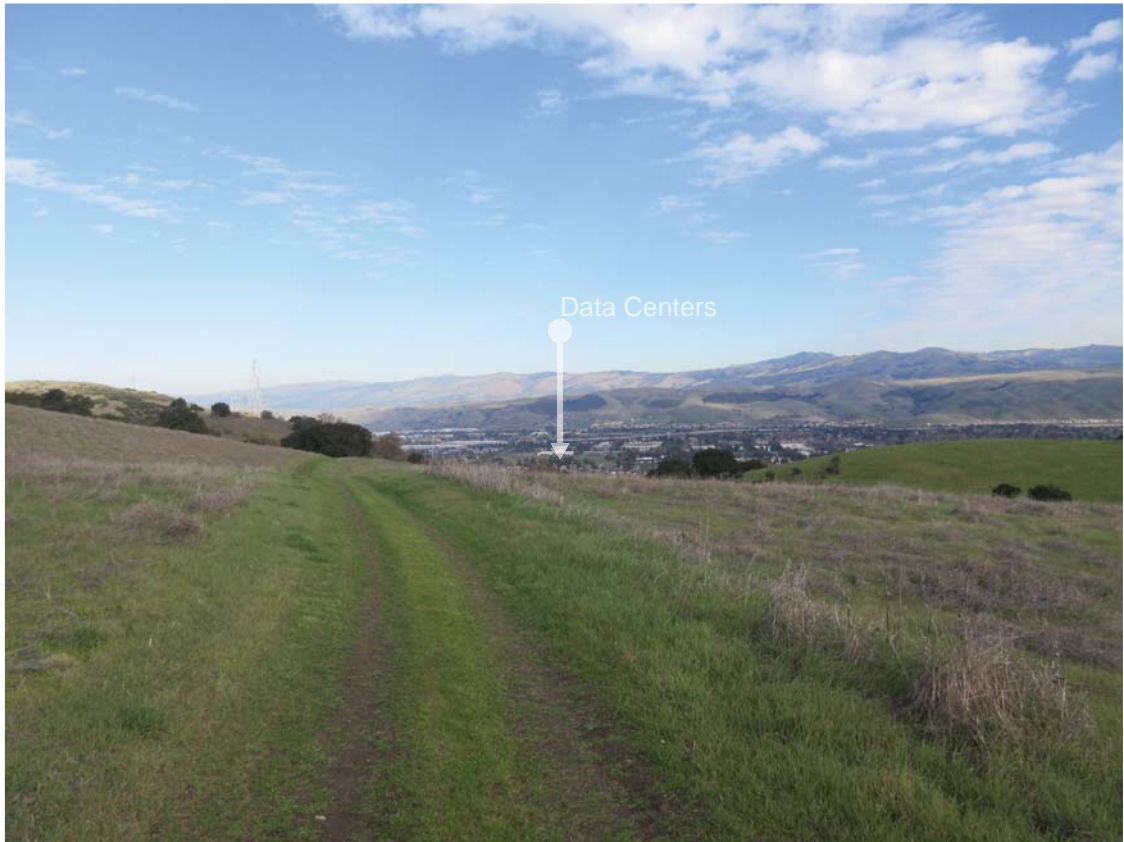


PHOTO 1



PHOTO 2



PHOTO 1



PHOTO 2

County of Santa Clara

Parks and Recreation Department

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Los Gatos, California 95032-7669
(408) 355-2200 FAX 355-2290
Reservations (408) 355-2201
www.parkhere.org



December 14, 2016

Ms. Stefanie Farmer
City of San Jose
Department of Planning, Building, and Code Enforcement
200 East Santa Clara Street, 3rd Floor Tower
San Jose, CA 95113-1905

Subject: Public Notice of Intent to Adopt a Mitigated Negative Declaration for the Equinix Data Centers Project (SV-12, SV-13, and SV-14)

Dear Ms. Farmer:

The County of Santa Clara Parks and Recreation Department (“County Parks Department”) is in receipt of the Public Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Equinix Data Centers Project. The project proposes to construct three, two-story data center buildings that would each be approximately 188,000 square feet in size with a building footprint of approximately 94,000 square feet. Potential impacts related to the *Santa Clara County Countywide Trails Master Plan Update*, relative to countywide trail routes, public access, and regional parks, are the primary focus of the County Parks Department’s comments.

The MND does not include a discussion related to the *Santa Clara County Countywide Trails Master Plan Update*, an element of the Parks and Recreation Section of the County General Plan that the Board of Supervisors adopted on November 14, 1995. The Juan Bautista de Anza National Historic Trail runs along Santa Teresa Boulevard, the location of the proposed data centers, as an on-street bicycle route within the road right-of-way. The MND should describe the route in relation to the project and evaluate the potential impacts to this trail, such as aesthetics/visual impacts and an increase in use from data center workers.

The MND does not address the aesthetics/visual impacts of the proposed project, particularly in regards to potential impacts to public views as seen from the higher elevation trails (Vista Loop, Joice Trail, Bernal Hill Trail, and the Pueblo Trail) of nearby Santa Teresa County Park (approximately 3,000 feet southwest of the project site). The MND states that mitigation

measures are not required. The MND should better address this potential for aesthetic/visual impacts, and as appropriate, incorporate mitigations to reduce the impacts of glare through vegetative screening, non-reflective windows, or other measures.

Thank you for the opportunity to comment on the Public Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Equinix Data Centers Project. If you have any questions regarding these comments, please feel free to contact me at (408) 355-2362 or via email at Michael.Hettenhausen@prk.sccgov.org.

Sincerely,

Michael Hettenhausen

Michael Hettenhausen,
Associate Planner