



# Flood County Park Landscape Plan

Final Revised Environmental Impact Report/  
Response to Comments Document

SCH #2016112040

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# Table of Contents

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1	Introduction.....	1
1.1	Purpose of the Response to Comments Document .....	1
1.2	Environmental Review Process .....	1
1.3	Document Organization .....	2
2	List of Commenters .....	3
2.1	Organization of Comment Letters and Responses .....	3
2.2	Public and Agency Comments Received.....	3
3	Comments and Responses .....	6
3.1	Topical Responses .....	6
3.2	Written Comments.....	17
4	Public Meeting Comments .....	76
5	Draft EIR Text Revisions.....	79
5.1	Draft Revised EIR Text Revisions .....	79

## Appendices

Appendix A	May 2018 Final EIR
Appendix B	Errata to the Final Revised EIR

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# 1 Introduction

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## 1.1 Purpose of the Response to Comments Document

This document has been prepared to respond to comments received on the Draft Revised Environmental Impact Report (Draft Revised EIR) prepared for the proposed Flood County Park Landscape Plan (project). The Draft Revised EIR identifies the likely environmental consequences associated with development of the project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides a response to comments on the Draft Revised EIR and makes revisions to the Draft Revised EIR, as necessary, in response to those comments or to make clarifications to material in the Draft Revised EIR. This document, together with the Draft Revised EIR, constitutes the Final Revised EIR for the proposed project. The Final Revised EIR will also include the Mitigation Monitoring and Reporting Program, which is technically a separate document that accompanies the project for mitigation measure implementation tracking during the construction phases.

## 1.2 Environmental Review Process

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft Revised EIR.

The County of San Mateo Parks Department circulated a Draft EIR and published a Final EIR for the Flood County Park Landscape Plan (proposed project) on the County's Reimagine Flood Park website in May 2018. Key concerns raised by neighbors on the Draft and Final EIR related to 1) projected growth in park visitation and use resulting from improvements accommodated under the Landscape Plan, including traffic impacts and parking demand, and 2) noise generated on-site from concurrent park events. County staff believed that these concerns warrant further analysis of the proposed project. Therefore, the County revised and recirculated a limited portion of the May 2018 EIR that relied on more conservative assumptions with regard to park visitation. Accordingly, the recirculated portion of the May 2018 EIR included changes to the Executive Summary, Introduction and Environmental Setting, Air Quality, Greenhouse Gas Emissions, Noise, Traffic, and Alternatives chapters, and new Wildfire and Energy chapters. All other issues were adequately addressed in the October 2017 Draft EIR and May 2018 Final EIR. The Original Draft EIR is hereby incorporated by reference to the Revised Final EIR to disclose the potential environmental effects of the project not included in the Revised Draft EIR. The May 2018 Final EIR with responses to comments received during the public review period from October to November 2017 is attached as Appendix A to the Revised Final EIR.

On August 8, 2019, the County circulated a Notice of Preparation (NOP) for the Revised Draft EIR to help identify the types of impacts that could result from the project, as well as potential areas of controversy. The NOP was mailed to public agencies (including the State Clearinghouse), organizations, and individuals considered likely to be interested in the project and its potential

impacts. Comments received by the County on the NOP were taken into account during the preparation of the Revised Draft EIR.

The Draft Revised EIR was made available for public review on August 9, 2019, and was distributed to relevant regional and State agencies. Copies of the Notice of Availability of the Draft Revised EIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and neighbors near the project site. The Notice of Availability was also posted on and adjacent to the project site. The Draft Revised EIR and an announcement of its availability were posted electronically on the County's website, and a paper copy was available for public review at the County of San Mateo Parks Department.

The 45-day CEQA public comment period began on August 9, 2019, and ended on September 23, 2019. The County of San Mateo Parks presented on the Draft Revised EIR's findings at the Fair Oaks Community Center in Redwood City 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.

## 1.3 Document Organization

This RTC Document consists of the following chapters:

- *Chapter 1: Introduction.* This chapter discusses the purpose and organization of this RTC Document and the Final Revised EIR, and summarizes the environmental review process for the project.
- *Chapter 2: List of Commenters.* This chapter contains a list of the agencies, individuals, and organizations that submitted written comments, and the public hearings that were held, during the public review period on the Draft EIR.
- *Chapter 3: Comments and Responses – Letters and Emails.* This chapter contains reproductions of comment letters received on the Draft Revised EIR. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- *Chapter 4: Comments and Responses – Public Meeting Summary.* This chapter contains summaries of oral comments from the public meeting held on the Draft Revised EIR by the County of San Mateo Parks Department on September 17, 2019 in Redwood City. A written response to CEQA-related comments received at the meeting is provided. Each response is keyed to the corresponding comment.
- *Chapter 5: Draft EIR Text Revisions.* Corrections and additions to the Draft Revised EIR that are necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft Revised EIR, are contained in this chapter. Underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ formatting has been deleted from the Draft EIR.

## 2 List of Commenters

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This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapters 3 and 4 of this document.

### 2.1 Organization of Comment Letters and Responses

The 16 letters are presented in chronological order, by date received. Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

### 2.2 Public and Agency Comments Received

The following comment letters were submitted to the County during the public review period from August 9 to September 23, 2019. Section 15088 of the *CEQA Guidelines* states that “the lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.”

**Table 1 List of Letter Numbers and Commenters**

Letter Number and Commenter	Page #
1. Meredith Ozbil	18
2. Rudy Colin	20
3. Ronald Friedman	22
4. Janet Benson	24
5. Nancy McMahan	26
6. Dan McMahan	28
7. Roy Meltzer	30
8. Alice Newton	32
9. Nettie Wijsman	38
10. Daniel Meehan	56
11. Matt Siegel	60
12. Carolyn Ordonez	62
13. James Steven McCarthy	65
14. Mark Leong, District Branch Chief, Local Development – Intergovernmental Review, Caltrans	67
15. Justin Murphy, Deputy City Manager, City of Menlo Park	72
16. Bill Lamkin	74

In addition to soliciting written public and agency comments on the Draft Revised EIR pursuant to CEQA, during the public review period verbal comments were taken on the Draft Revised EIR at a public meeting held by the County of San Mateo Parks Department on September 17, 2019. Responses to environmental issues raised in this meeting are included in Chapter 4 following the written comments and responses.



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## 3 Comments and Responses

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Written responses to each comment letter received on the Draft Revised EIR, as well as topical responses for recurring comments, are provided in this chapter. All letters received during the public review period on the Draft Revised EIR are provided in their entirety.

Please note that text within individual letters that has not been numbered does not specifically raise environmental issues nor relate directly to the adequacy of the information or analysis within the Draft Revised EIR, and therefore no comment is enumerated or response required, per *CEQA Guidelines* Section 15132.

Revisions to the Draft Revised EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft Revised EIR, are included in the responses. Underlined text represents language that has been added to the Draft Revised EIR; text with ~~strikeout~~ has been deleted from the Draft Revised EIR. All revisions are then compiled in the order in which they would appear in the Draft Revised EIR (by page number) in Chapter 5, Draft Revised EIR Text Revisions, of this document.

### 3.1 Topical Responses

This subsection includes topical responses, responses to recurring written and verbal comments relating to the environmental analysis and conclusions in the Draft Revised EIR. These will be referred to in the individual responses in Section 3.2 and Chapter 4.

As a general introduction, it should be noted that the Final Revised EIR's conclusions on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft Revised EIR and further clarified in this Response to Comments document. The County acknowledges that some commenters disagree with some conclusions in the EIR. Consistent with the intent of CEQA and the *CEQA Guidelines* for its implementation, this Final Revised EIR also includes the differing opinions presented by the commenters. 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 document.

#### **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.*

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. The noise analysis is based on a conservative assumption that residents would be sensitive to noise in their backyards directly adjacent to the park. Therefore, the Draft EIR relies on appropriate distances in estimating noise levels from the soccer/lacrosse field.

- *The Draft EIR's mitigation for noise from events at Flood County Park would be inadequate to protect nearby residents, permitting the use of air horns and sound amplification, while ignoring the option of installing a sound wall.*

As discussed under Impact N-3 in Draft EIR Section 4.8, *Noise*, events at the proposed athletic fields and gathering meadow would generate noise audible to nearby residents. Specific sources of high noise levels during events could include whistles, air horns, and sound amplification equipment that broadcasts commentary or music. However, sound amplification is typically not allowed in County Parks, even with procurement of a special event permit. Page 94 of the Draft Revised EIR states, "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. The County also would restrict the use of sound amplification equipment by athletic teams through individual agreements with teams that use the new fields per Mitigation Measure N-3(b). 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."

The Draft Revised EIR determines that the noise impact from air horns and sound amplification equipment at park events would be potentially significant and requires two mitigation measures to reduce this impact to less than significant. Mitigation Measure N-3(a) in the Draft Revised EIR would restrict the use of equipment that generates especially loud impulse noise during organized athletic events and performances without approval of a special event permit. This measure would substantially reduce the use of equipment that could generate high noise levels during large events. Mitigation Measure N-3(b) would restrict athletic practices and games to the hours of 9 a.m. to 8 p.m., preventing athletic activity that generates noise during early morning hours when the park is otherwise open to public use.

With implementation of the Mitigation Measure N-3(a), the County would prohibit the use of air horns and follow the Parks Department's review process for permitting of sound amplification during special events. Furthermore, this measure would require periodic enforcement of these equipment restrictions during events.

Although residents would still be exposed to noise from events at athletic events and the gathering meadow even with mitigation, this exposure would be typical of areas where local parks with active recreational use are surrounded by residential neighborhoods. Section 4.88.360(c) of the San Mateo County Code of Ordinances exempts such noise from parks owned and operated by a public entity. Therefore, noise from events at Flood County Park would not be subject to quantitative standards in the County's noise ordinance. After mitigation, noise from park activities also would not substantially disturb the peace and quiet of people of normal sensitivity in the area, as required by Section 4.88.350 of the County Code of Ordinances. Therefore, the impact would be less than significant after mitigation. Further mitigation, such as installation of a sound wall adjacent to residential properties, would not be required to reduce noise levels to a greater extent.

## **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 number of parking spaces at Flood Park. The revised count identified a total of 320 existing parking spaces at Flood Park. As discussed on page 120 of the Draft Revised EIR the anticipated maximum parking demand during peak summer days under the Landscape Plan is 344 parking spaces. Therefore, there would be a deficient of 24 parking spaces. To account for the deficient in parking spaces 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 exceed the peak parking demand by 25 parking spaces. The Final Revised EIR has been updated to include the following:

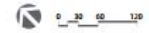
Page 31 of the Final Revised EIR is amended as follows:

### **2.4.2 Site Access**

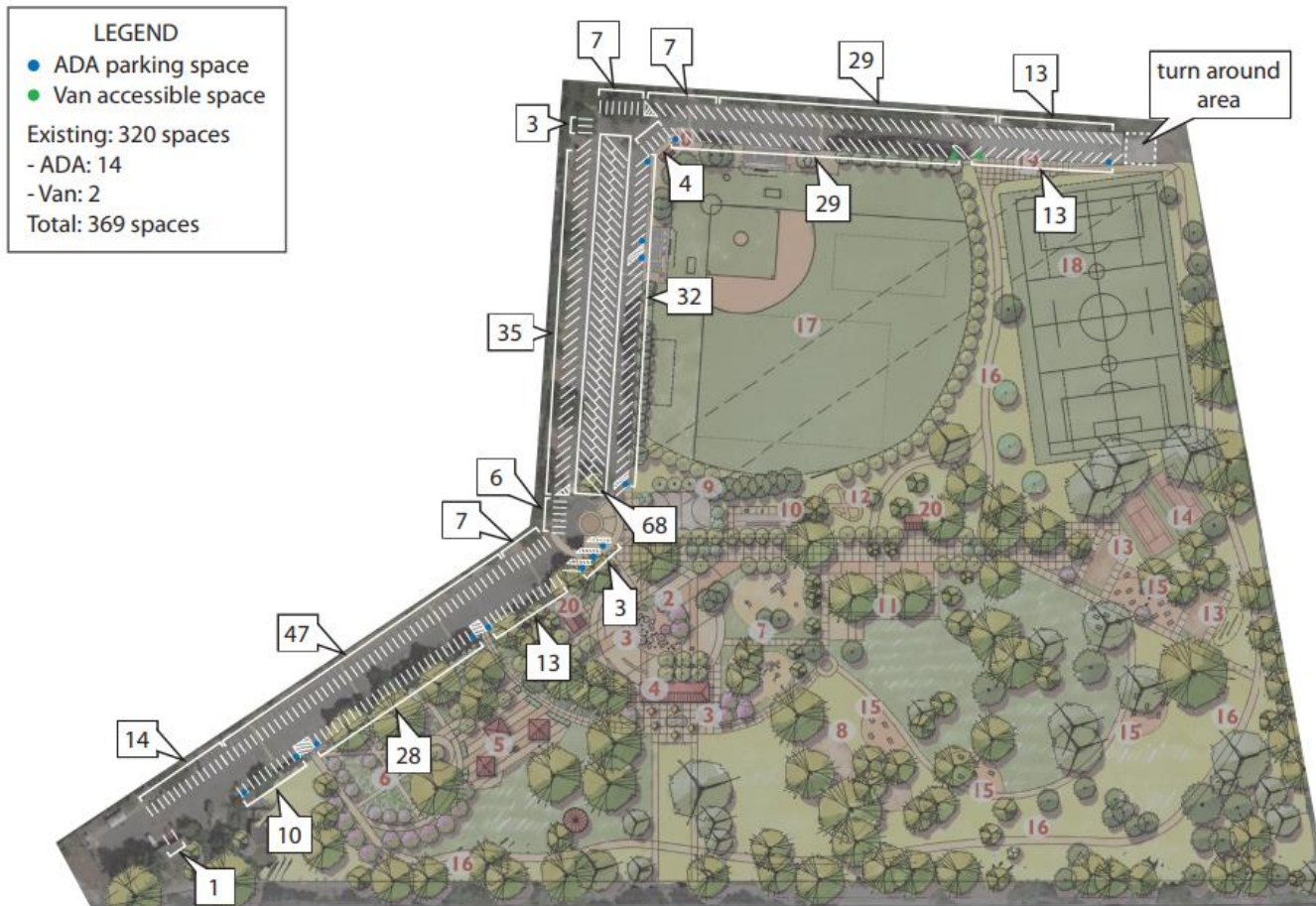
The Landscape Plan would not involve changes to parking and access, except for a new drop-off area on-site and stripping for an addition of 49 parking spaces on already paved and gravel surfaces. Flood County Park's existing vehicular access from Bay Road, via the entrance gate at the southwest corner 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 in a chain-link fence 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. 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 stripped outside of the pétanque court and 26 stalls stripped 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.

