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September 25, 2014

Bill Shoe, Principal Planner  
County of Santa Clara  
Planning Office  
70 West Hedding Street, 7<sup>th</sup> Floor  
San Jose, CA 95110

RE: Santa Clara County Health Element

Dear Bill,

Thank you for allowing Greenbelt Alliance an opportunity to provide comments on the Santa Clara County Health Element. The Health Element is an opportunity to demonstrate to the public that the way cities grow and develop, how people move from one place to another and how open space lands are protected and stewarded impacts our health every day. Greenbelt Alliance is the champion of the places that make the Bay Area special. We bring people together to ensure the right development happens in the right place. We work to protect the region's open spaces and make sure cities grow in a way that creates great neighborhoods for everyone.

Santa Clara County is the fastest growing county in the Bay Area and is an economic engine for the state; protecting its natural areas is key to maintaining its appeal. The home of Silicon Valley was originally known for its agricultural abundance. That heritage remains in the southern part of the county and the 388,000 acres of ranchland that define Santa Clara County's landscape, along with urban creek corridors and oak woodlands.

### **Golden Lands, Golden Opportunity**

Several years ago, Greenbelt Alliance partnered with the Bay Area Open Space Council, the Association of Bay Area Governments and experts from land trusts, park districts and other organizations to identify Bay Area lands that are vital to our collective health. The result was [\*Golden Lands, Golden Opportunity\*](#) and for Santa Clara County, three opportunities were identified:

- **Create an interconnected system of open space** to enable wildlife migration, trail connections, and continued farming.
- **Increase public access to open space**, especially near fast-growing areas, to help Santa Clara County continue to attract a talented workforce and ensure that all communities benefit.
- **Protect watershed lands** to safeguard the County's water supply for a growing population.

The Santa Clara County Health Element does a very good job of addressing the first two opportunities. If there is any room for improvement, it would be to add the word **interconnected** as follows:

**HE-C.6 Open space preservation.** Preserve rural open space and natural areas and focus urban uses and development away from these areas to protect **and create an interconnected system of** natural resources, agricultural lands, animal habitat, forested lands, and water supply resources.

As far as the third bulleted opportunity above, the Health Element should include language that directly connects the protection of watershed lands with ensuring adequate supplies of clean water for people and wildlife. Healthy Bay Area watersheds are fundamental to safeguarding California's limited water resources, now under increasing strain from development and climate change. Functioning watersheds reduce the need for costly infrastructure by storing water and naturally filtering polluted runoff. Healthy watersheds also reduce flooding. Soil and plants in protected watershed lands act like a sponge, naturally limiting flood danger by absorbing and slowly releasing storm water.

The Santa Clara County Open Space Authority recently released [\*Healthy Lands and Healthy Economies, Nature's Value in Santa Clara County\*](#) which estimates that Santa Clara County's natural capital provides \$1.6 billion to \$3.9 billion in benefits to people and the local economy *every year*. And unlike built capital (e.g. roads, bridges, and buildings) which depreciates over time, natural capital is mostly self-sustaining and its ecosystem services appreciate over time. Case in point is [New York City](#) which chose to protect its watershed lands at the fraction of the cost it would have taken to build a water filtration plant. They have been reaping the benefits as a result.

Potential language for inclusion in the Health Element is as follows:

**HE-C.7 Riparian corridors.** Ensure that urban runoff is as clean as possible by supporting the protection and stewardship of lands around streams and creeks to reduce erosion, protect water quality, and support healthy fish and wildlife populations. This includes implementing best management practices such as bioswales and creek day-lighting.

**HE-C.8 Ecosystem Services.** Account for ecosystem service benefits in decision-making and support new market-based projects and legislation that incentivize stewardship of natural capital on public and private lands.

### A Sustainable Food System in Santa Clara County

The Health Element section on Healthy Eating, Food Access and Sustainable Food Systems is very comprehensive and robust. We applaud the County for its leadership on this issue. Greenbelt Alliance has had the pleasure of sitting with representatives from the Public Health Department on the Santa Clara County Food System Alliance which produced an [Assessment](#) detailing the current state of our food system. It includes opportunities and gaps related to building a more resilient and equitable food system.

To strengthen this section even further, Greenbelt Alliance recommends including these additional policies:

**HE-F.1a Urban/rural edge. Increase public awareness of the challenges of farming at the urban/rural edge. A large part of farming and ranching in Santa Clara County takes place at the urban edge, which can create friction between urban and agricultural land users and pose a threat to agricultural viability. Public outreach and more thoughtful planning can alleviate this area of conflict.**

**HE-F.6a Encourage wholesale produce companies in Santa Clara County to procure goods from local farms and source-identify farm origin. Food distributor wholesalers serve a critical function in the food system by connecting farmers to markets and allowing for efficient distribution of food among many end users.**

This section includes great language about supporting local agriculture. Going one step further, Santa Clara County may want to consider adopting a local food ordinance that requires the county government to purchase locally produced foods when a department of the county serves food in the usual course of business (enhancing policy HE-F.21).

Lastly, the Health Element does a good job of addressing affordable housing and can be strengthened even more by making a connection to farmworker housing in the sustainable food system section. The Santa Clara County Food System Assessment makes the following recommendation:

**HE-F.1a Address local agricultural workers' housing shortages. The need for agricultural laborers in Santa Clara County is high because of the significant amount of hand labor required to tend and harvest the county's diversity of crops.**

### **Unincorporated County Pockets**

Greenbelt Alliance has had the opportunity to work on the West San Carlos Street and South Bascom Avenue urban village plans with the City of San Jose. These planning processes have been complicated by the fact that a large unincorporated county pocket exists in the middle of the planning area. This area is generally park deficient and lacking in access to healthy food outlets and safe streets. The County Health Element contains excellent language addressing these issues generally, but it will be helpful to call out the special nature of county pockets that are stuck in a state of limbo. The County would like to see these areas annexed into the city, but some residents are less keen on this idea. Nonetheless, special attention must be paid to residents' quality of life in county pockets.

We encourage staff from the county's departments of planning and parks to work collaboratively with staff from the City of San Jose's departments of planning and parks on issues facing residents of county pockets. We suggest the following language which could possibly fit in Section A: Health Conditions, Equity and Access.

**HE-A.4a County Pockets. Strive to work collaboratively with cities on planning processes that overlap with county pockets to ensure that, regardless of jurisdiction, residents' needs in terms of park access, fresh local food and complete streets are being addressed.**

## Final Thoughts

Overall, the Santa Clara County Health Element is an excellent document that has succeeded in making the connection to health in all policies. Greenbelt Alliance applauds the robust selection of policies that address everything from displacement concerns and walkable neighborhoods to equitable access to parks and VMT reduction. This document can be a model for other jurisdictions seeking to address positive health outcomes in their general plans.

Greenbelt Alliance welcomes the opportunity to strengthen our working relationship with both County Planning and the County Public Health Department to implement these policies and applauds staff for a job well done.

Sincerely,

A handwritten signature in black ink that reads "Michele Beasley". The signature is fluid and cursive.

Michele Beasley  
Regional Director