

April 18, 2008

To: Michael Brilliot, Envision San Jose 2040 Task Force, Michael.Brilliot@sanjoseca.gov

From: Leila Forouhi, Save Coyote Valley Coalition, Forouhi@myway.com

**Re: Preservation of Coyote Valley as Agricultural Asset and Open Space**

Dear Michael Brilliot and Members of the General Plan Task Force,

As you continue to work on the 'Envision San Jose 2040' General Plan, we would like you to genuinely establish sustainable land use measures into this 'blueprint' for future growth and development, specifically by incorporating the preservation and resurrection of the region of Coyote Valley as a resource for local food production and a wildlife corridor between the Mount Diablo and Santa Cruz Mountain Ranges.

According to the San Francisco Chronicle article, *Farming the City: Planners Start Thinking of How to Feed Us*, published on March 22, 2008, the American Planning Association recently adopted a policy to help build "stronger, sustainable and more self-reliant" local food systems. The article explicitly states that when cities invest in locally produced food, that investment stays within the community and has less environmental impacts through minimizing greenhouse gas emissions by transportation.

According to Greenbelt Alliance's alternative development plan for Coyote Valley, *Getting It Right: Preventing Sprawl in Coyote Valley*, "Despite the likely conversion of prime agricultural lands in Coyote Valley and the discouragement of long-time local farmers, there are indicators of new opportunities for the remaining farmland and for the entry of new farmers to the area" (Greenbelt Alliance 2003, 33).

An opportunity also exists for the City of San Jose to be a leader in environmental sustainability. The De Anza College Wildlife Corridor Stewardship Team is continuing to gather data on wildlife movement across Coyote Valley. What has become apparent is that Coyote Valley is one of three critical wildlife corridors for animals to migrate between the vast Diablo and Santa Cruz Mountain ranges. The unfettered migration of wildlife is critical for these native species to maintain healthy populations.

The Task Force has the ability to effect change at the policy level in regard to Coyote Valley, and we urge you to make the right decision. We ask that you work collaboratively with these two organizations in regard to the Envision 2040 San Jose General Plan and the Santa Clara Valley Habitat Conservation Plan/Natural Community Conservation Plan.

Attached are the following for your review:

- (1) San Francisco Chronicle Article: *Farming the City: Planners Start Thinking of How to Feed Us*
- (2) GIS Map of Potential Wildlife Corridors within Santa Cruz and Diablo Mountain Ranges
- (3) Comments by De Anza College Wildlife Stewardship Corridor Team

Thank-you for your consideration to our comments. Please contact me at any time.

## Figure 1: San Francisco Chronicle Article

### FARMING THE CITY

#### Planners start thinking of how to feed us

Deborah K. Rich, Special to The Chronicle

Saturday, March 22, 2008

Like many good ideas, community **food** planning seems obvious in retrospect. Each new subdivision raises a host of concerns as it goes through the approval process - but how well its surroundings can feed future homeowners has seldom been one of them.

However, the notion that a community must give some thought to how to feed its members seems to be taking root.

The nonprofit American Planning Association adopted a policy in May that encourages its members, 65 percent of whom work for state and local government agencies, to help build "stronger, sustainable and more self-reliant" local **food** systems.

Until recently, most **planners** were only peripherally concerned with **food** systems. Their involvement in conserving agricultural land stemmed more from a desire to protect open space than from an interest in preserving local **food** production.

"Yet, among the basic necessities of life - air, **food**, shelter and water - only **food** has been given short shrift by the planning community," write the authors of Policy Guide on Community and Regional **Food** Planning. That has now changed, though it's important to note that these are guidelines rather than enforceable rules.

"Local **food** planning is a very popular topic that has a surge behind it," said Amit Ghosh, chief planner at the San Francisco Planning Department. "It has a lot of currency here in the city. And it is not something that is just a fad. It's the basis of all sustainable policy that you may have. After all, **food** is one of those basic human needs."