Page 28 of the Final Revised EIR is amended as follows:

Figure 1 Proposed Landscape Plan



**Figure 5 Proposed Parking Map**



Source: Gates + Associates, 2019

013smx\_parking.ai 10/19

**Flood Park Traffic Impact Study  
 Proposed Parking Map**



Page 120 and 121 of the 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 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.

Based on this data, the anticipated typical peak parking demand for the proposed project is 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 344 parking spaces would ~~not~~ exceed the 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 at the site of the existing pétanque court. Following the proposed parking improvements Flood Park would have a total of 369 parking spaces. Therefore, it is anticipated that the existing parking supply would be adequate to accommodate peak parking demand under the Landscape Plan. However, it should be noted the parking demand could still potentially exceed the capacity during very large scheduled events.

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 344 parking spaces. The project would add an additional 49 parking spaces at the park for a total of 369 parking spaces. Available parking would exceed the projected demand of 344 parking spaces by 25 parking spaces. Therefore, 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, Mitigation Measure T-6 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.

- *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 to Flood County Park. This behavior could increase as the proposed recreational improvements attract new visitors to the park. Furthermore, the proposed 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, 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.

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.

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

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. 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. 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.

## **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.*

The park visitor assumptions were based on facility capacity, staff observations including existing use patterns, and observations of similar types of facilities. 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 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.

The 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 peak capacity refers to the maximum number of visitors who would be using an existing facility at the same time 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 projections for visitor assumptions are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this 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.

- *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.*

The park visitor assumptions do not account for use of the shade structures on weekdays because the analysis assumed events would only occur on weekends. Visitors using the shade structures during the weekday would not be using the shade structure as their primary amenity and are therefore accounted for in the visitor numbers for other park amenities.

It was assumed that the volleyball courts would be used weekdays by regular after-work players and the Red Rock League. 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

and a 48-visitor total. Table 6 on page 29 of the Draft Revised EIR has been updated accordingly, as shown below.

- *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.*

The number of existing picnic tables at Flood Park would remain following implementation of the Landscape Plan. The park includes eight small group reservable picnic areas that vary in size and 20 drop-in sites with bar-b-ques. It was assumed that each small group area would accommodate 15 people on average and the large group picnic area accommodates 200 people. Use of the 20 drop-in picnic sites is typically associated with 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. Gate and Associates assumed 25 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.

The additions to park usage assumptions as shown in Table 6 below would constitute an approximately two percent increase in park usage. 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	Maximum Capacity per Event	Daily	Maximum Capacity per Event		
Shade/market structure	200	75	N/A	N/A	1 event/day	N/A
Play area universal (2-5)	60	20	30	15	4 cycles/day	2 cycles/day
Play area universal (5-12)	120	40	60	30	4 cycles, 1 parent/2 kids	4 cycles, 1 parent/2 kids
Adventure play	70	35	40	20	2 cycles/day	2 cycles/day
Event/group picnic area	200	200	N/A	N/A	1 event	N/A
Small group picnic	120	120	N/A	N/A	8 areas, 15 people/area, 1 cycle/day	N/A
<u>Drop-in picnic area</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>
Tennis courts	<u>6448</u>	16	32	16	<u>2 courts, 8 playing, 8 waiting, 4 cycles/day</u> <del>10 playing, 10 waiting, 3 cycles/day</del>	<u>2 courts, 8 playing, 8 waiting, 2 cycles/day</u> <del>10 playing, 10 waiting, 1 cycle/day</del>
Basketball	60	20	10	10	<u>10 playing, 10 waiting, 3 cycles/day</u> <del>2 courts, 6 playing, 1 cycle/day</del>	<u>10 playing, 10 waiting, 1 cycle/day</u> N/A
Sand volleyball	12	12	<u>48</u> <del>N/A</del>	<u>48</u> <del>N/A</del>	<u>2 courts, 6 playing, 1 cycle/day</u> Ancillary use	<u>2 courts, 6 players, 6 spectators, 4 cycles/day</u>
Pump track	60	30	40	20	N/A	N/A
Ballfield	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	30	15	10	10	N/A	N/A
<b>Total</b>	<b><u>1,470</u><del>30</del></b>	<b><u>757</u><del>33</del></b>	<b><u>414</u><del>342</del></b>	<b><u>313</u><del>241</del></b>		

Source: Gates + Associates 2019

## 3.2 Written Comments

## Samuel Herzberg

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**To:** Meredith Ozbil Jazzercise Menlo Park  
**Subject:** RE: Flood Park

Letter 1

**From:** Meredith Ozbil Jazzercise Menlo Park [mailto:meredithozbil@hotmail.com]  
**Sent:** Tuesday, August 20, 2019 3:23 PM  
**To:** Samuel Herzberg <sherzberg@smcgov.org>  
**Subject:** Flood Park

**CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

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Hi there

We are neighbors of Flood Park at 12 Iris Lane. Yes, yes yes. We are thrilled with the plans and are not worried about noise at all, we currently don't hear anything and the park closes at sun down. Even if it were open later perhaps until 9 we would be ok with it. Use of the park would be better then the vacant outdated and abandoned eye sore it has become.

I hope updating the tennis courts are also in the plan. Looking forward to the amphitheater, market and playgrounds!!

We loved the movie in the Park this past month and would live more of the same.

Thanks  
Meredith Ozbil

1.1

## Letter 1

**COMMENTER:** Meredith Ozbil

**DATE:** August 20, 2019

### **Response 1.1**

The commenter states their support of the project plans, including tennis courts, and that they are not concerned about noise impacts, even with extended hours of operational until 9:00 p.m. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR.

## Samuel Herzberg

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**From:** Rudy Colin <rudycolin@hotmail.com>  
**Sent:** Tuesday, August 20, 2019 3:19 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park suggestions

Letter 2

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Planners,

I have lived about a mile away from Flood Park for 40 years. At this point it looks like there is no stopping the original plans. Please consider downscaling the bocci courts. It sounds romantic but NOBODY ever plays bocci unless it's set up like a clubhouse for older gentlemen from the old country. (See Red Morton Park) PICKLEBALL is the fastest growing sport in the country and is a great sport for all ages and abilities. Very easy to learn because of the inviting nature of the pickleball community. I feel three dedicated pickleball courts would fit nicely next to new tennis courts. Think Foster City pickleball courts but 1/2.

2.1

A must is a soccer COURT. Soccer players love playing soccer on tennis courts. This is very rough on the nets and fence. (See Spinass or Mezes parks).

2.2

Whoever keeps trying to make the sand volleyball courts with those railroad timbers needs to stop. It doesn't work. The wood opens and the sand falls out.

2.3

I love the plans for a play structure for all abilities.

Please never let them put a plastic field. It's gross. I'd rather everyone play on well kept dirt. I know this won't happen but people all over the world play these sports on dirt.

2.4

Thank you for taking these suggestions into consideration.

I have plenty of ideas. Let me know if you need more.

Rudy Colin



## Letter 2

**COMMENTER:** Rudy Colin

**DATE:** August 20, 2019

### **Response 2.1**

The commenter states that the bocce ball courts should be downsized and pickleball courts should be added to the project design. 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 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."

### **Response 2.3**

The commenter states their concern about making the sand volleyball courts with railroad timbers because the wood does not contain the sand. As discussed in Table 5 on page 26 of the Draft Revised EIR the project would replace the three volleyball courts. The new volleyball courts would include excavation of existing sand and new sand for fill. Existing railroad timbers would not be used to construct the volleyball courts.

### **Response 2.4**

The commenter states their support for the play structure, but does not support a plastic play field. Playground replacement would occur under Phase II of the project shown in Table 5 on page 26 of the Draft Revised EIR. 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." Therefore, the style of the playground, including ground surface, would be determined at a later date.

## Samuel Herzberg

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**From:** ron friedman <friedman.ron@comcast.net>  
**Sent:** Tuesday, August 20, 2019 2:26 PM  
**To:** Samuel Herzberg  
**Subject:** Pickleball courts at Flood Park

Letter 3

**CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

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Hello Mr. Herzberg:

I am a 22 year resident of Menlo Park. I would like to put in a request to build 4 pickleball courts at the new Flood Park. You may have heard of pickleball—it is the fastest growing sport in the United States. 4 pickleball courts will fit on the size of 1 tennis court so it makes very efficient use of space. Palo Alto is just beginning to build 6 permanent pickle ball courts at Mitchell Park. People come to play at Mitchell Park from miles around including very many folks from Menlo Park. It would be great to have our own courts in Menlo Park.

FYI—here is a link to the Palo Alto Pickleball Club website so you can get a better sense of the game and the layout of the courts.

<https://www.paloaltopickleballclub.org>

If I can provide more information on pickleball or on any aspect of this request, please let me know. Would it help for Menlo Park residents in favor of pickle ball courts to attend the meeting on Sept 17th?

Many thanks for your consideration of this request.

Ronald Friedman

3.1

## Letter 3

**COMMENTER:** Ron Friedman

**DATE:** August 20, 2019

### **Response 3.1**

The commenter requests that four pickleball courts should be constructed as part of the project instead of one of the proposed tennis courts because of the growing popularity of pickleball. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft 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 will be considered.

**Samuel Herzberg**

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**From:** jbenenson@sonic.net  
**Sent:** Wednesday, August 21, 2019 2:37 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park -protest

Letter 4

**CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

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Dear Mr. Sherzberg,

I used to live in very-peaceful Suburban Park and in fact attended James Flood Elementary School. I am emailing you because I am very concerned about the potential noise level which will inevitably increase if you create new playing fields (screaming kids, yelling parents, P.A. system, bull-horns, etc.) and an amphitheater (loud speakers, screaming kids and parents). I could have lied to you and told you that I still live there, but that isn't my style. I want Flood Park to remain both a quiet refuge and a place for families to gather for picnics. I doubt that you live in Suburban Park or in the Flood Triangle. Put yourself in the shoes of those who live on the sides of the park.

- 1) Ban p.a. systems and bull-horns. 4.1
- 2) Eliminate the drop-off point (#19) since it's near Del Norte and Iris Lane, both residential streets. This would eliminate the traffic congestion at Bay and Ringwood, where I now live. 4.2
- 3) Add some security people thereby creating jobs. 4.3
- 4) Hire more people to keep the park clean. 4.4

Thank you for taking these suggestions into consideration.

Sincerely,  
janet benenson  
[jbenenson@sonic.net](mailto:jbenenson@sonic.net)  
650-430-1945

## Letter 4

**COMMENTER:** Janet Benson

**DATE:** August 21, 2019

### **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 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 sound amplification and air horns without approval of a special event permit.

### **Response 4.3**

The commenter states that the drop-off point at the eastern end of the Park should be removed from the Landscape Plan to eliminate traffic congestion at Bay Road and Ringwood Avenue. As shown in Table 36 through Table 38 of the Draft Revised EIR the intersection of Bay Road and Ringwood Avenue is expected to experience degraded traffic conditions under existing plus project conditions, near-term 2021 plus project conditions, and cumulative 2040 project conditions. However, if the drop-off point is removed at the eastern end of Flood Park there would not be a designated location for drop-off and pick-up, which may result in increased parking impacts and congestions issues from not having a designated space to pull off the road. In addition, as shown in Table 31 and Table 32 of the Draft Revised EIR the intersection of Bay Road and Ringwood Avenue would operate at an unacceptable LOS D during near term 2021 PM peak hour and LOS F during cumulative 2040 PM peak hour without implementation of the Landscape Plan. Traffic congestion at Bay Road and Ringwood Avenue would therefore occur with or without the drop-off point at the eastern end of Flood Park.

### **Response 4.4**

The commenter requests that security persons and additional maintenance staff should be hired as part of the Landscape Plan to create jobs and keep the park clean. 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.

**Samuel Herzberg**

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**From:** Nancy & Dan McMahon <tehama@ookook.com>  
**Sent:** Tuesday, September 03, 2019 5:32 PM  
**To:** Samuel Herzberg  
**Cc:** Carla Schoof  
**Subject:** Comments for Reimagine Flood Park Draft Revised EIR Aug 2019

Letter 5

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Dear Samuel,

I appreciate the time and efforts associated with this revised draft EIR (Aug2019).

**Weekday Peak PM Hours**

While the revision shows the evaluation of traffic between 4:00 - 6:00p.m., the revised draft should have measured from 2:30 - 6:00p.m. as the schools (Upper Laurel, Lower Laurel, Encinal and M-A High) all have dismissals in this period of time (earlier on Thursdays for the Elementary schools). The revised draft missed an entire hour+ of congested traffic patterns.

