

## Errata to the Final Revised EIR

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Since publication of the Final Revised Environmental Impact Report (EIR) for the Flood County Park Landscape Plan in October 2019, the San Mateo County Parks Department has undertaken the following actions that require text amendments to the Final Revised EIR:

- Revising the design and layout of proposed recreational elements in the Flood County Park Landscape Plan, in response to comments offered by the San Mateo County Board of Supervisors and members of the public at the November 5, 2019, Board of Supervisors meeting
- Revising peak visitor use projections for summer months under the Landscape Plan
- Eliminating the existing vehicle entrance fee at Flood County Park

Figure ERR-1 shows the revised layout of recreational elements at Flood County Park, as proposed in the January 2020 update to the Landscape Plan.

To address the above changes, two supporting technical studies cited in the Final Revised EIR have been updated. Gates + Associates revised the Tree Report in July 2020 to document anticipated tree removal under the January 2020 update to the Landscape Plan (see Appendix ERR-1) and W-Trans prepared a memorandum in September 2020 that analyzes the effect of updated peak use projections on trip generation and parking availability (see Appendix ERR-2). This Errata considers the results of the revised technical studies when making text amendments to the Final Revised EIR.


In addition, the regulatory setting for traffic impacts has changed since publication of the Final Revised EIR in October 2019, requiring text amendments to the environmental document. Pursuant to Senate Bill 743, vehicle miles traveled (VMT) has replaced traffic delay as the primary metric for evaluating a project's impacts on the transportation system. Section 15064.3(a) in the *2020 California Environmental Quality Act (CEQA) Guidelines* implements this state law with respect to the environmental review process, stating that "a project's effect on automobile delay shall not constitute a significant environmental impact." Section 15064.3(c) adds that "beginning on July 1, 2020, the provisions of this section shall apply statewide." Subsequent to this date, the Landscape Plan's effect on traffic congestion can no longer be considered a significant environmental impact. This Errata still discusses the subject of traffic congestion, for informational purposes only.

The table following Figure ERR-1 details the above changes in the proposed Landscape Plan, supporting technical analysis, and regulations, and their effects on the Final Revised EIR.

**Figure ERR-1 Proposed Landscape Plan**



Source: Gates + Associates, 2020.

Not to Scale 

**Changes from Final Revised EIR and Environmental Effects**

Topic	Change from Final Revised EIR	Environmental Effects
Project elements	Instead of reconstructing the ballfield, the County would convert it into a multi-use field for baseball/softball, soccer, and lacrosse. A separate soccer/lacrosse field would be located at the south-central part of the park next to Bay Road, instead of near Del Norte Avenue.	Reduced noise exposure because of greater distance between the nearest residences and athletic activity.
	The originally proposed bocce ball court has been removed from the Landscape Plan.	Incremental reduction in vehicle trips.
	The gathering meadow has been renamed the amphitheater, and the shade/market structure has been renamed the preserved park administrative office.	No effect because the function of these facilities would remain the same.
Peak use projections	The County has revised peak use projections for the 2020 Landscape Plan, including corrections showing higher use of the picnic/reservation sites.	Higher peak parking demand, but the parking impact remains less than significant after mitigation.
Tree removal	The revised Tree Report estimates that the 2020 update to the Landscape Plan would result in removal of 72 trees (8 fewer).	Fewer trees are anticipated to be removed when compared to the 2019 Landscape Plan.
Vehicle entrance fee	The County has eliminated the entrance fee for vehicles entering Flood County Park.	Less off-site parking on residential streets and fewer traffic delays caused by queuing vehicles at the park entrance.
Transportation impacts	Vehicle miles traveled is now the primary metric for evaluating transportation impacts under CEQA, and traffic delay/level of service cannot be considered a significant environmental impact.	Effect on traffic delay would not be a significant environmental impact. Impact on vehicle miles traveled would remain less than significant.
	The memorandum prepared by W-Trans in September 2020 finds that the Landscape Plan would generate fewer weekday peak-hour vehicle trips but more Saturday peak-hour trips than estimated in the Final Revised EIR.	Higher trip generation during weekend peak hours; however, effect on traffic delay would not be a significant environmental impact. Effect on traffic noise would remain a significant and unavoidable impact.

As a result of these changes, the County has prepared this Errata document to update, clarify, and correct information in the Final Revised EIR. With this Errata, the County is rescinding and replacing the previous Errata published in October 2019. The changes analyzed in the new Errata do not introduce new or more severe adverse environmental effects and do not necessitate consideration of new feasible alternatives to the project or new mitigation measures beyond those considered in the Draft Revised EIR and Final Revised EIR. In fact, the change in regulatory setting would result in fewer adverse environmental impacts from implementation of the Landscape Plan: while the Final Revised EIR found a significant and unavoidable impact from greater traffic delay, the 2020 Landscape Plan would have no environmental impact related to traffic delay pursuant to *CEQA Guidelines* Section 15064.3. The impact on traffic noise along segments of Ringwood Avenue and Bay Road near Flood County Park would remain significant and unavoidable, as disclosed in the Final Revised EIR. The elimination of the entrance fee also renders unnecessary the Final Revised EIR’s Mitigation Measure T-1 (to alter parking fee collection practices), so this measure has been deleted. Therefore, the revisions herein do not contain significant new information pursuant to *CEQA Guidelines* Section 15088.5 that would deprive the public of a meaningful opportunity to comment

on environmental impacts. As a result, this Errata is not subject to the noticing and consultation requirements set forth in California Public Resources Code Section 21092.1 and *CEQA Guidelines* Section 15088.5.

## Changes to the Final Revised EIR Text

Revisions to the Final Revised EIR are shown below as excerpts from the EIR text. Underlined text represents language that has been added to the Final Revised EIR; text with ~~strikeout~~ formatting has been deleted from the Final Revised EIR.

Page 2 of the Final Revised EIR in Section 1.2, *Environmental Review Process*, is amended as follows:

The 45-day CEQA public comment period began on August 9, 2019, and ended on September 23, 2019. The County of San Mateo Parks Department presented the Draft Revised EIR's findings at the Fair Oaks Community Center in ~~Redwood City~~North Fair Oaks on September 17, 2019. The County received 16 comment letters on the Draft Revised EIR (not including comments received during the public meeting). Copies of all written comments received during the comment period and summaries of the oral comments received at the Fair Oaks Community Center meeting are included in Chapters 3 and 4 of this document.

On October 31, 2019, the County posted the Final Revised EIR and an Errata to the Final Revised EIR on the Reimagine Flood Park webpage. The October 2019 Errata was necessary to correct the Final Revised EIR's peak use projections for Flood County Park and the count of existing parking spaces, as well as to account for an additional 49 proposed parking spaces added to the Landscape Plan.

At its November 5, 2019, meeting, the County Board of Supervisors considered the Landscape Plan for approval and the Final Revised EIR and Errata for certification. The Board requested that the County reevaluate the location of the proposed recreational elements in response to public testimony.

In January 2020, the County prepared the revised Landscape Plan in collaboration with Gates + Associates. A new Errata to the Final Revised EIR was determined to be necessary to discuss the environmental effects of the revised Landscape Plan. The new Errata effectively rescinds and replaces the previous Errata prepared in October 2019.

Pages 6 and 7 of the Final Revised EIR in Section 3.1, *Topical Responses*, are amended as follows:

### **Topical Response A: Noise Impacts**

Recurring comments on this topic are summarized below, with responses following each.

- *The Draft EIR's estimates of noise generated by activities at the proposed soccer/lacrosse field are inaccurate.*

In the January 2020 update to the Landscape Plan, lacrosse and soccer would be accommodated at two athletic fields: (1) a multi-use field for baseball/softball, soccer, and lacrosse which would be located approximately 240 feet from residences at the Haven Family House on Van Buren Road and 300 feet from residences on Del Norte Avenue; and (2) a separate soccer/lacrosse field which would be located approximately 150 feet from residences on Bay Road and 350 feet from residences on Del Norte

Avenue. Based on these athletic fields' locations, lacrosse and soccer activity could occur as close as 150 feet from the nearest residences. All active recreational elements, including athletic fields and tennis courts, would be sited outside of a 100-foot buffer zone from the backyards of residences on Del Norte Avenue.

~~To verify the location of the proposed soccer/lacrosse field, the County has reviewed the amount of space needed for the reconstructed ballfield, existing hatches to the SFPUC's water pipelines, new asphalt paths, and the soccer/lacrosse field. Based on this review, the County has determined that the park has sufficient room to accommodate these features while siting the soccer/lacrosse field at least 100 feet from residential properties on Del Norte Avenue. Although precise construction plans have not been drafted at this stage of the Landscape Plan, the County would locate the soccer/lacrosse field at least 100 feet away from the edge of residential backyards. The exact distance of the soccer/lacrosse field from residential properties on Del Norte Avenue would be determined during the design phase. Draft EIR Section 4.8, *Noise*, estimates the exposure of residents to noise generated by soccer and lacrosse events based on this distance. Neighbors would usually be exposed to athletic noise within their residences, which are generally set back approximately 25 feet from the eastern boundary of Flood County Park. Please note, ~~the noise analysis is based on a conservative assumption that residents would be sensitive to noise not only in habitable rooms, but also in their backyards directly adjacent to the park. Therefore, the revised noise analysis~~ Draft EIR relies on appropriate distances in estimating noise levels from soccer and lacrosse activitythe soccer/lacrosse field.~~

Pages 92 to 94 of the Draft Revised EIR in Section 3.4, *Noise*, have been amended as follows based on the updated distances from athletic activity to residences:

#### *Phase I*

The operation of recreational facilities proposed in Phase I of the Landscape Plan would add new sources of noise at Flood County Park. Whereas the existing ballfields at the park are not currently open for programmed athletic use, the proposed multi-use field~~ballfield~~ and the separate soccer/lacrosse field would be available for organized athletic activities that would generate noise. Maintenance equipment such as leaf blowers also would generate noise at new locations in the park, depending on the siting of proposed tennis courts and asphalt paths. In addition, human activity at new passive recreational facilities would generate noise. These noise sources are analyzed below.

#### **ATHLETIC ACTIVITIES**

Organized practices and games at the proposed multi-use field~~ballfield~~ and soccer/lacrosse field would generate noise. Programmed athletic activities would occur throughout the year, although the County anticipates that they would generally be most frequent during the summer. ~~It is anticipated that organized activities at the athletic fields would typically occur no earlier than 9 A.M. and no later than 8 P.M.~~ No additional lighting that would enable nighttime use of athletic facilities is proposed as part of the Landscape Plan. The timing of athletic events would be constrained by the park's opening hours (8 A.M.) and closing hours (variable by season, but as late as 8 P.M. in September through Labor Day).

Specific noise sources associated with athletic practices and games include shouting and conversations by players, coaches, referees, and spectators, and whistles to control play. Other potential sources are air horns used by fans and sound amplification equipment to broadcast music or play-by-play commentary. Sound amplification equipment is only allowed at County parks with approval of a permit, pursuant to Section 3.68.030(b) of the County Code of Ordinances. (Radios and acoustic musical instruments are allowed at County parks without approval of a permit, as they are not defined as sound amplification equipment.) These noise sources would be intermittent during athletic events, adding to background ambient noise from passive recreational use of the park, nearby traffic, aircraft overflights, and residential activities.

Noise from the proposed soccer/lacrosse field would occur as close as approximately 150 feet from the front yards of residences on Bay Road to the southwest, 350-400 feet from the backyards of single-family residences on Del Norte Avenue to the southeast, and 475 feet from the backyards of residences on Hedge Road to the northwest. It is assumed that ~~these~~this distances ~~are~~is representative of the nearest activity on the proposed field with respect to these residences, as well as of spectators lining the ~~edges~~southeastern side of the field. Soccer and lacrosse activity at the multi-use field would generate noise as close as approximately 175 feet from residences on Hedge Road to the northwest, 240 feet from residents at Haven Family House on Van Buren Road to the northeast, and 300 feet from residences on Del Norte Avenue to the southeast. In addition, baseball and softball athletic activity at the reconstructed ballfield would generate noise as close as approximately 150 feet from residents at Haven Family House on Van Buren Road to the northeast, 175 feet from residences on Hedge Road to the northwest, and 330 feet from residences on Del Norte Avenue to the southeast.

The primary athletic ~~activities~~facility of concern with regard to noise ~~are soccer and lacrosse~~is the proposed soccer/lacrosse field, due to ~~their~~its proximity to residences and the prevalence of loud impulse sounds such as whistles, shouts, and air horns. Based on noise measurements taken in 2016 at a playoff lacrosse game with 162 spectators at a representative suburban Bay Area site, Marin Catholic High School, a lacrosse game generates overall noise levels of 65-70 dBA  $L_{eq}$  at approximately 50 feet from the edge of the field~~the edge of the stadium~~ while a lacrosse practice creates noise levels of 55-60 dBA  $L_{eq}$  at this distance (RGD Acoustics 2016). ~~These noise measurements were taken at a distance of approximately 50 feet from the edge of the lacrosse field.~~ Noise levels from the lacrosse playoff game are also considered representative of noise levels from soccer games (RGD Acoustics 2016). These noise levels provide a conservative estimate of lacrosse and soccer noise because they reflect substantially more spectator activity than anticipated at athletic events at Flood County Park. Based on a noise attenuation of 6 dBA per doubling distance noise levels from athletic activity, it is estimated that lacrosse or soccer activity during games with spectators on the multi-use field at Flood County Park would generate noise levels of up to 59 dBA  $L_{eq}$  at residences located 175 feet away on Hedge Road, 56 dBA  $L_{eq}$  at residences located 240 feet away on Van Buren Road, and 54 dBA  $L_{eq}$  at residences located 300 feet away on Del Norte Avenue~~64 dBA  $L_{eq}$  during games and up to 54 dBA  $L_{eq}$  during practices, as perceived at residences located 100 feet away on Del Norte Avenue.~~ Noise levels measured from



~~the lacrosse playoff game are also considered representative of noise from soccer games. It is estimated that lacrosse or soccer activity on the proposed soccer/lacrosse field would generate noise levels of up to 61 dBA  $L_{eq}$  at residences located 150 feet away on Bay Road, 53 dBA  $L_{eq}$  at residences located 350 feet away on Del Norte Avenue, and 50 dBA  $L_{eq}$  at residences located 475 feet away on Hedge Road.~~

Average sound energy levels during a lacrosse ~~and~~ soccer games at either athletic field may exceed existing ambient noise levels in the vicinity of Flood County Park. As shown in Table 18, ambient noise was measured at approximately 55-56 dBA  $L_{eq}$  on a Saturday afternoon at the southeastern edge of the park, ~~while~~ next to residential backyards, ~~and~~ at approximately 56 dBA  $L_{eq}$  on Del Norte Avenue on a weekday late afternoon, and at approximately 61 dBA  $L_{eq}$  on Bay Road on a Saturday ~~afternoon. At residences on Bay Road, a~~Anticipated noise levels of up to ~~61-59-64~~ 64 dBA  $L_{eq}$  during lacrosse and soccer games would not exceed existing ambient noise levels which were also measured at 61 dBA  $L_{eq}$  during midday weekend hours. ~~by an estimated 3 to 8 dBA  $L_{eq}$ . At residences on Del Norte Avenue, expected noise levels of up to 54 dBA  $L_{eq}$  also would not exceed existing ambient noise levels measured at 55-56 dBA  $L_{eq}$ . It is assumed that existing ambient noise levels along Hedge Road are similar to measured levels along Del Norte Avenue, as both roadways are residential side streets. Estimated noise levels of 59 dBA  $L_{eq}$  at residences on Hedge Road would exceed existing measured ambient noise levels of 55-56 dBA  $L_{eq}$  by up to 4 dBA  $L_{eq}$ . Therefore, projected noise levels averaged over the course of individual soccer and lacrosse games and practices would exceed existing ambient noise levels near Hedge Road but not near Bay Road or Del Norte Avenue. These short term increases in ambient noise would be perceptible to residents adjacent to the park.~~

In addition to events at the ~~separate~~ soccer/lacrosse field, ~~baseball or softball~~athletic games and practices at the ~~multi-use field~~reconstructed ballfield would generate noise. Based on noise measurements taken at a school in Sherman Oaks, California, softball games generate an average noise level of 72 dBA  $L_{eq}$  at a distance of 20 feet from the center of activities (Arup 2006). As noted above, the ballfield would be located approximately 330 feet from residences on Del Norte Avenue. At this distance, assuming that noise from athletic activity attenuates by 6 dBA per doubling of distance from the source, it is estimated that softball activity at Flood County Park would generate an average noise level of 48 dBA  $L_{eq}$  ~~for residences on Del Norte Avenue.~~ At the Haven Family House located approximately 150 feet from the ballfield, it is estimated that average noise from softball events would reach 55 dBA  $L_{eq}$ . These estimated noise levels from ballfield activity would not exceed the existing measured ambient noise levels of 55-56 dBA  $L_{eq}$  on a Saturday afternoon at the southeastern edge of the park. Therefore, noise from ballfield activity, in itself, would not substantially affect ambient noise levels experienced by residents.

This analysis makes the conservative assumption that athletic events generating noise at the ~~multi-use field~~ballfield and the ~~separate~~ soccer/lacrosse field could take place concurrently. Under this scenario, the nearest residences on Del Norte Avenue would be exposed to estimated average noise levels of up to ~~57-64~~ 64 dBA  $L_{eq}$  from simultaneous soccer and lacrosse games on each field, ~~and 48 dBA  $L_{eq}$  from softball~~

games. The nearest residences on Hedge Road also would be exposed to combined noise levels of up to 60 dBA  $L_{eq}$ .

Softball events at the ballfield would not substantially add to noise levels from simultaneous soccer/lacrosse activity. The combined average noise level from both types of events would be approximately 64 dBA  $L_{eq}$ . This is because the softball game noise levels would be 16 dBA lower than the soccer/lacrosse game and thus would not perceptibly increase average ambient noise relative to soccer/lacrosse noise. However, combined noise levels from two soccer games, or from a soccer and lacrosse game, would exceed existing ambient noise levels next to residential streets by up to 48 dBA  $L_{eq}$ . For reference, it is widely accepted that the average healthy ear can barely perceive an increase of up to 3 dBA  $L_{eq}$  in noise levels and that an increase of 5 dBA  $L_{eq}$  is readily perceptible.

In addition to increasing average noise levels, athletic activity would generate short-term spikes in noise, such as impulse noise, that may annoy or disturb residents. Impulse noise is a sudden burst of loud noise that can startle people by its fast and surprising nature (Cirrus Research 2015). Sources of impulse noise may include shouting, whistles, and air horns. Whistles could be especially intrusive because of their shrill pitch. Spectators could use portable air horns that produce loud blasts of sound. Sound amplification equipment also could broadcast commentary or music at high volume. However, Section 3.68.130(b) of the County's noise ordinance prohibits the use of sound amplification equipment in any County Park, except if allowed under a special event permit issued by the County of San Mateo Parks Department to regulate park events. The Parks Department generally does not allow the use of sound amplification equipment even with procurement of a special event permit. This restriction would limit the exposure of residents to noise from sound amplification.

Although Section 4.88.360(c) of the County Code of Ordinances would exempt activities at Flood County Park from quantitative noise standards, the County has determined that the qualitative standard in Section 4.88.350 of disturbing the peace and quiet of neighbors would still apply to the Landscape Plan. ~~The anticipated~~ timing of athletic events – no earlier than 8 A.M. between 9 A.M. and no later than 8 P.M. – would minimize disturbance to neighbors by avoiding normal sleeping hours. Perceptible athletic noise also would not necessarily disturb the peace and quiet of the surrounding neighborhood, as defined by the criteria in Section 4.88.350 of the County Code of Ordinances. The City of Menlo Park manages athletic fields located within 100 feet of nearby residences and has received few if any complaints regarding programmed athletic activities from residents since 2010 (Keith 2017). The County also would restrict the use of sound amplification equipment by athletic teams through individual agreements with teams that use the new fields. However, the use of whistles, air horns, and sound amplification equipment could result in an audible, albeit temporary, increase in ambient noise levels in the area. Furthermore, without explicit allowable hours for athletic events, early-morning and late-evening events could disturb the peace and quiet of neighbors.

For informational purposes only, this section also analyzes the impact of noise from new athletic facilities based on standards in the City of Menlo Park's noise ordinance (Section 8.06 of the Menlo Park Municipal Code). As discussed in Section



1.5, *Standards of Review*, the County has discretion as to which standards to apply to the project when reviewing its environmental impacts, and it has decided to apply the County's noise standards to the project. Nonetheless, the City's noise ordinance has an exemption for parks that is similar to that set forth in Section 4.88.360(c) of the County Code of Ordinances. Section 8.06.050(g) of the Menlo Park Municipal Code exempts from its noise standards organized athletic events or activities at parks that are owned or operated by the County, with the exception of amplified music or sound systems. Based on this provision, the use of sound amplification equipment could still disturb the peace and quiet of neighbors.

Page 8 through 13 of the Final Revised EIR in Section 3.1, *Topical Responses*, are amended as follows:

### Topical Response B: Transportation Impacts

Recurring comments on this topic are summarized below, with responses following each.

- *The Draft EIR's analysis of parking demand generated by the Landscape Plan is inadequate because it relies on inappropriate data and does not account for peak use of the park.*

A second parking count was completed at Flood Park on October 2, 2019, to confirm the total number of parking spaces currently available at Flood Park. The revised count identified a total of 320 existing parking spaces at Flood Park. As discussed in the revised parking analysis, prepared by W-Trans in September 2020 (Appendix ERR-2), on page 120 of the Draft Revised EIR the anticipated maximum parking demand during peak summer days under the Landscape Plan is 380 parking spaces. Therefore, there would be a deficiency of up to 60 parking spaces. However, to account for the deficiency in parking spaces, to the extent feasible given available space at Flood County Park, the Landscape Plan has been revised to include additional 49 parking spaces at Flood Park. With the additional 49 parking spaces there would be a total of 369 parking spaces at Flood Park, which would be 11 spaces less than the peak parking demand by 25 parking spaces. However, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park. The Final Revised EIR has been updated to include the following:

Page 31 of the Final Draft Revised EIR is amended as follows:

#### 2.4.2 Site Access

The Landscape Plan would not involve changes to parking and access, except for a new drop-off area on-site. Flood County Park's existing vehicular access from Bay Road, via the entrance gate at the southwest corner of the park, would be retained, as would the existing asphalt parking lot on the western edge of the site.

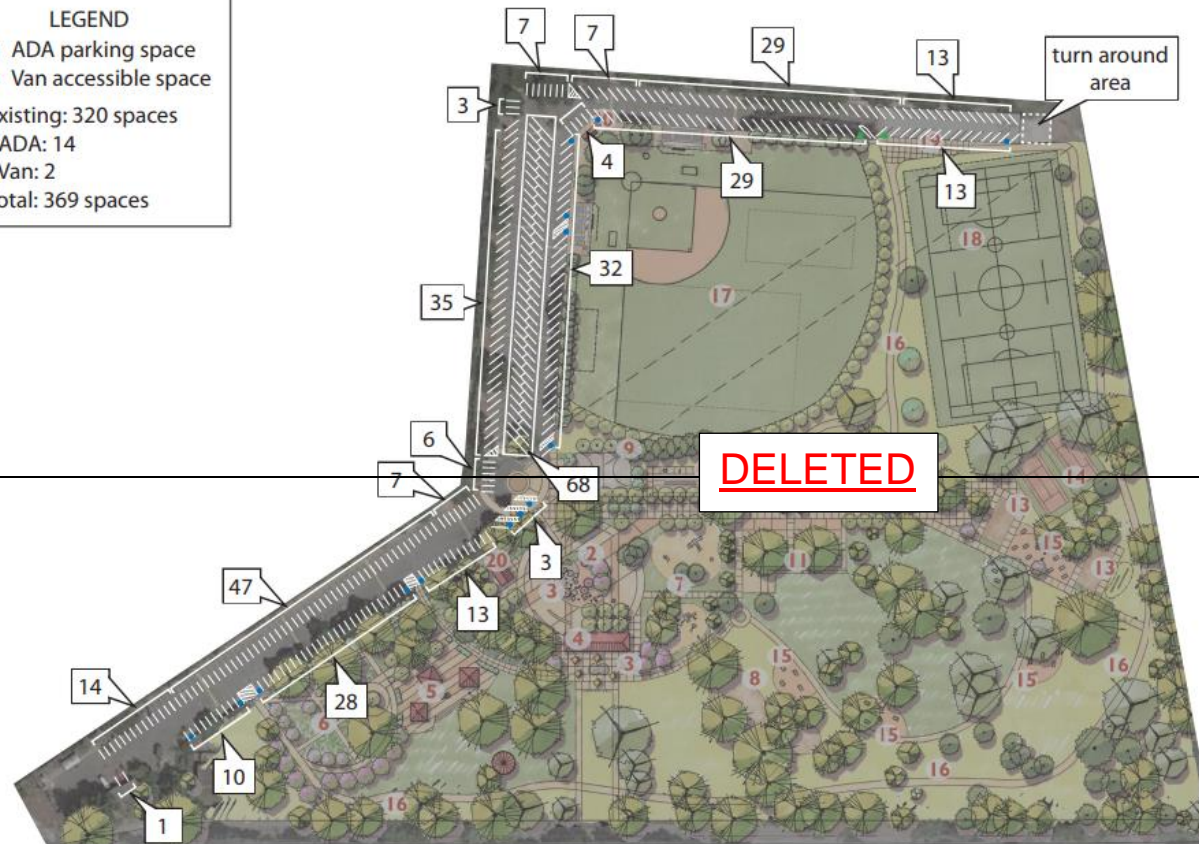
Pedestrians also would retain access to the park through entrances gaps along Bay Road and at the eastern gate from Iris Lane. An additional 26 parking spaces and a turnaround area would be added to the site of the existing pétanque court, as shown in Figure 4 and Figure 5, Proposed Parking Map. Twenty-three (23) new parking stall locations have been identified throughout the site in existing paved areas and include the following: one parking stall near the existing pay station; two

parking stalls in the island near the eastward turn near the ballfield; one stall in the island behind the ranger residence; one stall in the island on the south side of the eastward turn; seven stalls in the approximately 60 foot space and four stalls in the approximately 36 foot space before the pétanque court; and seven stalls by converting ADA van parking stalls to ADA car parking stalls. Therefore, an additional 23 stalls striped outside of the pétanque court and 26 stalls striped within the pétanque court would add a total of 49 new parking spaces at Flood Park. Please see Figure 5 for a layout of all 369 parking spaces. With the additional 49 parking spaces the Park would provide a total of 369 parking spaces.

Page 28 of the ~~Draft~~ Final Revised EIR in Section 3.1, *Topical Responses*, is amended as follows:

Figure 5 Proposed Parking Map

LEGEND  
● ADA parking space  
● Van accessible space  
Existing: 320 spaces  
- ADA: 14  
- Van: 2  
Total: 369 spaces



Source: Gates + Associates, 2019

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Flood Park Traffic Impact Study  
Proposed Parking Map



Pages 120 to 122 and 121 of the Draft Final Revised EIR are amended as follows:

*Phases I, II, and III*

During a count on October 2, 2019, The Traffic Impact Study prepared for the Revised EIR identifies 320~~375~~ existing parking spaces were identified at Flood County Park, ~~based on an November 2016 count.~~ This amount ~~excludes a northeastern portion of the on-site parking lot behind the ballfield, which was paved and striped for parking spaces at the time of the survey, but temporarily enclosed with chain-link fencing and covered by storage materials. This area is currently available for visitor parking. Based on site photos taken in August 2016 and Google Earth aerial imagery, the formerly closed portion of the parking lot includes approximately 20 parking spaces. Therefore, in practice Flood County Park has roughly 395 parking spaces. This analysis of parking availability is conservative in assuming an on-site parking supply of only 375 spaces.~~

Maximum parking demand during peak summer days under the Landscape Plan was estimated using the peak visitor~~maximum anticipated visitor~~ projections provided by Gates + Associates in August 2020~~April 2019~~. The peak user capacity of the park (as shown in Table 6), the expected proportion of multi-modal trips, and the assumed vehicle occupancy by amenity was used to derive the maximum parking demand for each recreational element of the Landscape Plan. The assumption is that all activities and facilities would be utilized concurrently at the same time, resulting in the maximum parking demand on the weekend. For a conservative analysis, no deductions were taken for motorists that would drop off and pick up park visitors at the proposed drop-off area. In practice, pick-up and drop-off activity may occur on a daily basis for athletic events in the summer.

Multi-modal trips by pedestrians, bicyclists, and transit users were deducted from the estimated maximum parking demand. The proportion of multi-modal trips was estimated based on counts of vehicles, pedestrians, and bicyclists entering Flood County Park taken on November 19, 2016. Between 12 p.m. and 6 p.m., 16 cars, 27 pedestrians, and 8 bicyclists accessed the park from various entry points. This data indicates that a substantial proportion of visitors access Flood County Park by multi-modal means. Conservatively, it was assumed that only 5 percent of visitors would access the park without using motor vehicles and would not contribute to parking demand.

For visitors who arrive by motor vehicle, the average number of people per vehicle was estimated based on W-Trans' and the County's experience with park visitors. The following table shows vehicle occupancy rates assumed in the analysis of parking demand.

**Vehicle Occupancy Rates in Parking Demand Analysis**

<u>Recreational Element</u>	<u>People Per Vehicle</u>
<u>Preserved Adobe Administrative Office</u>	<u>2.5</u>
<u>Play Area Universal (2-5)</u>	<u>2.5</u>
<u>Play Area Universal (5-12)</u>	<u>2.5</u>
<u>Adventure Play</u>	<u>0</u>
<u>Event / Group Picnic Area</u>	<u>2.5</u>
<u>Small Group Picnic</u>	<u>2.5</u>
<u>Tennis Courts (set of 2)</u>	<u>2.0</u>
<u>Basketball</u>	<u>1.2</u>
<u>Sand Volleyball</u>	<u>1.2</u>
<u>Pump Track</u>	<u>0</u>
<u>Synthetic Ballfield/Concession/Press Box</u>	<u>3.0</u>
<u>Synthetic Soccer/Lacrosse</u>	<u>3.0</u>
<u>Demonstration Garden</u>	<u>0</u>

Source: W-Trans 2020 (Appendix ERR-2)

It was assumed that the adventure play area and demonstration garden would be auxiliary elements that are used by people already at the park. As a result, this analysis assumes that they would not generate additional parking demand. This analysis also assumes that the pump track would not add to parking demand; because this recreational element would cater to bicyclists, visitors would arrive by bicycle.

Based on this data, the anticipated typical peak parking demand for the proposed project is 380 parking spaces. For a conservative analysis, no deductions to parking demand were taken for motorists that would drop off and pick up visitors rather than park in the on-site lot. In practice, pick up and drop off activity may occur on a daily basis for athletic events in the summer. Additionally, no deductions were taken for alternative modes, although the site is generally accessible by walking and bicycling. The estimated peak demand of 380 parking spaces would not exceed the existing on-site parking supply of 320 at least 375 spaces. However, the project would add an additional 49 parking spaces at the park. A total of 23 stalls would be added in already paved areas where there is space for additional parking and 26 stalls and a turnaround would be added to the site of the existing pétanque court. Following the proposed parking improvements, Flood County Park would have a total of 369 parking spaces.

Although the estimated peak parking demand of 380 spaces would exceed the proposed supply of 369 parking stalls by 11 spaces, therefore, it is anticipated that the existing parking supply would typically be adequate to accommodate peak parking demand under the Landscape Plan, even during busy summer days. In addition, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park. Furthermore, in 2020 the County eliminated its entrance fee for vehicles parking at

Flood County Park. The allowance of free parking could reduce the incentive for visitors to seek free parking on residential streets. Free access to the proposed drop-off area also would minimize pick-up and drop-off activity near the Iris Lane gate to the park.