A **food** system encompasses the production, processing, distribution and consumption of **food** and the management of waste. In justifying its new policy, the planning association said a city that can supply and control its **food** needs will have more say in what it eats, an opportunity to eat fresher foods and insulation from disruptions in national **food** distribution.

All that, plus the fact that dollars spent on locally produced **food** have a greater chance of cycling back through the community, and that **food** grown nearby bears a lesser liability for greenhouse gases released in transport.

Here are a few actions already taken by cities:

-- A crosstown bus line in Hartford, Conn., that links low-income neighborhoods to grocery stores.

-- A policy in Woodbury County, Iowa, mandating that county agencies buy locally produced foods for business events.

-- A goal in Madison, Wis., to establish a garden site for every 2,000 households.

-- The planned community of Prairie Crossing in Illinois that leases 40 of its 677 acres to a community-supported agriculture farm.

San Francisco has yet to address community **food** planning comprehensively, but the city is involved in a variety of initiatives aimed at tightening the connection between **food** producers and consumers. The San Francisco Department of Public Health, for example, adopted a policy in 2006 that promotes the inclusion of locally produced, healthy **food** at its events. The policy also requires that San Francisco General Hospital and Laguna Honda Hospital develop plans to begin purchasing **food** grown locally and sustainably.

"Local **food** goes along with the city's long-held public policy that urban centers are supposed to be designed in such a way that they are self-sustaining," said San Francisco planner Ghosh. He expects that these goals will become part of San Francisco's general plan once the city formalizes its approach to carbon neutrality.

Grassroots efforts within regional foods systems have emerged across the country as consumers discover the appeal of eating locally. But with few exceptions, these programs have occurred despite, rather than because of, county and municipal general plans.

State and federal **food**-planning guidelines are scant.

"It's still at the informal policy level," said Carol Whiteside, president of the Great Valley Center, a nonprofit organization that supports activities and organizations benefiting the Central Valley. "I would say that **food** security has not yet entered formal policy discussion. The cynics' comment that I've heard more than once is: 'If we think it's tough to deal with China on import policy or oil or whatever it happens to be, wait until it controls our **food** supply.'"

"People are asking: In a world where trade is hugely important but where trade embargoes become a weapon of defense, do we want to be dependent upon imported **food**? And what would it mean for this country to make a policy to be **food** independent? This is an issue that's bubbling, but my sense is that consumers are ahead of the government on it."

That said, Whiteside does believe that governments are paying attention to other issues that help to bring **food** systems into the discussion.

"By talking about obesity and disease and health, the government is creating an environment in which the ability to eat locally becomes an attractive alternative," she said.

"All the individual efforts are super important, but we need policymakers and business at the table, too," said Paula Jones, director of San Francisco **Food** Systems, a private-public partnership addressing **food** in San

Francisco. "Government can bring in not only the policy but also the funding and technical expertise that it takes to drive large-scale, systemic changes."