5.1

**PARKING FEE COLLECTION PRACTICES**

The recommendation to pay for parking upon exiting and/or utilizing automated fee machines is essential. Often times there is a back-up of cars on Bay Road in both directions waiting to get into the park before the park opens. I strongly support this recommendation.

5.2

**Alternative 2: Reduced Athletic Programming**

Please ensure the field for the soccer/LAX south sideline is 100 feet from the Del Norte residential backyard fences. I support this recommendation.

5.3

Thank you.

Nancy McMahon  
1025 Tehama Avenue  
Menlo Park CA 94025

## Letter 5

**COMMENTER:** Nancy McMahon

**DATE:** September 3, 2019

### **Response 5.1**

The commenter states that the traffic analysis should analyze traffic from 2:30 to 6:00 p.m. to capture traffic from nearby schools, instead of starting at 4:00 p.m. once schools have been dismissed for the day. As stated on page 108 of the Draft Revised EIR, "Operating conditions during the weekday P.M. and Saturday midday peak periods were evaluated at the study intersections to capture the highest potential impacts of the proposed project as well as the highest volumes on the local transportation network. The weekday PM peak hour occurs between 4:00 and 6:00 P.M. and reflects conditions during the homeward bound commute." Therefore, although there is additional traffic from 2:30 to 4:00 p.m. traffic was analyzed during the time of day when there are the most vehicles on the roadway.

### **Response 5.2**

The commenter supports the recommendation for paying parking fees upon exiting and/or utilizing automated fee machines. 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. 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 100 feet from the backyards of residences along Del Norte Avenue, similar to the proposed project.

## Samuel Herzberg

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**From:** Dan McMahon <dan@ookook.com>  
**Sent:** Tuesday, September 03, 2019 3:39 PM  
**To:** Samuel Herzberg  
**Subject:** Written comments for Revised EIR for the Flood County Park Landscape Plan

Letter 6

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Dear Sam,

The current traffic plan associated with the Park Landscape Plan does not take into account the increased number of 'student' pedestrians crossing at Bay Road at Ringwood Avenue from August to June.

A large number of Menlo Atherton High School students traverse this intersection both in the crosswalk on the north side of Bay Road and diagonally from Ringwood west of Bay to residential Ringwood east of Bay Road outside of the crosswalks.

6.1

Likewise, there are large numbers of younger children who both walk and cycle across this intersection each afternoon from the three public elementary schools; --Upper Laurel, Lower Laurel and Encinal.

The safety impact of increased traffic to athletic fields needs to be assessed with a focus on students walking and cycling home from school each afternoon.

Clearly, it will take more time for vehicles to pass through this intersection and most likely this intersection will become less safe for children walking and cycling home. No doubt the effect of seasonal light changes (i.e., winter vs summer) will create a negative impact as well.

6.2

The bell schedules associated with each school should provide a starting point for measuring this effect.

Thanks for your attention to this,

Dan McMahon

1025 Tehama Ave

Menlo Park, CA 94025



## Letter 6

**COMMENTER:** Dan McMahon

**DATE:** September 3, 2019

### **Response 6.1**

The commenter states that traffic plan associated with the Landscape Plan does not consider the number of pedestrians that are students crossing Bay Road at Ringwood Avenue when school is in session. Please see Topical Response B: Transportation Impacts for a response to comments about adverse effects from pedestrian crossings.

### **Response 6.2**

The commenter states that the Draft Revised EIR should considered safety impacts from children walking and bicycling home after school because more vehicles moving through the intersection would result in a safety concern. Impacts related to bicycle and pedestrian patterns are discussed under Impact T-5 on pages 119 and 120 of the Draft Revised EIR. As stated on page 119 of the Draft Revised EIR, “new pedestrian trips to the park may be subject to unsafe conditions because of a gap in the existing sidewalk on the north side of Bay Road between Del Norte Avenue and Ringwood Avenue. At this gap, pedestrians must walk along the roadway shoulder or in the bike lane.” Therefore, Mitigation Measure T-5(B) would be required for the Landscape Plan to install signage that informs visitors, including children, of a safe pedestrian route. As stated on page 118 of the Draft Revised EIR, “Existing bike lanes and sidewalks on Bay Road would safely accommodate bicyclists and pedestrians en route to the park. Therefore, the project would have no impact related to traffic hazards.” Children walking and bicycling home after school would not be exposed to additional safety impacts.

**Samuel Herzberg**

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**From:** Daniel Meehan <meehandaniel@hotmail.com>  
**Sent:** Monday, September 23, 2019 4:03 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park project....

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Hi Sam,

The message below the line is a copy of a letter written out by our neighbor, Roy Meltzer, who does not have access to email. Please include it with the comments. His are general comments, not specifically about the EIR.

Thanks  
Daniel Meehan

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Sept. 23.2019  
From  
Roy Meltzer  
1025 Del Norte Ave  
Menlo Park

To whom it may concern  
re Flood Park

I've been a member of this community for more then 50 years. And have enjoyed the park each and every day I am here.

I believe Flood Park was part of the Flood estate and should be a part of history and not tampered with. Last bit of natural land within the community should be kept natural for our children and over run by building, soccer fields, parking lots - stores etc.

Roy Meltzer

7.1

## Letter 7

**COMMENTER:** Roy Meltzer

**DATE:** September 23, 2019

### **Response 7.1**

The commenter states that Flood Park is part of history and should not be developed with the Landscape Plan but remain natural land. 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.

**Samuel Herzberg**

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**From:** Alice Newton <alicenewton62@hotmail.com>  
**Sent:** Monday, September 23, 2019 4:48 PM  
**To:** Samuel Herzberg  
**Cc:** ncalderone@smcgov.org  
**Subject:** Alice Newton's comments & questions re: Draft Revised EIR for Flood Park

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September 23, 2019

To: Sam Herzberg, Senior Planner, San Mateo County Parks Department  
Copy to Nick Calderon, Assistant Director, San Mateo County Parks Department

I will be looking forward to the responses to this email. Please be sure it is available to the public to read.

The Draft Revised EIR includes analyses (further analysis than in the previous Final EIR) of the "Preferred Plan" for renovations to Flood Park regarding 1) impact of projected growth in visitation to the park on traffic and parking demand, and 2) noise generated on-site from concurrent park events (parties, soccer or lacrosse games, and baseball games, etc. occurring simultaneously as anticipated in the Final EIR). Also studied were wildfire safety and energy issues as mandated by the State of California. I have lived adjacent to the eastern border of Flood Park since 1987 and am very familiar with the day to day activities occurring in the park. Although I am interested in wildfire and energy issues, I will limit my comments & questions to issues 1 & 2 with which I am familiar.

**1) IMPACT OF PROJECTED GROWTH IN VISITATION TO THE PARK ON TRAFFIC AND PARKING DEMAND:**

**Traffic-**

- A) Traffic on major roads – new sports fields will generate more traffic on the feeder roads to Flood Park. Traffic during commute hours M-F, 4-7 pm, is already severely congested. The Draft Revised EIR mentions probable use of new sports fields by Summit and Everest High Schools which are both in North Fair Oaks so their commuters would impact congestion on Marsh Road which the EIR states would be negligible because the EIR expects most players to come from Menlo Park via Ringwood Avenue. There is a discrepancy in data here. 8.1
- B) Traffic on neighboring streets due to inadequate parking in the parking lot resulting in people driving and parking – Parking on neighborhood streets occurs now (see below). **In addition, if the** 8.2

soccer/lacrosse field is located in the NE corner of the park, people will drop off and pick up at the Iris Lane gate because it will be much more convenient than doing so in the parking lot. They will tend to drive quickly on our streets and also park. No amount of signage or restrictions will counter the convenience aspect.

8.2  
cont'd

### **Parking -**

On Easter Sunday, 4/21/19, every reservable picnic site was full (8 sites accommodating 765 people according to the park website), all 21\*drop-sites with a total of 47 tables each of which could hold 10 people = 470 people were full, a conceptual total of 1,235 people before considering the countless groups that brought their own tables and chairs. These counts are probably just of adults for purposes of reserving sites and don't include the many children in the groups. Since children are required by law to have a seatbelt in the car, all these children impact the number of cars bringing users to the park. And, these numbers may be low since head counts are not done while the facilities are in use.

8.3

**At 3:45 pm, on 4/21/19 my husband and I noted the parking lot to be about 90% full using all 3 sections of the parking lot. It was likely more full around noon. We have regularly checked the parking lot on Saturdays when the park is full of people and found it to be at least 2/3 full in the afternoons. Clearly, there aren't enough parking spaces in the parking lot to accommodate simultaneous users of all the picnic sites plus people coming just to the playground or to use the proposed new amenities (renovated baseball field, new full-sized soccer/lacrosse field, other sports courts, etc.).**

8.4

Pam Noyer, retired Ranger IV who was a long-time head ranger at Flood Park when the baseball field was in operation, told me recently of having to get permission from the Menlo Park Police Department to allow cars to line up in the bike lanes along Bay Road while waiting for a parking space to become available. She told of a baseball coach angry because he needed to get into the park by game time, but had to wait to get a space. The current parking lot is the same as it was then. The number of picnic sites is the same. The same baseball field will be renovated. Yet, many more new amenities are proposed in the "Preferred Plan."

8.5

**Re: numbers of group and drop-in sites: my figures above for group sites are from the park website. On 9/19/19, I counted the drop-in sites and got 21 – 5 with 3 tables and 16 with 2 tables. The Draft Revised EIR proposes only one group picnic site and 8 drop-in sites. The picnickers are major users of the park now and come primarily from various underserved local communities. They fill the park with happy parties on summer Saturdays as noted above. Does the Co. Parks Department intend to eliminate the availability of most of the picnic areas?**

8.6

**Re: overflow parking: Since we've lived next to Flood Park for 32 years, we know that people park on neighborhood streets either because parking is unavailable in the parking lot or to avoid the \$6**

8.7

fee. Parking restrictions make no difference. The Menlo Park police rarely ticket cars and shouldn't be expected to have to handle an anticipated overflow from the parking lot.

8.7  
cont'd

**2) NOISE GENERATED ON-SITE FROM CONCURRENT PARK EVENTS (PARTIES, SOCCER OR LACROSSE GAMES, AND BASEBALL GAMES, ETC. OCCURRING SIMULTANEOUSLY AS ANTICIPATED IN THE FINAL EIR):**

- A) Noise from the anticipated simultaneous activities noted will be a major problem if noisy activities such as ball games are located too close to picnic areas. Holbrook-Palmer Park in Atherton is a good example of such a "hybrid park" design where noisy ball fields are next to the street and gathering areas are on the other side toward the homes. 8.8
- B) The Draft Revised EIR notes average of 64 decibels at Del Norte residences from the soccer/lacrosse field in its currently planned location in the "Preferred Plan" in the NE corner of the park. An average of 64 decibels means frequent noise above 64 decibels which is completely unacceptable. This is despite the committed buffer of 100 ft between the edge of the field (including spectator space). Games are anticipated to go from 9 a.m to 8 p.m (or park closing) every Saturday and Sunday year-round. The soccer/lacrosse field should be located next to the parking lot, not near the Del Norte Ave. residences for noise, safety, and accessibility reasons. 8.9
- C) The 100 buffer area should be planned for along the entire eastern boundary of the park. Homes along this boundary (on Del Norte Avenue and Iris Lane) were built in the late 1940s when there was no park fence. Their back yards are small. 8.10

**PROPOSED TREE REMOVAL:** The NOP of 8/9/19 states "This plan is intended to optimize preservation of large oak and bay trees, . . ." However, the Final EIR states that in the "Preferred Plan" 80 trees would be removed including the grove of redwood trees in the NE corner where the soccer/lacrosse field location is proposed. This is one more reason that the soccer/lacrosse field should be located in a different area of the park. Trees are a precious heritage not to be sacrificed for a sports field that can be located elsewhere. 8.11

Thank you,

Alice Newton, 1023 Del Norte Avenue since 1987

## Letter 8

**COMMENTER:** Alice Newton

**DATE:** September 23, 2019

### **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 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.

### **Response 8.2**

The commenter states that inadequate parking available at Flood Park results in people parking and driving on neighborhood streets. The commenter believes that the addition of the soccer/lacrosse field would result in people picking up and dropping off at the Iris Lane gate because it is more convenient. The commenter believes that no signage or restrictions would prevent people from dropping off and picking up at the Iris Lane gate. Please see Topical Response B: Transportation Impacts for a discussion of traffic, pick-up, and drop-off at the Iris Lane gate.

### **Response 8.3**

The commenter estimates that on Easter Sunday 2019 there were a total of 1,235 people at Flood Park, not including people who brought their own chairs and tables. The commenter states that this count likely does not include children and that children would increase the number of cars in the park. Please see Topical Response C: Park Usage Projections for a discussion of the projections and methods used to estimate Park usage. 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 park visitation estimates are adequate for the purposes of the environmental analysis.

### **Response 8.4**

The commenter states that on Easter Sunday 2019 the parking lot at the Park was about 90 percent full and that on Saturdays when the Park is full the parking lot is at least two thirds full in the afternoons. The commenter states that there is not enough parking to accommodate simultaneous users of the picnic sites plus people coming to use other Flood Park amenities. Please see Topical Response C: Transportation Impacts for a discussion of parking demand, existing parking, and additional parking to be added on the site.

### **Response 8.5**

The commenter claims that according to retired Park Ranger Pam Noyer cars used to line up in the bike lanes along Bay Road while waiting for parking to become available at Flood Park. The commenter states that the parking lot is the same size and the number of picnic tables is the same as it was when people were lining up for parking and new amenities proposed at Flood Park would increase parking demand. Please see Topical Response B: Transportation Impacts for a discussion of parking demand, existing parking, and additional parking to be added to the site.