However, it should be noted the parking demand could still potentially exceed the capacity during very large scheduled events, leading to spillover parking on nearby residential streets. Despite the adequate supply of parking spaces on-site new vehicle trips generated by the Landscape Plan could increase the number of visitors to Flood County Park who park on nearby residential streets. Under existing conditions, some visitors park on local streets like Del Norte Avenue rather than pay for on-site parking, including during the permit parking season on these streets. This existing condition could continue under implementation of the Landscape Plan, resulting in reduced parking capacity for residents on local streets.

~~The County would encourage on-site parking under the Landscape Plan by allowing participants in programmed active recreational activities to be dropped off and picked up inside the park without paying an entrance fee. This practice would minimize pick-up and drop-off activity near the Iris Lane gate to Flood County Park. However, off-site parking could still increase, resulting in a reduced parking capacity for residents on local streets.~~

## **Mitigation Measures**

~~Mitigation Measure T-1 to implement parking fee collection practices, such as automated fee machines and paying upon exiting the park, would facilitate on-site parking and could reduce the incentive for off-site parking. In addition, Mitigation Measure T-6 would require education of park visitors about on-street parking restrictions and coordination with the City of Menlo Park on enforcement of parking violations.~~

### **MM T-6 Parking Education and Enforcement**

The County shall inform park visitors of on-street parking restrictions on nearby residential streets and shall post this information in a clearly visible location on-site. The County also shall coordinate with the City of Menlo Park to reduce parking in the adjacent neighborhoods, including proactive communication when peak use of Flood County Park is anticipated (i.e., on weekday evenings and on weekend days when all picnic areas are reserved and all athletic fields are scheduled for concurrent use) and encouraging increased targeted enforcement of on-street parking restrictions.

## **Significance After Mitigation**

~~With implementation of Mitigation Measure T-6 mitigation measures to facilitate on-site parking and discourage on-street parking, the Landscape Plan would have a less than significant impact related to parking capacity.~~

As discussed in the above revisions, the estimated maximum peak parking demand during summer days has been revised using the visitor projections provided by Gates + Associates in August 2020 (shown in Table 6), expected proportion of multi-modal trips, and the assumed vehicle occupancy by amenity. Maximum parking demand during peak

summer days was estimated using the maximum anticipated visitor projections provided by Gates + Associates in April 2019. The user capacity of the park and the assumed vehicle occupancy by amenity was used to derive the maximum parking demand for each recreational element of the Landscape Plan. The assumption is that all park facilities would be utilized at the same time, resulting in the maximum parking demand on the weekend.

Other data sources cited by commenters, such as historical visitor data recorded in the 1983 Master Plan and on-site parking counts, could alternatively be used as a basis for estimating parking demand. However, visitor statistics in the 1983 Master Plan are approximately 35 years old and outdated for the purpose of establishing baseline environmental conditions in the EIR. Parking counts of occupied spaces within Flood County Park were not taken for the Landscape Plan. However, during an October 2019 count it was determined that there is a total of 320 parking spaces at Flood County Park. As discussed above, user capacity is appropriate to determine parking demand for the proposed project.

The anticipated typical peak parking demand for the proposed project is ~~380~~344 parking spaces. The project would add an additional 49 parking spaces at the park for a new total of 369 parking spaces. The projected peak parking demand would exceed the supply by an estimated 11 parking spaces. Available parking would exceed the projected demand of 344 parking spaces by 25 parking spaces. Therefore, it is anticipated that the on-site parking lot would have sufficient capacity to accommodate parking demand except on rare occasions, such as very large scheduled events. In addition, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park. Mitigation Measure T-6 also would inform park visitors of on-street parking restrictions, require the County to coordinate with the City of Menlo Park to reduce parking in adjacent neighborhoods, and encourage targeted enforcement of on-street parking.

Page 13 of the Final Revised EIR in Section 3.1, *Topical Responses*, is amended as follows:

- *The Landscape Plan would result in increased parking violations on residential streets near Flood County Park and pick-up and drop-off activity at the Iris Lane gate, as visitors seek to avoid paying a parking fee at the gatehouse.*

As discussed under Impact T-6 in the Draft Revised EIR Section 3.5, *Transportation and Circulation*, new vehicle trips generated by the Landscape Plan could increase the number of park visitors who use on-street parking. Currently, some visitors park on residential streets to avoid paying an entrance fee ~~at the~~ Flood County Park. However, the County eliminated this entrance fee in 2020. As a result, visitors under the Landscape Plan would have free access to the on-site parking lot, removing the previous incentive for visitors to park on residential streets in an effort to avoid paying the entrance fee. This effectively removes the need for Mitigation Measure T-1 from the Draft Revised EIR, which would have required implementation of new collection practices for parking fees to streamline access to the parking lot. Therefore, Mitigation Measure T-1 has been deleted.

This behavior could increase as the proposed recreational improvements attract new visitors to the park. Furthermore, the proposed ballfield/soccer/lacrosse field would be



~~located much closer to the park's Iris Lane gate than to the main gatehouse on Bay Road, potentially leading motorists to drop-off and pick-up athletic participants on Iris Lane for convenience. However~~ Furthermore, the proposed drop-off area County would encourage on-site parking under the Landscape Plan by allowing participants in programmed active recreational activities to be dropped off and picked up inside the park without paying an entrance fee. This practice would minimize pick-up and drop-off activity near the Iris Lane gate to Flood County Park. In addition, the extension of the parking lot into the pétanque court would allow for an increase in the supply of parking spaces.

Mitigation Measure T-6 would further reduce the incentive to park on residential streets by requiring the County to educate park visitors about on-street parking restrictions and to coordinate with the City of Menlo Park to reduce parking in adjacent neighborhoods and encourage on-street parking enforcement.

~~In addition, Mitigation Measure T-1 would facilitate parking on-site. This measure would require implementation of new collection practices for parking fees such as automated fee machines, paying upon exiting the park, or a combination of both practices. These mitigation measures would be expected to reduce to less than significant the parking impacts from pick-up and drop-off behavior near the Iris Lane and parking violations on residential streets. Further measures to encourage on-site parking, such as general fee waivers, would be unnecessary to avoid significant parking impacts.~~

Pages 13 and 14 of the Final Revised EIR in Section 3.1, *Topical Responses*, are amended as follows:

- *New vehicle trips would exacerbate existing traffic congestion during peak hours, especially due to simultaneous events at the park.*

As of July 1, 2020, pursuant to CEQA Guidelines Section 15064.3, a project can no longer be deemed to have a significant environmental impact based on traffic congestion levels. Throughout California, vehicle miles traveled has replaced traffic delay as the primary metric for analyzing a project's impact on the transportation system.

Nonetheless, this analysis addresses the Landscape Plan's effect on traffic congestion for informational purposes. W-Trans prepared a memorandum in September 2020 to weigh the effects of a revised Landscape Plan and updated peak use estimates on vehicle trips to and from the park (Appendix ERR-2). The memorandum assumes that 5 percent of visitors would use multi-modal transportation. It also updates assumptions in the Draft Revised EIR about the average number of people per vehicle based on W-Trans' and the County's experience with park visitors.

W-Trans estimates that phases 1 through 3 of the Landscape Plan would generate 216 trips during weekday P.M. peak hours, which is less than the 318 new trips assumed in the Draft Revised EIR. It is also estimated that phases 1 through 3 of the Landscape would generate 920 trips during Saturday peak hours. This level of weekend trip generation would be approximately 17 percent greater than assumed in the Draft Revised EIR, which estimated 784 trips during Saturday peak hours. The revised trip generation estimates still represent ~~As discussed above, the revised Traffic Impact Study analyzes~~ a conservative scenario of vehicle trips generated by concurrent use of multiple features at Flood County Park.

The updated trip generation analysis does not alter the Draft Revised EIR's finding that ~~Based on this traffic analysis,~~ new vehicle trips associated with active and passive

recreational use would increase traffic congestion at the Bay Road/Ringwood Avenue intersection to unacceptable levels according to City of Menlo Park criteria. ~~Draft Revised EIR Section 3.5, *Transportation and Circulation*, states that the Landscape Plan would have a significant and unavoidable impact on traffic conditions at this intersection under the Existing plus Project, Near Term 2021 plus Project, and Cumulative 2040 plus Project scenarios, and requires a Statement of Overriding Considerations. However, as discussed above, the Landscape Plan cannot have a significant environmental impact on traffic delay under new State regulations. Consistent with the Draft Revised EIR's analysis, the Landscape Plan would have a less than significant impact related to vehicle miles traveled. In addition, the Draft Revised EIR projects the Landscape Plan's effect on traffic congestion at the Bay Road/Marsh Road and Bay Road/Willow Road intersections. The project would have a less than significant impact at these other intersections.~~

Page 14 of the Final Revised EIR is amended as follows:

### **Topical Response C: Park Visitor Projections**

Recurring comments on this topic are summarized below, with responses following each.

- *The Draft Revised EIR's park visitor projections are incorrect because they do not use appropriate background information and assumptions.*

In response to this comment, the County reassessed the Draft Revised EIR's estimated peak visitor demand. The updated park visitor assumptions are were based on facility capacity, staff observations including existing use patterns, and observations of similar types of facilities in the nearby cities of Belmont, Redwood City, and San Mateo. Information regarding use of the picnic areas was obtained by using two years of reservation data from Flood County Park because the number of existing reservation sites and picnic tables would remain unchanged under the Landscape Plan. In estimating the number of users for an amenity the projections counted visitors who come to the park primarily for that specific amenity. To avoid double counting visits were only counted toward the primary activity of park users. ~~As discussed in the Draft Revised EIR the estimates of potential seasonal capacity were based on existing parks with similar features in the nearby cities of Belmont, Redwood City, and San Mateo.~~ Background data collected ~~from~~ for other existing parks included the type of athletic events, their seasonal and daily timing, peak use hours, and the number of events per day. The estimates of total use during each phase of the Landscape Plan are intended to be conservative, assuming concurrent use of ~~all~~ multiple park features on weekends.

The estimated daily capacity show in Table 6 on page 29 if the Draft Revised EIR refers to the number of visitors who would use an amenity over the course of a day. The estimated peak capacity refers to the maximum number of visitors who could use a would be using an existing facility at the same time. ~~This and~~ would not occur every day. Regular daily use over the course of a year would be considerably less than the estimated total use in Table 6. However, estimated peak use was used for the analysis in the Draft Revised EIR to provide a conservative analysis of impacts, particularly impacts related to transportation and noise.

It should be noted that the Draft Revised EIR's updated projections for visitor assumptions are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this ~~Errata~~ Response to Comments document. The County acknowledges that

some commenters disagree with some assumptions for the park use projections. As stated in the CEQA Guidelines (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts; this is done in this Response to Comments below.

Pages 14 and 15 of the Final Revised EIR are amended as follows:

- *The Draft Revised EIR's park visitor assumptions do not account for weekday uses of several amenities in the park including volleyball and the shade structures.*

In the January 2020 update to the Landscape Plan, the proposed shade/market structure has been renamed the preserved park administrative office, and this facility would serve the same functions as assumed in the Draft Revised EIR. The park visitor assumptions do not account for use of the preserved park administrative offices shade structures on weekdays because it is assumed that this building would accommodate special events only on weekends, such as farmers markets and art shows the analysis assumed events would only occur on weekends. Visitors using the preserved park administrative offices shade structures during the weekday would not be using ~~it~~ the shade structure as their primary amenity and are therefore accounted for in the visitor numbers for other park amenities.

The revised peak use projections assumed it was assumed that the volleyball courts would be used weekdays by regular after-work players and the Red Rock League. Daily use was assumed to include 12 players on the two proposed courts and 12 spectators, with two cycles of use, for a total of 48 visitors. Usage assumptions included six players on the two proposed courts plus 12 spectators for each court for a total of 24 visitors. Peak use assumed potential overlap of volleyball games and a 48-visitor total. Table 6 on page 29 of the Draft Revised EIR has been updated accordingly, as shown below.

Pages 15 and 16 of the Final Revised EIR are amended as follows:

- *The Draft Revised EIR's park visitor assumptions for the picnic areas do not account for full use of the picnic tables and underestimate usage.*

In response to this comment, the County reassessed the Draft Revised EIR's estimates of visitors at the reservation sites and picnic areas. The existing number of existing picnic tables at Flood County Park would remain unchanged following implementation of the Landscape Plan. The park includes ~~seven~~ eight small group reservable picnic areas that vary in size and 20 drop-in sites with bar-b-ques. The Draft Revised EIR ~~it was assumed that each small group area would accommodate 15 people on average and the large group picnic area accommodates 200 people.~~ To update this assumption, the County has reviewed and compiled reservation data from 2018 and 2019, identifying accurate occupancy rates at the reservation sites as shown in the table below.

### **Reservation Data at Picnic Areas**

<b><u>Picnic Area</u></b>	<b><u>Capacity</u></b>	<b><u>Average Occupancy Rate</u></b>	<b><u>Average Visitors per Day</u></b>
<b><u>Small Group Picnic Areas</u></b>			
<u>Bay</u>	<u>75</u>	<u>88%</u>	<u>66</u>
<u>Fir</u>	<u>50</u>	<u>89%</u>	<u>44</u>
<u>Madrone</u>	<u>100</u>	<u>82%</u>	<u>82</u>
<u>Manzanita</u>	<u>40</u>	<u>93%</u>	<u>37</u>
<u>Maple</u>	<u>100</u>	<u>80%</u>	<u>80</u>
<u>Pine</u>	<u>150</u>	<u>82%</u>	<u>122</u>
<u>Redwood</u>	<u>50</u>	<u>90%</u>	<u>45</u>
<b><u>Large Group Picnic Areas</u></b>			
<u>Oak</u>	<u>200</u>	<u>82%</u>	<u>164</u>
<u>Source: San Mateo County 2020</u>			

Based on recent use patterns, the County estimates that the seven small group reservation areas at the park hold an estimated 476 people during peak use periods in the summer.

At the large group picnic area, the Draft Revised EIR assumed that the maximum capacity is 200 people. In 2018 and 2019, this area was typically at 82 percent capacity, accommodating an average of 164 people. Therefore, the Draft Revised EIR's estimate of peak use of the large group picnic areas has been revised from 200 to 164 visitors.

Use of the 20 drop-in picnic sites is typically auxiliary to another activity on both weekends and weekdays. However, based on staff observations some of the use occurs as the primary activity. Consequently, drop-in picnic use has been added to the potential cumulative total visitor count. Gates + Associates assumed 20 percent of the drop-in picnic sites may be used as a primary activity. Therefore, it was assumed there would be 6 people per site in 4 areas for a potential 24 drop-in picnic visitors. An additional 24 visitors have been added to the weekday and weekend park visitor projections as shown in Table 6 below.

As discussed above under Topical Response B: Transportation Impacts, additional visitors to and from Flood County Park would not have a significant environmental impact related to traffic delay. As of July 1, 2020, pursuant to CEQA Guidelines Section 15064.3, a project can no longer have a significant environmental impact on traffic congestion. A two percent increase is a nominal increase that would result in insignificant environmental impacts. Although additional vehicle trips from the weekend volleyball activity, additional tennis court use, and drop-in picnic trips from increased visitor projections are not accounted for in the project trip generation summary, the summary provides a highly conservative estimate of park use assuming concurrent use of multiple park features. Regarding the added volleyball trips on weekdays, weekend trips are more than double weekday trip estimates and therefore assume the worst-case traffic scenario at the park. Adding additional volleyball visitors would not significantly alter the traffic assumptions and projections. The additional drop-in picnic visitors and increased use of tennis facilities would result in a less than two percent increase in visitors at the Flood Park during weekends as compared to what was

analyzed in the Draft Revised EIR. For picnic use W-trans assumed that 25 percent of users would arrive or departed during the weekend peak hour. This would result in an additional 10 persons during the weekend peak hour, or about 3 to 4 vehicles. This increase is within the normal variation in traffic, which can be ten percent, which would be expected on any given day. Therefore, the additions to the Landscape Plan visitor projections would not significantly impact project traffic patterns and the traffic study has not been updated with the revised Landscape Plan visitor projections. Further, the park has an excess of 25 parking stalls, which will accommodate the 3 to 4 vehicles.

**Table 6 Projected Peak Use of Flood County Park under Landscape Plan**

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily Capacity	Peak Capacity	Daily Capacity	Peak Capacity		
<u>Preserved park administrative office</u> <u>Shade/market structure</u>	200	75	N/A	N/A	<del>event/day</del>	N/A
Play area universal (2-5)	<del>45</del> <u>60</u>	<del>15</del> <u>20</u>	30	<del>10</del> <u>15</u>	4 cycles/day	2 cycles/day
Play area universal (5-12)	<del>85</del> <u>120</u>	<del>30</del> <u>40</u>	60	<del>20</del> <u>30</u>	4 cycles, 1 parent/2 kids	4 cycles, 1 parent/2 kids
<del>Adventure play</del>	<del>70</del>	<del>35</del>	40	<del>20</del>	<del>2 cycles/day</del>	<del>2 cycles/day</del>
<del>Event/Large group reservation area</del>	<del>164</del> <u>200</u>	<del>164</del> <u>200</u>	N/A	N/A	<del>82% occupancy rate</del> <u>1 event</u>	N/A
Small group picnic	<del>476</del> <u>120</u>	<del>476</del> <u>120</u>	N/A	N/A	<del>78 areas, 15 people/area,</del> <u>1 cycle/day</u>	N/A
<u>Drop-in picnic area</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>20% primary use, 6 people per site at 4 picnic areas</u>	<u>20% primary use, 6 people per site at 4 picnic areas</u>
Tennis courts	<del>64</del> <u>48</u>	16	32	16	<del>2 courts, 8 playing, 8 waiting, 4 cycles/day</del> <u>10 playing, 10 waiting, 3 cycles/day</u>	<del>2 courts, 8 playing, 8 waiting, 2 cycles/day</del> <u>10 playing, 10 waiting, 1 cycle/day</u>
Basketball	60	20	10	10	<del>10 playing, 10 waiting, 3 cycles/day</del> <u>2 courts, 6 playing, 1 cycle/day</u>	<del>10 playing, 10 waiting, 1 cycle/day</del> <u>N/A</u>
Sand volleyball	12	12	<del>48</del> <u>N/A</u>	<del>24</del> <u>N/A</u>	<u>2 courts, 12 playing, 1 cycle/day</u> <u>Ancillary use</u>	<u>2 courts, 12 players, 12 spectators, 2 cycles/day</u>
Pump track	60	<del>20</del> <u>30</u>	40	20	N/A	N/A
<u>Multi-use field</u> <del>Ballfield</del>	225	75	60	60	30 players, 45 spectators, 3 cycles/day	30 players, 30 parents, 1 cycle/day
Soccer/lacrosse field	225	75	60	60	30 players, 45 spectators, 3 cycles/day	30 players, 30 parents, 1 cycle/day

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily Capacity	Peak Capacity	Daily Capacity	Peak Capacity		
Demonstration garden/adventure play/other passive uses <sup>1</sup>	<u>N/A</u> <del>30</del>	<u>N/A</u> <del>15</del>	<u>N/A</u> <del>10</del>	<u>N/A</u> <del>10</del>	N/A	N/A
<b>Total</b>	<b><u>1,640</u><del>1,430</del></b>	<b><u>1,002</u><del>733</del></b>	<b><u>364</u><del>342</del></b>	<b><u>244</u><del>241</del></b>		

<sup>1</sup> Use of demonstration garden, adventure play area, amphitheater, and other passive uses assumed to be auxiliary to other recreational elements and would not generate new users.  
 Source: Gates + Associates 2020~~2019~~



Page 21 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 2.1**

The commenter states that the bocce ball courts should be downsized and pickleball courts should be added to the project design. Bocce ball courts have been removed from the January 2020 update to the proposed Landscape Plan and would not be added to Flood County Park. The commenter’s support for pickleball courts~~This comment~~ is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR; however, all comments will be forwarded to the County’s decision makers for their consideration. During the design stage of the tennis court remodel, the idea of pickleball accommodation and design will be considered.

### **Response 2.2**

The commenter states that a soccer court should be added to the project design. As shown in Figure 4, the January 2020 update to the Landscape Plan includes two proposed soccer facilities: a multi-use field for baseball/softball, soccer, and lacrosse, and a separate soccer/lacrosse field.~~As stated on page 27 of the Draft Revised EIR, “[a] soccer/lacrosse field (approximately 430 feet long by 260 feet wide) would be installed at the eastern corner, replacing the existing pétanque court and a portion of the existing tennis courts.”~~

Page 25 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 4.1**

The commenter states that they are concerned with the potential increase in noise from the new playing fields (i.e., bull-horns and people yelling) and an amphitheater (i.e., loud speakers, people yelling). Please see Topical Response A: Noise Impacts. As shown in Table 5 of the Draft Revised EIR, noise generated by events at the athletic fields and amphitheater would have a less than significant impact after implementation of Mitigation Measure N-3(a) to prohibit the use of air horns and to prohibit the use of sound amplification without approval of a special event permit, and after implementation of Mitigation Measure N-3(b) to restrict the timing of athletic events.~~the Landscape Plan would not include construction of an amphitheater.~~

### **Response 4.2**

The commenter requests that public announcement systems and bull-horns should be banned from the Landscape Plan. Please see Topical Response A: Noise Impacts. Mitigation Measure N-3(a) in the Draft Revised EIR would prohibit the use of air horns and would also prohibit the use of sound amplification equipment at the athletic fields and the amphitheater~~and air horns~~ without approval of a special event permit.

Page 27 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 5.2**

The commenter supports the recommendation for paying parking fees upon exiting and/or utilizing automated fee machines, in order to reducing queuing of vehicles on Bay Road approaching the park’s entrance gate. In 2020 the County eliminated the entrance fee for vehicles accessing the parking lot at Flood County Park. As a result, during implementation

of the Landscape Plan visitors would not be subject to entrance fees. Free access to on-site parking would reduce queuing behavior outside the entrance gate, addressing the commenter's concern. Mitigation Measure T-1 would require implementation of parking fee collection and may include automated fee machines, paying upon exit, or a combination of both. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft EIR.

### **Response 5.3**

The commenter supports Alternative 2: Reduced Athletic Programming and asks for assurance that the soccer field would be 100 feet from residential fences on Del Norte Avenue. Under the January 2020 update to the Landscape Plan, all athletic fields would be located more than 100 feet from the nearest residential property lines. As stated on page 134 of the Draft Revised EIR, "This alternative would introduce the same new recreational facilities as planned for in the Landscape Plan, and in the same phases of construction, but would prohibit the organized use of proposed athletic fields on weekdays during afternoon peak hours (4-6 P.M.)." Therefore, the soccer field would be located more than 100 feet from the backyards of residences along Del Norte Avenue under the Reduced Athletic Programming Alternative, similar to the proposed project.

Page 35 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 8.1**

The commenter states that the new sports field will generate more traffic on the side road that leads to Flood Park. The commenter states that traffic during the PM commute hour is already congested and that use of the sports fields by high schools would increase congestion on Marsh Road. The commenter believes there is discrepancy in the data presented in the Draft Revised EIR between what they are seeing on Marsh Road and what is reported. As discussed on page 10 of the Traffic Impact Study prepared for the Draft Revised EIR, existing traffic conditions were evaluated in the Vistro Visitor program, as required by the City of Menlo Park for traffic studies. This traffic analysis focused on weekday PM peak-hour and Saturday midday peak traffic hours at intersections near the park, including Bay Road and Marsh Road. The Traffic Impact Study estimated new vehicle trips generated by the Landscape Plan based on historic park visitor statistics, estimated peak use numbers, and anticipated future programming schedules. Therefore, the EIR's traffic analysis is based on the best available supporting evidence. The only reference to a high school in the Draft Revised EIR is the Marin Catholic High School in Kentfield, California used as a citation for noise source from lacrosse and soccer practice games. However, Summit High School and Everest Charter High School located in North Fair Oaks do not have ballfields and have notified County staff of their interest in using Flood Park ballfields. Use of Flood Park facilities by high school sports teams would be managed and regulated by San Mateo County Parks.

It should also be noted that as of July 1, 2020, traffic delay cannot be identified as a significant environmental impact in a CEQA document, pursuant to CEQA Guidelines Section 15064.3. Therefore, the Landscape Plan would not have a significant impact related to traffic on side roads leading to the park.

Page 36 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 8.7**

The commenter states that park users park on neighborhood streets either because the parking lot is full or to avoid paying a parking fee, but that Menlo Park police rarely ticket cars and should not have to handle anticipated parking lot overflow. The County eliminated the vehicle entrance fee at Flood County Park in 2020. This would remove an incentive for visitors to park on neighborhood streets. Please see Topical Response B: Transportation Impacts for a discussion of parking mitigation.

### **Response 8.8**

The commenter states that noise from concurrent park events will be a major problem if noisy activities are too close to picnic areas, and notes that Holbrook-Palmer Park in Atherton is an example of a “hybrid park” where noisy ball fields are near the street and gathering areas are on another side of the park. The January 2020 update to the Landscape Plan would design Flood County Park in a similar manner, with the soccer/lacrosse field next to Bay Road, the multi-use field on the site of the existing ballfield, and the picnic areas spread across the park in multiple locations. Please see Topical Response A: Noise Impacts for a discussion of ~~athletic noise project~~ noise estimates. Page 93 of the Draft Revised EIR, as amended, states, “This analysis makes the conservative assumption that athletic events generating noise at the ~~multi-use field ballfield~~ and ~~the separate soccer/lacrosse field~~ could take place concurrently. Therefore, the Draft Revised EIR conservatively analyzed noise from concurrent uses at Flood Park. New noise sources associated with the Landscape Plan are discussed under Impact N-3 on page 92 of the Draft Revised EIR and were determined to be less than significant with mitigation restricting sound amplification equipment and timing of athletic events.

Page 37 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 8.9**

The commenter states that the Draft Revised EIR notes an average of 64 decibels at Del Norte Avenue residences ~~ests~~ from the soccer/lacrosse fields in its planned location at the northeast of the park. The commenter states that the project would result in frequent noise above 64 decibels, despite the buffer of 100 feet from the edge of the field, which is unacceptable as games are anticipated to run from 9 a.m. to 8 p.m. on Saturdays and Sundays. The commenter suggests the soccer/lacrosse field be located next to the parking lot, not near the Del Norte Avenue residence for noise, safety, and accessibility reasons. Please see Topical Response A: Noise Impacts for a discussion of noise estimates generated by athletic activities under the January 2020 update to the Landscape Plan, which relocates the proposed soccer/lacrosse field on the ball field. Under the currently proposed layout of the Landscape Plan, athletic fields would be located at least 300 feet away from residences on Del Norte Avenue. This would reduce the noise exposure of the nearest residences on Del Norte Avenue to an estimated 57 dBA  $L_{eq}$  during simultaneous athletic events. Mitigation measures have also been incorporated into the Draft Revised EIR to reduce noise impacts from soccer and lacrosse activity~~the soccer/lacrosse field~~.

Page 37 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 8.10**

The commenter states that the 100-foot buffer should run the entire eastern boundary of the park, as homes along this boundary (on Del Norte Avenue and Iris Lane) were built in the late 1940s when there was no park fence and the backyards are small. The January 2020 update to the Landscape Plan includes a 100-foot buffer between all recreational elements and the entire property line adjacent to residences on Del Norte Avenue. Except for some picnic areas and a path near the property line, all facilities are anticipated to be located outside of this buffer area. ~~This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR; however, all comments will be forwarded to the County's decision makers for their consideration.~~

### **Response 8.11**

The commenter summarizes the Final EIR's finding that 80 trees would be removed including a redwood grove in the northeast corner of the site, and states that the proposed soccer/lacrosse field should be located in a different area of the park. Consistent with this comment, the January 2020 update to the Landscape Plan has relocated the proposed soccer/lacrosse field to the south-central part of the park. ~~This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR; however, all comments will be forwarded to the County's decision makers for their consideration. Under this layout, it is estimated that 72 trees would be removed (Appendix ERR-1). While removal of 80 trees is a worst case scenario, efforts will be made during the design stage to minimize removal of mature trees to the extent practicable.~~

Page 46 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 9.5**

The commenter states that the current event/group picnic areas (excluding shade market structure) currently can accommodate 565 people, while the EIR states a 200-person maximum weekend capacity, which is a significant reduction in use. The commenter asks for an explanation, given the frequently used reservable picnic spaces, which are often reserved on weekend during peak months. The commenter states that Table 33 of the EIR is only utilizing a quarter of the underrepresented picnic use. Please see Topical Response C: Park Visitor Projections for a discussion of the number of picnic sites and explanation of park use assumptions for the picnic area. As discussed therein, the peak use projections have been corrected to assume that the small group picnic areas can accommodate 476 people per day and during peak use times on summer weekends. ~~Table 33 on page 110 of the Draft Revised EIR includes a trip generation summary for the Landscape Plan and trip generation rates were developed for individual recreational elements of the Landscape Plan. As stated on page 109 of the Draft Revised EIR, "Park visitor statistics and anticipated vehicle occupancy were used to convert the maximum number of users into trip generation estimates based on the assumptions summarized in Appendix C of the Traffic Impact Study." Therefore, the trip generation rates assume the 200 person maximum on weekends.~~

Pages 46 and 47 of the Final Revised EIR in Section 3.2, *Written Comments*, are amended as follows:

### **Response 9.7**

The commenter states the current shade market structure can accommodate groups up to 200 people, while Table 6 of the EIR lists 200 people daily with a maximum of 75 per event, with one event per day, and that the W-Trans assumptions for the project during Saturday peak hours is 120 trips (60 in and 70 out) at 2.5 persons per vehicle, for a total of 150 people, and asks why this differs from the 200 people listed in Table 6 and 200 people currently accommodated, as well as why the W-Trans table assumes only half the structure would be used when the whole structure is currently used. As an example, the commenter mentions that on Sunday, September 15, 2019, a group of 150-175 people was present in the shade market structure, while the W-Trans table states there would be 120 Saturday peak trips, but only 30 during the Saturday peak hour, and that cutting this number to one-fourth underrepresents the picnic use. The commenter requests an explanation and suggests there would be 80 cars on a peak day based on the provided formula.

In the January 2020 update to the Landscape Plan, the shade/market structure has been renamed as the preserved park administrative office, but it would still be available for the same kinds of weekend events including farmers markets, art shows, and other community activities. This facility at Flood County Park is not currently open to public events. The commenter's counts of existing public use appear to pertain to the park's large group picnic area, not to the administrative office building. Therefore, this information is not relevant to the EIR's estimates of public use of the preserved park administrative office.

~~For the purposes of this traffic analysis, the~~ The maximum anticipated number of park visitors during each phase of implementing the Landscape Plan, including the proposed market structure, was derived from park industry data provided by Gates + Associates in August 2020/April 2019. As noted above, the ~~The County anticipates that the market structure would house farmers markets, art shows, and other community activities on weekends. Based on this type of use, it is estimated that daily weekend use of the market structure could reach 200 people, with a maximum capacity of 75 people at a given time. Table 33 on page 110 of the Draft Revised EIR shows 160 daily trips on Saturdays for the shade/market structure and 30 peak hour trips to account for the 200 daily users of the shade/market structure. The trip generation summary assumed more than one person in a few vehicles for a total of 160 daily trips and assumes that the entire structure would be used. Therefore, the park visitor assumption and trip generation summary are consistent. Park visitor statistics and anticipated vehicle occupancy were used to convert the maximum number of users into trip generation estimates. While the information provided by the commenter is good empirical information it is not indicative of Flood Park because information was gathered on a single day. The data used in the trip generation analysis were based on staff observations and assumptions. As stated in the CEQA Guidelines (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate. Therefore, for the trip generation estimates are adequate for the purposes of the environmental analysis.~~

### **Response 9.8**

The commenter states that the low numbers reported for picnic use is a departure from current use and asks if the demographics of park users will substantially shift, as a majority

of users are ethnic minorities. The commenter cites the 1983 Master Plan attendance numbers and asks if current users will be displaced as two fields are now proposed.