## **Plan ahead**

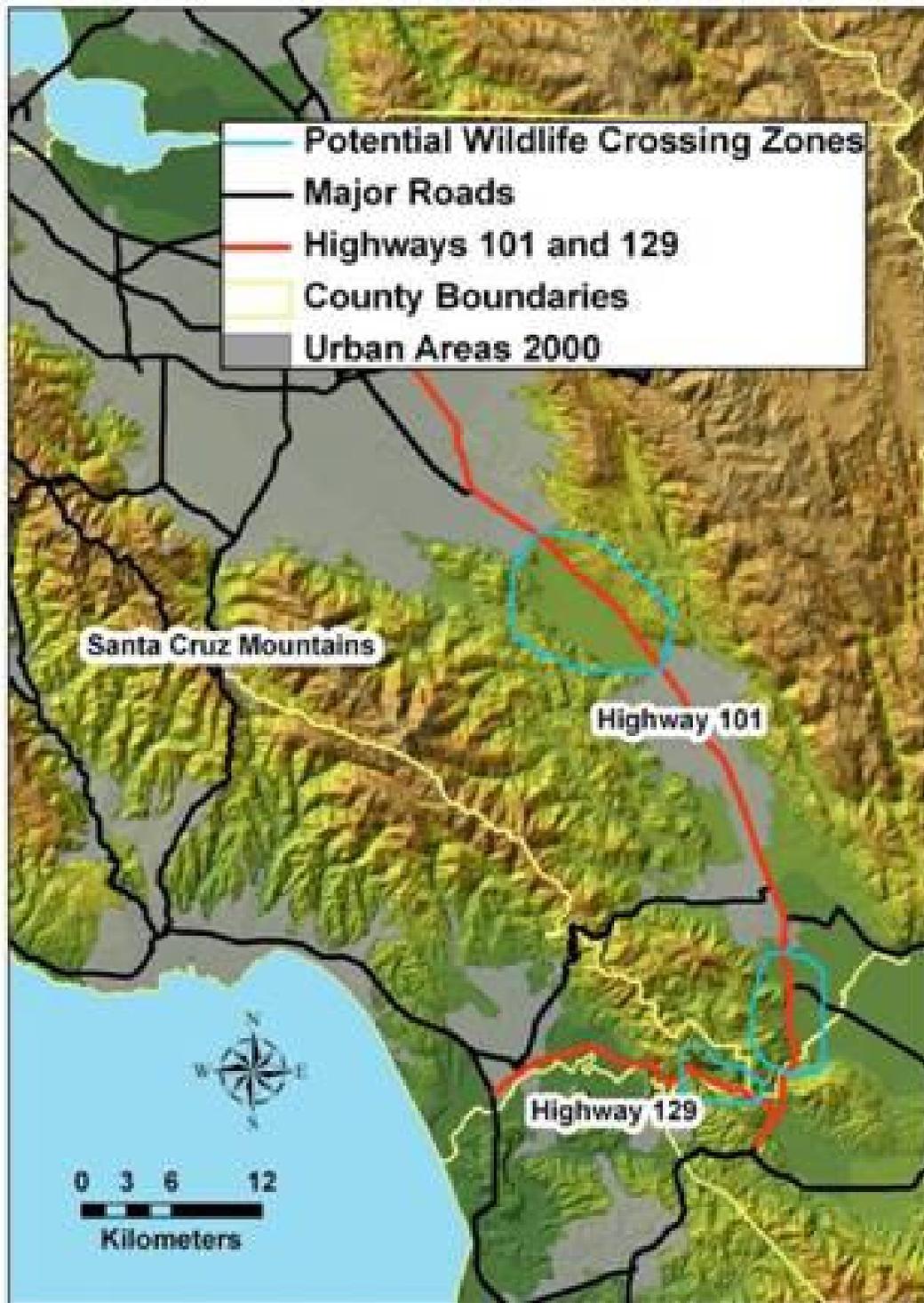
The American Planning Association consists of 43,000 **planners**, officials and citizens involved with urban and rural planning issues. Its members serve in a range of roles including as city and county **planners**, planning consultants and planning commissioners. There are 47 regional chapters and 19 divisions devoted to specialized planning interests.

For more information on the APA's Policy Guide on Community and Regional **Food** Planning, visit

[www.planning.org/policyguides/food.htm](http://www.planning.org/policyguides/food.htm).

*This article appeared on page **F - 1** of the San Francisco Chronicle*

**Figure 2: GIS Map of Potential Wildlife Corridors within Santa Cruz and Diablo Mountain Ranges**



*Source: Tanya Diamond, Geographic Information Systems, 2007*

**Figure 3: DEIR Comments on CVSP by De Anza College Wildlife Corridor Team**

**De Anza College Wildlife Corridor Stewardship Team comments on the Coyote 2007  
Valley Specific Plan's DEIR**

**CITY OF SAN JOSE  
DEVELOPMENT SERVICES**  
by Julie Phillips (Morgan Family Chair in Environmental Studies, Tulare County),  
Pat Cornely (Executive Director, Kirsch Center for Environmental Studies), Tanya  
Diamond, Lead Field Studies Instructor, Badger Biologist,  
Henry Coletto Field Consultant, Former Game Warden Santa Clara County,  
Christine Klinkowski, Wildlife Biologist, Data Analyses Consultant  
Field Studies Interns: Veronica Davis, Melissa Dekoven, John Fosnaugh, Jessica  
Gonzalez, Josh Goodwin, Lakhena Howey, Rick Malupo, Alan Smith, Alice Quan