### **Response 8.6**

The commenter claims that parking restrictions would not make a difference in people parking on neighborhood streets and that the Menlo Park police rarely ticket cars. Please see Topical Response B: Transportation Impacts for a discussion of parking mitigation and its effectiveness. The Mitigation Monitoring and Reporting Program for the Landscape Plan includes Mitigation Measure T-6: Parking Education and Enforcement where San Mateo County will be required to coordinate with the City of Menlo Park to encourage random enforcement of on-street parking restrictions.

### **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. 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. Please see Topical Response A: Noise Impacts for a discussion of noise project noise estimates. Page 93 of the Draft Revised EIR states, “This analysis makes the conservative assumption that athletic events generating noise at the ballfield and 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.



**Response 8.9**

The commenter states that the Draft Revised EIR notes an average of 64 decibels at Del Norte Avenue residents 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 activities on the ball field. Mitigation measures have been incorporated into the Draft Revised EIR to reduce noise impacts from the soccer/lacrosse field. Comments related to the Landscape Plan are noted and do 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 8.10**

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. 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. 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. 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.

EIR Comments per revised EIR 9/19 submitted by Nettie Wijsman

What hours are considered peak hours during the week and on the weekend?

9.1

**HISTORICAL USE**

Why have you continued to use the time period of 2011 – 2015 as representative of use?

- The park was closed until December 2011 for PUC work, and slow to recover for several years afterwards.
- The baseball field was not in use during this time.
- Historical use should be based on a time before the park closure and when the baseball field was in use. Ten-year old data would be more accurate than near term data, due to the baseball field not being in use and the degraded condition of the park due to lack of maintenance.
- You have been provided with data from the last master plan of 1983. There is no reason to believe the park use will be less than it was as evaluated by the 1983 Master Plan.
- There will be a whole new park, you are proposing two new sports fields instead of one, and many other new activities.

9.2

**November driveway counts** – Driveway counts taken in November 2016 uses inaccurate data, as November is low season. There are no restrictions with parking on the streets during November through March. Any driveway counts taken at the Flood Park parking lot will be based on low season use.

9.3

**PICNIC USE**

**Picnic areas** – The areas for picnic use are much smaller in the “Preferred Plan” than what is in the park now. Picnic use was a high priority item per the community surveys and is the most used activity in the park now. The current picnic areas are used frequently during the spring/summer/fall. **How many reservable picnic sites will there be and how many tables will each site contain?**

9.4

- **Event/group picnic areas** (excluding shade market structure), currently can accommodate 565 people per the Flood Park web site. The EIR states 200person maximum capacity on weekends. This is a significant reduction in use. The reservable picnic spaces are used frequently, and most sites are reserved on weekends during the peak months of the year. **Table 33 is only utilizing ¼ of the already under represented picnic use. Please explain?**

9.5

- **Non-reservable sites** - There are currently 27 non-reservable sites per the web site. The EIR states there are only 8 non-reservable sites in the new plan that will accommodate 15 people each. This is a hugh reduction in availability of non-reservable sites! Table 33 then states only ¼ of the sites would be usable during the peak hours on Saturday. That means only 2 sites are used during the peak hours on Saturday. **Table 33 is only utilizing ¼ of the already under represented picnic use. Please explain?**

9.6

- **The current Shade Market Structure** can accommodate groups up to 200 people now. Table 6 lists 200 people daily but 75/maximum per event. There is only 1 event/day. Per the W-Trans Flood Park Trip Generation Assumptions, trips for the shade market structure during the Saturday peak hours total 120/trips (60 in and 70 out) x 2.5 person/vehicle totaling 150 persons maximum. **Why is this number different from the 200 people listed per Table 6 and 200 people**

9.7

**currently accommodated in the shade market structure? Why would the W-Trans table say only ½ of the structure will be used when the whole structure is used currently?** On Sunday 9/15/19, there was a group of about 150-175 persons in the Shade Market structure. The W-Trans Trip Generation table says there would be 120 Saturday peak trips, but only 30 during the Saturday peak hour. Cutting this number in ¼ completely under represents the amount of picnic use. Please explain? Using the formula of 2.5 persons/car with a 200capacity structure, would equate to 80 cars on a peak day.

9.7  
(cont'd)

- The lower numbers reported for picnic use demonstrate a change of use for the park. **Is this going to change the demographics of who is using this park?** Currently, the majority of users are ethnic minorities of our communities. The 1983 Master Plan stated “when Saturday and Sunday attendance reaches about 1800 people and a baseball double header game is being played, space for picnic activity is limited.” **Are current park users going to be “squeezed out” with the proposed changes?** Now two fields are being proposed instead of one.

9.8

#### **PARKING**

**The EIR states there are 375 parking spaces. This is not correct. There are 330 spaces.** Please confirm this count.

9.9

**The EIR states 344 parking spaces are needed on the weekends during the peak summer hours. Please provide specific detail as to how you calculated this number?**

- The EIR claims this number is supposed to be a conservative number yet the estimates for picnic use on the weekend are very low. Table 33 only counts ¼ of the already low projections for picnic use from W-Trans, Flood County Park Trip Generation Assumptions. Per table 33, only 47 cars would enter during the Saturday peak hours (20 for event/group picnic area, 15 for shade market structure and 12 for small group picnic). This is an extremely low estimate and not representative of current use! Please explain why only ¼ of data is used during the Saturday peak hours?
- No more than 45 spectators are listed for games. The example of the Marin Catholic High School Lacrosse game had 162 spectators. If professional/semi-professional league games are played or other playoff games, the spectator count would likely be much higher.
- Parking/trip counts for the gathering meadow were not assessed and would increase trip counts and parking spaces needed over the current 344.
- The majority of people coming for picnics will occupy a parking space into the peak hours of 12 – 4PM. If accurate picnic use data is used, 344 parking spaces is very, very low! Why would you not count all cars for picnic use? Even if they enter before 12PM or leave after 4PM, all users will occupy a parking space during the peak hours?
- According to one of the rangers, two-thirds full is standard on weekends currently with only picnic, volleyball and playground use. Former ranger Steve Kramer stated during the 3/19/16 neighborhood meeting “that the parking lot is nearly full now during peak hours/days during the high season”.
- Parking demand could exceed the capacity during very large scheduled events”. Pg 121. **What events and how many?**

9.10

9.11

9.12

9.13

“Parking demand using the maximum anticipated park visitor statistics were derived from the plan phasing information and park industry data by Gates and Associates.” Pg 29

- Explain in detail what Park Industry data was derived by Gates and Associates?

9.14

- Of this data, what data was derived from Flood Park and what data was derived from other park/statistic tables? If this information is listed in the EIR report, please provide the page number(s) where it can be found.
- **If any picnic data was not utilized from Flood Park, please explain why. Picnic data should be used from Flood Park. Do other parks have large reservable picnic areas?**

9.14  
(cont'd)

**ENFORCEMENT OF NO PARKING** - Menlo Park police do not enforce the no parking rules now, therefore citing this as a mitigation measure is completely inaccurate. Menlo Park police did ticket during the early days of the no parking ordinance, but stopped after a few years. There is no reason to believe this won't happen again, even if they do enforce no neighborhood parking initially.

9.15

**COLLISION FACTOR**

**Analyze the effect of the "collision" factor on parking and traffic, that is when teams are changing players and cars are coming and going at the same time. This question has been asked multiple times and not answered.**

9.16

- Even if there is not a pay gate at the front entrance, there is only one lane in and out.
- The parking lot is long and skinny.
- Cars entering or leaving have to go by parking spaces where cars will be pulling in or out.
- The drop off turn-around is deep within the park.
- In 11/2017, I parked next to a park in San Mateo on E 28<sup>th</sup> street during the morning. I left during the afternoon during soccer team practice. It took me 15 minutes to travel one block because cars were leaving at the same time as others were arriving. The parking lot at Flood Park is similar, where a car coming in will have to wait for a car pulling out before moving forward. **This was a true example of the collision factor and will occur in Flood Park!**
- Because current picnic users come and stay for 4-5 hours, picnic use does not affect the collision factor in the same way as sports teams use.

9.17

**DROP OFF DEMAND**

**How are you going to prevent parents from dropping off kids at the Iris Lane or Bay Road gates?**

- There is no law prohibiting drop offs.
- Again, education will only be partially effective.
- The convenience will trump dealing with the long, skinny parking lot on Bay Road that will be cumbersome to get in and out of.
- The drop off area is deep within the parking lot, requiring a driver go by parked cars that will be pulling in and out. They will experience the collision factor.
- Most parking in the park is far from the Northeast side of the park where the second field is being proposed.
- Convenience will trump cost and time.

9.18

**Analyze backup congestion of cars coming eastward on Bay Road from Marsh Road wanting to turn left into the park entrance and having to wait for cars turning right from Bay Road. Mitigation?**

9.19

**GATHERING MEADOW** - There was no analysis of the gathering meadow. This was identified as a high priority item per the community process.

- **What types of activities will occur in the gathering meadow (i.e. movies, weddings, concerts, farmers market etc.), frequency, number of participants?**
- **Evaluate parking, traffic, and noise from these events and tie them into the total park use.**

9.20

**GATHERING PLAZA** - What is the Gathering Plaza and how will it be used? | 9.21

**AMPLIFICATION** - Although the Parks Department says amplification is only allowed with a special permit, it happens frequently now. Either the rule is not enforced or permits are easy to obtain. | 9.22

- **What will be required to obtain a permit for amplification and to whom may it be granted?**
- **Can a group picnic user apply for a permit?**

**WHO WILL BE USING THE FIELDS?**

- **Will professional/semi – professional league teams be allowed to use the fields as was the case in the past? If so, evaluate the number of spectators that may attend games.**
- A league style baseball field is being planned for; the park held minor league games in the past.
- The park reached its maximum capacity.
- Neighborhood restricted parking was not in effect at that time. Neighborhood parking relieved parking pressure. | 9.23
- The assessment of game spectators is very low if major or minor league teams will play in the park.
- The Marin Catholic HS Lacrosse game listed 162 spectators.
- None of the data presented lists more than 45 spectators.
- What is the maximum number of baseball/softball/soccer/lacrosse games that can be scheduled during the weekend?

**MULTIPLE PRACTICES ON A GIVEN FIELD**

- **If any field will be used for multiple team practices/games at one time, include the impact of the maximum number of players/participants/spectators if more than one group/field.** | 9.24

**TRIP GENERATION**

**Accurately evaluate where trips are currently coming from.**

- The EIR assumes the majority of the users of the park will be the Menlo Park Legends community baseball team. Unless this redesign of the park is going to change the demographics, this is not correct.
- The majority of users now are not from Menlo Park or the Menlo Park Legends. | 9.25
- This also does not address the use of the soccer/lacrosse field.
- **If players on teams or picnic/playground users are not coming from Menlo Park, include that data.**
- On Sunday 9/15/19, I asked 6 reserved picnic groups where they were from. Four said Redwood City and 2 had family members from all over the Bay Area and even LA. They were not from Menlo Park.

**NOISE**

- “Noise from the proposed soccer/lacrosse field would occur as close as approximately 100 feet from the backyards of single-family residences on Del Norte Avenue to the Southeast. It is assumed that this distance is representative of the nearest activity on the proposed field with respect to the residences, as well as of spectators lining the southeastern side of the field”. pg 93 | 9.26
- **Please clarify this distance, as there is only approximately 260 feet from the PUC hatch to the property lines.** The dimensions for a standard full-size lacrosse field: 180’ + 36’ limit lines + 10’

clear to PUC hatches + 15 'spectators = 241' leaving about 20' to property lines. If spectators take more space, this dimension would need to be changed.

9.26  
(cont'd)

#### NOISE MEASUREMENTS

- “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 the edge of the stadium while a lacrosse practice creates noise levels of 55-60 dBA  $L_{eq}$  (RGD Acoustics 2016).
- These noise measurements were taken at a distance of approximately 50 feet from the edge of the lacrosse field”. pg 93
- Based on a noise attenuation of 6 dBA per doubling distance and only 20 feet to neighbor’s property lines, noise levels from athletic activity would increase 3.6dBA resulting in levels of 68.6 – 73.6dBA during games and 58.6 – 63.6dBA during practices. Noise levels of 65 dBA are only allowed for 5 minutes and 70 dBA for 1 minute /hour per SM County noise standards. Above 75 dBA are not allowed at all.
- There is an assumption that noise from soccer games should be the same as lacrosse games. There is no real basis for this. Please provide noise studies as it pertains to soccer games for youth and adults

9.27

#### Explain how placing noisy activities close to residences will not intrude on the qualitative noise standard of section 4.88.350 of disturbing the peace and quiet of neighbors?

9.28

- Whistles, shouts and air horns are impulse noise and will be very disturbing.
- People have different individual standards as to what kind of noise and volume would be considered intrusive and bothersome.

#### The Landscape Plan refinement-

- “The County states the Landscape Plan was “refined” through a series of community outreach efforts structured to identify community values, preferred uses, and site layout preferences.” pg26.
- I attended all community meetings, and there was no discussion of site layout preferences at this meeting.
- What was proposed at the one meeting on 9/1/15 was a youth soccer field in the middle of the park. A guy stood up and stated “we really want a soccer field but please don’t cut down all of those big trees.” **Explain how possibly a few comments from sports advocates would trump all of the comments from the 350 community surveys?**
- **Community participants were told they could comment on-line, yet there was no way to do this after the plan was revised. Why not?**
- **Lacrosse wasn’t even identified by one survey participant and has become one of the primary activities. How did this occur?**
- **The community surveys identified youth soccer as a priority, not adult soccer. How did adult soccer become a primary activity?**

9.29

#### INACCURATE TRIP COUNTS DURING THE WEEK

- The trip generation summary assumes there are no volleyball games, small, or group picnic events during the week. This is not the case.