Please see Topical Response C: Park Visitor Projections for a discussion on corrections to the picnic use calculations for the Landscape Plan. The projections of visitors at the picnic areas have been corrected, and an additional 24 persons during weekdays and weekends were added to the overall park use projections to account for the drop-in picnic areas. Please see Responses 9.2 regarding attendance numbers in the 1983 Master Plan.

### **Response 9.10**

The commenter believes the estimates for weekend picnic use are too low, as they described in Comment 9.6 and 9.7. Additionally, the commenter states that the trip generation rates for the picnic area and shade structure are too low at 47 peak hour trips on Saturday.

Please see Topical Response C: Park Visitor Projections for a discussion on corrections to the picnic use calculations for the Landscape Plan. Section 3.1, Topical Responses, Topical Response B: Transportation Impacts and Responses 9.6 and 9.7 for a discussion of the number of parking spaces at the park. Per Table 33 on page 110 of the Draft Revised EIR estimates that the small group picnic area would generate 24 Saturday peak hour trips, the shade/market structure would generate 30 Saturday peak hour trips, and the event/group picnic area would generate 40 Saturday peak hour trips. All three uses together would generate a total of 94 peak-hour daily trips which is a conservative estimate assuming that all three uses would concurrently be at maximum capacity. Consistent with the commenter's opinion, the Draft Revised EIR underestimated trips associated with the picnic areas. The revised trip generation analysis prepared by W-Trans in September 2020 provides corrected estimates, including a total of 592 Saturday peak-hour trips associated with all picnic areas plus the shade/market structure (which has since been renamed as the preserved park administrative office).

Page 48 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 9.11**

The commenter states that parking/trip counts for the gathering meadow were not included in the EIR analysis. As stated on page 121 of the Draft Revised EIR, "Maximum parking demand during peak summer days under the Landscape Plan was estimated using the maximum anticipated visitor projections provided by Gates + Associates in April 2019. The user capacity of the park and the assumed vehicle occupancy by amenity was used to derive the maximum parking demand for each recreational element of the Landscape Plan. The assumption is that all activities would be utilized at the same time, resulting in the maximum parking demand on the weekend." Table 6 on page 29 of the Draft Revised EIR shows 30 daily trips to the gathering meadow. Therefore, the gathering meadow trips and parking are accounted for in the Draft Final Revised EIR.

In the January 2020 update to the Landscape Plan, the gathering meadow has been renamed as the amphitheater. The amphitheater would serve the same function as the gathering meadow. Because the amphitheater would be an auxiliary use at Flood County Park, hosting occasional activities such as Junior Rangers events, it is assumed that this element would not result in additional vehicle trips or parking demand.

### Response 9.13

The commenter cites a ranger who said the lot is two-thirds full on weekends with current use, and that a former ranger states during a neighborhood meeting that the parking lot is nearly full in the high season with current usage. The commenter also asks how many and what type of large scheduled events may result in parking demand exceeding capacity. Please see Topical Response B: Transportation Impacts for a discussion of existing and proposed parking spaces. A total of ~~4952~~ additional parking spaces ~~would~~will be added to the park as part of the Landscape Plan, resulting in a supply of 369 spaces. The estimated maximum parking demand of 380 spaces would not be anticipated to exceed parking capacity of 369 spaces during infrequent peak-use days in the summer. However, with implementation of Mitigation Measure T-6 to reduce parking on residential streets, the Landscape Plan would have a less than significant impact related to parking. In addition, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park.

### Response 9.14

The commenter asks what data was derived by Gates + Associates, as well as was data derived from Flood Park and what data was derived from other parks or statistics and asks for the EIR page number where this information can be found, if listed in the EIR. The commenter further asks for an explanation for using data not directly obtained from Flood Park, as other parks may not have large reservable picnic areas.

Please see Topical Response C: Park Use Projections for a detailed explanation of park industry data used to determine park visitor projections. The park visitor assumptions were based on facility capacity, staff observations including existing use patterns, and observations of similar types of facilities including similar features in the nearby cities of Belmont, Redwood City, and San Mateo. Information regarding use of the reservation sites~~picnic areas~~ was obtained from recent reservation data at Flood County Park because the number of existing picnic tables would remain unchanged under the Landscape Plan. An additional 24 visitors have been added to the use assumptions for the picnic tables, as described in Topical Response C: Park Use Projections.

Page 51 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### Response 9.19

The commenter asks for analysis and potential mitigation of backup car congestion eastbound on Bay Road from Marsh Road due to delay turning into the park entrance waiting for cars turning right from Bay Road. As discussed under Impact T-1 in Section 3.5, *Transportation and Circulation*, traffic delay at the intersection of Bay Road and Marsh Road would not exceed applicable standards~~have less than significant impacts~~ under the existing plus project, near-term 2021 plus project, and cumulative 2040 plus project scenarios. It should be noted that as of July 1, 2020, traffic delay cannot cause a significant environmental impact under CEQA Guidelines Section 15064.3. Therefore, no mitigation for traffic congestion would be required as part of the environmental review process.~~Therefore, mitigation at this intersection is not required.~~ Furthermore, the County has eliminated the



entrance fee for vehicles accessing the on-site parking lot, which would minimize queuing of vehicles waiting to enter Flood County Park.

Page 50 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 9.20**

The commenter states there was no analysis of the gathering meadow, which was identified as a high priority item for the community, and asks what types of activities will occur, as well as what parking, traffic, and noise impacts will result from these uses, both separate and as a component of the overall park use. The gathering meadow is included in Table 5 on page 26 of the Draft Revised EIR as being implemented during Phase II of the Landscape Plan. Therefore, the gathering meadow is analyzed throughout the Draft Revised EIR. For example, Impact N-3 of the Draft Revised EIR states that, “The Landscape Plan would add new sources of on-site operational noise from organized practices and games at the proposed athletic fields and events at the proposed amphitheater. Noise from whistles, sound amplification equipment, or air horns could disturb nearby residents. The impact from on-site operational noise would be less than significant with mitigation to prohibit the loudest equipment and restrict the timing of athletic events.” Page 95 of the Draft Revised EIR states that, “the gathering meadow in Phase II would be a space suitable for infrequent events including Junior Rangers, Parks Rx with County Health, and movie nights, which could involve the use of sound amplification equipment for music or commentary, although the County typically does not allow this equipment during either County-sponsored or private events at Flood County Park. The central location of this gathering meadow at the park, approximately 475 feet from the nearest residences on Del Norte Avenue, Bay Road, and Hedge Road, would reduce the exposure of noise-sensitive receptors to noise from this facility.” Because the gathering meadow is identified under Phase II of the Landscape Plan the gathering meadow was analyzed programmatically with what information was available at the time of this report. In the January 2020 update to the Landscape Plan, the gathering meadow has been renamed as the amphitheater. The amphitheater would serve the same function as the gathering meadow and would be an auxiliary use. Therefore, the Draft Revised EIR’s analysis of impacts associated with gathering meadow is still applicable.

### **Response 9.21**

The commenter asks what the gathering plaza is and how it will be used. The proposed gathering plazas would be implemented under Phase II of the Landscape Plan. The gathering plazas, which has been renamed as the amphitheater in the January 2020 update to the Landscape Plan, would be a places to gather for activities. Specific details of events at the amphitheatergathering plazas are not known at this time. As stated on page 26 of the Draft Revised EIR, “the EIR evaluates the environmental impacts of Phase II and III improvements at a programmatic level. At the time that Phase II or III elements are proposed for construction, the County would be required to conduct further CEQA review for any elements only if they are substantially different than described in the Landscape Plan and if they could have environmental impacts beyond those anticipated in the EIR.”

### **Response 9.22**

The commenter states that regardless of the requirement to get a permit for amplification, it currently happens frequently, meaning the rule is either not enforced or permits are easy

to obtain. The commenter asks what is required to obtain a permit, to whom a permit may be granted, and if a group picnic user may apply for one. The Mitigation Monitoring and Reporting Program for the Landscape Plan includes Mitigation Measure N-3(a): Restrict Sound Amplification Equipment and Prohibit Air Horns that will require a special event permit for the use of sound amplification. As included in the mitigation measure amplification devices ~~at would only be permitted for~~ organized athletic games, practices, and the ~~amphitheater gathering meadow would only be allowed with a special event permit~~. The Mitigation Monitoring and Reporting Program requires periodic patrol during organized athletic events and performances to ensure that the permits are enforced. Please see page 96 of the Draft Revised EIR for a full list of permit requirements.

Page 51 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 9.26**

The commenter asks for clarification on the EIR's use of 100 feet as the distance from the backyards of residences to the field activity, as their calculations yield only 20 feet. Please refer to Topical Response: Noise Impacts for a discussion of the distances between athletic fields and residences under the revised Landscape Plan. Under the January 2020 update to the Landscape Plan, the athletic fields would be located at least 300 feet from residences on Del Norte Avenue. As stated on page 27 of the Draft Revised EIR, "The County has committed to siting the soccer/lacrosse field at least 100 feet away from the property line adjacent to residences on Del Norte Avenue." Siting of the soccer/lacrosse field will occur in the Design phase.

Page 52 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

As stated in Topical Response A: Noise Impacts, under the January 2020 update to the Landscape Plan soccer and lacrosse activity would be at least 300 feet away from the property line adjacent to residents on Del Norte Avenue and noise levels would be up to 57 dBA  $L_{eq}$  during simultaneous events. As stated in Response 9.26 the soccer/lacrosse field would be at least 100 feet away from the property line adjacent to residents and noise levels would be 64 decibels during games and up to 54 decibels during practices, as perceived at residences located 100 feet away on Del Norte Avenue. The Draft Revised EIR assumes that soccer and lacrosse games and practices have similar noise levels because the two sports have a similar number of players and spectators. In addition, the concept of the two field sports are similar, which would result in comparable noise levels. As acknowledged in Topical Response A: Noise Impacts, combined noise levels from two soccer games, or from a soccer and lacrosse game, The Draft Revised EIR acknowledges that noise during lacrosse and soccer games may exceed existing ambient noise levels in the vicinity of Flood County Park. Therefore, the EIR and requires Mitigation Measure N-3(a) Restrict Sound Amplification Equipment and Prohibit Air Horns and Mitigation Measure N-3(b) Timing of Athletic Events to reduce noise associated with athletic events the field to a less than significant level.

### **Response 9.28**

The commenter asks for an explanation of how the project will comply with Section 4.88.350 of the County Code of Ordinances, as whistles, shouts, and air horns will be disturbing and people have different individual experiences of noise type and volume. As stated on page 94 of the Draft Revised EIR, "the County has determined that the qualitative

standard in Section 4.88.350 of disturbing the peace and quiet of neighbors would still apply to the Landscape Plan.” Mitigation Measure N-3(b) also would restrict athletic events to the hours of 9 A.M. to 8 P.M., which would prevent such events during Flood County Park’s initial open hour of 8 A.M. to 9 A.M. This would reduce the anticipated timing of athletic events — between 9 A.M. and 8 P.M. — would minimize disturbance to neighbors by avoiding normal sleeping hours. Page 94 adds that “Perceptible athletic noise also would not necessarily disturb the peace and quiet of the surrounding neighborhood, as defined by the criteria in Section 4.88.350 of the County Code of Ordinances.” The Landscape Plan would implement mitigation Measure N-3(a) Restrict Sound Amplification Equipment and Prohibit Air Horns so that these devices would not disturb nearby residences. With implementation of mitigation measures to restrict hours of athletic activity, regulate sound amplification, and prohibit air horns, noise generated by athletic events would have a less than significant impact on neighbors.

Page 53 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

Please see Topical Response C: Park Visitor Projections for a discussion of volleyball use projections. The trip generation estimates were developed to be conservative, assuming that multiple activities would start and end during the same peak-hour period. The weekday P.M. trip generation estimates assume that scheduled events on both the multi-use field and the separate soccer/lacrosse field start and end during the peak hour.

Pages 54 and 55 of the Final Revised EIR in Section 3.2, *Written Comments*, are amended as follows:

### **Response 9.35**

The commenter cites the EIR and asks for presentation of hard data, as well as reiterating a request for explanations regarding use of data not originating with Flood Park. The commenter claims there are several errors in Table 6 of the EIR, and questions some assumptions regarding data presented therein, and reiterates previous comments. The commenter claims there are inconsistencies between information from Table 6 and W-Trans assumptions.

Please see Topical Response C: Park Visitor Projections for a discussion on revised park usage assumptions, including corrections to visitor estimates at the picnic areas and tennis courts. The revised peak use projections are based on reservation data at Flood County Park, As stated on page 27 of the Draft Revised EIR, “These estimates of the potential seasonal capacity of recreational facilities were prepared in April 2019 by Gates + Associates, the consultant that assisted the County in designing the Landscape Plan, based on staff observations for existing use patterns, and use patterns at other existing parks with similar features in the nearby cities of Belmont, Redwood City, and San Mateo. Background data collected for other existing parks included the type of athletic events, their seasonal and daily timing, peak use hours, and the number of events per day. The estimates of total use during each phase of the Landscape Plan are intended to be conservative, assuming concurrent use of multiple park features. Regular daily use over the course of a year would be considerably less than the estimated total use in Table 6.” As stated in the CEQA Guidelines (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The park visitor projections in the Draft Revised EIR have been determined from staff observations of existing use patterns and observations from similar

~~type facilities. Therefore, although the commenter disagrees with the projections, they are adequate for the purposes of the environmental analysis.~~

Visitor use projections for the play area (5-12) assumes the area will accommodate between ~~2027~~ and 30 parents and children at one time. Weekend use assumes four cycles of use with peak use ~~as~~ a one-time occurrence. Over the course of a day, the projections assume one cycle of peak use, two cycles of 75 percent of peak use, and one cycle of 50 percent peak use, ~~resulting in would be~~ 85120 persons on weekends and 60 on weekdays. The play area (2-5) is proportionally reduced. Please see Topical Response C: Park Visitor Projections for a discussion of volleyball and picnic projections.

~~Please see Response 9.7. Table 33 of the Draft Revised EIR includes 160 daily weekend trips associated with the shade structure and 30 weekend peak hour trips to account for the weekend assumption of 200 daily users. Table 33 of the Draft Revised EIR includes 32 weekday daily trips and 48 weekend daily trips to account for the 64 weekend daily players on the tennis courts and 32 weekend players, assuming at least one person per vehicle. Therefore, there is no inconsistency between Table 6, use projections, and Table 33, trip generation summary, in the Draft Revised EIR.~~

Page 58 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

#### **Response 10.4**

The commenter expresses the opinion that the best location for a soccer field would be near the entrance and would result in fewer trees removed and would be farther from residences on Del Norte Avenue. Consistent with the commenter's suggestion, the January 2020 update to the Landscape Plan relocates the proposed soccer/lacrosse field to the south-central part of Flood County Park, farther from residences on Del Norte Avenue. As documented in the revised Tree Report, it is anticipated that the updated Landscape Plan would result in the removal of 72 trees (8 fewer than under the original Landscape Plan) (Appendix ERR-1). ~~As discussed in Original Draft EIR Section 4.1, Aesthetics, the loss of existing trees would "reduce the natural character of the park." However, the Landscape Plan would preserve the majority of scenic mature trees that contribute to the park's visual quality. Please see Topical Response A: Noise Impacts and Topical Response B: Transportation Impacts for a discussion of noise and traffic related to the soccer field.~~

Page 64 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

#### **Response 12.1**

The commenter expresses concern over project traffic and noise (including amplified noise). Please see Topical Response A: Noise Impacts for a discussion of amplified noise. Mitigation Measures N-3(a) and N-3(b) would reduce noise from amplification devices by prohibiting the use of air horns and sound amplification equipment without the procurement of a special event permit and restricting athletic practices and games to the hours of 9 a.m. to 8 p.m. Please see Topical Response B: Transportation Impacts for a discussion of traffic congestion. As of July 1, 2020, a project's effect on traffic congestion can no longer cause a significant environmental impact in CEQA analysis, pursuant to CEQA Guidelines Section 15064.3. However, a discussion of traffic congestion is provided for informational purposes. ~~Because of existing traffic congestion on nearby roadways, a small number of new trips associated with park use would result in a significant and unavoidable impact,~~

~~regardless of how athletic users access the park. The Draft Revised EIR acknowledges this significant impact.~~

The commenter is concerned over the loss of trees from the project and state that the trees help combat global warming. The construction contractor for individual elements of the Landscape Plan would plant new trees and shrubs after the conclusion of construction activities that generate these adverse effects. Implementation of Mitigation Measures BIO-2(a) and 2(b), as included in the Original Draft EIR, to replace removed heritage trees and protect remaining trees during construction would reduce impacts from the Landscape Plan to a less than significant impact on protected trees. The effects of tree removal at Flood County Park on air quality and greenhouse gas absorption would be minimal, as most trees would be preserved, and these environmental concerns are regional if not global in scale.

The commenter suggests moving the lacrosse field to a different location and changing demographics of park users for youth. Consistent with this comment, the January 2020 update to the Landscape Plan relocates the proposed soccer/lacrosse field to a site farther from adjacent residences. The comment on on park design features and demographics does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

Page 66 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### **Response 13.1**

The commenter expresses concern over noise levels at residences on Del Norte Avenue from activity on the soccer field and that no additional parking is proposed, which may impact emergency vehicle access. Please see Topical Response A: Noise Impacts for a discussion of noise from the ballfields. Mitigation Measures N-3(a) and N-3(b) would reduce noise from amplification devices by prohibiting the use of air horns and sound amplification equipment without the procurement of a special event permit and by restricting athletic practices and games to the hours of 9 a.m. to 8 p.m. As discussed in the topical response, estimated noise levels from concurrent athletic activities at different fields may reach 57 dBA L<sub>eq</sub> at the nearest residences on Del Norte Avenue on page 94 of the Draft Revised EIR ~~noise levels from athletic activities would range from 54 to 64 dBA L<sub>eq</sub> at the nearby residences and. Athletic noise would be less than~~ significant with implementation of Mitigation Measures N-3(a) and N-3(b). These mitigation measures would reduce noise from amplification devices by prohibiting the use of air horns, prohibiting sound amplification during athletic events without the procurement of a special event permit, and restricting athletic practices and games to the hours of 9 a.m. to 8 p.m.

Please see Topical Response B: Transportation Impacts for a discussion of additional project parking spaces. An additional ~~4952~~ spaces would be added to Flood County Park as part of the Landscape Plan. Emergency access is discussed in Section 4.9, *Transportation and Circulation*, of the Original Draft EIR. As discussed in the Original Draft EIR emergency access to Flood County Park is available through the main gate and the fire access entryway at the Iris Lane gate. The Landscape Plan would maintain these emergency access points, and park users would still be able to evacuate through the main gate and other pedestrian gateways.

### Response 13.2

The commenter expresses concern over the tree removal proposed as part of the project and Flood Park's unique recreational assets. As discussed in Original Draft EIR Section 4.1, *Aesthetics*, the loss of existing trees would "reduce the natural character of the park." However, the Landscape Plan would preserve the majority of scenic mature trees that contribute to the park's visual quality. In addition, the construction contractor for individual elements of the Landscape Plan would plant new trees and shrubs after the conclusion of construction activities that generate these adverse effects. Implementation of Mitigation Measures BIO-2(a) and 2(b), as included in the Original Draft EIR, to replace removed significant heritage trees and protect remaining trees during construction would reduce to a less-than-significant level impacts from the Landscape Plan to a less than significant impact on protected trees.

Page 70 of the Final Revised EIR in Section 3.2, *Written Comments*, is amended as follows:

### Response 14.3

The commenter states that as lead agency, San Mateo County is responsible for all project mitigation, including any improvements to the State Transportation Network and that the project's fair share contribution, financing, scheduling, implementation responsibilities and mitigation monitoring should be fully discussed. As of July 1, 2020, a project's effect on traffic congestion cannot be considered a significant environmental impact that requires mitigation under CEQA, pursuant to CEQA Guidelines Section 15064.3. This is because the State has implemented vehicle miles traveled, instead of traffic delay, as the primary metric for evaluation of transportation impacts. Nonetheless, the Landscape Plan would have a minor effect on traffic flow on U.S. 101. The project is not expected to significantly impact U.S. 101. Specific to U.S. 101 north of Marsh Road, the project would add an estimated four trips during the P.M. peak hour. Specific to U.S. 101 south of Willow Road, the project would add an estimated four trips during the P.M. peak hour. It is not anticipated that the Landscape Plan would include any improvements to the State Transportation Network.

Page 77 of the Final Revised EIR in Chapter 4, *Public Meeting Comments*, is amended as follows:

### Response PM.3

The commenter states that picnic uses at Flood Park were not correctly accounted for in the trip generation and parking calculations because they were only 25 percent was assumed to be occupied in the calculations and they are more frequently used.

Please see Topical Response C: Park Visitor Projections for a discussion of revised estimates of park usage and Response 9.35 for a discussion of parking demand associated with calculations for picnic uses.

The commenter requests that new screening trees at the park's perimeter be planted ahead of construction. Under the revised Landscape Plan designed in January 2020, existing redwood trees in Flood County Park near residences on Del Norte Avenue would be retained. Tree removal in the central areas of the park would not substantially affect the privacy of adjacent residences. Nevertheless, some existing mature trees near the park's eastern boundary would be removed during construction of Phase I elements in the Landscape Plan, especially the proposed soccer/lacrosse field. As required by Mitigation Measure BIO-2(a) in the Draft EIR would require the replacement of significant trees

~~removed from the park, which would largely restore tree cover over the long term.; replacements for trees removed within 25 feet of residential property lines would be replanted in a manner sufficient to restore the pre-existing level of privacy upon maturation. These replacement screening trees would be planted within the first two years of implementing the Landscape Plan, during grading for Phase I improvements.~~

Page 78 of the Final Revised EIR in Chapter 4, *Public Meeting Comments*, is amended as follows:

The commenter asks the County to double-check the distance from the proposed soccer/lacrosse field to the backyards of residences on Del Norte Avenue, asserting that residents were originally told a distance of 30 feet rather than 100 feet. Please refer to Topical Response A: Noise Impacts and Response 9.26 for a discussion of the distance between athletic fields and residences under the revised Landscape Plan, this distance and the resulting its effect on the exposure of residents to athletic noise. Under the updated Landscape Plan, the athletic fields would be at least 300 feet away from residences on Del Norte Avenue.

Page 79 of the Final Revised EIR in Chapter 5, *Draft EIR Text Revisions*, is amended as follows:

Page 1 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

~~The largest recreational facilities would be sited in the northern portion of the park, where the multi-use field existing ballfield in the northern portion of the park would be reconstructed and a soccer/lacrosse field in the south-central area would be installed at the eastern corner, replacing the existing pétanque court and a portion of the existing tennis courts.~~

Page 2 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

Among the park redevelopment options, the Reduced Athletic Programming Alternative would be the most environmentally superior alternative relative to the proposed project. This alternative would substantially reduce vehicle trips associated with athletic activity, reducing the project's effect on traffic noise.~~avoiding a significant and unavoidable impact on traffic congestion at the intersection of Bay Road and Ringwood Avenue during Saturday peak hours under cumulative traffic conditions. However, the Reduced Athletic Programming Alternative would not avoid a significant and unavoidable impact on traffic congestion at this intersection during weekday P.M. peak hours under existing plus project traffic conditions or cumulative traffic scenarios.~~ However, Bbecause this alternative would still have a significant and unavoidable impact related to traffic noise, a Statement of Overriding Considerations would still be required for approval of this alternative. The Multi-Use Field Alternative also would be environmentally preferable to the proposed project, yet it would not avoid the project's significant and unavoidable impact related to ~~on~~ traffic ~~noise~~congestion. Neither alternative for improving recreational facilities at the park would fully meet the project objectives.

Page 3 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

**Impact AES-1:** The Landscape Plan would not affect scenic vistas or corridors; however, it could~~would~~ alter views from existing residences, primarily by the removal of mature

trees and installation of netting around the proposed multi-use soccer/lacrosse field or the soccer/lacrosse field. This impact would be less than significant with mitigation for tree replacement and appropriate netting design.

**Mitigation Measure AES-1: Athletic Netting Color.** If the County installs athletic netting around the proposed soccer/lacrosse field or the multi-use ballfield/soccer/lacrosse field, this netting shall have a neutral color (e.g., forest green, black, gray) that blends in with the natural environment at Flood County Park.

Pages 5 and 6 of the Draft Revised EIR in the *Executive Summary* are amended in the Final EIR as follows:

**Impact BIO-2:** Construction of proposed recreational improvements may directly or indirectly affect significant heritage trees as defined ~~protected~~ by San Mateo County. The impact on protected trees would be less than significant with mitigation to replace protected trees that are removed and to protect remaining trees during construction.

**Mitigation Measure BIO-2(a): Tree Replacement.** The County shall replace ~~protected~~ County-defined significant trees that are removed from Flood County Park at 1:1 ratio.<sup>1</sup> Suitable replacement trees shall be similar species deemed suitable by the Planning Director ~~those species specified as heritage trees. Where mature trees are removed within 25 feet of residential property lines, the County shall plant replacement trees that upon maturation would be sufficient to restore the pre-existing level of privacy of adjacent residents.~~

**Mitigation Measure BIO-2(b): Tree Avoidance and Minimization Measures.** The following measures to avoid and protect trees shall apply to individual recreational elements of all proposed Phase I, II, and III improvements:

- a. The County shall monitor significant heritage trees with CRZs impacted by construction activities (canopies and roots) during construction for signs of distress. The CRZ is defined as the area of soil around a tree trunk where roots are located that provide stability and uptake of water and minerals required for tree survival by the ISA's Best Management Practices – Managing Trees During Construction handbook.
- b. Excavation/Trenching shall avoid CRZs to the greatest extent feasible. The following measures shall be applied when excavation and trenching occurs near significant heritage trees:
  - Where appropriate tunneling shall be used to preserve roots two inches in diameter, and wherever possible underground lines shall occupy common trenches.
  - When root cutting occurs, exposed major roots (greater than two inches in diameter or within five feet of the trunk) shall not be ripped by construction equipment. Roots shall be cleanly cut and made at right angles to the roots.

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<sup>1</sup> "Significant trees," as defined in the County's Significant Tree Ordinance, are "any live woody plant rising above the ground with a single stem or trunk of a circumference of thirty-eight inches (38") or more measured at four and one half feet (4 1/2') vertically above the ground or immediately below the lowest branch, whichever is lower, and having the inherent capacity of naturally producing one main axis continuing to grow more vigorously than the lateral axes" (San Mateo County Ordinance Code Section 12,012).



- A Certified Arborist shall be present if more than 30 percent of the root zone is impacted or roots greater than two inches or within five feet of the trunk will be cut, to document impacts to the CRZ.
- Absorbent tarp or heavy cloth fabric shall cover new grade cuts and be overlain by compost or woodchip mulch.

c. The County shall stage construction equipment outside of the CRZs and apply precautions, such as steel traffic plates and fencing, to protect sensitive root zones.

d. The County shall install protective fencing around significant heritage trees prior to any earthwork and remain until all work is complete, or until adjacent construction activity no longer threatens tree health. Fencing shall be six foot high chain link fencing (or comparable material) and installed at the outermost edge of the CRZ, or eight feet from the trunk of the significant heritage tree, whichever is greatest. Signs stating "Tree Protection Zone – Keep Out" shall be posted on the fence.

Page 7 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

Archival copies of the documentation also shall be submitted to the ~~City of San Mateo~~ County Libraries and the San Mateo County History Museum where they would be available to local researchers.

Pages 11 and 12 of the Draft Revised EIR in the *Executive Summary* are amended in the Final EIR as follows:

**Mitigation Measure N-3(a): Restrict Sound Amplification Equipment and Prohibit Air Horns.** ~~The County shall only allow the use of sound~~ Sound amplification equipment at organized athletic games and practices and at the ~~amphitheater~~ gathering meadow shall only be allowed with the procurement of a special event permit in accordance with County of San Mateo Parks Department procedures. The County shall notify all groups using the proposed ~~multi-use field~~ soccer/lacrosse field, soccer/lacrosse field ~~ballfield~~, and ~~amphitheater~~ gathering meadow of this requirement. The County shall prohibit the use of air horns at any park events. County staff shall periodically patrol the park during organized athletic events and performances to verify that park users are not operating air horns and are not operating sound amplification equipment without an approved Special Event Permit.

Special Event Permits are required for any use of a space beyond what is considered typical use. This could include such activities as: bounce houses, amplified sound, large events (walks, runs) and those that require additional staffing or support from other agencies. Depending on the scale of the event, notification may be posted in park kiosks, on the Parks Department website or by using other communication vehicles.

Page 12 of the Draft Revised EIR in the *Executive Summary* (with respect to the impact summaries, mitigation measures, and residual impacts shown in Table 1) is amended in the Final EIR as follows:

**Impact N-4:** Vehicle trips associated with operation of the proposed recreational elements would increase traffic volumes on nearby roadways, resulting in greater traffic noise audible to existing noise-sensitive residences. Based on the conservative (high) estimate of new vehicle trips presented in this EIR, it is anticipated that the increase of

vehicle trips from the project relative to existing traffic on Ringwood Avenue during Saturday peak hours in the summer would exceed the applicable FTA standard of 1 dBA Leq. Therefore, traffic noise impacts would be significant and unavoidable.

No mitigation is feasible to substantially reduce increases in traffic noise associated with the Landscape Plan during Saturday peak hours while still satisfying the project objectives. Restricting the weekend use of athletic fields at Flood County Park would reduce traffic noise, but this option would not fulfill the project objective to meet demand for active recreation facilities in San Mateo County. None required

As noted above, mitigation to reduce traffic noise during Saturday peak hours would not be feasible. Therefore, the Landscape Plan would generate an increase in weekend traffic noise that exceeds applicable standards. Although this analysis is based on highly conservative estimates of trip generation that apply to peak summer days at Flood County Park, the impact would nonetheless be significant and unavoidable during that time period. Less than significant without mitigation

Page 12 of the Draft Revised EIR in the *Executive Summary* (with respect to the impact summaries, mitigation measures, and residual impacts shown in Table 1) is amended in the Final EIR as follows:

**Impact T-1:** Traffic generated by the project would cause traffic delay exceeding the City of Menlo Park's standards at the intersection of Bay Road and Ringwood Avenue under all modeled traffic scenarios. Queuing of vehicles at the park's entrance gate also would cause temporary traffic delay on Bay Road. However, pursuant to CEQA Guidelines Section 15064.3, an increase in traffic delay cannot be found to result in a significant environmental impact. Therefore, the Landscape Plan would have a less than significant impact related to traffic. Although new parking fee collection practices would minimize queuing, mitigation measures at the affected intersection would be infeasible. Therefore, the project would have a significant and unavoidable impact on traffic under existing plus project conditions.

None requiredThe installation of a northbound left turn lane at the intersection of Bay Road and Ringwood Avenue would improve traffic conditions during P.M. peak hours from LOS D to B under existing plus project conditions, from LOS E to C under near term 2021 plus project conditions, and from LOS F to D under cumulative 2040 plus project conditions. However, physical constraints at the affected intersection could make implementation of such a measure infeasible.

To minimize queuing on Bay Road, Mitigation Measure T-1 would be required.

**Mitigation Measure T-1: Parking Fee Collection Practices.** The County shall implement parking fee collection practices to avoid the back-up of vehicles entering Flood County Park onto local streets. These practices may include automated fee machines, paying upon exiting the park, or a combination of both to move the queues associated with fee collection off of City streets and on-site.

Less than significant without mitigationIt may be infeasible to reconfigure the intersection of Bay Road and Ringwood Avenue to avoid a significant impact from traffic congestion. Therefore, the Landscape Plan would have a significant and unavoidable impact.