To establish the presence of wildlife species and wildlife corridors, a corridor analyses based on data collection must be preformed (Beier 1992, 1993, Clevenger 2001, 2005, Federal Highway Administration 200a, Gloyne 2001, Noss 1987, Penrod, 2001). The Coyote Valley Specific Plan DEIR made many false assumptions about wildlife presence and connectivity because there was no data collection or analyses performed.

De Anza College's Environmental Stewardship Program began a ten year project in 2005 researching movement corridors along the 37<sup>th</sup> parallel for connectivity between the outer (Santa Cruz Mountains) and inner coastal range (Diablo Range) in California. Since January 2007, an ongoing data collection effort has been conducted by the Stewardship team at De Anza College.

**Methods:**

Our methods to determine wildlife presence and movement patterns consisted of formal tracking (scats, tracks, and visible observation), digital field cameras located at Highway 101 culverts, and observational data from different agencies (Halfpenny , 1996). Field data was collected weekly along a transect encompassing the northern and southern sections of Coyote Valley. For each data point, the field interns GPSed the location, classified the habitat type, activity, sample age, proximity to human activity, and other information. Each data point was measured, photographed, and recorded onto data sheets. All data points were downloaded weekly and then mapped into an orthophoto (1m resolution 2005 USGS) and habitat layers consisting of vegetation, riparian corridors, wetlands, soil type, slope, roads, and urban layers using a GIS program (ArcMap ERSI 9.1).

**Results:**

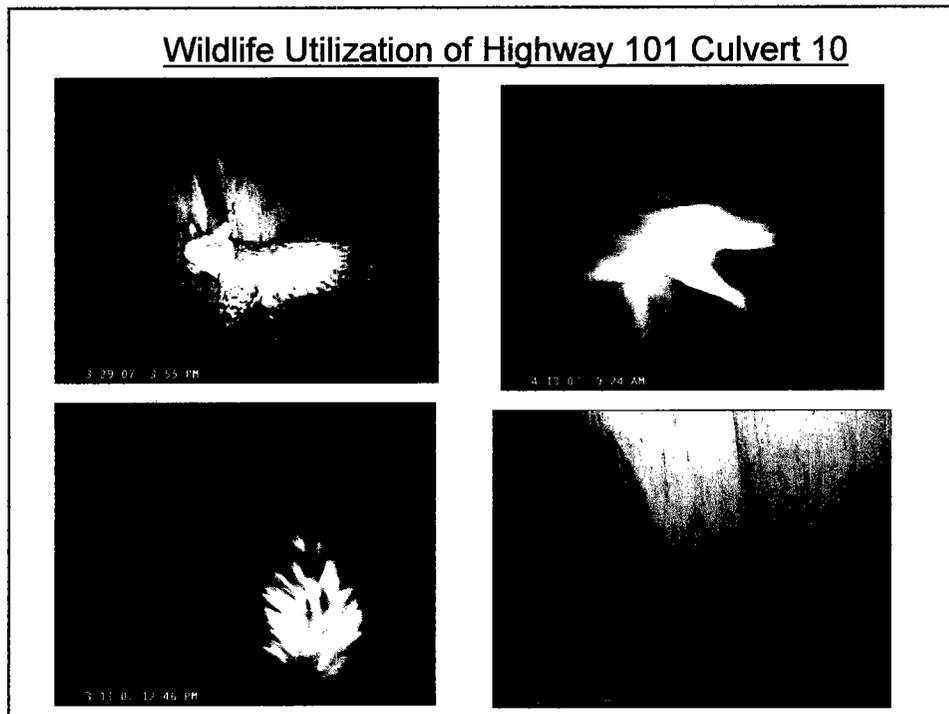
Over a 5 month period we collected over 400 data points. These data points were then utilized to develop a preliminary connectivity map for the Highway 101 corridor. This preliminary connectivity map demonstrates that many wildlife species are utilizing the Highway 101 culverts to move from east to west and west to east. These culverts allow wildlife to travel from the east hills, such as Coyote Ridge, and including the Mount. Hamilton region of the Diablo Range, under Highway 101 to access the Coyote Creek County Park and then disperse into Coyote Valley and surrounding hills, including

the Santa Cruz Mountains. The data also demonstrates that Coyote Creek County Park appears to be the core area of this corridor. High use