9.30

- Volleyball occurs nearly every day, weather permitting during the week in the afternoon, and there is picnic use and occasional shade market structure use during the week, especially during the summer.
- The data presented is not representative of current use. Monday evening 9/16/19, there were 10 people playing volleyball and 18 spectators. There were 24 cars in the parking lot at 5:30PM and no kids at the playground.

9.30  
(cont'd)

**SAFETY OF CHILDREN**

- Programmed sports games in the park during the weekday 4-6pm hours may jeopardize the safety of school children walking and biking home from school.
- Parents will be bringing their kids to sports activities at the same time as kids are walking/biking/riding home from MA High school.
- There are no sidewalks along Ringwood Ave and Ringwood is very crowded with activity during 3-4PM.

9.31

**EVALUATION OF ACTIVITIES IN PASES II AND III**

“The EIR evaluates the environmental impacts of Phase II and III improvements at a programmatic level. **Is this statement left over from the initial EIR analysis?** 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.” Pg 26.

9.32

- **Isn't the County required to evaluate all activities being proposed at an equal, project level of detail prior to approval and construction?**
- **What will happen if the estimates for use for activities in phase I are substantially higher than anticipated?**
- **Will picnic use be reduced if parking/usage estimates for activities in phase I were not accurate?** The estimates for picnic use are very underestimated in the current EIR.

**SOCCER/LACROSSE FIELD SIZE**

- “The proposed soccer/lacrosse field would be 260 feet wide by 430 feet long.” pg. 27
- **There is only approximately 260 feet from the PUC hatch to neighbor's property lines. How are you going to fit a field in of this size and allow a 100-foot distance to neighbor's property lines?**

9.33

**NEED FOR DRAINAGE STUDY**

- If construction is completed using impermeable surface, shouldn't a drainage study be completed? There are questions of run off flooding/ adequate water for plant life.

9.34

**INCONSISTINCIES WITH DATA FROM TABLES 33, TABLE 6 AND W -TRANS FOOD COUNTY PARK TRIP GENERATION ASSUMPTIONS.**

“Table 6 shows the estimated number of visitors to use the proposed elements of the Landscape Plan during peak summer days, organized by phase of construction. These estimates and the potential seasonal capacity of recreational facilities were prepared in April 2019 by Gates and Associates, the consultant that assisted the County in designing the Landscape Plan, based on the use patterns at other existing parks with similar features in the nearby cities of Belmont, Redwood City and San Mateo.” Pg 27

9.35

- **Please state which Parks were used for this analysis and include the hard data obtained for the individual sports activities, picnic and play-ground areas? If this information is listed in the EIR, please provide the page numbers associated with it.**
- **If Flood Park data was not used for picnic use, explain why?**
- Table 6 has multiple errors. The daily participation of play area universal (2-5) listed as 60 but should be 80 (4 cycles x 20), and play area universal (5-12) listed as 120 and should be 160 (4 cycles x 40).
- Sand volleyball only lists 12 participants 1 cycle/day on weekends and no spectators. There are likely to be multiple cycles on weekends and there are always spectators.
- Volleyball occurs daily throughout the week, and always has spectators. No volleyball is listed during the week and no spectators for any games.
- There are picnic's during the week in both reserved sites and unreserved sites. None are listed.
- As detailed earlier, picnic use in all areas has been reduced to only ¼ of total use which is already very reduced from the current usage. (565 person capacity for reservable picnic areas reduce to 200 maximum persons for picnic use.) 27 non-reservable sites reduced to 8. The numbers presented are completely inaccurate per current usage.

9.35  
(cont'd)

There are inconsistencies with information from table 6 and W-Trans Flood Park Trip Generation Assumptions.

- Table 6 states 200 people maximum/shade market structure during Weekend Summer, but 75 maximum per event. There is only one event/day. The whole structure is used, not 1/2. W-Trans Trip Generation list 150 people as maximum utilizing 60 trips with 2.5 persons/vehicle. What is the correct number being proposed?
- Table 6 lists 10 playing, 10 waiting for tennis, but W-Trans lists 8 playing, 8 waiting.
- There is inconsistency with numbers of cycles projected for different activities on the weekend per table 6 and the W-Trans table.

Nettie Wijsman



## Letter 9

**COMMENTER:** Nettie Wijsman

**DATE:** September 19, 2019

### **Response 9.1**

The commenter asks what hours are considered peak hours during the week and on the weekend. As stated on page 105 of the Draft Revised EIR, “weekday P.M. peak (between 4:00 P.M. and 6:00 P.M.) and Saturday midday peak (between 12:00 P.M. and 4:00 P.M.).”

### **Response 9.2**

The commenter asks why the time period of 2011 through 2015 is used as representative of baseline park use, and states that it was closed until 2011 and the baseball field was not in use during that time. The commenter states that historical use should be based on a time before the park closure when the baseball field was used and claims ten-year data would be more accurate than near term data due to the baseball field closure and degraded condition of the park due to lack of maintenance. The commenter further claims that there is no reason to believe the park will be used less than the use evaluated in the 1983 Master Plan, especially considering there will be a whole new park and two new sports fields instead of one, in addition to other activities.

Existing park use is most appropriate to establish the existing baseline. Although the ballfield has been closed since 2011, reducing the number of park visitors in recent years, the proposed Landscape Plan would result in an increase in park usage relative to existing usage. This analytical approach is consistent with *CEQA Guidelines* Section 15125 (Environmental Setting), which states that the environmental conditions existing when an EIR’s notice of preparation is published “will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Visitor statistics in the 1983 Master Plan are approximately 35 years old and outdated for the purpose of analysis in the Draft Revised EIR. However, the Master Plan is available for public viewing on the Parks Department website: <https://parks.smcgov.org/documents/flood-park-master-plan>.

### **Response 9.3**

The commenter claims that driveway counts taken in November 2016 are not representative, as November is the low season and there are no restrictions with parking on the streets during November through March. Please see Section 3.1, *Topical Responses*, Topical Response B: Transportation Impacts for a discussion of existing parking spaces at the park. The number of parking spaces was recounted in October 2019 to determine the correct number of spaces available at Flood Park, although the number of parking spaces on the site does not change seasonally. As discussed in Topical Response B, an additional 23 stalls stripped outside of the pétanque court and 26 stalls stripped within the pétanque court would add a total of 49 new parking spaces at Flood Park, increasing the total number of spaces at Flood Park to 369.

### **Response 9.4**

The commenter states that the areas designated for picnic use in the Preferred Plan are less than currently provided, even though picnic use was a high priority item identified in community surveys and the most used current park activity. Furthermore, the commenter states that the picnic areas

are frequently used during the spring, summer, and fall, and asks how many reservable picnic sites are proposed and how many tables each site would contain. Please see Topical Response C: Park Visitor Projections for a discussion of the number of picnic sites at the park and how many reservable picnic sites will be available as part of the Landscape Plan. The number of picnic tables at Flood Park would not change as a result of the Landscape Plan.

### **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. 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.

### **Response 9.6**

The commenter states that there are currently 27 non-reservable picnic sites, while 8 sites accommodating 15 people are proposed. The commenter continues that Table 33 of the EIR states only one quarter of the sites would be usable during Saturday peak hours, which is equivalent to 2 sites, and asks for an explanation. Please see Topical Response C: Park Visitor Projections for a discussion of the number of picnic sites. Please see Response 9.5 for a description of Table 33 and project trip generation rates for the park.

### **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.

For the purposes of this traffic analysis, the maximum anticipated number of park visitors during each phase of implementing the Landscape Plan was derived from park industry data provided by Gates + Associates in April 2019. 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 of the picnic use calculations for the Landscape Plan. 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 9.9**

The commenter cites the EIR's statement that there are 375 parking spaces and claims this is incorrect, as there are 330 spaces. The commenter is correct there are not 375 spaces available at Flood Park. Please see Topical Response B: Transportation Impacts for a discussion of the number of parking spaces at the park as counted on October 2, 2019

### **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 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 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 daily trips which is a conservative estimate assuming that all three uses would concurrently be at maximum capacity.

The commenter states that no more than 45 spectators are listed for games, even though the lacrosse game used for the noise analysis had 162 spectators, and professional/semi-professional games would have more. As discussed in Section 3.1, *Topical Responses*, Topical Response: Park Visitor Projections, assumptions for visitors were based on facility capacity staff observations including existing use patterns, and observations of similar types of facilities. The EIR analysis assumed 1.5 spectator/player for each peak weekend use for a total of 45 spectators. As stated in the *CEQA Guidelines* (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate.

**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 Final Revised EIR.

**Response 9.12**

The commenter claims 344 parking spaces is too low for the estimated picnic use and asks why all cars were not counted and mentions that users who enter before noon or leave after 4 p.m. may not be accounted for in estimates. Please see Response 9.11 for a summary of parking demand estimates. Not all cars were counted for parking because the Landscape Plan includes a drop-off zone for loading and unloading at the existing playground. Therefore, not all vehicles entering the site would require parking.

**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 52 additional parking spaces will be added to the park as part of the Landscape Plan. Parking demand of 344 spaces is not anticipated to exceed parking capacity of 369 spaces.

**Response 9.14**

The commenter asks what data was derived by Gates and Associates, as well as what data was 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 picnic areas was obtained from Flood Park because the number of existing picnic tables would remain 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.

### **Response 9.15**

The commenter states that Menlo Park police do not enforce no parking rules, and therefore citing this as mitigation is not appropriate, as it may not be enforceable. The Mitigation Monitoring and Reporting Program for the Landscape Plan includes Mitigation Measure T-6: Parking Education and Enforcement where San Mateo County will be required to coordinate with the City of Menlo Park to encourage increased random enforcement of on-street parking restrictions. The monitoring timing for this mitigation measure is periodically during operation of Flood Park to ensure that parking enforcement continues throughout operation of the Landscape Plan.

### **Response 9.16**

The commenter asks for analysis of potential for collisions in the parking lot, as there is only one lane in and out and the lot is long, resulting in cars entering and leaving driving by spaces where drivers may be pulling in or out of spaces, and the drop-off turn-around is deep within the park. Impact T-4 in Section 3.5, *Transportation and Circulation*, of the Final Revised EIR analyzes design feature hazards of the Landscape Plan. As stated on page 118 of the Draft Revised EIR, “The Landscape Plan would not alter the offsite circulation system and would introduce minor modifications to the on-site surface parking lot, including a pick-up and drop-off area. No potential design hazards such as sharp curves, dangerous intersections, or new incompatible uses are proposed.”

### **Response 9.17**

The commenter states that they drove next to another San Mateo park and left during afternoon soccer practice and that it took 15 minutes to travel one block due to cars leaving when other cars were arriving, and that this is similar to Flood Park’s situation. The commenter further asserts current picnic users stay at the park for 4-5 hours and therefore would not affect the “collision factor.” Please see Response 9.16 for a discussion of potential site hazards, including collision and Topical Response B: Transportation Impacts for a discussion of traffic congestion.

### **Response 9.18**

The commenter asks how parents will be prevented from dropping off kids at the Iris Lane or Bay Road gates, as there is no law prohibiting this, education will only be partially effective, especially when the convenience of dropping off at the gates is considered in comparison to the drop-off area and the parking located far from the northeast side of the park where a second field is proposed. Please see Section 3.1, *Topical Responses*, Topical Response B: Transportation Impacts for a response to comments about adverse effects from pick-up and drop-off activity.

### **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*, the intersection of Bay Road and Marsh Road would have less than significant impacts under the existing plus project, near-term 2021 plus project, and cumulative 2040 plus project scenarios. Therefore, mitigation at this intersection is not required.

**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 performances at the proposed gathering meadow. 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.

**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 III of the Landscape Plan. The gathering plazas would be places to gather for activities. Specific details of the gathering 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 would only be permitted for organized athletic games, practices, and the gathering meadow. 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.

### **Response 9.23**

The commenter asks if professional/semi-professional league teams would be allowed to use the fields and if so, that the number of spectators be evaluated due to capacity issues regarding parking. The commenter states if these games will happen, the estimated number of spectators is very low, due to data presented in Comment 9.10, and asks what the maximum number of games (including baseball, softball, soccer, and lacrosse) that can be scheduled during the weekend is. The Landscape Plan does not assume that professional/semi-professional teams would use the field. Please see Topical Response C: Park Visitor Projections for a discussion of visitor projections and Response 9.10 for a discussion of assumptions for estimating spectators at Flood Park.

### **Response 9.24**

The commenter asks that if any field will be used for multiple practices or games at one time, the impact of the maximum number of players/participants/spectators should be considered. Multiple practices or games would not occur on a single field at one time. Therefore, the Final Revised EIR reflects the most conservative play, participant, and spectator visitor projections as discussed in Topical Response C: Park Visitor Projections.

### **Response 9.25**

The commenter says the EIR must accurately evaluate trip distribution, as it currently assumes the majority of park users are from the Menlo Park Legends team, which is not accurate and does not account for use of the soccer/lacrosse field. The commenters states that if players or picnic/playground users are not coming from Menlo Park, they must be included in the data. The commenter cites personal conversations at the park from September 2019 that included groups from Redwood City, the Bay Area, and LA. 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 distribution analysis were based on facility capacity, staff observations including existing use patterns, and observations of similar types of facilities. As stated in the *CEQA Guidelines* (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate. The Draft Revised EIR provides reasonable assumptions for trip distribution, as described in Appendix C of the Draft Revised EIR, based on professional's experience and is therefore appropriate for analyzing the Landscape Plan.

### **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. 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.

### **Response 9.27**

The commenter states that noise levels from the soccer/lacrosse games would be 68.6 to 73.6 decibels during games and 58.6 to 63.6 decibels during practices because the field would be as close as 20 feet from residents. The commenter cites the San Mateo County noise standards and states that noise from the field would exceed these standards. The commenter states there is no basis for

an assumption that noise from soccer games is similar to noise from lacrosse games and asks for studies pertaining specifically to soccer games.

