



August 10, 2020

To: Cindy McCormick, Senior Planner

Dear Ms. McCormick:

The mission of the Sierra Club is to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment.

The Sierra Club Loma Prieta Chapter (SCLP) would like to submit the following comments regarding the DEIR for the Gilroy 2040 General Plan, with concerns regarding climate change and greenhouse gas emissions, wildlife and habitat, and smart growth.

- 1) The overwhelming support of Gilroy's voters for the Urban Growth Boundary in 2016 shows the importance of maintaining open space and a "rural" atmosphere in and around Gilroy. In the stated objectives of the Plan, to "Balance Growth and Open Space" should be the first objective, not the third.
- 2) Again in recognition of the demonstrated will of the majority of Gilroy residents to maintain open space, we recommend that "Alternative 2: the Reduced Urban Growth Boundary" Alternative be chosen over the Plan's "Preferred" Alternative. The Gilroy city boundary should not be extended into open space areas outside the current city boundary.
- 3) Alternative 1 ("Preferred") has significant and unavoidable impacts: greenhouse gas (GHG) emissions, Air Quality, and vehicle miles travelled (VMT). Minimization of contributions to climate change needs to be considered a high priority of any project, as climate change is widely recognized to be one of highest "existential threats" of our time.
- 4) Analysis of traffic (and GHG emission) impacts from the Plan extends only as far north as Dunne Avenue in Morgan Hill, and south to Highway 25. It is reasonable to assume that traffic will also increase farther north into San Jose, south into Monterey County, and on Pacheco Pass Highway toward Los Baños. These areas are currently impacted by commute traffic, which will only increase with the population increase that this project will accommodate. The traffic

analysis provides projections that depend on use of mass transit that is not yet available and that is not assured as part of the project.

5) The DEIR defers analysis of impacts and mitigation to future site specific development projects. This includes impacts to wildlife corridors and “Reserve Systems” (per Santa Clara County Habitat Conservation Plan), as well as to special status species and to sensitive habitats. Deferring to future analysis and determining impacts to be Less Than Significant is not consistent with the terms of CEQA compliance.

6) The DEIR does not address increased mortalities to bird and other wildlife species from increased traffic, and bird strikes with new buildings and development.

7) The analysis of the impacts of light pollution, and proposed mitigation is inadequate. The proposed policy regarding light pollution is to “encourage measures to limit light pollution from outdoor sources, and direct outdoor lighting downward and away from wildlife habitat.”

Artificial light at night contributes to light pollution, and is biologically disruptive for living beings. Migratory birds are attracted to light and collide with buildings and other structures. Their migratory flight paths can be altered, and in some extreme cases, birds become trapped in beams of artificial light and die of exhaustion. Many species of mammals will avoid areas illuminated by artificial light at night.

Steps need to be included to require (not just encourage) that lighting be measured and regulated to avoid impacts to birds and other wildlife. Light pollution has dramatic impacts on many wildlife species and is largely unaddressed.

8) We find the conclusion that the project will not adversely impact groundwater to be questionable. Groundwater depletion is compared to that predicted in the population growth analysis made in 2015, before the Urban Growth Boundary. It is not clear that either the 2015 analysis, or the current one, with a slightly lower population projection, accurately predict groundwater conditions during “drought” conditions. With observed changes in rainfall with climate change, we cannot count on historic average rainfall for the future. “Drought” may become the norm.

Thank you for consideration of these comments. Again, we recommend that the City comply with the intent of its residents, as demonstrated in 2016 with the passage of the Urban Growth Boundary initiative, and comply with CEQA to minimize impacts to the environment, including habitat for birds and other wildlife. Please choose an alternative that will protect the existing open space around the periphery of the City, and help minimize climate change by reducing traffic and GHG.

Sincerely,

Martha Schauss
Wildlife Committee
Loma Prieta Chapter, Sierra Club