Data maps will be made available to DIER staff upon request.

1) The DEIR states that highway 101 acts as the most significant barrier to wildlife movement on page 271.

We have found that this is not the case. Many different species utilize Highway 101 culverts to travel under the highway. The picture below is the same culvert with multi-species use within a 1 month surveillance period. This culvert was also utilized by a mountain lion. These data points of wildlife use of Highway 101 culverts were then mapped in GIS to develop a preliminary connectivity map for the Highway 101 corridor. This preliminary connectivity map demonstrates that many wildlife species are utilizing the Highway 101 culverts to move from east to west and west to east. These culverts allow wildlife to travel from the east hills, such as Coyote Ridge, and including the Mount Hamilton region of the Diablo Range, under Highway 101 to access the Coyote Creek County Park and then disperse into Coyote Valley and surrounding hills, including the Santa Cruz Mountains.



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**Wildlife Utilization of Highway 101 Culverts: Raccoons**



2) The DEIR states, see below passage, that culverts big enough to allow for large mammal passage exist only in the southern section on page 271.

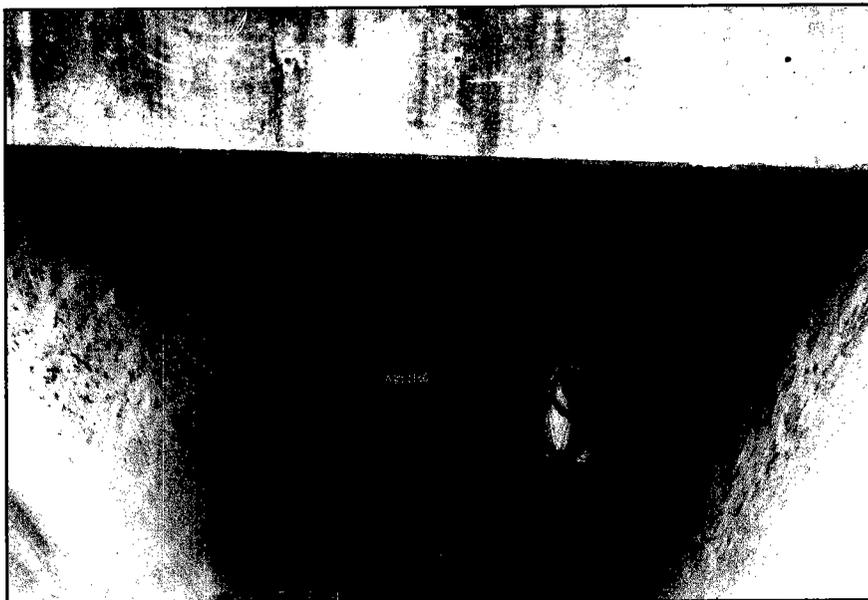
This statement is incorrect as there are 3 large culverts in the north section of Coyote Valley large enough to allow for large mammals such as mountain lions and deer to cross through. The picture below shows one culvert large enough for humans standing upright to pass through. This culvert is within Coyote Creek habitat and is located before the Bailey highway exit. There are three culverts large enough to allow for large mammals to travel through in the north section of Coyote Valley

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**Coyote Valley Wildlife Corridor Internship Team**



Large Terrestrial Mammals Traveling through large  
Culvert in the North Section of Coyote Valley



For larger wildlife species, such as deer and mountain lion, there are only three significant passages across Highway 101. The largest of these crossings is just outside the southern half of the Greenbelt, where Coyote Creek passes underneath Highway 101. This crossing offers the cover of the Coyote Creek riparian corridor and is not associated with developed areas. The other two crossings are at the Coyote Creek Golf Course in the Greenbelt: the Coyote Creek Golf Course Exit, which passes beneath Highway 101, and one golf cart crossing underneath Highway 101.