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. 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 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 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. The anticipated timing of athletic events – between 9 A.M. and 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 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.

### **Response 9.29**

The commenter states there was no discussion of site layout preferences at community meetings and cites a comment made at one of the meetings. The commenter asks for explanations about how community input was used in the site plan, states that online commenting was not available, and asks how adult soccer became part of the proposed project.

The Draft Revised EIR was made available for public review and was distributed to a list of interested parties, groups and public agencies, as well as property owners and neighbors near the project site. The Notice of Availability was also posted on and adjacent to the project site. The Draft Revised EIR and an announcement of its availability were posted electronically on the County’s website, and a paper copy was available for public review at the County of San Mateo Parks Department. Per the *CEQA Guidelines* the Draft Revised EIR was circulated for a 45-day public review period on August 9, 2019, and ended on September 23, 2019 providing the community the opportunity to comment on the document. Comments on refinement of the Landscape Plan are noted and do not conflict with or challenge the analysis and conclusions of the Draft Revised EIR. All comments will be forwarded to the County’s decision makers for their consideration. The Design phase will include an opportunity for public review and feedback within the mitigations cited in this Revised EIR.

### **Response 9.30**

The commenter states that the trip generation summary in the EIR assumes no volleyball games or picnic events occur during the week, but that volleyball occurs nearly every day and picnic use



happens occasionally during the week, especially in the summer. The commenter asserts that the data presented is not representative of current use and cites data they collected on September 16, 2019.

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 ballfield and 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. This weekday case represents a very busy but plausible trip generation estimate for all phases of the Landscape Plan. This conservative analysis does not represent typical park operations but highlights the few instances through the year when Flood County Park has the potential to operate at maximum capacity but can be controlled by County Park staff. Therefore, although the weekday volleyball trips are not accounted for in the trip generation summary, the summary provides a highly conservative estimate of park use. In addition, weekend trips are more than double week day trip estimates and therefore assume the worst-case traffic scenario at the park.

### **Response 9.31**

The commenter states that children's safety may be jeopardized by sports games occurring in the park from 4 p.m. – 6 p.m. if it conflicts with them walking or biking home, since parents will be bringing kids to these sports games and there are no sidewalks along Ringwood Avenue, which is crowded from 3 p.m. – 4 p.m.

Phase I of the proposed Landscape Plan includes a proposed drop-off area in the park's parking lot near the playground area. This drop-off area would provide a safe location for children using the park, including participants in programmed athletic events, to be picked up. The County would encourage use of the drop-off area by allowing athletic participants to be dropped off and picked up there without paying an entrance fee. As discussed in Response 44.11, Mitigation Measure T-5(b) also would require the County to install signage informing park visitors of alternative pedestrian routes that avoid the use of the Bay Road segment that lacks a sidewalk. This measure would reduce the exposure of pedestrian park users to traffic safety hazards. However, the City of Menlo Park has identified a need to close the existing sidewalk gap on Bay Road in its Sidewalk Master Plan (2009) and has funding to implement this improvement. The City of Menlo Park is drafting a Transportation Master Plan and the County has committed to continuing dialog with the City regarding improvements near the park, but has not committed to any improvements. Please refer to Response 15.1. Future closure of the sidewalk gap would further improve pedestrian safety in the vicinity of Flood County Park. Therefore, programmed sports games would not pose a substantial safety hazard to children using the park. In addition, Flood Park is developing a Transportation Master Plan that will consider improvements in street ROW, such as the addition of sidewalks on Bay Road. As cited in the Final EIR, staff from San Mateo County Parks and Public Works have committed to meeting with Menlo Park staff to discuss the findings in the Transportation Master Plan after it has been developed.

### **Response 9.32**

The commenter asks if a statement is left over from the initial EIR analysis and asks if the County is required to evaluate all proposed activities at an equal level of detail, and asks what will happen if

actual use is higher than anticipated use during Phase I, and if the picnic use will be reduced if parking use estimates for Phase I were not accurate.

The commenter is correct that the Phase II and III improvements were analyzed at a programmatic level, this statement is not left over from the Original Draft EIR. The County is not required to evaluate all activities at a project level and impacts are evaluated at the appropriate level in the Draft Revised EIR given the information available at the time of EIR analysis. If elements in the Landscape Plan differ from what was analyzed in the Draft EIR then the County would be required to conduct further CEQA review of these elements when project specific information is available. Phase I of the Landscape Plan is analyzed on a project level and use estimates would not be substantially higher than anticipated in the Draft Revised EIR because the Draft Revised EIR visitor assumptions are conservative assuming that that visitors would be concurrently using the non-scheduled activity centers at the park. Please see Section 3.1, *Topical Responses*, Topical Response C: Park Visitor Assumptions for a discussion of picnic use estimates.

### **Response 9.33**

The commenter asks how the proposed soccer/lacrosse field would fit while allowing 100 feet to the neighbor's property lines. Please refer to Response 9.26.

### **Response 9.34**

The commenter asks if a drainage study has been completed as there are questions about runoff flooding and adequate water for plant life considering the impermeable surfaces that may be used during construction. A drainage study has not been completed for the Landscape Plan. Impacts from flooding and drainage are discussed under Impact HWQ-3 of the Original Draft EIR and were determined to be less than significant. As stated on page 112 of the Original Draft EIR, "By compliance with NPDES requirements for storm water discharges during construction and operation, Phase I would have a less than significant impact related to changes in drainage patterns, storm water runoff flow, and storm water drainage systems... Phase II and III recreational elements including restrooms, pathways, and gathering plazas also could incrementally increase the area of impervious surfaces in the park. As for Phase I, compliance with Provision C.3 requirements in the San Francisco Bay RWQCB's MS4 General Permit would prevent excessive storm water flow from the project site." Compliance with Provision C.3 requirements would be assessed during the design phase, prior to construction.

### **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 of park usage assumptions, including the picnic area. 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 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) assume the area will accommodate 27 to 30 children at one time. Weekend use assumes four cycles of use with peak use at a one-time occurrence. Over the course of a day one cycle of peak use, two cycles of 75 percent of peak use, and one cycle of 50 percent peak use would be 120 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.

**Samuel Herzberg**

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**From:** Daniel Meehan <meehandaniel@hotmail.com>  
**Sent:** Monday, September 23, 2019 2:41 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park Project and EIRs

**CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

Hello Mr. Herzberg,

My comments are concerning the Flood Park Reimagine Project and the related EIRs and meetings.

I attended the September 17th meeting at the North Fair Oaks community center. I would like to point out that most of the people there would prefer to have the park remain as is (open savanna with historic adobe structures), with some small upgrades. I believe this reflects the opinion and voice of the neighbors.

10.1

I have visited the park on weekends all summer. On some weekends there were 300 to 400 people in the park. These are church groups, communities and families who are celebrating or gathering for birthdays, for new babies, wedding partys, and many other celebrations. The atmosphere is happy and fun oriented. These people, the users of the park, have not expressed any opinions, and have no voice in the Flood Park project. Please think about this, we don't know what the general public thoughts are on this project.

10.2

I still have my concerns about the amount of traffic generated by the changes. We live in the area and have seen some serious traffic issues, usually around commute times. I am concerned about the parking capacity issues, the amount of noise from sporting events is also a concern. These changes will have a direct negative impact on the local neighborhoods quality of life.

10.3

If a soccer field is part of the plan, the best place for it would be at the other end of the park, towards the entrance. There is an open area there, we may lose a few old trees, but it would be less then the proposed area. The proposed area is much too close to the homes on Del Norte.

10.4

I would like to reiterate and state, that walking in the park I have meet several neighbors (from the Flood Triangle, Atherton and Suburban/Lorelei Manor areas). And talking with them, they all question the need and wisdom of making these changes to what is currently a good adequate useful peaceful park.

10.5

Below the line, I have pasted my letter to the supervisors. It states my concerns regarding the Flood Reimagine project and the related EIR.

Thank you  
Respectfully  
Daniel Meehan

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This document is feedback to the Draft EIR for Reimagine Flood Park, and the Reimagine Flood Park project.

My name is Daniel Meehan, I live at 1023 Del Norte Avenue. I have lived here with my wife Alice Newton and our children, Carmela and Kenny for 30 years. My back yard borders Flood park. I think it would be appropriate and wise to leave the park as is. It is one of the last pieces of open savannah on the Peninsula and with historical adobe structures from the WPA period. I usually walk through the park, and on weekends in the summer it is well used by many groups and parties of various sizes. We should remember that the people who use the park for parties or family picnics are not well represented in these changes. I think that

10.6

some of the proposals would reduce the number of picnic areas. But I realize that “Doing nothing” is not realistic for most people.

I would prefer and support the following:

. A dual use play field for baseball and soccer, placed far from the homes on Del Norte and Hedge road. This can be done. It has been done in many places with good results. Having a dual use field will also help with traffic as it reduces visitors. Also, dual use moves the soccer field away from the residences and thereby reduces sound.

.The children’s play ground is heavily used by the community and the visiting picnickers. It would be wonderful to see it upgraded in Phase one. And please add picnic tables that are lower for children to sit at.

.The traffic here in this part of Menlo Park at morning and evening commute time is terrible. I don’t understand how an increase would work. This issue needs to be addressed before any increase to the parks visitors is made.

.Please consider free parking. This would help the neighborhood street parking related to activities in the park.

.The picnic areas could be improved, expanded and updated. Actually it would be fine to just take what is there now and cleaned it up and revitalized it. I like the old style or flavor of the park, and will miss it. The proposal shows 4 picnic sites, and there are currently 9. Can this be changed and increased?

.The Gathering Meadow, please insure that sound emitted from this area is directed away from the residences on Del Norte and Hedge Road.

.Number 16 on the proposed plan, the trail through the redwoods. Please keep the trail as far away as possible from the fence that borders the park and yards on Del Norte. Please leave this Redwood forest area in place.

186

General comments. I have been to most of the meetings, and have read many emails from many people regarding these changes to Flood park. I have been surprised by the small numbers of neighbors and residents of the two neighborhoods attending the meetings. At the last DEIR meeting there were two people, a couple from the Suburban Park – Lorelei Manor neighborhoods. Given the change to traffic on Bay Road, I would think more people would be concerned about an increase.

Regards

Daniel Meehan

1023 Del Norte Ave. Menlo Park, CA

[meehandaniel@hotmail.com](mailto:meehandaniel@hotmail.com)

10.6  
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## Letter 10

**COMMENTER:** Daniel Meehan

**DATE:** September 23, 2019

### **Response 10.1**

The commenter states they attended the September 17, 2019 meeting and that most people would prefer to have the park remain as-is with small upgrades. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR. All comments will be forwarded to the County's decision makers for their consideration.

### **Response 10.2**

The commenter states there are 300-400 park users on weekends who have not expressed any opinions and therefore the public has no voice in the project. The Draft Revised EIR was circulated for a 45-day CEQA public comment period that began on August 9, 2019 and ended on September 23, 2019 per Section 15087 of the *CEQA Guidelines*. In addition, the Draft Revised EIR was distributed to relevant regional and State agencies. Copies of the Notice of Availability of the Draft Revised EIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and neighbors near the project site. The Notice of Availability was also posted on and adjacent to the project site. The Draft Revised EIR and an announcement of its availability were posted electronically on the County's website, and a paper copy was available for public review at the County of San Mateo Parks Department for the public to review.

### **Response 10.3**

The commenter states they have concerns about the project-generated traffic, the amount of parking provided, and noise from sporting events. Please see Topical Response A: Noise Impacts for a discussion of project noise, Topical Response B: Transportation Impacts for a discussion of project generated traffic and for a discussion of parking provided at the park.

### **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. 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.

### **Response 10.5**

The commenter states they have talked with people who question the need for the proposed project. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR. Beginning in May 2015, San Mateo County solicited public input for this project through five community meetings. Feedback from these meetings was utilized to identify community needs, and to gather public opinion on potential plans to redesign the park. Feedback was integrated into the Flood County Landscape Plan. On December 6, 2017, the San Mateo County

Parks Department held a community meeting for residents to participate in an EIR scoping meeting for the Flood County Park Landscape Plan in order to learn about the process and identify items that they want to be included in the review process.

### **Response 10.6**

The commenter provides their letter to the Board Supervisors that contains a list of comments on the Landscape Plan. These comments on park design features do not conflict with or challenge the analysis and conclusions of the Draft Revised EIR. This comment is noted and all comments will be forwarded to the County's decision makers for their consideration.

**Samuel Herzberg**

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**From:** Matt Siegel <msiegel4@gmail.com>  
**Sent:** Tuesday, September 17, 2019 4:25 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park Project

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Dear Sam,

I am a resident of Suburban Park and have lived there for almost 10 years. I am very excited about the possibility of Flood Park being renovated, and the plans on the county parks website look great! I realize it may be too late because the proposed layout looks fairly well vetted, but I thought I would suggest adding pickleball courts. It is a rapidly growing sport and would certainly draw a friendly group of people to the park on a regular basis.

11.1

Thank you for your contributions, and I hope this project can get started soon.

Best Regards,

Matt Siegel



## Letter 11

**COMMENTER:** Matt Siegel

**DATE:** September 17, 2019

### **Response 11.1**

The commenter requests the addition of pickleball courts to the proposed project. The comment on park design features do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration. Please review Response 2.1 above.

**Samuel Herzberg**

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**From:** Carolyn Ordonez <cardord@gmail.com>  
**Sent:** Monday, September 23, 2019 9:26 AM  
**To:** Samuel Herzberg  
**Cc:** Don Horsley; Warren Slocum  
**Subject:** Flood Park comments

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I don't know why we go through all the trouble and expensive of EIR and then pay absolutely no attention to the report and recommendations. I guess only because an EIR is required by law but not required to be followed.