Page 13 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

**Mitigation Measure T-5(b): Pedestrian Signage.** The County shall install signage in a central location in Flood County Park that informs visitors of an alternative pedestrian route ~~around~~ to the segment of Bay Road between Del Norte Avenue and Sonoma Avenue which lacks a sidewalk.

Page 13 of the Draft Revised EIR in the *Executive Summary* is amended in the Final EIR as follows:

**Impact T-6:** ~~While it is estimated that parking demand during peak summer days at Flood County Park could would not exceed the on-site parking supply, and the Landscape Plan could result in increased parking on local residential streets. The impact on parking capacity would be less than significant impact with mitigation measures to facilitate on-site parking and discourage on-street parking by visitors to Flood County Park.~~

**Mitigation Measure T-1: Parking Fee Collection Practices** (see full measure under Impact T-1)

Pages 25 and 26 of the Draft Revised EIR in Section 2.4, *Project Features*, are amended in the Final EIR as follows:

The proposed project entails a Landscape Plan for the long-term redevelopment of San Mateo County's Flood County Park in the city of Menlo Park. The planning process for development of the Landscape Plan took place between May and December 2015. On April 7, 2016, the County Parks and Recreation Commission voted to approve the Landscape Plan (referred to herein as the 2016 Plan)~~this plan~~ as the Draft Preferred Alternative for improving Flood County Park. The Landscape Plan was refined through a series of community outreach efforts structured to identify community values, preferred uses, and site layout preferences. In response to public comment, the County has refined the proposed plan to optimize preservation of large oak and bay trees, increase offerings of sports, and provide a variety of active and passive uses for a range of user groups.

The Landscape Plan was revised in January 2020 in order to better balance the (1) community's desires for (i) greater access to recreational amenities and (ii) preservation of mature trees and (2) the neighbors' expressed concerns regarding projected impacts as identified in the EIR. The revised Landscape Plan relocates desired features into more appropriate locations. Key highlights of this plan (referred to herein as the 2020 Plan or the proposed Landscape Plan) include:

- Retaining the mixture of recreational amenities identified in the 2016 Plan, although their locations have been adjusted
- Observance of the 100-foot setback for playfields and courts along the southeastern property edge to minimize noise impacts from sport uses (i.e., soccer, tennis, and volleyball)
- A soccer/lacrosse field (approximately 86 x 143 yards, or about 260 x 430 feet) overlay use on the ballfield
- Extension of the parking lot where the current pétanque court is located in the eastern corner of the park and restriping of the existing parking lot

- A revised layout which should reduce the number of existing trees requiring removal
- Preserving the existing number of reservable group and drop-in picnic sites
- Adding a soccer/lacrosse field (approximately 60 x 110 yards, or 180 x 330 feet) that meets high-school soccer and lacrosse requirements
- Preserving the adobe office building and other adobe structures except for Restroom D, which cannot be renovated to meet health and safety standards
- Removal of the Bocce Ball court.

The 2020 Plan has a mixture of passive recreational facilities like group and drop-in picnic areas and trails, and active recreation facilities including sport fields, two playgrounds, tennis courts, sand volleyball courts and a pump track. It provides an organizing framework with a central promenade and gathering spaces, which link the variety of active, passive and recreational uses. There are spaces provided for informal community interactions or community events, such as farmers markets or an art show.

To reduce the potential noise impacts of park uses on the residential homes along the southeastern edge of the park, the 2020 Plan provides a 100-foot setback for sport uses like soccer and tennis. Passive uses, like walking paths and group picnic areas, are allowed in the setback.

Table 5 lists the proposed recreational facilities in the Landscape Plan and their anticipated phasing.

**Table 5 Proposed Recreational Facilities and Phasing**

Phase	Improvements
Phase I	<u>Replacement of existing ballfield with multi-use field</u> <del>Baseball field replacement and bathroom</del> Soccer/lacrosse field Two tennis courts Sand volleyball court replacement Basketball court Pump track Asphalt paths Adobe bathroom renovation Tree-lined promenade Drop off at playground area New utilities: water, electric, gas, greywater piping <sup>1</sup>
Phase II	Restrooms Demonstration gardens Playground replacements Adventure Play Individual picnic area renovations <del>Amphitheater</del> <del>Gathering meadow (performance space)</del>
Phase III	Rehabilitation of adobe administrative building <sup>2</sup> Group picnic area renovations with shade shelters Completion of all pathways with exercise stations

Phase	Improvements
	Gathering plazas
	Focal element (may incorporate existing water pump feature)

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<sup>1</sup> Purple piping may be installed for the future use of greywater.

<sup>2</sup> The adobe administrative building would be rehabilitated for seismic stability and use by park visitors.

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Pages 27 to 30 of the Draft EIR in Section 2.4, Project Features, are ~~the Executive Summary~~ is amended in the Final EIR as follows:

Figure 4 shows the layout of recreational facilities in the proposed Landscape Plan. As shown in this figure, the County has committed to siting all active recreational facilities including athletic fields and tennis courts at least 100 feet away from the property line adjacent to residences on Del Norte Avenue. Passive uses, like walking paths and group picnic areas, would be allowed in this setback. The following recreational facilities would be located within the SFPUC right-of-way: the multi-use ballfield/soccer/lacrosse field, basketball court, promenade, and a picnic area.

The largest recreational facilities would be sited in the northern portion of the park, where the existing ballfield would be reconstructed (approximately 450 feet long on each side) and the soccer/lacrosse field (approximately 430 feet long by 260 feet wide) would be installed at the eastern corner, replacing the existing pétanque court and a portion of the existing tennis courts. The promenade would run eastward across the center of the park from the parking lot. Picnic areas clustered in the southern half of the park would be reconstructed. A demonstration garden would be established in the western part of the park, near the parking lot entrance off Bay Road. In addition, the following recreational facilities would be located within the SFPUC right-of-way outlined in Figure 4: a ballfield, soccer/lacrosse field, basketball court, and promenade. The Parks Department would preserve existing adobe buildings on-site, with the exception of demolishing the adobe Restroom D located west of the existing tennis courts. The adobe administrative building in the southwest part of the park would be rehabilitated for seismic stability.

### Athletic Fields

The existing ballfield would be retained in its current location in the northern portion of the park (approximately 450 feet long on each side), but reconstructed to accommodate an overlay of a soccer/lacrosse field (approximately 260 feet by 430 feet). This multi-use field would be used by only one sport at a time. The ballfield would also serve both baseball and softball uses. A separate, smaller soccer/lacrosse field (approximately 180 feet by 330 feet) would be constructed in the southern meadow area adjacent to Bay Road. The soccer/lacrosse field would be sited to avoid the existing SFPUC utility boxes at the eastern edge of the existing baseball outfield and the adobe restroom structure, and to minimize removal of mature trees.

It is assumed that fencing and/or netting would be installed around the proposed athletic fields. The ~~multi-use field~~reconstructed ballfield would be bordered by a portable chain-link fence (outfield fence)ing of similar height and placement to the existing field. Based on the industry standard for soccer and lacrosse fields, it is assumed that fencing four to six feet in height would ring the ~~soccer/lacrosse~~ fields used for

soccer and lacrosse (Sprecher 2012). Netting would likely be installed to contain soccer and lacrosse balls within this multi-use field. This netting is often set at a 20-foot height at the ends of the field or encircling the field (Sprecher 2012). This analysis conservatively assumes the installation of 20 to 30-foot-tall netting that encircles the proposed soccer/lacrosse field.

### Picnic Areas

The Landscape Plan would renovate and adjust the locations of the seven covered, reservable group picnic areas, which would have a maximum combined capacity of 476 visitors, the 20 informal “drop-in” picnic tables with barbecues scattered throughout the site, and the large reservation site that has a capacity of 164 visitors. The current capacity of picnic areas would be retained.

### Play Areas

In addition to a centrally located all-abilities play area for both children aged 5 – 12 and for younger children with seating for their parents, the Landscape Plan would add an informal adventure play area. This new play area would allow children to interact with nature, near a tree grove on the eastern edge of the park.

### Structures

The Landscape Plan would preserve the existing adobe buildings on-site, except for the adobe Restroom D building located west of the existing tennis courts, which is structurally unsalvageable and would be demolished. Restroom D cannot be seismically retrofitted or brought to current health and safety standards. The adobe administrative building in the southwest part of the park would be rehabilitated for seismic stability. The three existing restroom structures would be retained and renovated.

### Courts

The Landscape Plan would renovate the two existing sand volleyball courts. Currently, these courts are primarily used midweek by both the Red Rock League and regular after-work users. A full basketball court with a non-seated area for casual spectators would be located near the drop-off/promenade entry by the parking lot. Two new tennis courts would replace the existing four tennis courts. All new courts will be located outside of the 100-foot setback along the southeastern property edge.

### Demonstration Gardens

A passive, demonstration garden area would be established in the western part of the park, near the ranger’s house and the parking lot entrance off Bay Road.

### Pump Track

A small pump track would be located between the tree groves adjacent to the new tennis courts and easily accessible to bicyclists via the Iris Lane gate.

## Pedestrian Paths

An extensive path system would loop and meander through Flood County Park with benches and exercise stations along its length. The promenade would run eastward across the center of the park from the parking lot.

## Parking

The Landscape Plan would preserve the current location of the motor vehicle and pedestrian entries along Bay Road. Restriping the existing parking lot would add an additional 23 stalls. The parking area in the eastern corner of the site would be extended to provide an additional 26 parking stalls and a turnaround at the terminus of the new parking area. A pedestrian/bike-only connection from Iris Lane would be retained.

## Tree Removal

It is anticipated that the Landscape Plan could result in the removal of 72 trees.<sup>2</sup>

## Peak Use Projections

Table 6 shows the estimated number of visitors to use proposed elements of the Landscape Plan during peak summer days. These estimates of the potential seasonal capacity of recreational facilities were prepared in August 2020 by Gates + Associates, the consultant that assisted the County in designing the Landscape Plan. They are based on a variety of factors, including the capacity of recreational elements (e.g., the number of players on teams using an athletic field), staff observations of existing use patterns, and observations from existing parks with similar features in the nearby cities of Belmont, Redwood City, and San Mateo. Background data collected for other existing parks included the type of athletic events, their seasonal and daily timing, peak use hours, and the number of events per day.

It is important to note that a recreational element at a park, or a park in its entirety, does not typically achieve maximum occupancy on a given day. Visitor use is staggered throughout the day. Many visitors also use more than one element at a park during their visit. For example, a visitor may come to Flood County Park primarily to use the multi-use field but may also use the playground and a picnic table. Additionally, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park.. The estimates of total use during each phase of the Landscape Plan are intended to be conservative, assuming concurrent use of multiple park features. Regular daily use over the course of a year would be considerably less than the estimated total use in Table 6. However, estimated peak use is appropriate for the purpose of a conservative analysis of impacts related to transportation and noise.

Table 6 estimates both daily and peak capacity during the summer. Daily capacity refers to the number of visitors who will use a recreational element over the course of a day.

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<sup>2</sup> For further detail on trees planned for removal under the Landscape Plan, refer to the updated Tree Report in Appendix ERR-1.

This analysis defines peak capacity as the maximum number of visitors who could be accommodated at an individual facility at one time. The peak use would not occur every day.

~~Table 5 compares recent historical recreational use of Flood County Park to projected future use by baseball and soccer groups under implementation of the Landscape Plan. The recent historical data in Table 5 dates from 2009 to 2010, when the existing ballfield was last in use. This data serves as a point of comparison to projected future use with a reconstructed comparison to projected future use with a reconstructed ballfield at the park. Nevertheless, because the ballfield has been inactive for a period of more than five years, existing use of the park is the most reasonable baseline against which to evaluate the Landscape Plan's environmental impacts from future use.~~

As shown in the table below, the projected use of the athletic fields improvements under the Landscape Plan (i.e., a multi-use fieldreconstructed ballfield and new soccer/lacrosse field) would generally be highest during the summer. The County also anticipates that lacrosse would typically occur during the spring and fall seasons, with practices usually taking place during the week and games on the weekends. Concurrent use of the multi-use fieldbaseball and soccer/lacrosse field is anticipated. ~~The park would typically accommodate either soccer or lacrosse use at any given time; however, soccer and lacrosse events could be concurrent on weekdays if one group were to use the ballfield.~~ It should be noted that the proposed Landscape Plan would not, in itself, include programming and scheduling of athletic events, but the proposed athletic fields would accommodate anticipated demand from local user groups.




**Figure 1 Proposed Landscape Plan**



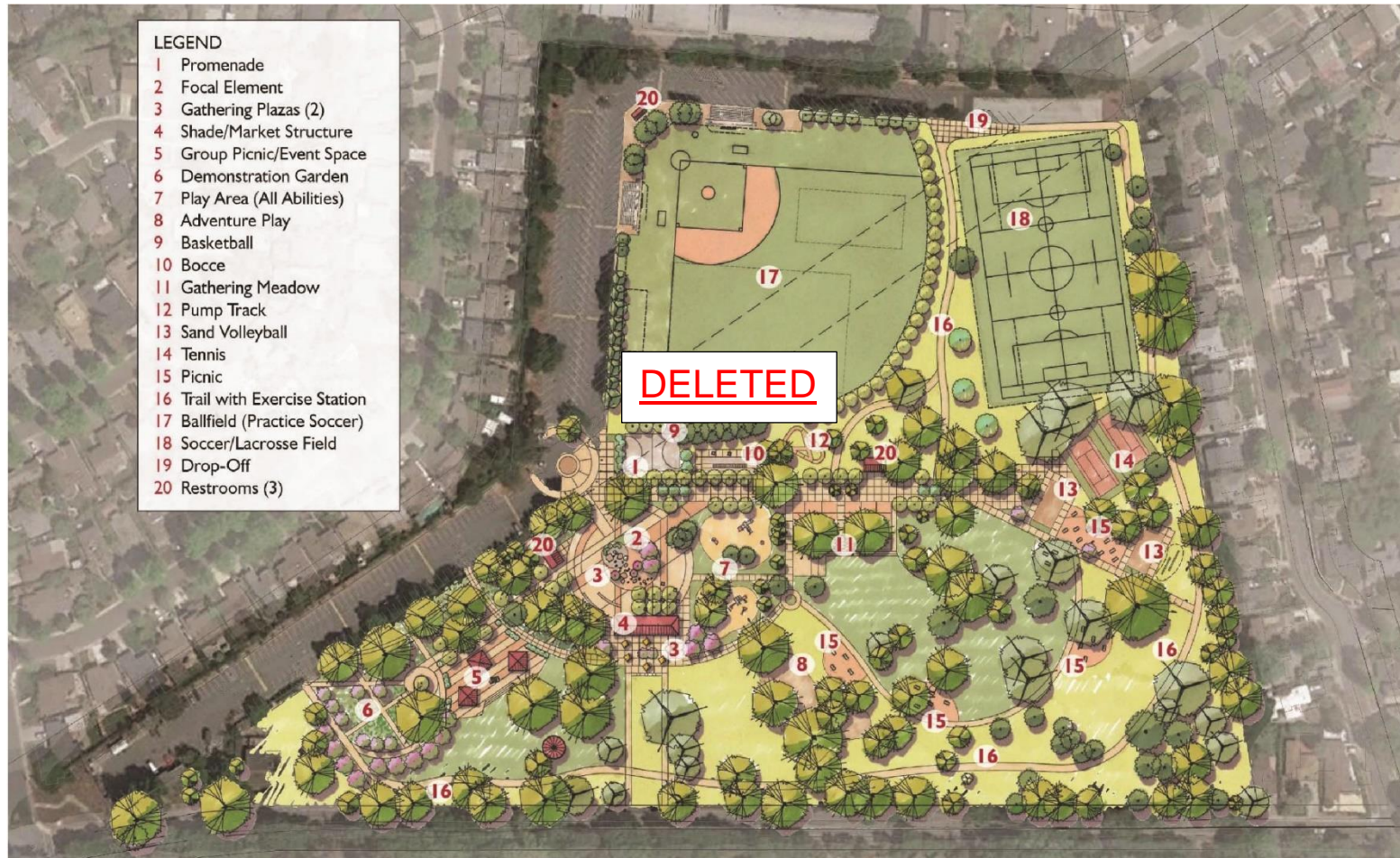
- LEGEND**
- 1 Promenade
  - 2 Focal Element
  - 3 Gathering Plazas (2)
  - 4 Preserved Park
  - 5 Administrative Office
  - 6 Group Picnic / Event Space (7)
  - 7 Demonstration Garden
  - 8 Play Area (All Abilities)
  - 9 Adventure Play
  - 10 Basketball
  - 11 Amphitheater
  - 12 Pump Track
  - 13 Sand Volleyball
  - 14 Tennis
  - 15 Trail w Exercise Station
  - 16 Ballfield / Soccer / Lacrosse
  - 17 Soccer/Lacrosse Field
  - 18 Drop-off
  - 19 Restrooms (3)
  - 19 Large Reservable Picnic Area

Source: Gates + Associates, 2020.

Not to Scale 

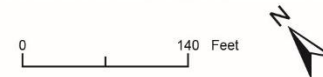


**Figure 2—Proposed Landscape Plan**



The Flood Park Preferred Plan reflects the community feedback received on the three alternatives. The plan provides a wide range of uses, both active and passive, for a variety of user groups. Fields sports (soccer and lacrosse) have been added, as well as number elements targeted to youth (basketball, pump track, adventure play).

Based on community feedback, uses have been located to minimize the removal of large Oak and Bay trees.



**Table 6 Projected Peak Use of Flood County Park under Landscape Plan**

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily Capacity	Peak Capacity	Daily Capacity	Peak Capacity		
<u>Preserved park administrative office</u> <u>Shade/market structure</u>	200	75	N/A	N/A	<del>1 event/day</del>	N/A
Play area universal (2-5)	<del>45</del> 60	<del>15</del> 20	30	<del>10</del> 15	4 cycles/day	2 cycles/day
Play area universal (5-12)	<del>85</del> 120	<del>30</del> 40	60	<del>20</del> 30	4 cycles, 1 parent/2 kids	4 cycles, 1 parent/2 kids
Adventure play	70	35	40	20	<del>2 cycles/day</del>	<del>2 cycles/day</del>
<u>Event/Large group reservation picnic area</u>	<del>164</del> 200	<del>164</del> 200	N/A	N/A	<del>82% occupancy rate</del> 1 event	N/A
Small group picnic	<del>476</del> 120	<del>476</del> 120	N/A	N/A	<del>78 areas, 15 people/area,</del> 1 cycle/day	N/A
<u>Drop-in picnic area</u>	24	24	24	24	<u>20% primary use, 6 people per site at 4 picnic areas</u>	<u>20% primary use, 6 people per site at 4 picnic areas</u>
Tennis courts	<del>64</del> 48	16	32	16	<del>2 courts, 8 playing, 8 waiting,</del> <del>4 cycles/day</del> <del>10 playing, 10 waiting, 3 cycles/day</del>	<del>2 courts, 8 playing, 8 waiting,</del> <del>2 cycles/day</del> <del>10 playing, 10 waiting, 1 cycle/day</del>
Basketball	60	20	10	10	<del>10 playing, 10 waiting,</del> <del>3 cycles/day</del> <del>2 courts, 6 playing, 1 cycle/day</del>	<del>10 playing, 10 waiting, 1 cycle/day</del> N/A
Sand volleyball	12	12	<del>48</del> N/A	<del>24</del> N/A	<del>2 courts, 12 playing,</del> 1 cycle/day Ancillary use	<del>2 courts, 12 players, 12 spectators,</del> 2 cycles/day
Pump track	60	<del>20</del> 30	40	20	N/A	N/A
<u>Multi-use field</u> <u>Ballfield</u>	225	75	60	60	30 players, 45 spectators, 3 cycles/day	30 players, 30 parents, 1 cycle/day
Soccer/lacrosse field	225	75	60	60	30 players, 45 spectators, 3 cycles/day	30 players, 30 parents, 1 cycle/day
Demonstration garden/adventure play/other passive uses <sup>1</sup>	<del>N/A</del> 30	<del>N/A</del> 15	<del>N/A</del> 10	<del>N/A</del> 10	N/A	N/A

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily Capacity	Peak Capacity	Daily Capacity	Peak Capacity		
<b>Total</b>	<b><u>1,640</u><del>1,430</del></b>	<b><u>1,002</u><del>733</del></b>	<b><u>364</u><del>342</del></b>	<b><u>244</u><del>241</del></b>		

<sup>1</sup> Use of demonstration garden, adventure play area, amphitheater, and other passive uses assumed to be auxiliary to other recreational elements and would not generate new users.

Source: Gates + Associates 2020~~2019~~

No additional lighting that would enable nighttime use of athletic facilities is proposed as part of the Landscape Plan, although path lights that could be manually turned on and off for special events may be installed. Lighting of paths and buildings would be primarily for security and safety. If lighting is necessary, it would be designed and located to avoid intrusion on adjacent residences.

### 2.4.1 Grading and Construction

It is anticipated that implementation of the Landscape Plan would occur in three phases: Phase I, Phase II, and Phase III. The Phase I improvements are expected to be completed in approximately two years. The County anticipates initiating the improvements identified under Phase I within one to two years after certification of the EIR, with construction estimated to take from a year to eighteen months. During this construction period, the portion of the park to be improved would be closed to public access. Phases II and III would be implemented subsequent to Phase I, as funding permits. While precise timeframes are uncertain, the County's goal would be to implement Phase II within five to seven years and Phase III within seven to ten years so that the revitalization of Flood County Park is completed within ten years of certification of the EIR.

During Phase I, the areas to be improved for athletic fields and other initial recreational elements~~northern portion of the park stretching from the proposed central promenade to the north and east~~ would be graded. The area of grading in this phase would total approximately nine acres, ~~including 3.4 acres at the ballfield and 1.6 acres at the soccer/lacrosse field.~~ Grading activity would be required primarily to raise the ground surface above the SFPUC pipelines; reconstruct the ballfield; install a soccer/lacrosse field, pump track, and new underground utilities; demolish the existing playground, the adobe restroom next to the existing tennis courts, and asphalt paths; remove the foundations at the existing tennis courts; and reuse base rock from the existing pétanque court.

It is assumed that up to eight inches of existing soil would be excavated and exported offsite to prepare for construction of the multi-use field~~ballfield~~ and soccer/lacrosse field, and two feet of excavation would be required for the new sand volleyball courts. Soil export during construction would total an estimated 5,630 cubic yards. Based on February 2015 potholing in the SFPUC right-of-way at the ballfield, the ground surface at the reconstructed multi-use field~~ballfield~~ and ~~the new soccer/lacrosse field~~ would need to be raised by approximately six inches to provide adequate soil cover over the water pipelines. It is conservatively estimated that the County would need to import up to 4,370 cubic yards of soil to provide six inches of additional soil cover at the multi-use field~~ballfield and soccer/lacrosse field~~, and to provide a two-foot base for the sand volleyball courts.

SFPUC's Land Engineering Requirements would restrict the type of construction activity allowed within 20 feet of the centerline of its pipelines. No mechanical excavation is allowed within 24 inches of SFPUC pipelines, and digging within 24 inches of pipeline must be done with hand tool. In addition, vibratory compaction equipment is prohibited within the right-of-way except with written approval from the Commission. SFPUC also restricts the weight class of vehicles in its right-of-way to no greater than the American

Association of State Highway and Transportation Officials (AASHTO) Standard H-10 Loading.

As documented in the Tree Report prepared by Gates + Associates for the Landscape Plan in ~~January 2020~~ July 2016, ground disturbance for the proposed recreational facilities would involve removal of an estimated ~~7278~~ trees from the Flood County Park.<sup>3</sup> The Parks Department would plant or replant trees for accenting, screening, or other purposes as space allows, with a preference for native trees.

Page 81 of the Final Revised EIR in Chapter 5, *Draft EIR Text Revisions*, is amended as follows:

Page 31 of the Draft Revised EIR in Section 2.4, *Project Features*, is amended in the Final EIR as follows:

## 2.4.2 Site Access

~~The Landscape Plan would not involve changes to parking and access, except for a new drop-off area on-site. Flood County Park's existing vehicular access from Bay Road, via the entrance gate at the southwest corner of the park, would be retained, as would the existing asphalt parking lot on the western edge of the site. Pedestrians also would retain access to the park through entrances gaps along Bay Road and at the eastern gate from Iris Lane. An additional 26 parking spaces and a turnaround area would be added to the site of the existing pétanque court, as shown in Figure 4 and Figure 5, Proposed Parking Map. Twenty-three (23) new parking stall locations have been identified throughout the site in existing paved areas and include the following: one parking stall near the existing pay station; two parking stalls in the island near the eastward turn near the ballfield; one stall in the island behind the ranger residence; one stall in the island on the south side of the eastward turn; seven stalls in the approximately 60 foot space and four stalls in the approximately 36 foot space before the pétanque court; and seven stalls by converting ADA van parking stalls to ADA car parking stalls. Therefore, an additional 23 stalls striped outside of the pétanque court and 26 stalls striped within the pétanque court would add a total of 49 new parking spaces at Flood Park. Please see Figure 5 for a layout of all 369 parking spaces. With the additional 49 parking spaces the Park would provide a total of 369 parking spaces.~~

Page 84 of the Final Revised EIR in Chapter 5, *Draft EIR Text Revisions*, is amended as follows:

Page 64 of the Draft Revised EIR in Section 3.2, *Energy*, is amended in the Final EIR as follows:

**Consistent.** A tree-lined promenade is proposed for development during Phase I. In addition, the County would replace protected trees that are removed at a ~~12~~ to 1 ratio. New and replacement trees would help meet Goal 3 of the EECAP for energy efficiency in new construction.

Page 86 of the Draft Revised EIR in Section 3.4, *Noise*, is amended in the Final EIR as follows:

It is assumed that the operation of recreational facilities proposed in the Landscape Plan would generate on-site noise from organized athletic activities and maintenance equipment such as leaf blowers. In addition, it is assumed that the use of athletic field

<sup>3</sup> Refer to Appendix ERR-1 for the updated Tree Report.

could involve temporary use of sound-amplifying equipment during events. This analysis estimates noise levels from lacrosse and soccer~~athletic activities at the proposed soccer/lacrosse field~~ based primarily on reference noise levels reported in a comprehensive noise study prepared by RGD Acoustics in August 2016 for lacrosse and soccer practices and games at Marin Catholic High School in Kentfield, California.

Pages 88 and 89 of the Draft Revised EIR in Section 3.4, Noise, are amended in the Final EIR as follows:

**Impact N-1** Construction of proposed recreational facilities would generate high noise levels on and adjacent to the project site. However, construction noise would be temporary, and adherence to the County's allowed hours of construction would prevent noise disturbance during sensitive evening and nighttime hours. Therefore, the impact from construction noise would be less than significant.

*Phase I*

Construction of the proposed Phase I ~~elements~~features over an anticipated two-year period would intermittently generate high noise levels on and adjacent to Flood County Park. Construction activity would primarily occur in the northern and south-central portions of the park for the ballfield replacement, new soccer/lacrosse field, and new tennis courts. During the demolition phase, the County would use jackhammers to break up existing paved surfaces in the northern part of the park, including the two tennis courts and asphalt paths, and bulldozers or similar heavy equipment to demolish the existing Restroom D building. It is expected that site preparation and grading for new utilities and athletic fields would involve the use of bulldozers, excavators, graders, and backhoes. The construction of new asphalt paths, tennis courts, and a basketball court could require the use of pavers and rollers.

Table 23 estimates maximum noise levels from construction equipment based on the combined use of construction equipment anticipated to be used concurrently during each phase of construction. Noise levels are shown for a reference distance of 50 feet from the source equipment and at other distances that correspond to various noise-sensitive receptors. Forty feet is representative of the distance between the closest edge of the existing tennis courts (to be demolished) to the adjacent residence on Del Norte Avenue. ~~50~~Fifty feet is representative of the closest potential utility work to residences south of Bay Road, ~~80 feet is representative of the estimated distance between grading activity at the southeastern edge of the park and residences on Del Norte Avenue,~~ and ~~130~~115 feet is representative of the distance between paving activity at the new tennis courts and adjacent residences on Del Norte Avenue. The noise levels shown in Table 23 are conservative because they assume the use of construction equipment next to the nearest residences, even though most construction activity would occur farther from the site boundary, and they assume simultaneous grading and construction of three recreational facilities.

**Table 23 Maximum Estimated Noise Levels by Construction Phase**

Construction Phase	Equipment	Estimated Noise Levels at Nearest Sensitive Receptors (dBA L <sub>eq</sub> )			
		40 feet	50 feet	80 feet	<del>130</del> <sup>145</sup> feet
Demolition	Dozer, Jackhammer, Saw	86	84	<del>80</del>	<del>75</del> <sup>77</sup>
Site Preparation	Backhoe, Dozer	82	80	<del>81</del>	<del>77</del> <sup>78</sup>
Grading	Backhoe, Dozer, Excavator, Grader	86	84	<del>85</del>	<del>81</del> <sup>82</sup>
Facility Construction	Backhoe, Forklift, Generator, Welder	82	81	<del>81</del>	<del>77</del> <sup>78</sup>
Paving	Cement Mixer, Paver, Roller	85	83	<del>79</del>	<del>74</del> <sup>75</sup>

Source: FTA 2018 and 2012. See Appendix C for equipment noise impact data sheets and assumptions.

Based on Table 23, noise-sensitive receptors would experience the loudest noise during demolition of the existing tennis courts and grading activity at that site, with noise levels reaching an estimated 86 dBA L<sub>eq</sub> at the nearest residences located 40 feet to the southeast along Del Norte Avenue. ~~Grading would cause noise levels estimated at 85 dBA L<sub>eq</sub> at residences on Del Norte Avenue.~~ In addition, grading and excavation for new utilities extending from Bay Road also would generate estimated noise levels approaching 84 dBA L<sub>eq</sub> at residences located 50 feet to the south.

These temporary noise levels during construction would exceed the existing ambient noise levels of approximately 56 dBA L<sub>eq</sub> along Del Norte Avenue and 70 dBA L<sub>eq</sub> during peak-hour traffic on Bay Road. However, construction activity would be prohibited outside of the County’s allowed daytime hours (i.e., between 6:00 P.M. and 7:00 A.M. on weekdays, 5:00 P.M. and 9:00 A.M. on Saturdays, or at any time on Sundays, Thanksgiving and Christmas). This timing restriction would prevent construction noise during the most sensitive evening and nighttime hours. Therefore, the construction of Phase I elements would have a less than significant impact on nearby noise-sensitive receptors.

Pages 90 to 92 of the Draft Revised EIR in Section 3.4, Noise, are amended in the Final EIR as follows:

**Impact N-2** Grading activity would temporarily generate groundborne vibration on and adjacent to Flood County Park. Because construction of proposed recreational elements would occur inside the hours allowed in the County Code of Ordinances, it would not generate vibration when people normally sleep. Construction vibration would not exceed levels that may cause structural damage to historic adobe buildings on-site. The Landscape Plan would have a less than significant vibration impact.

*Phase I*

During Phase I of the Landscape Plan, construction of the proposed recreational elements would involve the temporary use of equipment that generates groundborne vibration. The County would use jackhammers to break up existing paved surfaces in the



northern part of the park, including the two tennis courts and asphalt paths, and bulldozers to move earth over approximately nine acres. Bulldozers or similar heavy equipment might be used to demolish the existing Restroom D building.

Table 24 identifies vibration velocity levels at a reference distance of 25 feet and at distances that correspond to various noise-sensitive receptors. Forty (40) feet is representative of the distance between the closest edge of the existing tennis courts (to be demolished and regraded) to the adjacent residence on Del Norte Avenue and 80 feet is representative of the estimated distance between grading activity at the southeastern edge of the park and residences on Del Norte Avenue. The vibration levels shown in Table 24 are conservative because they assume the use of construction equipment next to the nearest residences, even though most construction activity would occur farther from the site boundary, and the use of large as well as small bulldozers.