3) The DEIR makes the statement that there are no truly barrier free corridors that exist within the Coyote Valley region on page 272.

This statement is also false. These culverts located in the North section of Coyote Valley all have unrestricted access for wildlife to travel from the east hills to Coyote Creek habitat. In terms of a truly free barrier corridor, five surveyed culverts allow for wildlife to cross under Highway 101 into Coyote Creek habitat, in which wildlife can then travel through an orchard and hay field to Monterey Highway, in which the divider has not begun into Coyote Valley, then up into the hills. See pictures below of the orchard and hay field adjacent to Monterey Highway where there is no divider. The DEIR also states that Monterey Highway acts as a barrier to movement; this is also incorrect as you can see from the picture. This section of Monterey Highway is not part of the intersection but is adjacent to it to it.



Hay field with access into Coyote Creek County Park



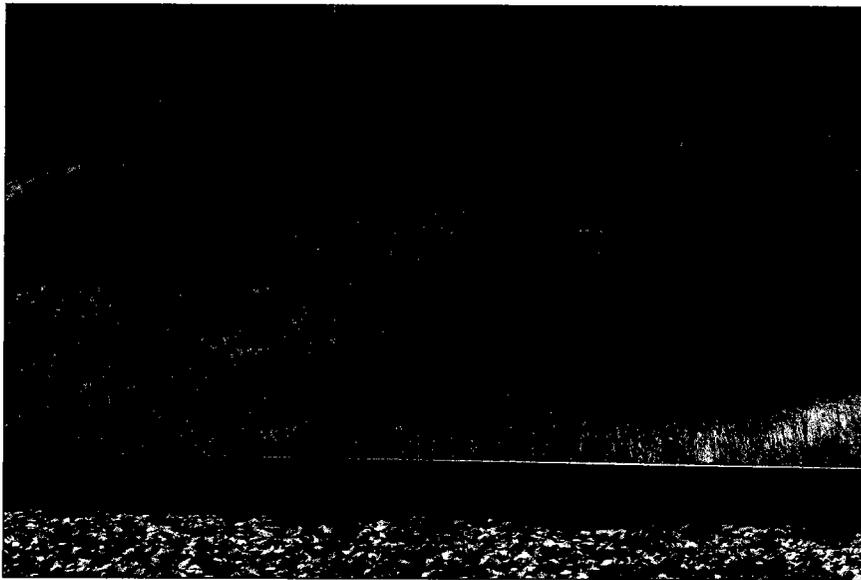
Orchard with access into Coyote Creek County Park



Monterey Highway north of Bailey Ave. without divider and access into Coyote Valley

4) The DEIR states that there is a retaining wall at the Metcalf intersection which would restrict wildlife movement to Tulare Hill on page 271.

This is a false statement. Another access point, which is barrier free for wildlife to travel from Highway 101 culverts, through the Coyote Creek to Tulare Hill is adjacent to Metcalf Road, see picture below. There are also game trails from the railroad tracks leading up to the hill.