My biggest concerns with this ambitious project is traffic, which can not be mitigated, noise, and loss of trees.

I think all the flaws, and there are many, with the EIR have been pointed out so that is not my goal. My goal is to reason with the idea that we need the addition of the LaCrosse field " for the youth ".

The youth are the future. Your decisions will effect the youth, as adults, for years to come. Do they want grid lock? Are you aware of "willow village" proposed by Facebook? I understand the population will equal the population of Menlo Park. Concentrated in the area of Willow Road, 101, Bay Road, Marsh Road. Traffic is horrendous now.

For those of us who live on the east side of Bay Road have to use Bay Road to exit our neighborhoods. We will be effected by the traffic as stated in the EIR and it can not be mitigated. Adding a left turn lane is not feasible at the intersection of Bay and Ringwood. The stop is five way and to add a sixth would be too confusing to drivers. And bicyclists using the pedestrian overcrossing use the intersection and rarely stop.

This is a neighborhood, we do not want a traffic light.

I don't hear any noise from Flood Park now and I don't want to hear any noise in the future. With 101 freeway adjacent to our neighborhoods we already have noise beyond the allowable decibels. We now, also, have jets to SFO thanks to Nexgen. Amplified noise is not allowed now and should never be allowed. When Kelly Park, across the freeway has an event we hear is far into the night.

And the loss of trees. What a shame. If there is one thing that a person can do to help combat global warming it is to save trees and plant more trees. The trees planted next to the hetch hetchy are limited in intimate size of the trees. They will not replace the heritage oaks ever.

I read in the Almanac newspaper that staff was recommending the large picture. Where is the compromise on part of the county? The residents, that will have to have a LaCrosse field in their back gardens, have suggested compromise by placing the field somewhere else or by sharing fields. Both sides need to compromise. It is so disappointing that people who live here, where all this happens, do not listen or compromise on the project. Please think of the future for everyone.

This park is unique and the changes are major. The demographic of who will use the park will change, traffic and noise is increased.

It is a sad day if the most invasive proposal is adopted.

12.1

Sincerely,  
Carolyn Ordonez

Sent from my iPad

## Letter 12

**COMMENTER:** Carolyn Ordonez

**DATE:** September 23, 2019

### **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 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. 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. The comment on park design features and demographics do 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.

**Samuel Herzberg**

---

**From:** attymccarthy@comcast.net  
**Sent:** Monday, September 23, 2019 12:31 PM  
**To:** Samuel Herzberg  
**Subject:** Flood Park Design Soccer Field Location

**CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.**

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Hello:

My name is James Steven McCarthy and my family resides at 1068 Del Norte Avenue Menlo Park . We have lived her for over 30 years. We love Flood Park . We have been very interested in the design of Flood Park . We are deeply concerned about the dire consequences of one of the concepts for the reimagine of the park having the soccer filed new the residences . This will greatly and negatively effect our quiet enjoyment on our block. Also it our understanding that there is currently NO ADDITIONAL PARKING SPACE allotted for the park. Where in the world will the excess flow of cars go ? They will be on our street which deadends at the end of the block. Emergency vehicles now can not access the space.

13.1

More notably we want the beauty of the park with the trees and landscape preserved for the future. We do not believe trees and natural should be sacrificed for some soccer filed usage. There are plenty of places for soccer to be played. Every school in the county has a field. However the UNIQUE donation of the Flood Estate was for the quiet enjoyment of the residents in the are to enjoy the splendor of the park. You can not enjoy it with whistles and crowds and oak trees being cut down and vehicle overflow. Please review the plan with the donors of the Flood estate in mind. This park is unique in the county . There is no other like it. It should not be treated as some fungible land that can easily be turned into a soccer field. We need the park for people to enjoy nature and have birthday parties and gatherings at this precious site.

13.2

Please lets preserve the Park for what it was meant for . Enjoying nature and the wonderous trees and other landscape . It is not just a place to put a sports field on where the land will be dominated by constant yelling screaming whistles and footpaths that will add nothing to the enjoyment of the people who now enjoy the wonderful Flood Park.

Thanks and please let me know if you have any questions

James and Arlene McCarthy  
1068 Del Norte Avenue  
Menlo Park CA 04025

## Letter 13

**COMMENTER:** James Steven McCarthy

**DATE:** September 23, 2019

### **Response 13.1**

The commenter expresses concern over noise levels from 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 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. As discussed on page 94 of the Draft Revised EIR noise levels from athletic activities would range from 54 to 64 dBA  $L_{eq}$  at the nearby residences and would be less than significant with implementation of Mitigation Measures N-3(a) and N-3(b) would reduce noise from amplification devices by prohibiting the use of air horns 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 52 spaces would be added to Flood 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 heritage trees and protect remaining trees during construction would reduce impacts from the Landscape Plan to a less than significant impact on protected trees.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4  
 OFFICE OF TRANSIT AND COMMUNITY PLANNING  
 P.O. BOX 23660, MS-10D  
 OAKLAND, CA 94623-0660  
 PHONE (510) 286-5528  
 TTY 711  
 www.dot.ca.gov



*Making Conservation  
 a California Way of Life.*

September 23, 2019

SCH #2016112040  
 GTS # 04-SM-2016-00271  
 GTS ID: 2139  
 Co/Rt/Pm: SM-101-3.621

Sam Herzberg, Senior Planner  
 San Mateo County  
 455 County Center, 2nd Floor  
 Redwood City, CA 94063

**Project- Flood County Park Landscape Plan – Draft Environmental Impact Report (DEIR)**

Dear Sam Herzberg:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals our continuing approach to evaluate and mitigate impacts to the State's multimodal transportation network. Our comments are based on the August 2019 Draft Environmental Impact Report (DEIR).

**Project Understanding**

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. This plan is intended to optimize preservation of large oak and bay trees, increase sports offerings, and provide a variety of active and passive uses for a range of user groups. It is anticipated that the proposed recreational facilities would be developed within ten years. The largest recreational facilities would be sited within the northern portion of the park, where the existing ballfield would be reconstructed, and a soccer/lacrosse field would be installed at the eastern corner, replacing the existing pétanque court and a portion of the existing tennis courts. A 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. 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

14.1

the southwest part of the park would be rehabilitated for seismic stability. Although the project is adjacent to US 101, Regional access is provided one mile away from the project at US-101 and State Route (SR)-114.

14.1  
(cont'd)

**Construction-Related Impacts**

Potential impacts to US-101 and SR-114 from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the DEIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

14.2

Prior to construction, coordination is required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

**Lead Agency**

As the Lead Agency, San Mateo County is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

14.3

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires a Caltrans-issued encroachment permit. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

14.4



Sam Herzberg, Senior Planner  
September 23, 2019  
Page 3

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Michael McHenry at 510-286-5562 or michael.mchenry@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Leong", with a long horizontal flourish extending to the right.

Mark Leong  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

## Letter 14

**COMMENTER:** Mark Leong, District Branch Chief, Local Development – Intergovernmental Review, Caltrans

**DATE:** September 23, 2019

### **Response 14.1**

The commenter summarizes Caltrans' mission and their understanding of the proposed project. The comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft Revised EIR.

### **Response 14.2**

The commenter states that potential impacts to U.S. 101 and SR 114 from project-related temporary access points should be analyzed and mitigation for significant impacts due to construction and noise should be identified. Construction noise impacts are discussed under Impact N-1 in Section 3.4, *Noise*, of the Draft Revised EIR and were determined to be less than significant. Construction of the Landscape Plan would occur entirely on the project site as shown on Figure 2, Project Location, on page 23 of the Draft Revised EIR. Therefore, the project would not result in temporary construction impacts for U.S. 101 and SR 114.

The commenter states that movement of oversized or excessive load vehicles on state roadways requires a Caltrans permit and coordination with Caltrans is required prior to construction to development a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network. However, TMPs are only required for significant projects. A significant project is defined in the Final Rule on Work Zone Safety and Mobility as one that, alone or in combination with other concurrent projects nearby, is anticipated to cause sustained work zone impacts that are greater than what is considered tolerable based on state policy and/or engineering judgment. The project is not a significant project and therefore a TMP is not required. Nonetheless, all comments will be forwarded to the County's decision makers for their consideration.

### **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. 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.

### **Response 14.4**

The commenter advises that any work or traffic control encroaching onto state right-of-way required a Caltrans encroachment permit and includes information on how to obtain this permit. Draft Revised EIR Section 2.6, *Required Approvals*, describes the anticipated approvals for the proposed Landscape Plan. It is not anticipated that construction for the Landscape Plan would

require encroachment of Caltrans right-of-way. Nonetheless, all comments will be forwarded to the County's decision makers for their consideration.



September 23, 2019

Sam Herzberg, Senior Planner  
County of San Mateo Parks Department  
455 County Center – Fourth Floor  
Redwood City, California 94063

**RE: Flood County Park Landscape Plan, Draft Revised Environmental Impact Report (SCH#20161122040) Comments**

Dear Mr. Herzberg,

Thank you for the opportunity to comment on the Draft Revised Environmental Impact Report (EIR) for the Flood County Park Landscape Plan located in Menlo Park.

Please find attached the City of Menlo Park's comments on the Flood Park Landscape Plan Final EIR, dated July 26, 2018. The attached comments highlight several deficiencies in the EIR that have not been addressed in the Draft Revised EIR. In particular, the City is interested in collaborating with the County on potential mitigation measures on the following three topics:

- Monitoring on-street parking for a period after the redevelopment of the Park. (Comment 44.3)
- Exploring potential improvements to the intersection of Bay Road and Ringwood Avenue (Comment 44.9)
- Pursuing improved pedestrian facilities on the north side of Bay Road between Ringwood Avenue and the Park (Comment 44.11)

15.1

In addition, the proposal by Ravenswood School District to redevelop the Flood School site into housing should be considered as part of the cumulative impacts of this EIR.

The City appreciates the opportunity to comment on the proposed project and the Draft Revised EIR and looks forward to these issues being addressed prior to certification of the environmental document.

Sincerely,

Justin Murphy  
Deputy City Manager

## Letter 15

**COMMENTER:** Justin Murphy, Deputy City Manager, City of Menlo Park

**DATE:** September 23, 2019

### **Response 15.1**

The commenter states the City is interesting in collaborating with the County on potential mitigation measures including monitoring on-street parking after the project is implemented, exploring potential Bay Road/Ringwood Avenue intersection improvements, and pursuing improved pedestrian facilities on the north side of Bay Road between Ringwood Avenue and the park.

In response to this comment the lead agency, San Mateo County Parks and Public Works Departments, agree to meet with City of Menlo Park staff a second time to discuss the Landscape Plan and possible improvements to the Ringwood Avenue and Bay Road intersection and improved pedestrian facilities on Bay Road. San Mateo County Parks agrees to have continued dialogue with the City of Menlo Park as the intersection and pedestrian projects are further defined in the City's completion of a Transportation Management Plan. The Menlo Park Transportation Management Plan would outline feasible intersection improvement options, the sidewalk improvement plan, and a funding strategy for the intersection and sidewalk. The Transportation Management Plan would provide San Mateo County Parks a better understanding of feasible options to reduce congestion at the intersection and potential to discuss cost sharing opportunities once funding for improvements is identified. At this time there are not sufficient details regarding the costs and design for intersection and sidewalk improvements and the lead agency cannot commit to detailed funding but is open to further discussion regarding the potential improvements.

Regarding the Ravenswood School District redevelopment at the Flood School site, San Mateo County Parks acknowledges the proposed development adjacent to the Landscape Plan. It should be noted that redevelopment of the school site is not part of the Landscape Plan. At this time the proposed housing project has not been fully defined. The number of proposed units and size of the development is not available. Therefore, redevelopment site cannot be added into the cumulative analysis for the Final Revised EIR because there is not sufficient project information to complete a cumulative analysis.

Letter 16

**From:** Bill Lamkin [<mailto:billlamkin@yahoo.com>]

**Sent:** Monday, September 23, 2019 6:06 PM

**To:** Samuel Herzberg <[sherzberg@smcgov.org](mailto:sherzberg@smcgov.org)>; Nicholas Calderon <[ncalderon@smcgov.org](mailto:ncalderon@smcgov.org)>

**Subject:** Flood Park EIR

**CAUTION:** This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

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Gentlemen,

I was copied on Alice Newton and Nettie Wijsman's emails to you regarding the Reimagine Flood Park project and its EIR. I would like to add my name to each and every comment and question that they both posed. I could not have said it better. I have the same questions.

Bill Lamkin

1055 Tehama Ave.  
Menlo Park, CA94025

Since 1987

16.1

## Letter 16

**COMMENTER:** Bill Lamkin

**DATE:** September 23, 2019

### **Response 16.1**

The commenter states their agreement with Comment Letters 8 and 9. Please refer to Responses 8.1 through 8.11 and 9.1 through 9.35 for responses to Comment Letters 8 and 9.

## **4 Public Meeting Comments**

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Verbal comments received at a public meeting on the Draft Revised EIR (September 17, 2019) that pertain to environmental issues are summarized below and individually numbered, with responses following.



**MEETING:** San Mateo County Parks Department

**DATE:** September 17, 2019

### **Response PM.1**

The commenter states that the Draft Revised EIR's analysis of parking availability is flawed because the analysis was based on incorrect information and assumptions. The commenter states that there are actually 330 parking spaces at the park, which are often used by Park staff for storage and become unavailable for park users. The commenter continues that they have observed that on Easter 80 to 90 percent of the parking lot is full and the parking lot is often maxed out under current conditions. A Park Ranger has also told the commenter that the parking lot is almost full during peak use times under current conditions. The commenter concluded that the parking lot is not adequate to serve the proposed Landscape Plan

Please see Topical Response B: Transportation Impacts. A new parking count was conducted on October 2, 2019 and yielded a total of 320 spaces available at Flood Park. An additional 49 parking spaces would be added to Flood Park as part of the Landscape Plan for a total of 369 available spaces.