**Table 24 Vibration Levels for Construction Equipment at Noise-Sensitive Receptors**

Equipment	Estimated VdB at Nearest Sensitive Receptors		
	25 Feet	40 Feet	80 Feet
Large Bulldozer	87	81	72
Jackhammer	79	73	64
Small Bulldozer	58	51	42

Source: FTA 2018

Based on Table 24, noise-sensitive receptors would experience the strongest vibration during the use of bulldozers and jackhammers to demolish the existing tennis courts, with vibration levels reaching an estimated 81-73 VdB at the nearest residence located 40 feet to the southeast. ~~The use of large bulldozers during grading near southeastern property line for the proposed soccer/lacrosse field would generate similar vibration levels of approximately 78-72 VdB at residences on Del Norte Avenue.~~

Compliance with Section 4.88.360(e) of the San Mateo County Code of Ordinances would restrict construction activities to daytime hours that are generally outside of normal sleeping hours, i.e., 7:00 A.M. to 6:00 P.M. on weekdays and 9:00 A.M. to 5:00 P.M. on Saturdays. This timing restriction on construction activity would limit the exposure of nearby residences to vibration. Vibration levels would not exceed the FTA's threshold of 72 VdB for residences during normal sleeping hours. As discussed in the Setting, it is acknowledged that individual neighbors of Flood County Park may have unusual sleeping hours that result in greater sensitivity to daytime noise and vibration. Nonetheless, noise standards are typically drafted with normal sensitivity in mind. Therefore, vibration would not have significant adverse effects on residences.

Pages 92 to 94 of the Draft Revised EIR in Section 3.4, Noise, are amended in the Final EIR as follows:

*Phase I*

The operation of recreational facilities proposed in Phase I of the Landscape Plan would add new sources of noise at Flood County Park. Whereas the existing ballfields at the park are not currently open for programmed athletic use, the proposed multi-use

~~field~~ballfield and the separate soccer/lacrosse field would be available for organized athletic activities that would generate noise. Maintenance equipment such as leaf blowers also would generate noise at new locations in the park, depending on the siting of proposed tennis courts and asphalt paths. In addition, human activity at new passive recreational facilities would generate noise. These noise sources are analyzed below.

### **ATHLETIC ACTIVITIES**

Organized practices and games at the proposed multi-use field~~ballfield~~ and soccer/lacrosse field would generate noise. Programmed athletic activities would occur throughout the year, although the County anticipates that they would generally be most frequent during the summer. ~~It is anticipated that organized activities at the athletic fields would typically occur no earlier than 9 A.M. and no later than 8 P.M.~~ No additional lighting that would enable nighttime use of athletic facilities is proposed as part of the Landscape Plan. The timing of athletic events would be constrained by the park's opening hours (8 A.M.) and closing hours (variable by season, but as late as 8 P.M. in September through Labor Day).

Specific noise sources associated with athletic practices and games include shouting and conversations by players, coaches, referees, and spectators, and whistles to control play. Other potential sources are air horns used by fans and sound amplification equipment to broadcast music or play-by-play commentary. Sound amplification equipment is only allowed at County parks with approval of a permit, pursuant to Section 3.68.030(b) of the County Code of Ordinances. (Radios and acoustic musical instruments are allowed at County parks without approval of a permit, as they are not defined as sound amplification equipment.) These noise sources would be intermittent during athletic events, adding to background ambient noise from passive recreational use of the park, nearby traffic, aircraft overflights, and residential activities.

Noise from the proposed soccer/lacrosse field would occur as close as approximately 150 feet from the front yards of residences on Bay Road to the southwest, 350~~100~~ feet from the backyards of single-family residences on Del Norte Avenue to the southeast, and 475 feet from the backyards of residences on Hedge Road to the northwest. It is assumed that ~~these~~this ~~distances~~ are ~~is~~ representative of the nearest activity on the proposed field with respect to these residences, as well as of spectators lining the ~~edges~~southeastern side of the field. Soccer and lacrosse activity at the multi-use field would generate noise as close as approximately 175 feet from residences on Hedge Road to the northwest, 240 feet from residents at Haven Family House on Van Buren Road to the northeast, and 300 feet from residences on Del Norte Avenue to the southeast. In addition, baseball and softball~~athletic~~ activity at the reconstructed ballfield would generate noise as close as approximately 150 feet from residents at Haven Family House on Van Buren Road to the northeast, 175 feet from residences on Hedge Road to the northwest, and 330 feet from residences on Del Norte Avenue to the southeast.

The primary athletic ~~activities~~facility of concern with regard to noise are soccer and lacrosse~~is the proposed soccer/lacrosse field~~, due to their~~its~~ proximity to residences and the prevalence of loud impulse sounds such as whistles, shouts, and air horns. Based on noise measurements taken in 2016 at a playoff lacrosse game with 162 spectators at a representative suburban Bay Area site, Marin Catholic High School, a lacrosse game generates overall noise levels of 65-70 dBA  $L_{eq}$  at approximately 50 feet from the edge

~~of the field~~~~the edge of the stadium~~ while a lacrosse practice creates noise levels of 55-60 dBA  $L_{eq}$  at this distance (RGD Acoustics 2016). ~~These noise measurements were taken at a distance of approximately 50 feet from the edge of the lacrosse field.~~ Noise levels from the lacrosse playoff game are also considered representative of noise levels from soccer games (RGD Acoustics 2016). These noise levels provide a conservative estimate of lacrosse and soccer noise because they reflect substantially more spectator activity than anticipated at athletic events at Flood County Park. Based on a noise attenuation of 6 dBA per doubling distance noise levels from athletic activity, it is estimated that lacrosse or soccer activity during games with spectators on the multi-use field at Flood County Park would generate noise levels of up to 59 dBA  $L_{eq}$  at residences located 175 feet away on Hedge Road, 56 dBA  $L_{eq}$  at residences located 240 feet away on Van Buren Road, and 54 dBA  $L_{eq}$  at residences located 300 feet away on Del Norte Avenue ~~64 dBA  $L_{eq}$  during games and up to 54 dBA  $L_{eq}$  during practices, as perceived at residences located 100 feet away on Del Norte Avenue. Noise levels measured from the lacrosse playoff game are also considered representative of noise from soccer games. It is estimated that lacrosse or soccer activity on the proposed soccer/lacrosse field would generate noise levels of up to 61 dBA  $L_{eq}$  at residences located 150 feet away on Bay Road, 53 dBA  $L_{eq}$  at residences located 350 feet away on Del Norte Avenue, and 50 dBA  $L_{eq}$  at residences located 475 feet away on Hedge Road.~~

Average sound energy levels during a lacrosse and soccer games at either athletic field may exceed existing ambient noise levels in the vicinity of Flood County Park. As shown in Table 18, ambient noise was measured at approximately 55-56 dBA  $L_{eq}$  on a Saturday afternoon at the southeastern edge of the park, while next to residential backyards, and at approximately 56 dBA  $L_{eq}$  on Del Norte Avenue on a weekday late afternoon, and at approximately 61 dBA  $L_{eq}$  on Bay Road on a Saturday afternoon. At residences on Bay Road, ~~Anticipated noise levels of up to 61~~ 59-64 dBA  $L_{eq}$  during lacrosse and soccer games would not exceed existing ambient noise levels which were also measured at 61 dBA  $L_{eq}$  during midday weekend hours by an estimated 3 to 8 dBA  $L_{eq}$ . At residences on Del Norte Avenue, expected noise levels of up to 54 dBA  $L_{eq}$  also would not exceed existing ambient noise levels measured at 55-56 dBA  $L_{eq}$ . It is assumed that existing ambient noise levels along Hedge Road are similar to measured levels along Del Norte Avenue, as both roadways are residential side streets. Estimated noise levels of 59 dBA  $L_{eq}$  at residences on Hedge Road would exceed existing measured ambient noise levels of 55-56 dBA  $L_{eq}$  by up to 4 dBA  $L_{eq}$ . Therefore, projected noise levels averaged over the course of individual soccer and lacrosse games and practices would exceed existing ambient noise levels near Hedge Road but not near Bay Road or Del Norte Avenue. These short-term increases in ambient noise would be perceptible to residents adjacent to the park.

In addition to events at the separate soccer/lacrosse field, baseball or softball ~~athletic games and practices at the multi-use field~~ reconstructed ballfield would generate noise. Based on noise measurements taken at a school in Sherman Oaks, California, softball games generate an average noise level of 72 dBA  $L_{eq}$  at a distance of 20 feet from the center of activities (Arup 2006). As noted above, the ballfield would be located approximately 330 feet from residences on Del Norte Avenue. At this distance, assuming that noise from athletic activity attenuates by 6 dBA per doubling of distance from the source, it is estimated that softball activity at Flood County Park would generate an average noise level of 48 dBA  $L_{eq}$  for residences on Del Norte Avenue. At the Haven

Family House located approximately 150 feet from the ballfield, it is estimated that average noise from softball events would reach 55 dBA  $L_{eq}$ . These estimated noise levels from ballfield activity would not exceed the existing measured ambient noise levels of 55-56 dBA  $L_{eq}$  on a Saturday afternoon at the southeastern edge of the park. Therefore, noise from ballfield activity, in itself, would not substantially affect ambient noise levels experienced by residents.

This analysis makes the conservative assumption that athletic events generating noise at the ~~multi-use field~~ ballfield and ~~the separate~~ soccer/lacrosse field could take place concurrently. Under this scenario, the nearest residences on Del Norte Avenue would be exposed to estimated average noise levels of up to ~~57~~64 dBA  $L_{eq}$  from simultaneous soccer and lacrosse games on each field, and ~~48 dBA  $L_{eq}$  from softball games~~. The nearest residences on Hedge Road also would be exposed to combined noise levels of up to 60 dBA  $L_{eq}$ .

Softball events at the ballfield would not substantially add to noise levels from simultaneous soccer/lacrosse activity. The combined average noise level from both types of events would be approximately 64 dBA  $L_{eq}$ . This is because the softball game noise levels would be 16 dBA lower than the soccer/lacrosse game and thus would not perceptibly increase average ambient noise relative to soccer/lacrosse noise. However, combined noise levels from two soccer games, or from a soccer and lacrosse game, would exceed existing ambient noise levels next to residential streets by up to 48 dBA  $L_{eq}$ . For reference, it is widely accepted that the average healthy ear can barely perceive an increase of up to 3 dBA in noise levels and that an increase of 5 dBA is readily perceptible.

In addition to increasing average noise levels, athletic activity would generate short-term spikes in noise, such as impulse noise, that may annoy or disturb residents. Impulse noise is a sudden burst of loud noise that can startle people by its fast and surprising nature (Cirrus Research 2015). Sources of impulse noise may include shouting, whistles, and air horns. Whistles could be especially intrusive because of their shrill pitch. Spectators could use portable air horns that produce loud blasts of sound. Sound amplification equipment also could broadcast commentary or music at high volume. However, Section 3.68.130(b) of the County's noise ordinance prohibits the use of sound amplification equipment in any County Park, except if allowed under a special event permit issued by the County of San Mateo Parks Department to regulate park events. The Parks Department generally does not allow the use of sound amplification equipment even with procurement of a special event permit. This restriction would limit the exposure of residents to noise from sound amplification.

Although Section 4.88.360(c) of the County Code of Ordinances would exempt activities at Flood County Park from quantitative noise standards, the County has determined that the qualitative standard in Section 4.88.350 of disturbing the peace and quiet of neighbors would still apply to the Landscape Plan. ~~The anticipated~~ timing of athletic events – no earlier than 8 A.M. between 9 A.M. and no later than 8 P.M. – would minimize disturbance to neighbors by avoiding normal sleeping hours. Perceptible athletic noise also would not necessarily disturb the peace and quiet of the surrounding neighborhood, as defined by the criteria in Section 4.88.350 of the County Code of Ordinances. The City of Menlo Park manages athletic fields located within 100 feet of nearby residences and has received few if any complaints regarding programmed

athletic activities from residents since 2010 (Keith 2017). The County also would restrict the use of sound amplification equipment by athletic teams through individual agreements with teams that use the new fields. However, the use of whistles, air horns, and sound amplification equipment could result in an audible, albeit temporary, increase in ambient noise levels in the area. Furthermore, without explicit allowable hours for athletic events, early-morning and late-evening events could disturb the peace and quiet of neighbors.

For informational purposes only, this section also analyzes the impact of noise from new athletic facilities based on standards in the City of Menlo Park's noise ordinance (Section 8.06 of the Menlo Park Municipal Code). As discussed in Section 1.5, *Standards of Review*, the County has discretion as to which standards to apply to the project when reviewing its environmental impacts, and it has decided to apply the County's noise standards to the project. Nonetheless, the City's noise ordinance has an exemption for parks that is similar to that set forth in Section 4.88.360(c) of the County Code of Ordinances. Section 8.06.050(g) of the Menlo Park Municipal Code exempts from its noise standards organized athletic events or activities at parks that are owned or operated by the County, with the exception of amplified music or sound systems. Based on this provision, the use of sound amplification equipment could still disturb the peace and quiet of neighbors.

Page 95 of the Draft Revised EIR in Section 3.4, *Noise*, is amended in the Final EIR as follows:

The County also uses leaf blowers to clear paved surfaces such as the existing tennis courts and asphalt paths. The existing tennis courts are located as close as approximately 40 feet from the backyards of residences on Del Norte Avenue. Based on the proposed Landscape Plan shown in Figure 4, it is estimated that new asphalt paths would be built as close as approximately ~~3075~~ feet from the backyards of residences on Del Norte Avenue, and the new tennis courts would be located about ~~100~~<sup>115</sup> feet from these noise-sensitive receptors. Current noise levels from leaf blowers at Flood County Park's existing tennis courts were measured at up to 76 dBA at a distance of 140 feet. Assuming that noise from this source attenuates by 6 dBA per doubling of distance, it is estimated that leaf blowers would generate a maximum noise level of ~~89~~<sup>81</sup> dBA at a distance of ~~3075~~ feet from residential backyards. However, noise levels from leaf blowers would not increase over existing conditions because the proposed asphalt paths would be located no closer to residences than the existing tennis courts, which are as close as approximately 15 feet to residential backyards.

Page 96 of the Revised Draft EIR in Section 3.4, *Noise*, is amended in the Final EIR as follows:

***MM N-3(a) Restrict Sound Amplification Equipment and Prohibit Air Horns***

~~The County shall only allow the use of sound~~ Sound amplification equipment at organized athletic games and practices and at the ~~amphitheater~~<sup>gathering meadow</sup> shall only be allowed with the procurement of a special event permit in accordance with County of San Mateo Parks Department procedures. The County shall notify all groups using the proposed ~~soccer/lacrosse~~ multi-use field, ~~soccer/lacrosse~~ field<sup>ballfield</sup>, and ~~amphitheater~~<sup>gathering meadow</sup> of this requirement. The County shall prohibit the use of air horns at any park events. County staff shall periodically patrol the park during organized athletic events and performances to verify that park users are not operating

air horns and are not operating sound amplification equipment without an approved Special Event Permit.

Special Event Permits are required for any use of a space beyond what is considered typical use. This could include such activities as: bounce houses, amplified sound, large events (walks, runs) and those that require additional staffing or support from other agencies. Depending on the scale of the event, notification may be posted in park kiosks, on the Parks Department website or by using other communication vehicles.

Page 97 of the Revised Draft EIR in Section 3.4, *Noise*, is amended in the Final EIR as follows:

Table 26 shows the estimated net increase in peak-hour traffic volumes on the studied roadway segments, according to traffic data in the Traffic Impact Study prepared by W-Trans in June 2019 (see Appendix D). This table relies on trip generation estimates in the Flood County Park Landscape Plan Traffic Impact Study revised by W-Trans in June 2019. After the January 2020 update to the Landscape Plan, W-Trans prepared a memorandum finding that weekday peak-hour trip generation would decrease relative to the June 2019 Traffic Impact Study, from 318 trips to 216 trips, as a result of multiple factors (e.g., accounting for bicycle, pedestrian, and transit trips, and for auxiliary elements of the Landscape Plan that would not generate additional trips to the park) (Appendix ERR-2). Fewer weekday peak-hour trips would result in a smaller increase in traffic noise than anticipated on weekdays.

During Saturday peak hours, the W-Trans memorandum found that trips would increase relative to the June 2019 Traffic Impact Study. It is currently estimated that the Landscape Plan would generate 920 trips during weekend peak hours. This represents a 17 percent increase from the 784 weekend peak-hour trips anticipated in the June 2019 Traffic Impact Study. This level of increased trip generation for weekend peak hours would not substantially alter the estimates in Table 26 that the Landscape Plan would result in a 2 dBA  $L_{eq}$  increase in traffic noise on Ringwood Avenue, and a 1 dBA  $L_{eq}$  increase on Bay Road near the park.

Page 103 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

This section evaluates potential impacts relating to transportation and traffic on and around the project site. The analysis is based on the Flood County Park Landscape Plan Traffic Impact Study revised by W-Trans in June 2019 (Appendix D) and Traffic Review of the Revised 2020 Flood Park Landscape Plan in March 2020.

Page 108 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743 (Steinberg, 2013). SB 743 changes the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, Section 21099, subd. (b)(2)). In addition to new exemptions for projects that are consistent with specific plans, the SB 743 guidelines replace congestion based metrics, such as auto delay and level of service, with vehicle miles traveled (VMT) as the basis for determining significant impacts, unless the guidelines provide specific exceptions. As of July 1, 2020,

pursuant to *CEQA Guidelines* Section 15064.3, VMT is the primary metric for evaluating transportation impacts under CEQA, replacing the metric of traffic delay. Therefore, the County has evaluated the Landscape Plan using VMT analysis. In addition, for informational purposes only, ~~The deadline for transitioning to VMT for CEQA analysis is July 2020. Therefore, for the sake of thoroughness, the County has evaluated the Landscape Plan using both LOS and VMT analysis. This approach is consistent with the City of Menlo Park's currently adopted thresholds for traffic conditions, which use intersection LOS to determine impacts on the transportation system.~~

Page 109 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

The trip generation estimates were developed to be conservative, assuming that multiple activities would start and end during the same peak-hour period. The weekday P.M. trip generation estimates assume that scheduled events on both the multi-use field~~ballfield~~ and the separate soccer/lacrosse field start and end during the peak hour. It was also assumed that visitors would be concurrently using the non-scheduled activity centers at the park (e.g., pump track, tennis courts, play areas). This weekday case represents a very busy but plausible trip generation estimate for all phases of the Landscape Plan.

The Saturday peak-hour trip generation estimates assume that scheduled games on both the multi-use field and soccer/lacrosse field start and end during the peak hour.

Page 110 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

Table 33 estimates trip generation for all phases of the Landscape Plan. This table shows trip generation as estimated in the Flood County Park Landscape Plan Traffic Impact Study revised by W-Trans in June 2019. After the January 2020 update to the Landscape Plan, W-Trans prepared a memorandum finding that the Landscape Plan would add fewer weekday peak-hour trips but more Saturday peak-hour trips than anticipated in the June 2019 Traffic Impact Study (Appendix ERR-2). Because this analysis relies on the Traffic Impact Study's higher trip generation estimates for weekday peak hours, when existing traffic is most congested, it takes a conservative approach to evaluating the Landscape Plan's effects on traffic delay.

Page 111 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

### **Vehicle Miles Traveled**

Vehicle miles traveled (VMT) is the measure of miles traveled within a specific geographic area for a given period and it provides an indication of automobile and truck travel on a transportation system. This metric is often used in noise, air quality, and greenhouse gas emissions analyses. VMT can also be used to quantify the impact of a project or plan on the larger transportation system. The California Governor's Office of Planning and Research in the *Final Adopted Text Revisions to the CEQA Guidelines 2018*, introduced VMT as the metric to quantify a project's impact in place of level of service. ~~However, local jurisdictions are required to adopt a VMT threshold by July 1, 2020, and use VMT to determine transportation impacts per the updated *CEQA Guidelines*. the updated guidelines and San Mateo County has yet to adopt such a threshold~~ update its

~~own CEQA guidelines. Therefore, Nonetheless, for the sake of thoroughness, this analysis evaluates the Landscape Plan's impacts on the transportation system based on its effect includes a discussion of the Landscape Plan's effects on countywide VMT for informational purposes.~~

Page 113 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

### **Traffic Operation Standards**

This EIR discusses the Landscape Plan's effect on traffic delay for informational purposes only. As of July 1, 2020, pursuant to Senate Bill 743, vehicle miles traveled (VMT) has replaced traffic delay as the primary metric for evaluating a project's impacts on the transportation system. Section 15064.3 in the *2020 California Environmental Quality Act (CEQA) Guidelines* implements this state law, stating that "a project's effect on automobile delay shall not constitute a significant environmental impact." Therefore, the Landscape Plan's effect on traffic congestion can no longer be considered a significant environmental impact. However, traffic congestion is discussed for informational purposes because it is a topic of concern for policymakers and the community.

As discussed in Section 1, *Introduction*, whereas this EIR generally applies the County's standards to the proposed Landscape Plan, for the purposes of transportation analysis the County has chosen to ~~discuss the Landscape Plan's effect on attainment of~~ rely on the City of Menlo Park's standards. The City's standards are most appropriate in this issue area because the proposed Landscape Plan would affect the transportation network within the city limits of Menlo Park and the City's traffic standards are stringent relative to other nearby jurisdictions. The City's 2004 Circulation System Assessment establishes standards of significance for analyzing a project's impact on the circulation network. ~~These include A potentially significant impact would occur if the addition of project traffic that causes an intersection or collector street operating to LOS A through C to operate at an unacceptable level (LOS D, E, or F) or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first. In addition, they include causing a potentially significant impact would occur if a project causes an intersection on arterial streets or local approaches to state-controlled signalized intersections operating at LOS A through D to operate at an unacceptable level (LOS E or F) or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first.~~

Moreover, a project can have a ~~substantial effect on traffic delay~~ potentially significant impact if the addition of project traffic causes an increase of more than 0.8 second seconds of average delay to vehicles on all critical movements for intersections operating at near term LOS D through F for collector streets and at a near term LOS E or F for arterial streets. A critical movement is the phase or leg of an intersection that requires the most green time. For local approaches to state-controlled signalized intersections, a project is considered to have a ~~substantial effect~~ potentially significant impact if the addition of project traffic causes an increase of more than 0.8 second of delay to vehicles on the critical movements for intersections operating a near term LOS E or F. Table 35 summarizes the LOS thresholds applied to the study intersections.



**Table 35 Level of Service Standards**

Study Intersection	Jurisdiction	LOS Significance Standard Threshold	Standard Significance Threshold for Unacceptable LOS
Bay Road/Marsh Road	City of Menlo Park	D	LOS becomes E or worse or delay increases by 23 seconds or more or, if LOS is currently E or F, all critical movement delay increases by 0.8 seconds.
Bay Road/Ringwood Avenue	City of Menlo Park	C	LOS becomes D or worse or delay increases by 23 seconds or more or, if LOS is currently D, E, or F, all critical movement delay increases by 0.8 seconds
Bay Road/Willow Road	State (local approach)	D	LOS becomes E or F or, if LOS is currently E or F, all critical movement delay increases by 0.8 seconds

Source: W-Trans 2019; see Appendix D.

Page 114 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

Traffic generated by the project would cause traffic delay exceeding the City of Menlo Park’s standards at the intersection of Bay Road and Ringwood Avenue under all modeled traffic scenarios. Queuing of vehicles at the park’s entrance gate also would cause temporary traffic delay on Bay Road. However, pursuant to *CEQA Guidelines Section 15064.3*, an increase in traffic delay cannot be found to result in a significant environmental impact. Therefore, the Landscape Plan would have a less than significant impact related to traffic. Although new parking fee collection practices would minimize queuing, mitigation measures at the affected intersection would be infeasible. Therefore, the project would have a significant and unavoidable impact on traffic under existing plus project conditions.

Pages 116 and 117 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, are amended in the Final EIR as follows:

In 2020 the County eliminated the entrance fee for vehicles accessing Flood County Park. During peak-use times at the park, payment of the entrance fee used to result in queuing of vehicles on Bay Road, as cars lined up at the main gate. Free parking would streamline vehicle access, so that the Landscape Plan would not result in substantial queuing of vehicles. Therefore, queuing would not substantially increase traffic delay on Bay Road. The project also could increase traffic congestion on Bay Road for brief periods as vehicles queue up at the park’s main entrance, waiting for admission at the fee collection booth. The County plans to move the existing entrance gate to Flood County Park farther back from Bay Road, which would increase the driveway’s storage capacity for vehicles waiting to enter the park. However, queuing behavior could still occur during peak summer months, especially with the operation of the proposed athletic fields in Phase I of the Landscape Plan. Because of increased traffic congestion at the intersection of Bay Road and Ringwood Avenue and temporary queuing on Bay Road, the Landscape Plan would have a potentially significant impact under existing plus project conditions.

Although the Landscape Plan would result in increased traffic delay that exceeds City standards, an effect on traffic delay is not a significant environmental impact, pursuant to CEQA Guidelines Section 15064.3. As discussed above, VMT has supplanted traffic delay as the primary metric for evaluating transportation impacts as of July 1, 2020. Therefore, the Landscape Plan would have a less than significant impact related to traffic delay, and no mitigation is required as part of the CEQA process. As a caveat to the finding of a potentially significant impact related to traffic congestion, this analysis is predicated on locally adopted LOS standards that will change in the near future. The deadline for local jurisdictions to transition to VMT as the primary metric for evaluating traffic impacts under CEQA analysis is July 2020. At present time, locally adopted traffic standards are still in terms of LOS. As discussed in Impact T-2, project-generated traffic would have a negligible effect on VMT in San Mateo County. Therefore, the Landscape Plan would have a less than significant impact related to traffic using VMT as the standard of analysis. Nevertheless, this EIR relies on the City of Menlo Park's existing adopted LOS standards for traffic congestion.

### **Mitigation Measures**

No mitigation is required because the Landscape Plan would have a less than significant environmental impact related to traffic. Nonetheless, for informational purposes only, the effects of a physical modification to the intersection of Bay Road and Ringwood Avenue are discussed below.

As shown in Table 36, Table 37, and Table 38, the installation of a northbound left-turn lane at the intersection of Bay Road and Ringwood Avenue would improve traffic conditions during P.M. peak hours from LOS D to B under existing plus project conditions, from LOS E to C under near-term 2021 plus project conditions, and from LOS F to C under cumulative 2040 plus project conditions. This reconfiguration of the intersection would reduce traffic congestion relative to without-project conditions. However, physical constraints at the affected intersection would make implementation of such a measure less feasible. The San Mateo County Assessor Map confirms that Ringwood Avenue has 55 feet of right-of-way approaching Bay Road. In this right-of-way, the removal of an existing parking lane and street trees on the east side of Ringwood Avenue would be required to make room for a northbound left-turn lane. This reconfiguration also would require the relocation of existing utility poles and street drainage. Additionally, this measure would require coordination with, and approval, by the City of Menlo Park and the Town of Atherton, which cannot be guaranteed. Therefore, it is conservatively assumed that installing a new turn lane at the intersection would be infeasible.

~~To minimize queuing on Bay Road, Mitigation Measure T-1 would be required.~~

### **MM T-1 Parking Fee Collection Practices**

~~The County shall implement parking fee collection practices to avoid the back up of vehicles entering Flood County Park onto local streets. These practices may include automated fee machines, paying upon exiting the park, or a combination of both to move the queues associated with fee collection off of City streets and on-site.~~

## Significance After Mitigation

~~This impact would be less than significant without mitigation. Implementation of Mitigation Measure T-1 would reduce temporary congestion on Bay Road from queuing of vehicles at the park gate. Nevertheless, as discussed above, it may be infeasible to reconfigure the intersection of Bay Road and Ringwood Avenue to avoid a significant impact from traffic congestion. Therefore, the Landscape Plan would have a significant and unavoidable impact on traffic under existing plus project, near-term 2021 plus project, and cumulative 2040 plus project conditions.~~

Page 117 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

It is expected that the Landscape Plan would have a negligible effect on vehicle miles traveled in San Mateo County. Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. Because the Landscape Plan would not involve residential, office, or retail development, it is unlikely to have a significant VMT impact. The reconstruction of the existing out-of-service ballfield and addition of a new soccer/lacrosse field could shorten trips by local sports teams and programs that would no longer have to travel to more distant sites to access quality athletic fields. ~~It is expected that the main user of the athletic fields would be the Menlo Park Legends community baseball program, which currently uses other fields in Menlo Park and Atherton. Local athletic groups that currently travel to more distant sites would be able to travel a shorter distance to new athletic fields at Flood County Park. Therefore, the project would redistribute existing VMT.~~ Furthermore, the Landscape Plan would maintain and revitalize passive recreational elements likely to be used by local residents who would travel short distances to the park. Existing SamTrans bus stops are also available within acceptable walking distance of Flood County Park, which would incentivize the use of transit rather than driving to the site. ~~In addition, because the City of Menlo Park has not yet adopted VMT as its primary metric for evaluating the traffic impacts on projects, there is no local significance threshold against which to judge the Landscape Plan's effects on VMT. Therefore, the project would have a less than significant impact related to VMT.~~

Page 118 of the Revised Draft EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

### *Phases I, II, and III*

The City/County Association of Governments of San Mateo County (C/CAG) serves as the Congestion Management Agency (CMA) for San Mateo County. C/CAG's most recent Congestion Management Plan (CMP), referred to as the 2013 CMP Monitoring Report, establishes the designated CMP Roadway network, which includes I-280, U.S. 101, the Bayfront Expressway (SR 84), El Camino Real (SR 82), and Willow Road (SR 114), and the LOS standard for each roadway in the network. It is expected that local residents would account for the majority of new trips associated with the Landscape Plan. Therefore, project-generated trips would not substantially affect traffic on designated CMP roadways that serve as regional corridors. The project would not conflict with C/CAG's Congestion Management Program. Furthermore, a project's effect on traffic delay cannot be a significant environmental impact pursuant to CEQA Guidelines Section 15064.3. Therefore, the impact on CMP roadways would be less than significant.

Page 120 of the Draft Revised EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

### **MM T-5(B) Pedestrian Signage**

The County shall install signage in a central location in Flood County Park that informs visitors of an alternative pedestrian route ~~around~~ to the segment of Bay Road between Del Norte Avenue and Sonoma Avenue which lacks a sidewalk. This signage shall include a map of the alternative pedestrian route on Del Norte Avenue, Oakwood Place, and Sonoma Avenue.

Pages 120 to 122 of the Draft Revised EIR in Section 3.5, *Transportation and Circulation*, are amended in the Final EIR as follows:

~~While it is estimated that parking demand during peak summer days at Flood County Park could not exceed the on-site parking supply, and the Landscape Plan could result in increased parking on local residential streets. The impact on parking capacity would be less than significant impact with mitigation measures to facilitate on-site parking and discourage on-street parking by visitors to Flood County Park.~~

#### *Phases I, II, and III*

~~During a count on October 2, 2019, The Traffic Impact Study prepared for the Revised EIR identifies 320375 existing parking spaces were identified at Flood County Park, based on an November 2016 count. This amount excludes a northeastern portion of the on-site parking lot behind the ballfield, which was paved and striped for parking spaces at the time of the survey, but temporarily enclosed with chain-link fencing and covered by storage materials. This area is currently available for visitor parking. Based on site photos taken in August 2016 and Google Earth aerial imagery, the formerly closed portion of the parking lot includes approximately 20 parking spaces. Therefore, in practice Flood County Park has roughly 395 parking spaces. This analysis of parking availability is conservative in assuming an on-site parking supply of only 375 spaces.~~

Maximum parking demand during peak summer days under the Landscape Plan was estimated using the peak visitor maximum anticipated visitor projections provided by Gates + Associates in August 2020 April 2019. The peak user capacity of the park (as shown in Table 6), the expected proportion of multi-modal trips, and the assumed vehicle occupancy by amenity was used to derive the maximum parking demand for each recreational element of the Landscape Plan. The assumption is that all activities and facilities would be utilized concurrently at the same time, resulting in the maximum parking demand on the weekend. For a conservative analysis, no deductions were taken for motorists that would drop off and pick up park visitors at the proposed drop-off area. In practice, pick-up and drop-off activity may occur on a daily basis for athletic events in the summer.