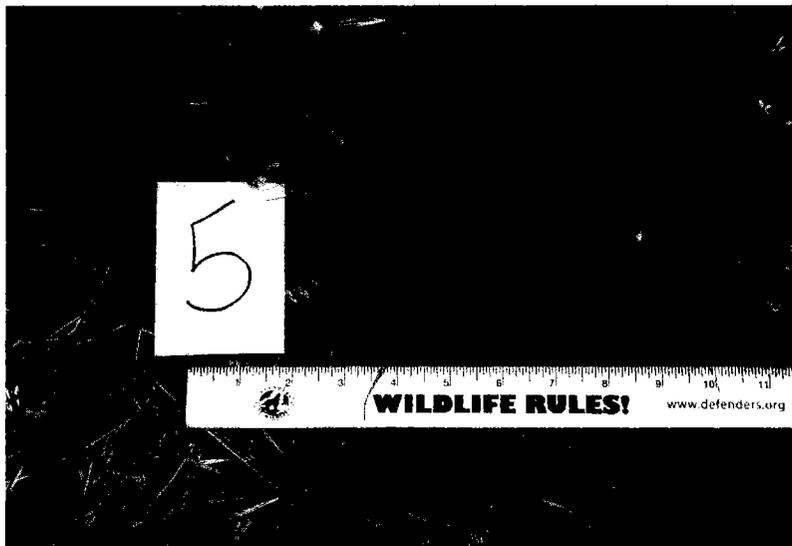
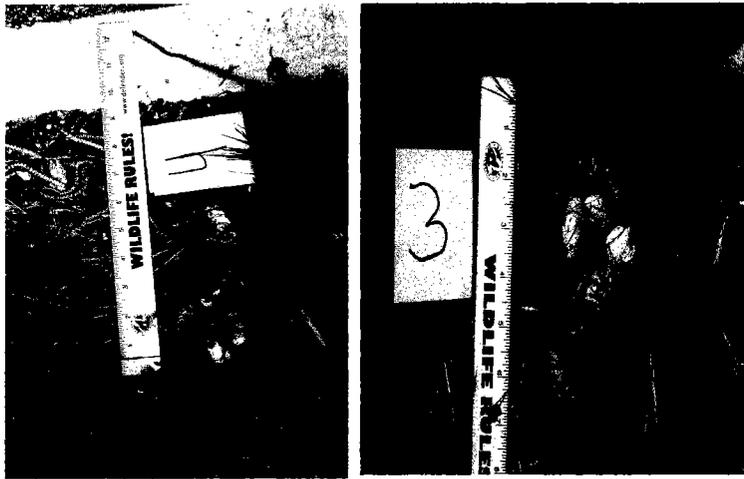


Tulare Hill was also found be a high use area by species such as coyote, fox, badger, and many prey species which would attract predators to come up to hunt.

Coyote Creek consists of highly suitable habitat for many wildlife species. From our data collection, we have found consistent high use of the habitat by wildlife. We have also found that along the bike trail, when it is exposed to Highway 101's noise and light from the automobile traffic, species tend to avoid those areas of the bike trails. At some locations we have found that game trails become multi-species use in avoidance of the highway. The pictures below are of a bobcat scat, coyote scat, and deer track at the same location. This indicates that increased traffic and light from the proposed development will negatively impact wildlife use of the some sections of the corridor.

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**Coyote Valley Wildlife Corridor Internship Team Data Collection**



In summary, our data collection has shown that the statement made in the DEIR on pg. 271, that there are only limited access points for wildlife to cross from east to west, is false. Also, that there are few limited areas for large mammals to cross from east to west in the north section of Coyote Valley is false. Also, our research shows that Coyote

Creek County Park and the Highway 101 culverts play a critical role in maintaining connectivity from the Diablo Range to the Santa Cruz Mts.

Poor planning will lead to costly problems and damage which could be avoided if the plan is modified in a manner that is based on the best available science, data collection, and expertise, which is all readily available to your staff if you make the effort to work with us.

Will this wildlife corridor, which has been identified as a critical connectivity region by corridor experts, be cut off by the development plans or will there be discussions with DEIR staff for plans on how keep the wildlife corridor intact (Thorne et al 2002) ?

The DEIR states that highways, such as 101 is a barrier to wildlife movement. We have found through placing digital field cameras at Highway 101 culverts that many wildlife species are utilizing the Highway 101 culverts to move from east to west and west to east. These culverts enable wildlife to travel from the east hills, such as Coyote Ridge under Highway 101 to access the Coyote Creek County Park and then disperse into Coyote Valley to access the east hills and County Park such as Santa Teresa and Calero County Park. Below is a map of the data collected so far in terms of Highway 101 not being acting as a barrier to wildlife movement into Coyote valley.