Multi-modal trips by pedestrians, bicyclists, and transit users were deducted from the estimated maximum parking demand. The proportion of multi-modal trips was estimated based on counts of vehicles, pedestrians, and bicyclists entering Flood County Park taken on November 19, 2016. Between 12 p.m. and 6 p.m., 16 cars, 27 pedestrians, and 8 bicyclists accessed the park from various entry points. This data indicates that a substantial proportion of visitors access Flood County Park by multi-modal means.

Conservatively, it was assumed that only 5 percent of visitors would access the park without using motor vehicles and would not contribute to parking demand.

For visitors who arrive by motor vehicle, the average number of people per vehicle was estimated based on W-Trans' and the County's experience with park visitors. The following table shows vehicle occupancy rates assumed in the analysis of parking demand.

**Vehicle Occupancy Rates in Parking Demand Analysis**

<u>Recreational Element</u>	<u>People Per Vehicle</u>
<u>Preserved Adobe Administrative Office</u>	<u>2.5</u>
<u>Play Area Universal (2-5)</u>	<u>2.5</u>
<u>Play Area Universal (5-12)</u>	<u>2.5</u>
<u>Adventure Play</u>	<u>0</u>
<u>Event / Group Picnic Area</u>	<u>2.5</u>
<u>Small Group Picnic</u>	<u>2.5</u>
<u>Tennis Courts (set of 2)</u>	<u>2.0</u>
<u>Basketball</u>	<u>1.2</u>
<u>Sand Volleyball</u>	<u>1.2</u>
<u>Pump Track</u>	<u>0</u>
<u>Synthetic Ballfield/Concession/Press Box</u>	<u>3.0</u>
<u>Synthetic Soccer/Lacrosse</u>	<u>3.0</u>
<u>Demonstration Garden</u>	<u>0</u>

Source: W-Trans 2020 (Appendix ERR-2)

It was assumed that the adventure play area and demonstration garden would be auxiliary elements that are used by people already at the park. As a result, this analysis assumes that they would not generate additional parking demand. This analysis also assumes that the pump track would not add to parking demand; because this recreational element would cater to bicyclists, visitors would arrive by bicycle.

Based on this data, the anticipated typical peak parking demand for the proposed project is 380~~344~~ parking spaces. For a conservative analysis, no deductions to parking demand were taken for motorists that would drop off and pick up visitors rather than park in the on-site lot. In practice, pick-up and drop-off activity may occur on a daily basis for athletic events in the summer. Additionally, no deductions were taken for alternative modes, although the site is generally accessible by walking and bicycling. The estimated peak demand of 380~~344~~ parking spaces would not exceed the existing on-site parking supply of 320~~at least 375~~ spaces. However, the project would add an additional 49 parking spaces at the park. A total of 23 stalls would be added in already paved areas where there is space for additional parking and 26 stalls and a turnaround would be added to the site of the existing pétanque court. Following the proposed parking improvements, Flood County Park would have a total of 369 parking spaces.

Although the estimated peak parking demand of 380 spaces would exceed the proposed supply of 369 parking stalls by 11 spaces, Therefore, it is anticipated that the existing parking supply would typically be adequate to accommodate peak parking demand

under the Landscape Plan, even during busy summer days. In addition, when scheduling events at athletic fields, reserved picnic sites, and the preserved adobe administration building, the County would ensure that anticipated attendance does not exceed the parking capacity at Flood County Park. Furthermore, in 2020 the County eliminated its entrance fee for vehicles parking at Flood County Park. The allowance of free parking would reduce the incentive for visitors to seek free parking on residential streets. Free access to the proposed drop-off area also would minimize pick-up and drop-off activity near the Iris Lane gate to the park.

However, it should be noted the parking demand could still potentially exceed the capacity during very large scheduled events, leading to spillover parking on nearby residential streets. Despite the adequate supply of parking spaces on-site new vehicle trips generated by the Landscape Plan could increase the number of visitors to Flood County Park who park on nearby residential streets. Under existing conditions, some visitors park on local streets like Del Norte Avenue rather than pay for on-site parking, including during the permit parking season on these streets. This existing condition could continue under implementation of the Landscape Plan, resulting in reduced parking capacity for residents on local streets.

~~The County would encourage on-site parking under the Landscape Plan by allowing participants in programmed active recreational activities to be dropped off and picked up inside the park without paying an entrance fee. This practice would minimize pick-up and drop-off activity near the Iris Lane gate to Flood County Park. However, off-site parking could still increase, resulting in a reduced parking capacity for residents on local streets.~~

## **Mitigation Measures**

~~Mitigation Measure T-1 to implement parking fee collection practices, such as automated fee machines and paying upon exiting the park, would facilitate on-site parking and could reduce the incentive for off-site parking. In addition, Mitigation Measure T-6 would require education of park visitors about on-street parking restrictions and coordination with the City of Menlo Park on enforcement of parking violations.~~

### **MM T-6 Parking Education and Enforcement**

The County shall inform park visitors of on-street parking restrictions on nearby residential streets and shall post this information in a clearly visible location on-site. The County also shall coordinate with the City of Menlo Park to reduce parking in the adjacent neighborhoods, including proactive communication when peak use of Flood County Park is anticipated (i.e., on weekday evenings and on weekend days when all picnic areas are reserved and all athletic fields are scheduled for concurrent use) and encouraging increased targeted enforcement of on-street parking restrictions.

## **Significance After Mitigation**

With implementation of ~~Mitigation Measure T-6~~ mitigation measures to facilitate on-site parking and discourage on-street parking, the Landscape Plan would have a less than significant impact related to parking capacity.

Page 122 of the Draft Revised EIR in Section 3.5, *Transportation and Circulation*, is amended in the Final EIR as follows:

### **Cumulative Impacts**

As discussed in Impact T-1, cumulative traffic ~~would result in an exceedance of the City's standards for traffic delay at the intersection of Bay Road and Ringwood Avenue under the near-term 2021 and 2040 scenarios with the addition of project-generated trips. However, pursuant to CEQA Guidelines Section 15064.3, a project's effect on traffic delay cannot be a significant environmental impact. Therefore, the project would not have a considerable contribution to a significant cumulative traffic impact.~~ ~~impacts at the intersection of Bay Road and Ringwood Avenue would be significant and unavoidable under the near-term 2021 and 2040 scenarios with the addition of project-generated vehicle trips. New trips by park users would contribute to a future exceedance of the City of Menlo Park's LOS D threshold at this unsignalized intersection. Although the installation of a northbound left turn lane on Ringwood Avenue would successfully mitigate the project's contribution to this impact, such a mitigation measure may be infeasible. Therefore, the project would have a considerable contribution to a significant cumulative traffic impact.~~

Page 131 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

The analysis in this EIR shows that the proposed Landscape Plan would result in a significant and unavoidable impact with respect to ~~traffic congestion and~~ traffic noise; all other impacts of the project would either be less than significant or could be mitigated to a less than significant level. A Reduced Athletic Programming Alternative (Alternative 2) is intended to reduce the project's ~~effect on significant and unavoidable impact from~~ traffic congestion to the extent feasible, by prohibiting programmed use of athletic fields during P.M. peak traffic hours. In addition, a Multi-Use Field Alternative (Alternative 3) is intended to consolidate athletic activities that generate noise farther from residences adjacent to Flood County Park, reducing the project's already less than significant impact from on-site operational noise.

Page 132 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

**Table 39 Comparison of Project Alternatives' Buildout Characteristics**

Characteristic	Alternatives			
	Proposed Project	No Project	Reduced Athletic Programming	Multi-Use Field
Athletic Fields	<u>Multi-use field for baseball/softball, soccer, lacrosse</u> <del>Reconstructed ballfield</del> New soccer/lacrosse field	Existing ballfield closed indefinitely	<u>Multi-use field for baseball/softball, soccer, lacrosse</u> <del>Reconstructed ballfield</del> New soccer/lacrosse field	Multi-use field for baseball/softball, soccer, lacrosse
Area of Phase I Grading	9 acres	None	9 acres	7-9 acres
Timing of Programmed Athletic Activities	Full park hours	None	Morning and afternoon park hours except for 4-6 P.M. on weekdays	Full park hours

Pages 132 and 133 of the Draft Revised EIR in Section 4, *Alternatives*, are amended in the Final EIR as follows:

In addition to the Reduced Athletic Programming and Multi-Use Field alternatives, the County considered two other options for alternatives analysis. One option was to replace the existing ballfield with a soccer/lacrosse field while installing a new ballfield in the eastern portion of the park. ~~swap the proposed placement of the reconstructed ballfield and the new soccer/lacrosse field.~~ This alternative site layout was considered with the intention of reducing the exposure of adjacent residents to noise from soccer and lacrosse activity. ~~Whereas the proposed soccer/lacrosse field would be located approximately 100 feet away from the backyards of the nearest residences, the swapped field would be approximately 150 feet away from the nearest residences.~~ The field-swapping alternative was rejected primarily because it is infeasible. The new ballfield would be constructed over two existing concrete hatches within the San Francisco Public Utilities Commission's (SFPUC) pipeline right-of-way. First, the County would have to import additional soil to raise the new field to the level of the concrete hatches, which provide access to the pipelines. Second, to protect the safety of recreational users, grass or artificial plugs would need to be installed above the hatches. The County anticipates that SFPUC would not approve this restriction to pipeline access in its right-of-way. Furthermore, the revised Landscape Plan finalized in January 2020 locates the proposed athletic fields approximately 300 feet or more from residences on Del Norte Avenue, a distance at which athletic noise would substantially attenuate. Finally, the Multi-Use Field Alternative would accomplish the same purpose of reducing noise exposure, without necessitating more grading or interfering with pipeline access.

The County also considered an alternative to increase preservation of natural and cultural resources. This resource-preservation alternative would ~~remove the proposed soccer/lacrosse field to~~ protect an existing grove of redwood trees and retain existing adobe structures. The primary intention would be to retain the historic feeling associated with adobe structures at Flood County Park. However, since publishing a Notice of Preparation of a Draft EIR in November 2016, the County has amended the Landscaped Plan to increase adobe preservation and to protect the redwood grove near



~~the existing tennis courts.~~ When that notice was issued, the Landscape Plan called for partial demolition of the adobe administrative office building and complete demolition of an adobe maintenance building. The County has since revised the Landscape Plan to preserve these features and to repair the administrative office building for seismic stability. With these changes to the Landscape Plan, impacts related to cultural resources would be less than significant, as discussed in Section 4.4, Cultural Resources, of the original EIR. In addition, impacts to protected trees would be less than significant with mitigation, as discussed in Section 4.3, Biological Resources, of the original EIR. Because the currently proposed project would not have significant impacts on biological or cultural resources after mitigation, a resource-preservation alternative would not be necessary to analyze.

Page 133 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

By not constructing new athletic facilities, the No Project Alternative also would have no impact related to athletic noise ~~or traffic congestion from athletic participants queuing at the entrance gate.~~ This would avoid the need for mitigation to restrict the timing of programmed athletic events and the use of noise-generating devices at athletic events and to implement new parking fee collection practices.

Page 134 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

The Reduced Athletic Programming Alternative focuses on revising the programming of the recreational facilities to address ~~the project's effect on traffic congestion identified adverse traffic impacts.~~ This alternative would introduce the same new recreational facilities as planned for in the Landscape Plan, and in the same phases of construction, but would prohibit the organized use of proposed athletic fields on weekdays during afternoon peak hours (4-6 P.M.). This alternative is intended to limit active recreational use that contributes to existing traffic congestion during the afternoon rush hour. The proposed ~~multi-use field ballfield~~ and soccer/lacrosse field would remain available for informal, non-programmed use at this time.

Page 134 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

Similar to the proposed Landscape Plan, ~~it is assumed that~~ this alternative would involve the installation of 20-to-30-foot netting around the soccer/lacrosse field to retain lacrosse balls and protect the safety of nearby people. Because of its height, the netting could be a prominent feature in residential views of Flood County Park, especially from adjacent properties on Del Norte Avenue. ~~Mature trees in the eastern part of the park, which enhance the privacy of adjacent residences on Del Norte Avenue,~~ also would be removed to clear room for the soccer/lacrosse field. Like the proposed project, the impact on residential views and privacy would be less than significant with implementation of Mitigation Measure AES-1 to use athletic netting with neutral colors and Mitigation Measure BIO-2(a) to replace removed mature trees ~~along residential property lines.~~

Page 135 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

Similar to the proposed project, this alternative would involve the removal of approximately ~~7280~~ trees, including some ~~significant heritage~~ trees protected by the County. The County would prepare a permit application for the removal of protected trees and would be subject to Mitigation Measure BIO-2(a) to replace protected trees at a ~~12~~ to 1 ratio.

Page 138 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

As shown in Table 40, the Reduced Athletic Programming Alternative would substantially reduce traffic congestion at the intersection of Bay Road and Ringwood Avenue during weekday P.M. peak hours, relative to the Landscape Plan. ~~Although~~ However, traffic delay under this alternative would still exceed the City of Menlo Park's threshold of LOS D for unsignalized intersections, CEQA Guidelines Section 15064.3 requires that effects on traffic delay not be considered significant environmental impacts. Therefore, similar to the project, this alternative would have a less than significant impact under existing plus project conditions. ~~This alternative would not avoid the project's significant and unavoidable impact under existing plus project conditions.~~

Table 41 and Table 42 show that traffic delay would also still exceed LOS D at this intersection under near-term 2021 and cumulative 2040 conditions. Similar to the proposed project, a potential mitigation measure to install at northbound left-turn lane on Ringwood Avenue, approaching Bay Road, may be infeasible. Nonetheless, as discussed above, traffic delay cannot be considered a significant environmental impact. Therefore, similar to the project, this alternative would have a less than significant impact under near-term 2021 and cumulative 2040 conditions. ~~Therefore, this alternative would still have a significant and unavoidable traffic impact during weekday P.M. peak hours under near-term 2021 and cumulative 2040 conditions. Mitigation Measure T-1 also would be applicable to minimize queuing of vehicles on Bay Road by facilitating on-site parking.~~

Because the Reduced Athletic Programming Alternative would not reduce new trip generation on weekends, relative to the Landscape Plan, traffic delay under cumulative 2040 conditions would still reach LOS D at the intersection of Bay Road and Ringwood Avenue during Saturday peak hours. ~~Nonetheless~~ Therefore, this alternative would also have a less than significant and unavoidable traffic impact during Saturday peak hours under cumulative 2040 conditions.

Page 140 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

The Multi-Use Field Alternative would introduce a new multi-use athletic field in the location of the existing ballfield, while eliminating the Landscape Plan's proposed separate soccer/lacrosse field. A multi-use field would cater to baseball/softball, soccer, and lacrosse without the need for additional separate athletic fields. This field would fit approximately within the dimensions of the existing ballfield, with an estimated width of 400 feet and a length of 360 feet. The Multi-Use Field Alternative would retain all other

planned recreational elements in the Landscape Plan. In the ~~south-central~~eastern part of the park, the alternative could potentially involve ~~demolition of the existing pétanque and tennis courts~~ and construction of new passive recreational elements in lieu of the proposed soccer/lacrosse field.

Page 141 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

Mature trees in the ~~south-central~~eastern part of the park, ~~which enhance the privacy of adjacent residences on Del Norte Avenue,~~ also could be removed for the installation of additional passive recreational facilities. Like the proposed project, the impact on residential views and privacy would be less than significant with implementation of Mitigation Measure AES-1 to use athletic netting with neutral colors and Mitigation Measure BIO-2(a) to replace removed protected mature trees ~~along residential property lines~~.

The Multi-Use Field Alternative could reduce the loss of mature trees that serve as scenic resources at Flood County Park. If the ~~south-central meadow area~~existing pétanque and tennis courts were left in place, the County would retain oak trees and other specimen trees located in this area ~~a grove of redwood trees between these facilities in the eastern corner of the park~~. However, other mature trees would still be removed for construction of other facilities like volleyball courts and the multi-use field. Ground disturbance during construction also could encroach on the root zone of remaining mature trees, impairing their health. Therefore, similar to the project, the impact on scenic resources would be less than significant with implementation of Mitigation Measures BIO3(a) and BIO-3(b) to replace protected trees once removed and to avoid the root zone of remaining protected trees during construction. This alternative could further reduce this less than significant impact if mature trees in the meadow area ~~near the existing tennis courts~~ are preserved.

Page 141 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

As shown in Table 39, whereas Phase I of the proposed Landscape Plan would involve grading of an estimated nine acres for the construction of athletic fields, the Multi-Use Field Alternative would require grading of an estimated seven to nine acres for this phase. If no new recreational elements are constructed in lieu of the proposed soccer/lacrosse field, then the area of grading in Phase I would decrease by approximately two acres. Therefore, this alternative could incrementally reduce emissions of air pollutants during construction. Like the project, construction emissions would not exceed BAAQMD's significance thresholds and would have a less than significant impact on air quality. Implementation of BAAQMD's basic construction mitigation measures and reduction measures for NOx and fugitive dust would still be recommended to further reduce emissions.

During the operation of new recreational elements, this alternative would incrementally reduce vehicle trips associated with athletic events. Whereas the proposed multi-use field ~~reconstructed ballfield~~ and soccer/lacrosse field would enable simultaneous athletic events on each field, it is assumed that a multi-use field would typically accommodate one event at a time.

Page 142 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

~~As discussed in Section 4.3, *Biological Resources*, of the original EIR, Based on the 2020 Tree Report prepared for the revised Landscape Plan, it is estimated that construction of the proposed recreational elements would involve the removal of approximately 7280 trees. Because this alternative could preserve the grove of redwood trees in the south-central meadow area between the existing pétanque and tennis courts, it could incrementally reduce the removal of County-protected trees. However, similar to the proposed project, the County would prepare a permit application for the removal of protected trees and would be subject to Mitigation Measure BIO-2(a) to replace protected trees at a 12 to 1 ratio. Construction activities also could disturb the root zone of remaining protected trees, so Mitigation Measure BIO-2(b) would still be required to avoid and protect such trees. Like the proposed project, the impact on protected trees would be less than significant with implementation of these measures. This alternative could further reduce the less than significant impact if mature trees in the meadow area near the existing tennis courts are preserved.~~

Page 142 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

~~Similar to the proposed project, this alternative would involve demolition of one adobe building (Restroom D) to clear room for the proposed because it could not be structurally salvaged soccer/lacrosse field in the eastern corner of the park but would preserve other adobe buildings at the park.~~

Page 142 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

~~By constructing only one athletic field, the Multi-Use Field Alternative would accommodate fewer simultaneous athletic events than would the proposed multi-use field ballfield and soccer/lacrosse field, and therefore, would not satisfy project objectives.~~

Page 143 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

~~As shown in Table 39, whereas Phase I of the proposed Landscape Plan would involve grading of an estimated nine acres for the construction of athletic fields, the Multi-Use Field Alternative would require grading of an estimated seven to nine acres for this phase. If no new recreational elements are constructed in lieu of the proposed soccer/lacrosse field, then the area of grading in Phase I would decrease by approximately two acres.~~

~~During the operation of new recreational elements, this alternative also would incrementally reduce vehicle trips associated with athletic events. Whereas the proposed multi-use field reconstructed ballfield and separate soccer/lacrosse field would enable simultaneous athletic events on each field, it is assumed that a single, multi-use field would typically accommodate one event at a time.~~

Page 144 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

The Multi-Use Field Alternative is intended to reduce the exposure of nearby residents to athletic noise~~increase the distance between nearby residents and organized athletic activities that generate noise~~ at Flood County Park. While the proposed project would plan for construction of a separate soccer/lacrosse field an estimated ~~350-400~~ 350 feet away from residents on Del Norte Avenue, this alternative would eliminate that proposed facility. Similar to the proposed Landscape Plan, as revised in January 2020, in place of a reconstructed ballfield, this alternative would add a multi-use field that caters to baseball/softball, soccer, and lacrosse. The soccer and lacrosse uses at this field would be located approximately 240 feet from residences at the Haven Family House on Van Buren Road and 300 feet from residences on Del Norte Avenue, ~~located as close as approximately 150 feet from residences on Hedge Road and Van Buren Road and an estimated 300 feet from residences on Del Norte Avenue.~~ By eliminating the proposed soccer/lacrosse field, ~~Because the multi-use field would be about 50 feet farther from noise-sensitive receptors than would the soccer/lacrosse field,~~ it is estimated that average noise from lacrosse and soccer games would reach 54 dBA L<sub>eq</sub> at residences on Del Norte Avenue. This noise level would be less than the combined estimated noise level of 57 dBA L<sub>eq</sub> from simultaneous athletic events at the proposed multi-use field and soccer field. ~~decrease from 59-64 dBA L<sub>eq</sub> to 56-61 dBA L<sub>eq</sub> at the nearest receptors. At residences located approximately 300 feet away on Del Norte Avenue, such noise would decrease to 50-55 dBA L<sub>eq</sub>.~~ Despite this reduction in average noise levels, impulse noise from whistles, sound amplification equipment, or air horns at either athletic events or the ~~amphitheater gathering meadow~~ could still disturb nearby residents. This alternative would further reduce the project's already less than significant impact from on-site operational noise with implementation of Mitigation Measures N-3(a) and N-3(b) to restrict the loudest equipment without an approved special event permit and to further restrict the timing of athletic events.

Page 145 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

The Multi-Use Field Alternative would generate incrementally fewer new vehicle trips for active recreation than would the proposed Landscape Plan because it would accommodate less simultaneous athletic events. It would generate a similar amount of trips associated with passive recreation at other proposed facilities. Despite incrementally reducing new vehicle trips, this alternative would not avoid the project's exceedance of the City's LOS standards~~significant impacts~~ at the intersection of Bay Road and Ringwood Avenue under existing, near-term 2021, or cumulative 2040 conditions. As discussed under Impact T-1 in Section 3.5, *Transportation and Circulation*, the addition of only 25 P.M. peak-hour trips would push operating conditions at this intersection from LOS C to D, causing an exceedance of the City of Menlo Park's traffic standards. Even one adult baseball or softball game would generate an estimated 30 P.M. inbound trips (Appendix D). Therefore, a reduction in simultaneous athletic events at the park would not be sufficient to retain LOS C conditions at the affected intersection. It would be necessary to eliminate athletic events during weekday P.M. peak hours to avoid an exceedance of LOS standards~~significant impact~~ under existing conditions. Nonetheless, pursuant to CEQA Guidelines Section 15064.3, a project's effect

~~on traffic delay cannot be a significant environmental impact. Similar to the proposed project, a potential mitigation measure to install at northbound left turn lane on Ringwood Avenue, approaching Bay Road, may be infeasible. Therefore, similar to the project, this alternative would still have a less than significant and unavoidable traffic impacts under existing, near-term 2021, and cumulative 2040 conditions.~~

Page 146 of the Draft Revised EIR in Section 4, *Alternatives*, is amended in the Final EIR as follows:

Among the park redevelopment options, Alternative 2 (Reduced Athletic Programming) would be the most environmentally superior alternative relative to the proposed project. This alternative would substantially reduce vehicle trips associated with athletic activity, ~~avoiding an exceedance of traffic delay standards significant and unavoidable impact on traffic congestion~~ at the intersection of Bay Road and Ringwood Avenue during weekday P.M. peak hours under existing plus project traffic conditions. However, a project's effect on traffic delay cannot be a significant environmental impact under CEQA Guidelines Section 15064.3. Therefore, the alternative's impact on traffic ~~this impact~~ would still be less than significant, similar to the proposed project and unavoidable under cumulative traffic scenarios. The reduction in vehicle trips also would avoid the project's significant and unavoidable impact from traffic noise, and its considerable contribution to a significant cumulative impact from traffic noise. In addition, reducing trips would incrementally decrease emissions of air pollutants and GHGs, further reducing the project's less than significant impacts in these resource areas. This alternative would partially meet the proposed objectives but would not make athletic fields available on weekday late afternoons. Therefore, it would not meet demand for active recreation facilities to the same extent as would the proposed project.

Alternative 3 (Multi-Use Field) also would be environmentally preferable to the proposed project, although it would not avoid the project's significant and unavoidable impacts related to ~~traffic congestion and~~ traffic noise. Without construction of the proposed soccer/lacrosse field near residences on Del Norte Avenue, this alternative would reduce people's exposure to operational noise.

**Table 43 Impact Comparison of Alternatives**

<b>Issue</b>	<b>Proposed Project Impact Classification</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: Reduced Athletic Programming</b>	<b>Alternative 3: Multi-Use Field</b>
Aesthetics	Less than Significant with Mitigation	+ (Less than Significant)	= (Less than Significant with Mitigation)	= (Less than Significant with Mitigation)
Air Quality	Less than Significant	+ (Less than Significant)	+/ (Less than Significant)	= (Less than Significant)
Biological Resources	Less than Significant with Mitigation	+ (Less than Significant)	= (Less than Significant with Mitigation)	= (Less than Significant with Mitigation)
Cultural Resources	Less than Significant with Mitigation	+ (Less than Significant)	= (Less than Significant with Mitigation)	= (Less than Significant with Mitigation)
Energy	Less than Significant	= (Less than Significant)	= (Less than Significant)	= (Less than Significant)
Geology and Soils	Less than Significant	+ (Less than Significant)	= (Less than Significant)	= (Less than Significant)
Greenhouse Gas Emissions	Less than Significant	+ (Less than Significant)	+/ (Less than Significant)	= (Less than Significant)
Hydrology and Water Quality	Less than Significant	+ (Less than Significant)	= (Less than Significant)	= (Less than Significant)
Noise	Significant and Unavoidable	+ (Less than Significant with Mitigation)	+/ (Significant and Unavoidable)	+/ (Significant and Unavoidable)
Transportation and Circulation	<u>Less than Significant</u> Significant and Unavoidable	+ (Less than Significant)	+/ <u>Less than Significant</u> (Significant and Unavoidable)	= <u>Less than Significant</u> (Significant and Unavoidable)
Tribal Cultural Resources	Less than Significant with Mitigation	+ (Less than Significant)	= (Less than Significant)	= (Less than Significant)
Wildfire	Less than Significant	= (Less than Significant)	= (Less than Significant)	= (Less than Significant)

+ Superior to the proposed project (reduced level of impact)  
- Inferior to the proposed project (increased level of impact)  
= Similar level of impact to the proposed project

Pages 41 to 44 of the original Draft EIR in Section 4.1, *Aesthetics*, which are incorporated by reference in the Final Revised EIR, are amended in the Final EIR as follows:

**Impact AES-1** The Landscape Plan would not affect scenic vistas or corridors; however, it ~~could~~would alter views from existing residences, primarily by the removal of mature trees and installation of netting around the proposed multi-use field or the soccer/lacrosse field. This impact would be less than significant with mitigation for tree replacement and appropriate netting design.

#### Phase I

Flood County Park is not visible from the nearest State-designated or eligible scenic highway, I-280, which is located approximately 4.6 miles to the southeast. No County-designated scenic routes are located near the project site. The park also lacks scenic natural resources such as water bodies, marshes, or riparian corridors. Therefore, the proposed Landscape Plan would not affect scenic vistas or corridors. While Bay Road is not a designated scenic route, its segment adjacent to Flood County Park does have a scenic character because of mature overhanging trees and northward views of open space and mature trees on the park. The Landscape Plan would preserve almost all trees along Bay Road, as well as the scenic, fragmented adobe wall at the property line. Therefore, Phase I would not adversely affect scenic views from Bay Road.

The park is visible from some adjacent residences. Next to the emergency access gate to the park on Iris Lane, residences have views through chain-link fencing at the eastern property line. The two-story Haven Family House also has views of the park, partially filtered by chain-link fencing and trees at the property line. In addition, residences on the western side of Del Norte Avenue and the eastern side of Hedge Road, particularly two-story houses, have partially obstructed views of the park over fencing and trees at the property lines. Currently, residents have views of existing athletic facilities at the park, such as tennis and pétanque courts and the ballfield, as well as mature trees.

During implementation of Phase I, the construction and development of recreational facilities in the northern portion of Flood County Park would affect private views from adjacent residences. The grading of approximately nine acres would expose residents to disturbed soils and construction equipment; however, this adverse effect on residential views would be temporary and limited to the initial grading period. Substantial tree removal is not anticipated within the proposed 100-foot buffer next to residences on Del Norte Avenue, which would minimize adverse effects on existing residential views.~~The removal of evergreen redwood trees near the existing tennis courts could open up views of the park from several adjacent residences on Del Norte Avenue. As documented in the Tree Report prepared for the project by Gates + Associates in July 2016, the County may preserve eight of 11 mature trees located between the tennis courts and adjacent residences, which would protect existing residential views and privacy (see Appendix D).~~ However, tree removal to the west of this buffer, where the existing ballfield would be reconstructed and the soccer/lacrosse field would be installed in the southern meadow area, could be visible from residents on Bay Road and Del Norte Avenue~~construction of the proposed soccer/lacrosse field may entail the removal of additional trees.~~ In addition, this analysis conservatively assumes that 20-to-30-foot netting would border the lacrosse area of the proposed multi-use field~~circle the proposed soccer/lacrosse field to retain balls on the field and protect the safety of adjacent residents.~~ Because of its height, this netting ~~could~~would be a



prominent feature from the perspective of residents. Tree removal and netting would have a potentially significant impact on residential views.

#### Phases II and III

Whereas Phase I would involve the construction of large-scale athletic facilities, the later phases of the Landscape Plan would focus on smaller-scale facilities, such as restrooms, a new playgrounds, and gathering plazas. Proposed improvements would be clustered in the west-central portion of the park, farthest from adjacent residences. Phases II and III would not involve substantial tree removal near residential property lines or the installation of obtrusive features like tall athletic netting. Therefore, the impact on residential or scenic roadway views of the park during these phases would be less than significant.

#### **Mitigation Measures**

~~Mitigation Measure BIO-2(a) As discussed in Section 4.3, Biological Resources, Mitigation Measure BIO-2(a) would reduce~~ mitigation Measure BIO-2(a) would minimize adverse effects on residential views by requiring the replacement of removed significant trees (as defined in the County's Significant Tree Ordinance) mature trees along residential property lines. ~~The replacement trees would, upon maturation, be sufficient to restore the pre-existing level of privacy of adjacent residents.~~ Mitigation Measure AES-1 would reduce the prominence of netting around the proposed ~~soccer/lacrosse~~ area of the multi-use field.

#### **MM AES- 1 Athletic Netting Color**

If the County installs athletic netting around the proposed soccer/lacrosse field or the multi-use ballfield/soccer/lacrosse field, this netting shall have a neutral color (e.g., forest green, black, gray) that blends in with the natural environment at Flood County Park.

#### **Significance after Mitigation**

The protection of existing trees within the proposed 100-foot buffer area next to residences on Del Norte Avenue would minimize the effect of tree removal under the Landscape Plan on the privacy of adjacent residents. Furthermore, ~~as~~ as required by Mitigation Measure BIO-2(a), the replanting of significant mature trees (as defined in the County's Significant Tree Ordinance) along residential property lines would, over the long term, help to preserve residential views and privacy. In addition, the installation of neutral-colored netting would minimize this feature's obtrusiveness to neighbors. These measures would reduce impacts on residential views to less than significant.

#### **Threshold 2**

*Significantly damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.*

**Impact AES-2** While the Landscape Plan would largely preserve historic adobe building, it would involve removal of mature trees that serve as scenic resources. This impact on scenic resources would be less than significant with mitigation to replant trees of suitable species and protect remaining trees from construction activity.

#### Phase I

Site preparation for proposed recreational facilities in Phase I would involve the removal of mature trees that serve as scenic resources for visitors to Flood County Park. The bulk of tree removal under the Landscape Plan would occur during Phase I. Based on the Tree

Report prepared by Gates + Associates (20202016), it is estimated that up to 7050 trees would be removed during Phase I, out of the 72 total trees that the County expects to remove while implementing the Landscape Plan. Although the County would preserve the largest signature oak trees at the park, tree removal would include a grove of oak trees and other species at the proposed soccer/lacrosse field, ~~large redwood trees at the proposed soccer/lacrosse field,~~ several oak trees at the proposed volleyball courts, and a row of mature Ligustrum (privet) trees and strawberry trees at the edge of the proposed reconstructed ballfield. It is estimated that tree removal during Phase I would include up to 40 significant trees with a circumference of at least 38 inches.<sup>4</sup> Ground disturbance during construction also could encroach on the root zone of remaining mature trees, impairing their health.

Phase I activities also would affect scenic historic features in the built environment. Demolition of the Restroom D building adjacent to the existing tennis courts would remove a small historic adobe structure that dates to the Works Progress Administration program of the 1930s. However, this building is only one of several extant adobe structures that serve as scenic resources at Flood County Park, and the Landscape Plan would preserve the remaining adobes. The most prominent adobe structure, the administrative office building at the heart of the park, would be preserved. Therefore, Phase I would not have a substantial adverse effect on scenic features in the built environment.

Phase I would have a potentially significant impact on scenic resources due to the loss of mature trees.

#### Phases II and III

Phases II and III would involve the removal of trees at a lesser scale than in Phase I, ~~for the construction of recreational facilities in the southern portion of the park. The primary scenic natural features in this area, mature oak trees, would be preserved.~~ However, as for Phase I, construction could impinge on the root zone of remaining mature trees. With respect to the built environment, the County would not demolish any scenic adobe structures during these phases. In fact, Phase III would enhance the accessibility of the adobe administrative office building by making it seismically safe for public use. However, Phases II and III would have a potential significant impact on scenic resources from the loss of mature trees.

#### **Mitigation Measures**

As discussed in Section 4.3, *Biological Resources*, Mitigation Measure BIO-2(a) would require the replacement of removed significant trees at a 1:1 ratio. ~~Significant and heritage trees~~ under County of San Mateo Ordinance Code would be replaced with suitable trees acceptable to the Planning Director that the County recognizes as significant or heritage species. In addition, Mitigation Measure BIO-2(b) would ensure avoidance of the root zone of significant ~~heritage~~ trees during construction.

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<sup>4</sup> "Significant trees," as defined in the County's Significant Tree Ordinance, are "any live woody plant rising above the ground with a single stem or trunk of a circumference of thirty-eight inches (38") or more measured at four and one half feet (4 1/2') vertically above the ground or immediately below the lowest branch, whichever is lower, and having the inherent capacity of naturally producing one main axis continuing to grow more vigorously than the lateral axes" (San Mateo County Ordinance Code Section 12,012).

### Significance after Mitigation

Although implementation of the Landscape Plan would result in the loss of clusters of scenic trees, Mitigation Measures BIO-2(a) and BIO-2(b) would minimize adverse effects by replanting of mature scenic trees and avoidance of such trees during construction. These measures would preserve the park's collection of scenic trees over the long term. Therefore, the project would have a less than significant impact on scenic resources after mitigation.

### Threshold 3

*Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface relief features, and/or development on a ridgeline.*

**Impact AES-3** The Landscape Plan would preserve the majority of scenic mature trees and adobe buildings as well as open fields for passive recreational use, maintaining the park's overall existing visual character. The impact on visual character or quality would be less than significant.

### Phase I

The construction of recreational facilities in Phase I would temporarily degrade visual quality at Flood County Park. Grading activity would disturb approximately nine acres in ~~the northern portion of the park~~. Construction equipment such as bulldozers and backhoes also may be visible to visitors in the remainder of the park and to neighbors. However, these visual effects would be limited to the duration of construction. The site's topography also would remain relatively flat, with the minor exception of small rollers and banks~~ridges and jumps~~ installed at a new pump track.

The improvements proposed in Phase I would largely maintain Flood County Park's existing open, spacious visual character with a mixture of passive and active recreational uses. Currently, the northern section of the park predominantly has active recreational facilities including a ballfield, pétanque court, and tennis courts ~~predominate in the northern portion of the park~~. Under Phase I, active recreational uses would be expanded at Flood County Park~~similar recreational facilities would be built in the same area~~: the ballfield would be reconstructed with a new multi-use field, the tennis courts replaced, a pump track, and a new soccer/lacrosse field added in the south-central portion~~eastern corner~~ of the site. The addition of a soccer/lacrosse field would incrementally increase the acreage of athletic fields and reduce the natural character of the park by removing a grove of oak~~redwood~~ trees and other species. Twenty-to-thirty foot netting around the soccer/lacrosse field would also add a prominent artificial feature. Nevertheless, these new recreational elements would not substantially modify the overall visual character of the 24.5-acre park. The park would still have an open, spacious character that preserves the majority of scenic mature trees and adobe buildings as well as open fields for passive recreational use. The existing grove of redwood trees near residences on Del Norte Avenue would be preserved. Therefore, Phase I would have a less than significant impact on visual character or quality.

### Phases II and III

As discussed in Impact AES-1, the later phases of the Landscape Plan would focus on smaller-scale recreational facilities, such as restrooms, ~~a~~ new playgrounds, and gathering plazas. Phases II and III would not involve substantial tree removal near residential property lines or the installation of obtrusive features like tall athletic netting. The County would

rehabilitate the adobe administrative building for public use, preserving this scenic structure as a central element of the built environment. Therefore, these phases would have a less than significant impact on visual character or quality.

#### **Mitigation Measures**

No mitigation is required.

#### **Significance after Mitigation**

This impact would be less than significant without mitigation.

Page 67 of the original Draft EIR in Section 4.3, *Biological Resources*, which is incorporated by reference in the Final Revised EIR, is amended in the Final EIR as follows:

Flood County Park is operated by the County of San Mateo Parks Department; as such it is not subject to the County's protected tree ordinances. However, the County is applying the Significant Tree Ordinance standards to the Landscape Plan. The Heritage Tree Ordinance is, and the County is not applying them to this project; however, these ordinances are summarized below for informational purposes.

Page 70 of the original Draft EIR in Section 4.3, *Biological Resources*, which is incorporated by reference in the Final Revised EIR, is amended in the Final EIR as follows:

#### Phase I

The following proposed recreational elements in Phase I would require removal of trees and shrubs: multi-use baseball field replacement and bathroom, soccer/lacrosse field, tennis courts, asphalt paths, tree-lined promenade, and drop off playground area. In addition, the adobe Restroom D building would be demolished.

Pages 71 and 72 of the original Draft EIR in Section 4.3, *Biological Resources*, which are incorporated by reference in the Final Revised EIR, are amended in the Final EIR as follows:

**Impact BIO-2** Construction of proposed recreational improvements may directly or indirectly affect Significant ~~and heritage~~ trees as defined ~~protected~~ by San Mateo County. The impact on protected trees would be less than significant with mitigation to replace protected trees that are removed and to protect remaining trees during construction.

#### Phase I

The construction of Phase I improvements would require the removal of protected trees, primarily ~~in the northern section of the park~~ where athletic fields would be reconstructed and built. Based on the Tree Report prepared for the project site by Gates + Associates (2020~~2016~~), it is estimated that up to 70 approximately 50 trees would be removed during Phase I, including up to 40 significant trees as defined by the County of San Mateo that measure at least 38 inches in circumference. Once landscape plans for individual recreational improvements in Phase I are finalized, the exact number, types, and locations of trees to be removed from Flood County Park can be determined. Based on the proposed Landscape Plan, however, Phase I would result in a loss of protected trees.

Construction of Phase I improvements also could have indirect adverse effects on significant heritage trees not planned for removal. Disturbance of greater than 30 percent of the critical root zone (CRZ) may affect the tree's long-term health and structural stability. Trees with canopies and/or CRZ that are impacted by more than 30 percent may require

replacement. Therefore, Phase I would have a potentially significant impact from the removal of protected trees and disturbance of remaining protected trees during construction.

#### Phases II and III

Based on the Tree Report prepared for the project site by Gates + Associates (20202016), it is estimated that the construction of Phase II and III improvements would involve the removal of several~~30~~ trees. Similar to Phase I, once landscape plans for individual recreational improvements are finalized for Phases II and III, the exact number, types, and locations of trees to be removed within the project site can be determined. However, implementation of Phases II and III would result in the further loss of protected trees. Therefore, Phases II and III would have a potentially significant impact from the removal of protected trees and disturbance of remaining protected trees during construction.

#### **Mitigation Measures**

##### ***MM AES- 2(a) Tree Replacement***

The County shall replace ~~protected~~ County-defined significant trees that are removed from Flood County Park at 1:1 ratio. Suitable replacement trees shall be similar species deemed suitable by the Planning Director~~those species specified as either significant or heritage trees. Where mature trees are removed within 25 feet of residential property lines, the County shall plant replacement trees that upon maturation would be sufficient to restore the pre-existing level of privacy of adjacent residents.~~

Pages 88 and 89 of the original Draft EIR in Section 4.4, *Cultural Resources*, which are incorporated by reference in the Final Revised EIR, are amended in the Final EIR as follows:

##### ***MM CUL-1(a) Historic Documentation Package***

Prior to issuance of demolition permits, the County shall ensure that documentation of the buildings proposed for demolition is completed in the form of a Historic American Building Survey (HABS)-like documentation that shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation (National Park Service [NPS] 1990). The documentation shall generally follow the HABS Level III requirements and include digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (NPS 1983). The original archival-quality documentation shall be offered as donated material to the County of San Mateo Parks Department where it would be available for current and future generations. Archival copies of the documentation also shall be submitted to the City of San Mateo County Libraries~~and~~ and the San Mateo County History Museum where they would be available to local researchers. Completion of this mitigation measure shall be monitored and enforced by the lead agency.

# Appendix ERR-1

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Tree Report



Re:imagine  
**FLOOD**  
**PARK**

County of San Mateo

**FLOOD PARK  
LANDSCAPE PLAN 2020  
TREE REPORT**



# FLOOD PARK LANDSCAPE PLAN 2020

## TREE REPORT

### PROJECT DESCRIPTION

The Revised EIR, dated 2019, evaluated the 2016 Landscape Plan's impact on trees. This updated report identifies trees potentially impacted by the Flood Park Landscape Plan dated January 2020. As part of this update, additional trees were assessed to address the Landscape Plan modifications. There are more than 900 trees in Flood County Park, and this report inventories over 300 of these trees. Trees not inventoried in this report are not anticipated to be impacted by the Landscape Plan.

This report identifies trees that would be removed in the implementation of the 2020 Landscape Plan and compares the cumulative tree removal impact with the 2016 Landscape Plan. The Plan is at a "planning" level of detail and, as such, depending on the exact location, configuration and construction requirements of improvements, may undergo refinement as the project moves toward implementation. In subsequent phases, more detailed information will become available that allows adjustments to be made to address specific site conditions. As such, this report should be considered an approximation of tree removal given the current level of design detail.

The 2016 Landscape Plan had identified the cumulative removal of 80 trees. The 2020 Landscape Plan requires the cumulative removal of no more than 80 trees. None of the

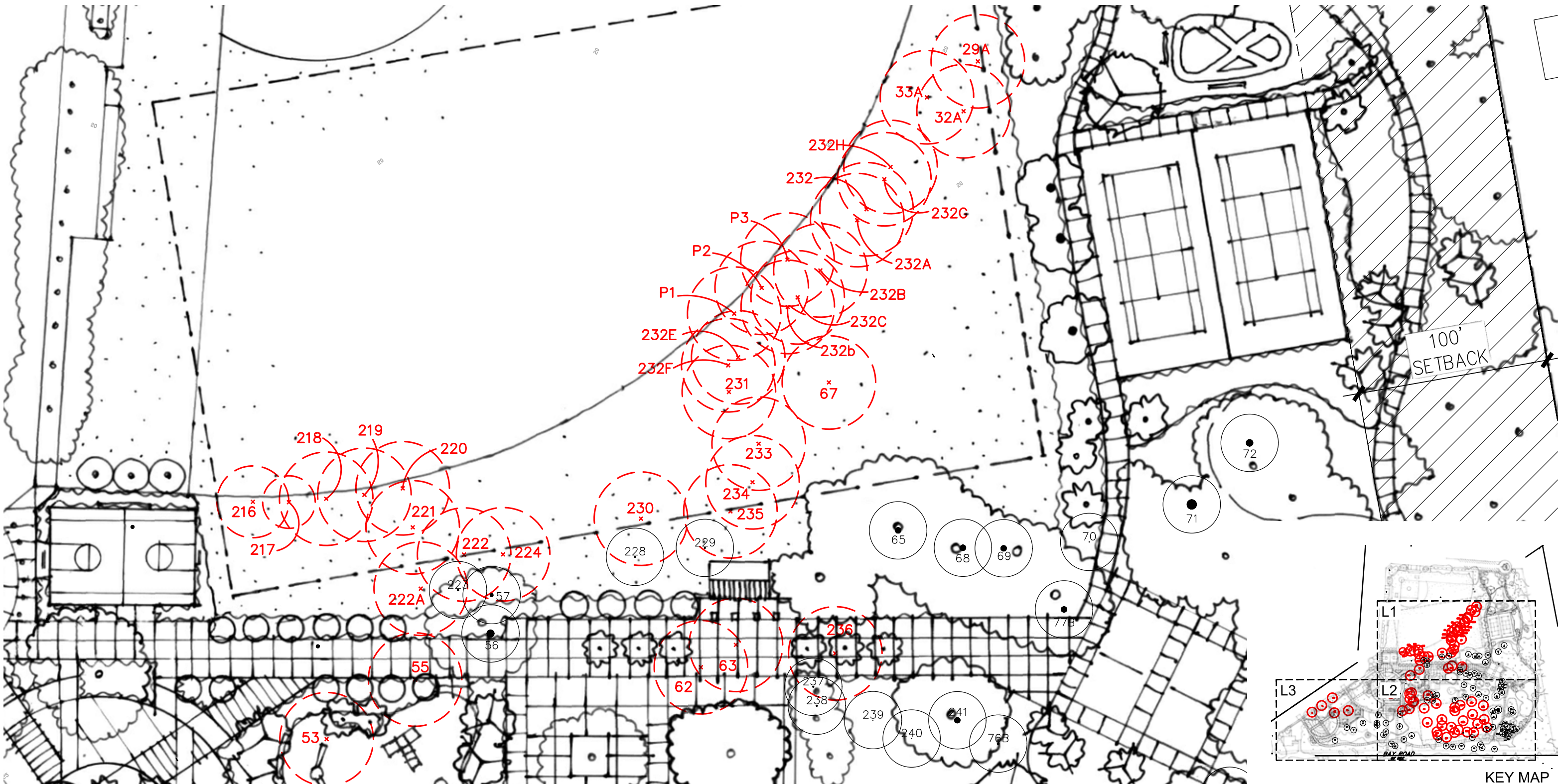


- LEGEND**
- 1 Promenade
  - 2 Focal Element
  - 3 Gathering Plazas (2)
  - 4 Preserved Park
  - Administrative Office
  - 5 Group Picnic / Event Space (7)
  - 6 Demonstration Garden
  - 7 Play Area (All Abilities)
  - 8 Adventure Play
  - 9 Basketball
  - 10 Amphitheater
  - 11 Pump Track
  - 12 Sand Volleyball
  - 13 Tennis
  - 14 Trail w Exercise Station
  - 15 Ballfield / Soccer / Lacrosse
  - 16 Soccer Field
  - 17 Drop-off
  - 18 Restrooms (3)



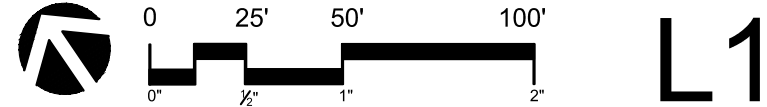
LANDSCAPE PLAN  
2020





**LEGEND**

- x Tree to be removed
- Tree to remain

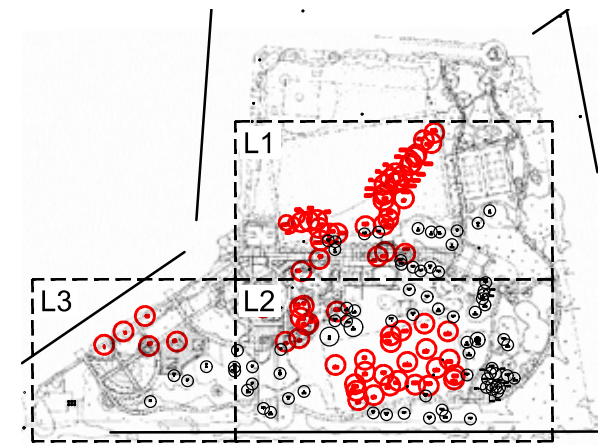
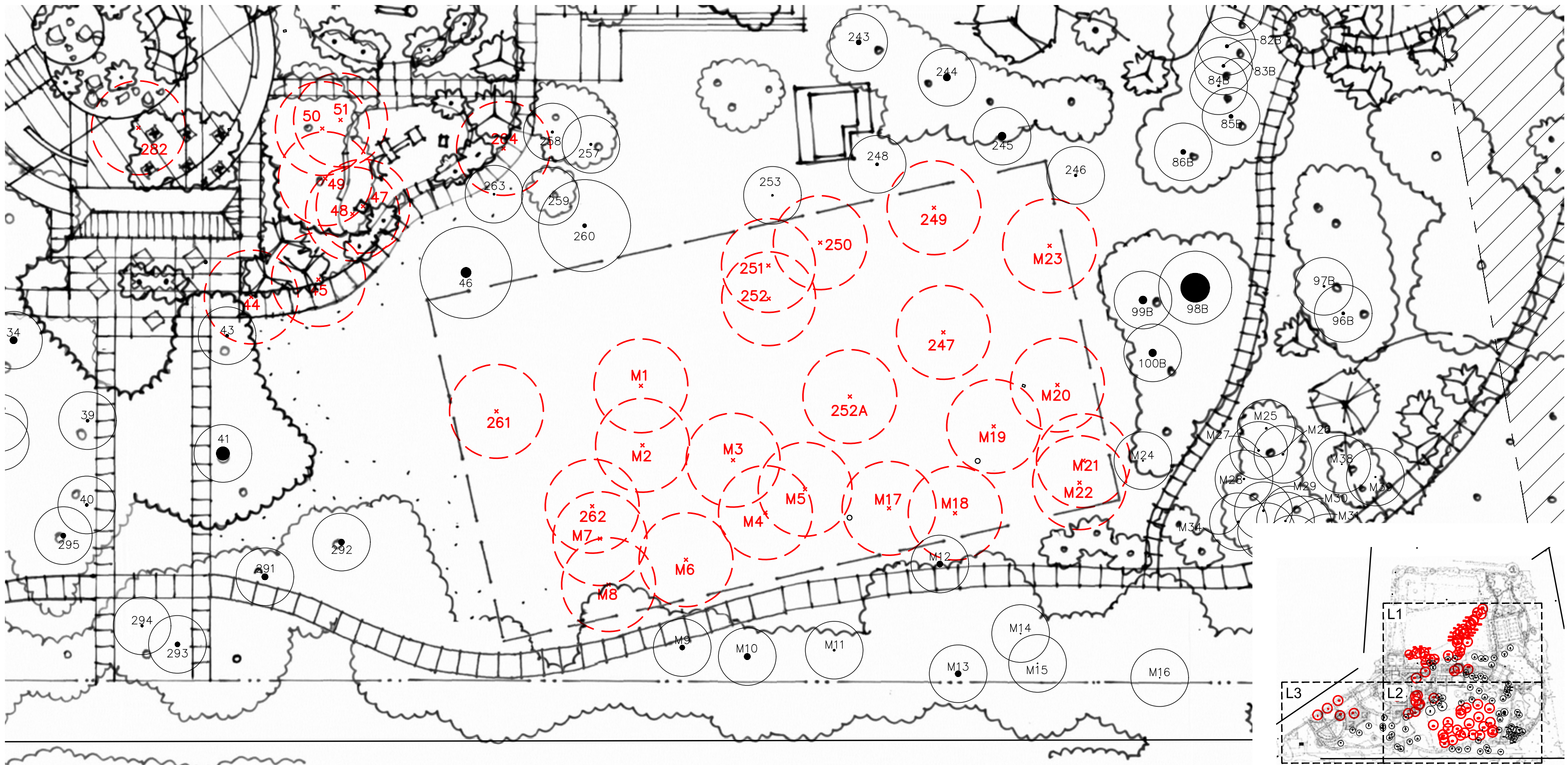


**LANDSCAPE PLAN 2020  
ENLARGEMENT**

KEY MAP

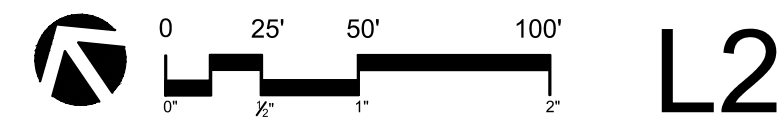
**L1**





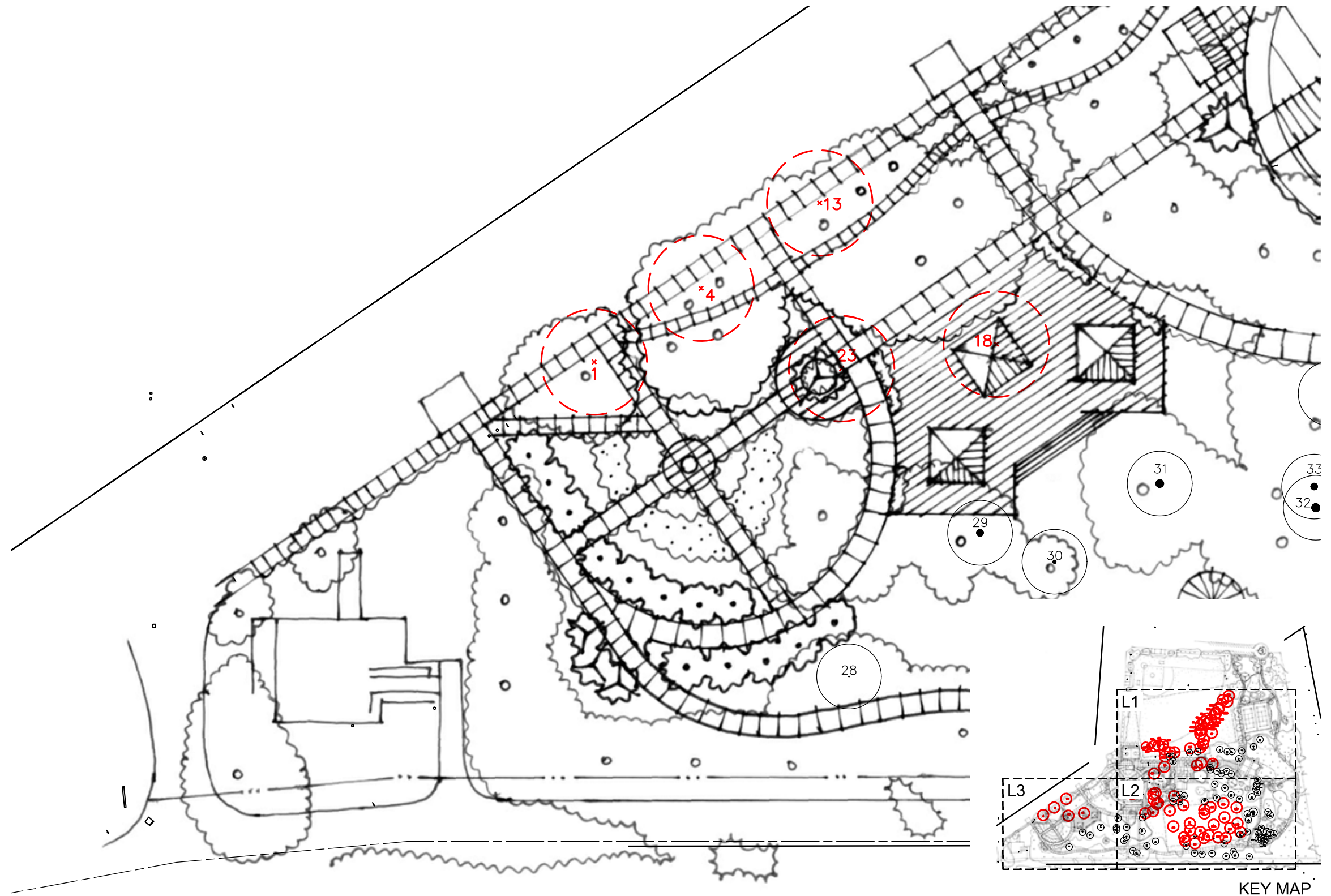
**LEGEND**

- x Tree to be removed
- Tree to remain



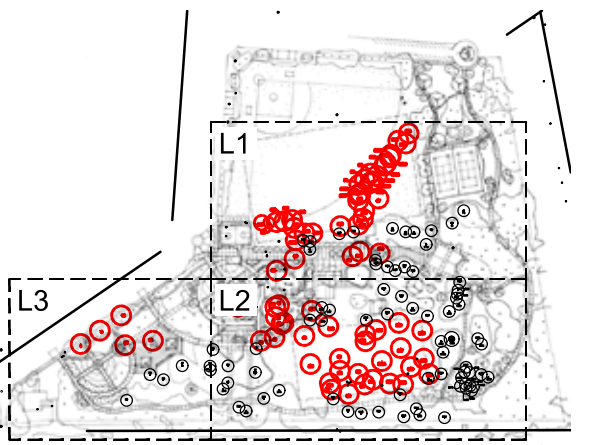
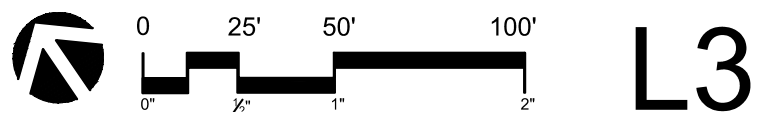
**LANDSCAPE PLAN 2020  
ENLARGEMENT**





**LEGEND**

- x Tree to be removed
- Tree to remain



**LANDSCAPE PLAN 2020  
ENLARGEMENT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
1	Quercus agrifolia	Coast Live Oak	31.5	99	36'	A	Remove	Remove
2	Quercus agrifolia	Coast Live Oak	16.6	52		A		
3	Quercus agrifolia	Coast Live Oak	10.2	32		A		
4	Quercus agrifolia	Coast Live Oak	19.7	62		A	Remove	Remove
5	Quercus agrifolia	Coast Live Oak	19.7	62		A		
6	Quercus agrifolia	Coast Live Oak	33.1	104		A		
7	Quercus agrifolia	Coast Live Oak	21.3	67		A		
8	Quercus agrifolia	Coast Live Oak	15.6	49		A		
9	Quercus agrifolia	Coast Live Oak	21.6	68		A		
10	Quercus agrifolia	Coast Live Oak	17.5	55		A		
11	Quercus agrifolia	Coast Live Oak	14.3	45		A		
12	Quercus agrifolia	Coast Live Oak	33.4	105		A-		
13	Quercus agrifolia	Coast Live Oak	15.0	47		A	Remove	Remove
14	Quercus agrifolia	Coast Live Oak	8.3	26		B		
15	Quercus agrifolia	Coast Live Oak	10.8	34		A		
16	Ulmus genus	Elm Tree	15.0	47		B-		
17	Quercus lobabta	Valley Oak	40.4	127	60'	A		
18	Quercus lobabta	Valley Oak	8.0	25		A	Remove	Remove
19	Quercus agrifolia	Coast Live Oak	16.9	53		A		
20	Quercus lobabta	Valley Oak	35.0	110		A		
21	Quercus agrifolia	Coast Live Oak	8.0	25		A		
22	Umbellularia californica	California Bay Laurel	3.5	11	15'	A		
23	Pistacia chinensis	Chinese Pistache	11.5	36	25'	A	Remove	Remove
24	Pistacia chinensis	Chinese Pistache	7.6	24		A		
25	Pistacia chinensis	Chinese Pistache	7.0	22		C		
26	Pistacia chinensis	Chinese Pistache	9.5	30		B		
27	Quercus lobabta	Valley Oak	35.7	112		A		
28	Quercus agrifolia	Coast Live Oak	28.0	88	35'	A		
29	Quercus agrifolia	Coast Live Oak	24.0	75				
30	Quercus lobabta	Valley Oak	18.5	58		C		
31	Quercus lobabta	Valley Oak	37.2	117	60'	A		
32	Quercus agrifolia	Coast Live Oak	43.6	137	80'	A+		
33	Quercus agrifolia	Coast Live Oak	35.3	111		A		
34	Quercus agrifolia	Coast Live Oak	43.6	137		A+		
35	Callitris genus	Pine	37.2	117	60'	A		
36	Quercus lobabta	Valley Oak	34.4	108	50'	B+		
37	Quercus lobabta	Valley Oak	31.8	100		A		
38	Quercus lobabta	Valley Oak	43.0	135		A		
39	Platanus acerifolia	Sycamore	14.3	45	40'	A		
40	Platanus acerifolia	Sycamore	17.2	54		A		
41	Umbellularia californica	California Bay Laurel	58.3	183	60	A		
42	Arbutus unedo	Strawberry Tree	10.5	33		A-		
43	Platanus x acerifolia	London Plane Tree	19.1	60		A		
44	Arbutus unedo	Strawberry Tree	8.3	26		C	Remove	Remove
45	Quercus ilex	Holly Oak	15.3	48	25'	A	Remove	Remove
46	Quercus agrifolia	Coast Live Oak	58.9	185	70'	A		
47	Umbellularia californica	California Bay Laurel	22.0	69		B	Remove	Remove
48	Lithocarpus	Tanbark Oak	9.5	30		A	Remove	Remove
49	Quercus lobabta	Valley Oak	41.4	130	60'	A	Remove	Remove
50	Quercus lobabta	Valley Oak	22.6	71		A	Remove	Remove
51	Prunus caroliniana	Laurel	9.0	30			Remove	Remove
52	Pyrus calleryana	Callery Pear	15.9	50	25'	A	Remove	