As you can see, many wildlife species are even utilizing the same culverts to travel through. This data collection is ongoing. We have not monitored all the culverts, which are colored in white. This does not mean wildlife are not using these culverts, data has not yet been collected.

#### Conclusion:

According to several wildlife corridor/connectivity experts, Coyote Valley is a critical wildlife corridor and habitat for many species (Thorne *et al* 2002, 2006.). This was also stated in the DEIR on page 32 of the Biological Resources section. At the Sierra Azul Wildlife Connectivity Decision Makers Workshop, hosted by the Elkhorn Slough Coastal Training Program, on January 29, 2007, a presentation on a Wildlife Corridor Analyses for North American Badger (*Taxidea taxus*) within the Coyote Valley region by Tanya Diamond, graduate student at San Jose State University. In attendance were WRA environmental consultants writing the DEIR for Coyote Valley This presentation included several corridor analyses showing that Coyote Valley consists of both critical core habitat and a corridor for badgers, which are a Species of Special Concern (Dept. of Fish & Game, 1986). Please see attachment of corridor analyses.

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This data collection effort was spurned by the concern the wildlife species such as Tule elk, badgers, mountain lions, bobcat, deer, foxes, coyotes, and many other species would lose a critical habitat that serves as important connectivity. It has been demonstrated that corridors can facilitate the movement of species through habitat patches by providing connectivity (Hilty *et al* 2006, Soule and Gilpin 1991).

Connectivity between habitat patches is critical to maintain genetic viability and maintain viable populations of wildlife (Noss, 1987, Buza et al 2000). Wildlife corridors facilitate the movement for wildlife species to find mates, resources, and for juveniles to disperse out of their parental home range (Beier 1983). This is a very important concern for badgers as they exist in small populations and low densities because of their large home ranges. Further efforts will be made to see if badgers should be federally listed. Genetic isolation of badgers due to fragmentation from the Coyote Valley Specific Plan could result in badgers becoming a listed species which results in very costly future management efforts for developers, the City of San Jose, and resource agencies. Please see Tanya Diamond's comments on the DEIR for further information about North American badger populations and connectivity issues within the region.

Questions assembled by Stewardship Research team to Coyote Valley Specific Plan DEIR staff and leadership:

Why was this analyses or any mention of wildlife corridor for badgers left out of the DEIR? Especially when great efforts on many people's part and time were made to get this information to the DEIR staff while they were writing the DEIR?

Why weren't these methods which are used to establish wildlife presence and corridors not conducted by the DEIR staff?

Why was this analyses or any mention of wildlife corridor for badgers left out of the DEIR?

Knowing that a scientific evaluation consisting of data collection should have been conducted by the methods we have been utilizing, why did the DEIR staff not conduct their own analysis and data collection effort? Because of the fact that Coyote Valley has been identified as a critical wildlife corridor and the fact that it is one of the first places for wildlife to cross from the Hamilton Region of the Diablo Range to the Santa Cruz Mountains, this should have been a high priority for in-depth research.

Following is a list of comparison of the data we have collected with examples in comparisons to the DEIR statements.

The DEIR states that highways, such as 101 is a barrier to wildlife movement. We have found through placing digital field cameras at Highway 101 culverts that many wildlife species are utilizing the Highway 101 culverts to move from east to west and west to east. These culverts enable wildlife to travel from the east hills, such as Coyote Ridge under Highway 101 to access the Coyote Creek County Park and then disperse into Coyote Valley to access the east hills and County Park such as Santa Teresa and Calero County Park. Below is a map of the data collected so far in terms of Highway 101 not being acting as a barrier to wildlife movement into Coyote valley.

As wildlife biologists, who specialize in corridor design, we ask why wasn't this type of data collection of wildlife use of highway culverts conducted by the DEIR consultants? Also, the assumptions made in the EIR about high roads acting as a barrier have been proven false. Will decision makers such as the City Council be altered to the fact that the EIR have made some gravely false assumptions about wildlife movement in the Coyote Valley region?