**TREE REMOVAL REPORT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
53	Pyrus calleryana	Callery Pear	16.6	52	25'	A	Remove	Remove
54	Pittosporum	Mock-Orange	6.7	21		A		
55	Maytenus boaria	Mayten Tree	3.8	12		A	Remove	Remove
56	Quercus lobabta	Valley Oak	34.4	108		A		
57	Quercus agrifolia	Coast Live Oak	16.9	53	35'	A		
58	Quercus agrifolia	Coast Live Oak	50.9	160	70'	A		
59	Quercus agrifolia	Coast Live Oak	35.7	112		A		
60	Quercus agrifolia	Coast Live Oak	15.0	47	35'	A		
61	Quercus lobabta	Valley Oak	20.4	64	35'	A		
62	Quercus lobabta	Valley Oak	23.2	73	35'		Remove	Remove
63	Quercus agrifolia	Coast Live Oak	11.8	37	30'		Remove	Remove
64	Quercus lobabta	Valley Oak	33.1	104	55'			
65	Quercus lobabta	Valley Oak	34.4	108	60'			
66	Quercus agrifolia	Coast Live Oak	48.0	150		A		
67	Quercus lobabta	Valley Oak	31.8	100	40'	A		Remove
68	Quercus lobabta	Valley Oak	35.7	112	60'	A		
69	Quercus agrifolia	Coast Live Oak	36.3	114	55'	A		
70	Quercus agrifolia	Coast Live Oak	3.8	12	15'			
71	Quercus lobabta	Valley Oak	31.2	98	60'	A		
72	Quercus agrifolia	Coast Live Oak	42.0	132		A		
73	Quercus lobabta	Valley Oak	29.9	94	50'	A		
74	Quercus lobabta	Valley Oak	29.9	94		A		
75	Quercus agrifolia	Coast Live Oak	25.1	79		A		
76	Quercus agrifolia	Coast Live Oak	49.0	152	60'	A		
77	Sequoia sempervirens	Coast Redwood	7.3	23	20'	A		
78	Sequoia sempervirens	Coast Redwood	35.3	111	80'	A		
79	Sequoia sempervirens	Coast Redwood	37.2	117		A		
80	Quercus agrifolia	Coast Live Oak	20.1	63		A		
81	Sequoia sempervirens	Coast Redwood	33.7	106		A		
82	Sequoia sempervirens	Coast Redwood	40.7	128		A	Remove	
57B	Umbellularia californica	California Bay Laurel	36.3	114		A		
58B	Quercus agrifolia	Coast Live Oak	26.7	84				
59B	Quercus agrifolia	Coast Live Oak	16.6	52			Remove	
60B	Quercus agrifolia	Coast Live Oak	13.7	43			Remove	
61B	Quercus agrifolia	Coast Live Oak	13.7	43		A-		
62B	Quercus agrifolia	Coast Live Oak	5.1	16		A-		
63B	Quercus agrifolia	Coast Live Oak	11.5	36		A-		
64B	Pittosporum	Mock-Orange	11.5	36		B+		
65B	Pittosporum	Mock-Orange	8.6	27		B-	Remove	
66B	Pittosporum	Mock-Orange	8.6	27		B-	Remove	
67B	Pittosporum	Mock-Orange	8.9	28		C	Remove	
68B	Pittosporum	Mock-Orange	7.0	22		B-	Remove	
69B	Quercus agrifolia	Coast Live Oak	13.4	42		A+		
70B	Quercus agrifolia	Coast Live Oak	28.6	90		A+	Remove	
71B	Quercus agrifolia	Coast Live Oak	30	94		A	Remove	
72B	Quercus agrifolia	Coast Live Oak	12.7	40		A+	Remove	
73B	Quercus agrifolia	Coast Live Oak	11	35		A	Remove	
74B	Quercus agrifolia	Coast Live Oak	17.5	55		A	Remove	
75B	Quercus agrifolia	Coast Live Oak	17.2	54		A	Remove	
76B	Quercus genus	Oak	34.4	108		B-		
77B	Quercus lobabta	Valley Oak	35.0	110		A+		
78B	Liquidambar styraciflua	American Sweet Gum	12.4	39		A		



**TREE REMOVAL REPORT**



Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
79B	Liquidambar styraciflua	American Sweet Gum	7.3	23		A		
80B	Platanus x acerifolia	London Plane Tree	18.5	58		A		
84B	Sequoia sempervirens	Coast Redwood	15.0	47		A		
85B	Sequoia sempervirens	Coast Redwood	12.7	40		A		
86B	Sequoia sempervirens	Coast Redwood	12.7	40		A		
87B	Sequoia sempervirens	Coast Redwood	7.6	24		A		
88B	Fraxinus genus	Ash	22.0	69		A		
89B	Fraxinus genus	Ash	5.1	16		A		
90B	Fraxinus genus	Ash	11.8	37		C		
91B	Sequoia sempervirens	Coast Redwood	4.8	15		A		
92B	Sequoia sempervirens	Coast Redwood	4.1	13		A		
93B	Sequoia sempervirens	Coast Redwood	4.8	15		A		
94B	Sequoia sempervirens	Coast Redwood	7.3	23		A	Remove	
95B	Sequoia sempervirens	Coast Redwood	14.0	44		A	Remove	
96B	Fraxinus genus	Ash	25.1	79		A	Remove	
97B	Fraxinus genus	Ash	18.5	58		A	Remove	
98B	Sequoia sempervirens	Coast Redwood	13.7	43		A	Remove	
99B	Sequoia sempervirens	Coast Redwood	10.8	34		A	Remove	
1A	Sequoia sempervirens	Coast Redwood	14.3	45		A	Remove	
2A	Sequoia sempervirens	Coast Redwood	25.5	80		A	Remove	
3A	Sequoia sempervirens	Coast Redwood	10.5	33		A	Remove	
4A	Sequoia sempervirens	Coast Redwood	27.1	85		A	Remove	
5A	Sequoia sempervirens	Coast Redwood	9.5	30		A	Remove	
6A	Fraxinus genus	Ash	24.2	76		C	Remove	
7A	Sequoia sempervirens	Coast Redwood	18.1	57			Remove	
8A	Sequoia sempervirens	Coast Redwood	22.0	69			Remove	
9A	Quercus agrifolia	Coast Live Oak	17.2	54			Remove	
10A	Sequoia sempervirens	Coast Redwood	17.5	55			Remove	
11A	Quercus agrifolia	Coast Live Oak	15.0	47			Remove	
12A	Sequoia sempervirens	Coast Redwood	21.6	68			Remove	
13A	Sequoia sempervirens	Coast Redwood	15.3	48			Remove	
14A	Fraxinus genus	Ash	19.1	60			Remove	
15A	Fraxinus genus	Ash	9.9	31			Remove	
16A	Sequoia sempervirens	Coast Redwood	18.1	57			Remove	
17A	Sequoia sempervirens	Coast Redwood	14.0	44			Remove	
18A	Sequoia sempervirens	Coast Redwood	19.4	61			Remove	
19A	Quercus lobabta	Valley Oak	4.8	15		A	Remove	
20A	Quercus agrifolia	Coast Live Oak	3.5	11			Remove	
21A	Sequoia sempervirens	Coast Redwood	21.0	66			Remove	
22A	Sequoia sempervirens	Coast Redwood	20.7	65			Remove	
23A	Sequoia sempervirens	Coast Redwood	9.5	30			Remove	
24A	Sequoia sempervirens	Coast Redwood	10.8	34			Remove	
25A	Sequoia sempervirens	Coast Redwood	9.2	29			Remove	
26A	Quercus agrifolia	Coast Live Oak	22.3	70			Remove	
27A	Sequoia sempervirens	Coast Redwood	20.1	63			Remove	
28A	Sequoia sempervirens	Coast Redwood	10.8	34			Remove	
29A	Sequoia sempervirens	Coast Redwood	18.8	59			Remove	Remove
30A	Acer genus	Maple	8.6	27			Remove	
31A	Acer genus	Maple	9.2	29			Remove	Remove
32A	Arbutus unedo	Strawberry Tree	10.8	34			Remove	Remove
33A	Quercus agrifolia	Coast Live Oak	7.0	22			Remove	Remove
34A	Quercus agrifolia	Coast Live Oak	22.6	71				



**TREE REMOVAL REPORT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
35A	Pittosporum undulatum	Victorian Box Pittosporum	10.5	33		B		
36A	Pittosporum undulatum	Victorian Box Pittosporum	9.2	29		B		
37A	Pittosporum undulatum	Victorian Box Pittosporum	6.0	19			Remove	
38A	Pittosporum undulatum	Victorian Box Pittosporum	5.1	16				
39A	Pittosporum undulatum	Victorian Box Pittosporum	8.0	25			Remove	
40A	Pittosporum undulatum	Victorian Box Pittosporum	7.3	23			Remove	
41A	Sequoia sempervirens	Coast Redwood	3.2	10				
42A	Pittosporum undulatum	Victorian Box Pittosporum	7.0	22			Remove	
43A	Pittosporum undulatum	Victorian Box Pittosporum	7.0	22		C		
44A	Pittosporum undulatum	Victorian Box Pittosporum	8.9	28		B		
45A	Pittosporum undulatum	Victorian Box Pittosporum	8.3	26		C		
46A	Pittosporum undulatum	Victorian Box Pittosporum	7.6	24		B		
47A	Pittosporum undulatum	Victorian Box Pittosporum	8.9	28				
48A	Pittosporum undulatum	Victorian Box Pittosporum	8.0	25		C		
49A	Pittosporum undulatum	Victorian Box Pittosporum	9.9	31		B		
50A	Pittosporum undulatum	Victorian Box Pittosporum	8.3	26		C		
51A	Pittosporum undulatum	Victorian Box Pittosporum	8.0	25		B		
52A	Pittosporum undulatum	Victorian Box Pittosporum	9.9	31		C	Remove	
53A	Quercus agrifolia	Coast Live Oak	29.9	94		A+		
54A	Acacia melanoxyton	Australian Blackwood	14.3	45		B		
55A	Acacia melanoxyton	Australian Blackwood	35.7	112		A+		
56A	Pittosporum undulatum	Victorian Box Pittosporum	8.3	26		B		
81B	Platanus x acerifolia	London Plane Tree	15.3	48		A		
82B	Platanus x acerifolia	London Plane Tree	19.7	62		A		
83B	Platanus x acerifolia	London Plane Tree	14.3	45		A		
84B	Platanus x acerifolia	London Plane Tree	13.1	41		A		
85B	Quercus lobabta	Valley Oak	24.2	76		A		
86B	Calocedrus decurrens	Incense cedar	33.1	104		B-		
87B	Quercus wislizeni	Interior Live Oak	8.3	26		B-		
88B	Quercus wislizeni	Interior Live Oak	8.3	26		B-		
89B	Sequoia sempervirens	Coast Redwood	36.6	115		A+		
90B	Sequoia sempervirens	Coast Redwood	11.8	37		A+		



**TREE REMOVAL REPORT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
91B	Sequoia sempervirens	Coast Redwood	21.6	68		A		
92B	Sequoia sempervirens	Coast Redwood	17.2	54		A		
93B	None	None						
94B	Umbellularia californica	California Bay Laurel	64.9	204		A+		
95B	Prunus cerasifera	Purple Leaf Plum	9.5	30		C-		
96B	Platanus x acerifolia	London Plane Tree	17.2	54		A+		
97B	Platanus x acerifolia	London Plane Tree	8.6	27				
98B	Umbellularia californica	California Bay Laurel	69.7	219		A+		
99B	Umbellularia californica	California Bay Laurel	44.2	139		A+		
100B	Umbellularia californica	California Bay Laurel	42.0	132		A+		
216	Removed							
217	Removed							
218	Calocedrus decurrens	Incense cedar	12	37				Remove
219	Calocedrus decurrens	Incense cedar	18	57				Remove
220	Calocedrus decurrens	Incense cedar	14	44				Remove
221	Calocedrus decurrens	Lucense Cedar	18	57		C		Remove
222	Zelkova	Water-elm	30	94				Remove
222A	Zelkova	Water-elm	27	85				Remove
222B	Removed							
223	Quercus agrifolia	Coast Live Oak	27	85				
224	Zelkova	Water-elm	24	75				Remove
225	Pyrus	Pear Tree	20	63			Remove	
226	Pyrus	Pear Tree	20	63			Remove	
227	Pittosporia Tobra	Mock-Orange	Multi 9 18" - 24"				Remove	Remove
228	Sequoia sempervirens	Redwood	14	44			Remove	
229	Quercus agrifolia	Coast Live Oak	12	37				
229A	Quercus lobate	Valley Oak	4	12.5				
229B	Quercus Lobate	Valley Oak						
230	Sequoia sempervirens	Redwood	14	44			Remove	Remove
231	Quercus agrifolia	Coast Live Oak	18	57				Remove
232	Arbutus unedo	Strawberry Tree	Multi 14", 18", 14"					Remove
233	Quercus Lobate	Valley Oak	8	25				Remove
234	Quercus agrifolia	Coast Live Oak	10	31				Remove
235	Quercus Lobate	Valley Oak	8	29				Remove
236	Arbutus unedo	Strawberry Tree	8	25				Remove
237	Quercus agrifolia	Coast Live Oak	16	50				
238	Quercus agrifolia	Coast Live Oak	16	50				
239	Quercus agrifolia	Coast Live Oak	12	37				
240	Quercus agrifolia	Coast Live Oak	12	37				
241	Quercus agrifolia	Coast Live Oak	12	37				Remove
242	Quercus agrifolia	Coast Live Oak	30	94				
243	Quercus ilex	Holly Oak	16",14"					
244	Quercus Lobate	Valley Oak	47	148				
245	Quercus agrifolia	Coast Live Oak	48	150				
246	Quercus agrifolia	Coast Live Oak	24	75				
247	Quercus agrifolia	Coast Live Oak	48	150				Remove
249	Pinus	Pine Tree	35	110				Remove



**TREE REMOVAL REPORT**



Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
250	Quercus agrifolia	Coast Live Oak	14	43				Remove
251	Umbellularia californica	California Bay Laurel	22	69				Remove
252	Quercus agrifolia	Coast Live Oak	16	50				Remove
252A	Quercus agrifolia	Coast Live Oak	30	94				Remove
254	Quercus agrifolia	Coast Live Oak	9	27				
255	Quercus Lobate	Valley Oak	5	16				
256	Quercus agrifolia	Coast Live Oak	9	28				
257	Calocedrus decurrens	Incense cedar	24	76				
258	Quercus agrifolia	Coast Live Oak	36	113				
258A	Pinus nigra	Black Pine	20	63				
260	Calocedrus decurrens	Incense cedar	15	47				
261	Quercus agrifolia	Coast Live Oak	36	113				Remove
262	Quercus agrifolia	Coast Live Oak	40	126				Remove
264	Quercus agrifolia	Coast Live Oak	14	43				Remove
265	Quercus agrifolia	Coast Live Oak	25	78				
266	Quercus agrifolia	Coast Live Oak	16	49				
267	Quercus agrifolia	Coast Live Oak	13	42				
268	Quercus agrifolia	Coast Live Oak	15	47				
269	Quercus agrifolia	Coast Live Oak	11	35				
270	Quercus agrifolia	Coast Live Oak	16	50				
271	Quercus agrifolia	Coast Live Oak	23	72				
272	Quercus agrifolia	Coast Live Oak	40,38	109				
273	Sequoia sempervirens	Redwood	13	41			Remove	
274	Sequoia sempervirens	Redwood	20	63			Remove	
275	Sequoia sempervirens	Redwood	12	37				
276	Sequoia sempervirens	Redwood	20	62				
279	Sequoia sempervirens	Redwood	38	119				
280	Sequoia sempervirens	Redwood	44	138				
281	Pistacia	Pistachio Tree	34	107				
282	Pistacia	Pistachio Tree	23	72			Remove	Remove
283	Pistacia	Pistachio Tree	31	97				
284	Pistacia	Pistachio Tree	38	119				
285	Pistacia	Pistachio Tree	27	85				
286		Plaza Tree	29	91				
287		Plaza Tree	14	44				
288		Plaza Tree	21	66				
290	None	None	None					
291	Umbellularia californica	California Bay Laurel	26	81				
292	Quercus agrifolia	Coast Live Oak	18	56				
293	Umbellularia californica	California Bay Laurel	86	270				
294	Quercus agrifolia	Coast Live Oak	45	141				
295	Arbutus	Strawberry Tree	51	160				



**TREE REMOVAL REPORT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
<b>BALLFIELD</b>								
P1	Ligustrum lucidum	Privet	30	94				Remove
P2	Ligustrum lucidum	Privet	24	75				Remove
P3	Ligustrum lucidum	Privet	24	75				Remove
232A	Arbutus unedo	Strawberry Tree	16	50				Remove
232B	Arbutus unedo	Strawberry Tree	16	50				Remove
232C	Arbutus unedo	Strawberry Tree	12	37				Remove
232D	Arbutus unedo	Strawberry Tree	10,12,16					Remove
232E	Arbutus unedo	Strawberry Tree	10	31				Remove
232F	Arbutus unedo	Strawberry Tree	12	37				Remove
232G	Arbutus unedo	Strawberry Tree	12	37				Remove
232H	Arbutus unedo	Strawberry Tree	10	31				Remove

**MEADOW (44 Removed)**

M1	Quercus agrifolia	Coast Live Oak	20	63				Remove
M2	Quercus agrifolia	Coast Live Oak	24	75				Remove
M3	Quercus agrifolia	Coast Live Oak	20	63				Remove
M4	Quercus agrifolia	Coast Live Oak	12	37				Remove
M5	Quercus agrifolia	Coast Live Oak	28	88				Remove
M6	Quercus agrifolia	Coast Live Oak	12	37				Remove
M7	Quercus agrifolia	Coast Live Oak	24	75				Remove



**TREE REMOVAL REPORT**

Tree No.	Botanical Name	Common Name	DBH (in.)	Circumference (in.)	Height (feet)	Health (2016)	Landscape Plan 2016	Landscape Plan 2020
M8	Quercus agrifolia	Coast Live Oak	30	94				Remove
M9	Quercus agrifolia	Coast Live Oak	20	63				
M10	Quercus Lobate	Valley Oak	40	126				
M11	Quercus Lobate	Valley Oak	42	132				
M12	Melaluca genus	Paper Bark Tree	12,14,8,10,10,14					
M13	Quercus agrifolia	Coast Live Oak	12,14,10					
M14	Quercus agrifolia	Coast Live Oak	12	37				
M15	Umbellularia californica	California Bay Laurel	49	154				
M16	Umbellularia californica	California Bay Laurel	50	157				
M17	Quercus ilex	Holly Oak	20	63				Remove
M18	Quercus agrifolia	Coast Live Oak	14	44				Remove
M19	Umbellularia californica	California Bay Laurel	16	50				Remove
M20	Quercus Lobate	Valley Oak	10	31				Remove
M21	Sequoia sempervirens	Redwood	18	57				Remove
M22	Sequoia sempervirens	Redwood	24	75				Remove
M24	Sequoia sempervirens	Redwood	12	37				
M25	Sequoia sempervirens	Redwood	12	37				
M26	Sequoia sempervirens	Redwood	14	44				
M27	Sequoia sempervirens	Redwood	10	31				
M28	Sequoia sempervirens	Redwood	16	50				
M29	Sequoia sempervirens	Redwood	12	37				
M30	Sequoia sempervirens	Redwood	12	37				
M31	Sequoia sempervirens	Redwood	10	31				
M32	Sequoia sempervirens	Redwood	14	44				
M33	Sequoia sempervirens	Redwood	16	50				
M34	Sequoia sempervirens	Redwood	12	37				
M35	Sequoia sempervirens	Redwood	14	44				
M36	Sequoia sempervirens	Redwood	12	37				
M37	Sequoia sempervirens	Redwood	12	37				
M38	Sequoia sempervirens	Redwood	10	31				
M39	Sequoia sempervirens	Redwood	16	50				



# Appendix ERR-2

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Traffic and Parking Memorandum



September 24, 2020

Mr. Jonathan Berlin  
Rincon Consultants, Inc.  
449 15th Street, Suite 303  
Oakland, CA 94612

## Review of the Revised 2020 Flood Park Peak Use Projection

Dear Mr. Berlin;

As requested, W-Trans has prepared a review of the revised July 2020 Flood Park Peak Use Projection as compared to the project as evaluated in the *Traffic Impact Study (TIS) for the Flood Park County Park Landscape Plan* (W-Trans, 2019) and the Errata to the Final Revised EIR (Rincon, 2019).

### Capacity

The 2020 Plan was developed as an alternative to the Landscape Plan as evaluated in the *TIS for the Flood Park County Park Landscape Plan* (W-Trans, 2019). The following is a review of the revised plan in terms of potential traffic and parking impacts.

### Trip Generation

Trip generation estimates are typically developed using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 10<sup>th</sup> Edition, 2017. However, standard rates are not available or applicable to the improvements planned at the park; therefore, trip generation rates were developed based on historic park visitor statistics, estimated peak use numbers, and anticipated future programing schedules.

The existing conditions at Flood County Park were derived using historic park visitor statistics from 2011 through 2015. During this time period the baseball field was not in programmed use, and therefore this time period was assumed to represent the existing conditions at the park. Driveway counts collected in November 2016 were used to validate these assumptions. This data was used to understand the magnitude of the maximum increase in park visitors. For the purposes of this traffic study, the maximum anticipated park visitor statistics were derived from the Plan phasing information and park industry data by Gates and Associates.

W-Trans utilized the park visitor statistics and anticipated vehicle occupancy to convert the maximum number of users into trip generation estimates based on the assumptions summarized in the attached Trip Generation Assumptions. The trip generation estimates were developed to be reasonably conservative, assuming that multiple activities would start and end during the same hour. The weekday p.m. trip generation estimates assume that scheduled events on both the baseball/softball/lacrosse and soccer/lacrosse fields start and end during the peak hour. It was also assumed that the non-scheduled activity centers (amenities without a specified start and end time, such as the pump track, tennis courts, and play areas) would be utilized at the same time as well. This weekday case represents a busy, but also feasible and not unreasonable trip generation estimate for all project phases.

The Saturday peak hour trip generation estimates assume that scheduled games on both the baseball/softball/lacrosse and soccer/lacrosse fields start and end during the peak hour. It was also assumed that the non-scheduled activity centers would be utilized at the same time as well. This weekend case represents a busy, but also feasible and not unreasonable trip generation estimate for all project phases during the peak summer months.

This reasonably conservative analysis does not represent typical park operations but highlights the few instances through the year when Flood Park has the potential to operate at maximum capacity. To account for the impact of transit, pedestrian infrastructure, and bicycle facilities on the vehicle trip generation, a five-percent multimodal reduction was applied to both daily and peak hour trips. This figure was derived based on a review of park entry activity during the November 2016 surveys, knowledge of the surrounding area, and professional judgment.

Trip generation estimates are presented in the enclosed Trip Generation Assumptions and summarized in Table 1 below. Overall, the park would be expected to generate a maximum of 160 weekday p.m. peak hour trips and 302 Saturday peak hour trips during Phase 1. Upon full buildout, the park would be expected to generate a maximum of 216 weekday p.m. peak hour trips and 920 weekend peak hour trips.

**Table 1 – Phase 1, 2, and 3 Maximum Trip Generation Summary**

Land Use	Weekday Daily Trips	PM Peak Hour			Saturday Daily Trips	SAT Peak Hour		
		Trips	In	Out		Trips	In	Out
<i>Phase 1</i>								
Synthetic Baseball/Softball/Lacrosse Field	40	40	20	20	150	100	50	50
Synthetic Soccer/Lacrosse Field	40	40	20	20	150	100	50	50
Tennis Courts	32	32	16	16	64	32	16	16
Sand Volleyball	80	40	20	20	20	20	10	10
Basketball	16	16	8	8	100	66	33	33
Pump Track	0	0	0	0	0	0	0	0
Phase 1 Subtotal Trips	208	168	84	84	484	318	159	159
Transit and Non-Motorized Trips	-10	-8	-4	-4	-24	-16	-8	-8
<b>Phase 1 Total Trips</b>	<b>198</b>	<b>160</b>	<b>80</b>	<b>80</b>	<b>460</b>	<b>302</b>	<b>151</b>	<b>151</b>
<i>Phase 2</i>								
Demonstration Garden	0	0	0	0	0	0	0	0
Play Area Universal (2-5)	24	14	7	7	36	20	10	10
Play Area Universal (5-12)	48	26	13	13	68	40	20	20
Adventure Play	0	0	0	0	0	0	0	0
Small Group Picnic	0	0	0	0	380	380	190	190
Drop-in Picnic	20	20	10	10	20	20	10	10
Phase 2 Subtotal Trips	92	60	30	30	504	460	230	230
Transit and Non-Motorized Trips	-5	-4	-2	-2	-25	-24	-12	-12
<b>Phase 2 Total Trips</b>	<b>87</b>	<b>56</b>	<b>28</b>	<b>28</b>	<b>479</b>	<b>436</b>	<b>218</b>	<b>218</b>

**Table 1 – Phase 1, 2, and 3 Maximum Trip Generation Summary**

Land Use	Weekday Daily Trips	PM Peak Hour			Saturday Daily Trips	SAT Peak Hour		
		Trips	In	Out		Trips	In	Out
<i>Phase 3</i>								
Shade/Market Structure	0	0	0	0	160	60	30	30
Event/Group Picnic Area	0	0	0	0	132	132	66	66
Phase 3 Subtotal Trips	0	0	0	0	292	192	96	96
Transit and Non-Motorized Trips					-15	-10	-5	-5
<b>Phase 3 Total Trips</b>					<b>277</b>	<b>182</b>	<b>91</b>	<b>91</b>
<b>Total Trips from Phase 1, 2, and 3</b>	<b>285</b>	<b>216</b>	<b>108</b>	<b>108</b>	<b>1216</b>	<b>920</b>	<b>460</b>	<b>460</b>

Compared to the project as evaluated in the *TIS for the Flood Park County Park Landscape Plan* (W-Trans, 2019) and the *Errata to the Final Revised EIR* (Rincon, 2019), the revised July 2020 Flood Park Peak Use Projection would generate fewer trips during the weekday p.m. peak hour and would generate a greater number of trips during the weekend peak hour.

**Finding** – The proposed revised July 2020 Flood Park Peak Use Projection would generate fewer daily and weekday p.m. peak hour trips as compared to the previously proposed project. The revised project would generate additional weekend peak hour trips as compared to the previously proposed project.

## Parking

Flood County Park was analyzed to determine whether the proposed parking supply would be sufficient for the anticipated parking demand. The City of Menlo Park Municipal Code and the San Mateo Code of Ordinances do not specify parking requirements for a park. The revised July 2020 Flood Park Peak Use Projection project would provide 369 parking spaces.

Parking demand using the maximum anticipated park visitor statistics were derived from the Plan phasing information and park industry data by Gates and Associates. The user capacity of the park and the assumed vehicle occupancy by amenity was used to derive the maximum parking demand for each amenity. The assumption is that all activities would be utilized at the same time, resulting in the maximum parking demand on the weekend. For a conservative analysis, no deductions were taken for motorists that would drop-off and pick-up park visitors and not park in the lot. A five-percent multimodal trip reduction was applied to the user-maximum capacity, similar to the trip generation analysis. Based on this data, the anticipated typical peak parking demand for the proposed project is 380 parking spaces. Using these calculations and conservative assumptions, it is anticipated that the proposed project would be short by 11 parking spaces at the period of peak weekend parking demand.

**Finding** – The proposed parking supply would result in an 11-parking space deficit based on the estimated parking demand rate.

## Conclusion

- The proposed project is expected to generate a maximum of 216 weekday p.m. peak hour trips and 920 Saturday peak hour trips. This is 102 fewer weekday peak hour trips and 136 greater weekend peak hour trips compared to the analysis presented in the *TIS for the Flood Park County Park Landscape Plan* (W-Trans, 2019) and the *Errata to the Final Revised EIR* (Rincon, 2019).

- The estimated peak weekend parking demand for the project (380 spaces) would exceed the proposed parking supply (369 spaces). This represents a demand for 36 additional parking spaces compared to the analysis presented in the *TIS for the Flood Park County Park Landscape Plan (W-Trans, 2019)* and the *Errata to the Final Revised EIR (Rincon, 2019)*.

The July 2020 Flood Park Peak Use Projection is expected to operationally emulate the intersection operation and traffic impacts as discussed in the *TIS for the Flood Park County Park Landscape Plan (W-Trans, 2019)* and the *Errata to the Final Revised EIR (Rincon, 2019)*. The parking demand is anticipated to exceed the proposed parking supply by 11 spaces.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,



Allison Woodworth, EIT  
Assistant Engineer



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MES/akw/SMX013.L2

Enclosure: Trip Generation Assumptions





## Flood County Park Trip Generation Assumptions

Travel assumptions are included below.

Note: One cycle is defined as a group of users arriving, utilizing, and departing the park.

### Phase 1 – Projected Use

- Synthetic Ballfield/Lacrosse Field Overlay/Concession/Press Box
  - 30 players, 45 spectators per game on weekends, 3 games per day
  - 30 players, 30 parents on weekdays, 1 game per day
  - 3.0 persons per vehicle
  - Assume one cycle occurs during the weekday peak hour
  - Assume two cycles occur during the weekend peak hour
  - Weekend peak hour trip rate: 100 total trips, 50 in/50 out
  - Weekday peak hour trip rate: 40 total trips, 20 in/20 out
- Synthetic Soccer/Lacrosse
  - 30 players, 45 spectators per game on weekends, 3 games per day
  - 30 players, 30 parents on weekdays, 1 game per day
  - 3.0 persons per vehicle
  - Assume one cycle occurs during the weekday peak hour
  - Assume two cycles occur during the weekend peak hour
  - Weekend peak hour trip rate: 100 total trips, 50 in/50 out
  - Weekday peak hour trip rate: 40 total trips, 20 in/20 out
- Tennis Courts (set of 2)
  - 8 players, 8 people waiting on weekends, 4 cycles per day
  - 8 players, 8 people waiting on weekdays, 2 cycles per day
  - 2.0 persons per vehicle
  - Assume two cycles occur during the weekday peak hour
  - Assume two cycles occur during the weekend peak hour
  - Weekend peak hour trip rate: 32 total trips, 16 in/16 out
  - Weekday peak hour trip rate: 32 total trips, 16 in/16 out
- Sand Volleyball (set of 2)
  - 12 players on weekends
  - 12 players, 12 spectators on weekdays
  - 1.2 persons per vehicle
  - Assume one cycle occurs during the weekday peak hour
  - Assume one cycle occurs during the weekend peak hour
  - Weekend peak hour trip rate: 20 total trips, 10 in/10 out
  - Weekday peak hour trip rate: 40 total trips, 20 in/20 out
- Basketball
  - 10 players, 10 people waiting on weekends, 3 cycles per day
  - 10 players, 10 people waiting on weekdays, 1 cycle per day
  - 1.2 persons per vehicle
  - Assume one cycle occurs during the weekday peak hour
  - Assume two cycles occur during the weekend peak hour
  - Weekend peak hour trip rate: 66 total trips, 33 in/33 out
  - Weekday peak hour trip rate: 16 total trips, 8 in/8 out

- Pump Track
  - 20 person maximum capacity
  - 0 persons per vehicle; assumed that pump track users arrive and depart on bicycle
  - No vehicle trips generated by this amenity

#### Phase 2 – Projected Use

- Play Area Universal (2-5)
  - 15 person maximum capacity on weekends
  - 10 person peak use on weekdays
  - 2.5 persons per vehicle
  - Peak use is a one time occurrence. Assume one cycle of peak use, two cycles of 75% peak use, and one cycle of 50% peak use.
  - Weekday peak hour trip rate: 14 total trips per game, 7 in/7 out
- Play Area Universal (5-12)
  - 30 person maximum capacity on weekends
  - 20 person peak use on weekdays
  - 2.5 persons per vehicle
  - Peak use is a one time occurrence. Assume one cycle of peak use, two cycles of 75% peak use, and one cycle of 50% peak use.
  - Weekend peak hour trip rate: 40 total trips per game, 20 in/20 out
  - Weekday peak hour trip rate: 26 total trips per game, 13 in/13 out
- Adventure Play
  - Auxiliary use; does not generate new users.
- Small Group Picnic
  - 7 small picnic areas, average of 68 people per site on weekends
  - No weekday activity
  - 2.5 persons per vehicle
  - Assume one cycle occurs during the weekend peak hour
  - Weekend peak hour trip rate: 380 total trips per event, 190 in/190 out
- Drop-in Picnic
  - Assume 20% of drop-in picnic sites are used as a primary activity
  - Assume 6 persons per site at 4 picnic areas
  - 2.5 persons per vehicle
  - Weekend peak hour trip rate: 20 total trips per event, 10 in/10 out
  - Weekday peak hour trip rate: 20 total trips per event, 10 in/10 out

#### Phase 3 – Projected Use

- Shade/Market Structure
  - 200 person daily capacity on weekends
  - 75 person peak use on weekends
  - No weekday activity
  - 2.5 persons per vehicle
  - Weekend peak hour trip rate: 60 total trips per event, 30 in/30 out
- Event/Group Picnic Area
  - 164 person daily capacity on weekends
  - 164 person peak use on weekends
  - No weekday activity
  - 2.5 persons per vehicle
  - Weekend peak hour trip rate: 132 total trips per event, 66 in/66 out