### **Response PM.2**

The commenter asks for an explanation of what park industry data was used by Gates & Associates in the park usage projections. For a detailed explanation of park usage projections and data please see Topical Response C: Park Usage Projections.

### **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 park usage and Response 9.35 for a discussion of parking demand calculations for picnic uses.

The commenter requests that new screening trees at the park's perimeter be planted ahead of construction. 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, 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.

### **Response PM.4**

The commenter states that group picnic sites are heavily used and appear to always be reserved in advance. 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 PM.5**

The commenter states that the projections used in the Draft Revised EIR do not include volleyball or picnics on weekdays and that these activities occur on weekdays. Please see Topical Response C: Park Visitor Projections for a discussion of park usage assumptions.

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 this distance and its effect on the exposure of residents to athletic noise.

### **Response PM.6**

The commenter states that the Draft Revised EIR states that high school teams would use the sports fields, which would alter the trip distribution because more trips would come from places other than Menlo Park and use different roadways. Please see Response 8.1 for a discussion of use of park facilities by high school teams.

### **Response PM.7**

The commenter states that the Draft Revised EIR should analyze kids being dropped off at Iris Lane for drivers who want to avoid congestion at the Bay Road entrance. The commenter continues that the configuration of Iris Lane would cause congestion. Topical Response B: Transportation Impacts for a discussion of congestion on Iris Lane.

### **Response PM.8**

The commenter states that the Draft Revised EIR underestimates the number of spectators for the sports fields, which would increase traffic congestion and parking impacts beyond what was analyzed in the Draft Revised EIR. Please see Topical Response C: Park Visitor Projections for a discussion of spectators use assumptions.

### **Response PM.9**

The commenter states that the Draft Revised EIR should disclose the types of teams that would use the proposed sports fields because certain teams could result in additional spectators not analyzed in the Draft Revised EIR. Please see Response PM.8 and Topical Response C: Park Usage Projections for a discussion of the park use assumptions and projections.

### **Response PM.10**

The commenter states that the Draft EIR needs to address whether drop-off activity at the Iris Lane gate would be a problem after mitigation. Please refer to Topical Response B: Transportation Impacts for a discussion of traffic impacts related to drop-off activity after implementation of mitigation.

### **Response PM.11**

The commenter asks if multiple games could be played on the Landscape Parks fields at one time and that multiple games should be analyzed because impacts would be greater than one game or practice per field. Please see Topical Response C: Park Usage Projections for a discussion of how the fields are projected to be used. It is not anticipated that multiple games would be played on one field.

## 5 Draft EIR Text Revisions

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Chapter 5 presents specific changes to the text of the Draft Revised EIR that are being made to correct errors or omissions or clarify information presented in the Draft EIR in response to comments received during the public review period. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page section number are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted from the Draft EIR is shown in ~~strikeout~~. Page numbers correspond to the page numbers of the Draft Revised EIR.

### 5.1 Draft Revised EIR Text Revisions

Page 29 of the Draft Revised EIR in Section 2.4 Project Features is amended in the Final EIR as follows:

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

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily	Maximum Capacity per Event	Daily	Maximum Capacity per Event		
Shade/market structure	200	75	N/A	N/A	1 event/day	N/A
Play area universal (2-5)	60	20	30	15	4 cycles/day	2 cycles/day
Play area universal (5-12)	120	40	60	30	4 cycles, 1 parent/2 kids	4 cycles, 1 parent/2 kids
Adventure play	70	35	40	20	2 cycles/day	2 cycles/day
Event/group picnic area	200	200	N/A	N/A	1 event	N/A
Small group picnic	120	120	N/A	N/A	8 areas, 15 people/area, 1 cycle/day	N/A
<u>Drop-in picnic area</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>
Tennis courts	<u>6448</u>	16	32	16	<u>2 courts, 8 playing, 8 waiting, 4 cycles/day</u> <del>10 playing, 10 waiting, 3 cycles/day</del>	<u>2 courts, 8 playing, 8 waiting, 2 cycles/day</u> <del>10 playing, 10 waiting, 1 cycle/day</del>
Basketball	60	20	10	10	<u>10 playing, 10 waiting, 3 cycles/day</u> <del>2 courts, 6 playing, 1 cycle/day</del>	<u>10 playing, 10 waiting, 1 cycle/day</u> N/A
Sand volleyball	12	12	<u>48</u> <del>N/A</del>	<u>48</u> <del>N/A</del>	<u>2 courts, 6 playing, 1 cycle/day</u> Ancillary use	<u>2 courts, 6 players, 6 spectators, 4 cycles/day</u>
Pump track	60	30	40	20	N/A	N/A
Ballfield	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	30	15	10	10	N/A	N/A
<b>Total</b>	<b><u>1,470</u><del>30</del></b>	<b><u>757</u><del>33</del></b>	<b><u>414</u><del>342</del></b>	<b><u>313</u><del>241</del></b>		

Source: Gates + Associates 2019

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 and stripping for an addition of 49 parking spaces on already paved and gravel surfaces. 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 in a chain-link fence 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. 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 stripped outside of the pétanque court and 26 stalls stripped 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.

Page 28 of the Draft Revised EIR in Section 2.4 Project Features is amended in the Final EIR as follows:

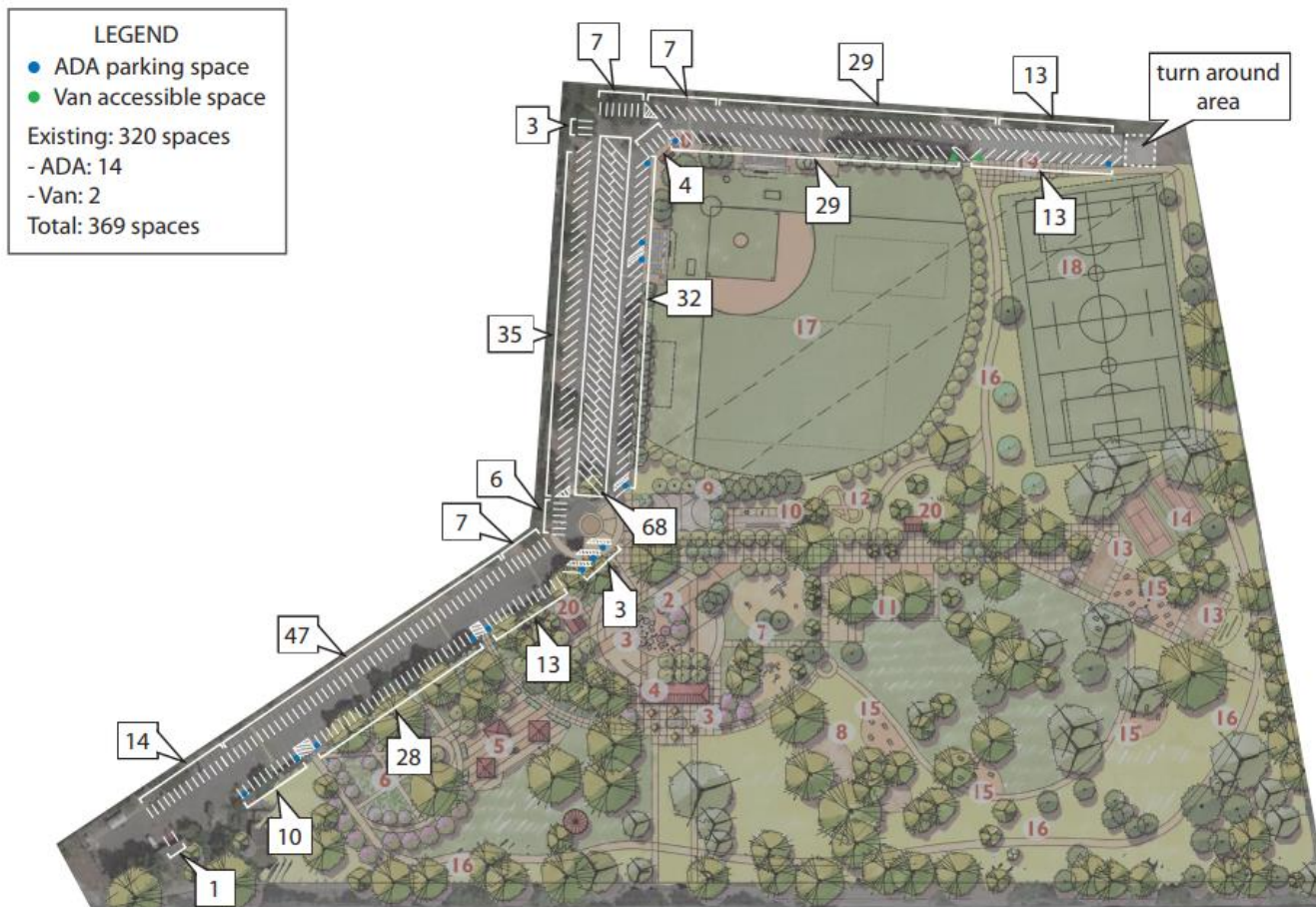
Figure 2 Proposed Landscape Plan



0 30 60 120



**Figure 5 Proposed Parking Map**



Source: Gates + Associates, 2019

013smx\_parking.ai 10/19

**Flood Park Traffic Impact Study  
 Proposed Parking Map**



Pages 120 and 121 of the Draft Revised EIR in Section 3.5 Transportation and Circulation are amended in the Final EIR 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 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.

Based on this data, the anticipated typical peak parking demand for the proposed project is 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 344 parking spaces would ~~not~~ exceed the 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 at the site of the existing pétanque court. Following the proposed parking improvements Flood Park would have a total of 369 parking spaces. Therefore, it is anticipated that the existing parking supply would be adequate to accommodate peak parking demand under the Landscape Plan. However, it should be noted the parking demand could still potentially exceed the capacity during very large scheduled events.



# Appendix A

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May 2018 Final EIR



# Flood County Park Landscape Plan

Final Environmental Impact Report/  
Response to Comments Document

SCH#2016112040

*prepared by*  
**County of San Mateo Parks Department**  
455 County Center – Fourth Floor  
Redwood City, California 94063  
Contact: Marlene Finley, Parks Director

*prepared with the assistance of*  
**Rincon Consultants, Inc.**  
449 15<sup>th</sup> Street  
Oakland, California 94612



May 2018

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# Errata to the Final EIR

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The County has prepared this Errata sheet to clarify and correct information in the Final Environmental Impact Report (Final EIR) for the Flood County Park Landscape Plan. These minor changes do not introduce new or more severe adverse environmental effects and do not address feasible alternatives to the Project or mitigation measures beyond those considered in the Draft EIR and Final EIR. 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 EIR Text

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

Page 141 of the Final EIR is corrected as follows:

### **Response 44.9**

The commenter states that the Bay Road/Ringwood Avenue intersection and its vicinity is a “critical connection” to Menlo-Atherton High School from neighborhoods near Flood County Park. Because of the importance of this connection, the commenter opposes any improvements that would reduce or eliminate walking paths or bike lanes on Ringwood Avenue. Neither the proposed Landscape Plan nor mitigation measures in the Draft EIR would involve the reduction or elimination of pedestrian or bicyclist access on Ringwood Avenue.

The commenter also requests a meeting between City staff and the County about mitigation for the Bay Road/Ringwood Avenue intersection, including contributions by the County toward future improvements. ~~In response to this comment, the lead agency held a meeting with City staff to discuss potential improvements to the intersection.~~ With regard to traffic improvements at the Bay Road/Ringwood Avenue intersection, ~~the~~ County finds that it would be infeasible to expand the intersection’s capacity, due to the physical and jurisdictional constraints discussed in Draft EIR Section 4.9, *Transportation and Circulation*. The Draft EIR acknowledges that the project would have a significant and unavoidable impact on traffic congestion at the intersection.

# 1 Introduction

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## 1.1 Purpose of the Response to Comments Document

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the proposed Flood County Park Landscape Plan (project). The Draft EIR identifies the likely environmental consequences associated with development of the project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides a response to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications to material in the Draft EIR. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

## 1.2 Environmental Review Process

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

On November 17, 2016, the County circulated a Notice of Preparation (NOP) to help identify the types of impacts that could result from the project, as well as potential areas of controversy. The NOP was mailed to public agencies (including the State Clearinghouse), organizations, and individuals considered likely to be interested in the project and its potential impacts. Comments received by the County on the NOP were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for public review on October 3, 2017, and was distributed to relevant regional and State agencies. Copies of the Notice of Availability of the Draft EIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and neighbors near the project site. The Notice of Availability was also posted on and adjacent to the project site. The Draft EIR and an announcement of its availability were posted electronically on the County's website, and a paper copy was available for public review at the County of San Mateo Parks Department.

The 45-day CEQA public comment period began on October 3, 2017, and ended on November 16, 2017. The County of San Mateo Parks Department held a public meeting on the Draft EIR on November 1, 2017, and also presented on the Draft EIR's findings at a Menlo Park City Council meeting on November 7, 2017. The County received 79 comment letters on the Draft EIR (not including public meeting comments). Copies of all written comments received during the comment period and summaries of the oral comments received at the public meeting are included in Chapters 3 and 4 of this document.

## 1.3 Document Organization

This RTC Document consists of the following chapters:

- *Chapter 1: Introduction.* This chapter discusses the purpose and organization of this RTC Document and the Final EIR, and summarizes the environmental review process for the project.
- *Chapter 2: List of Commenters.* This chapter contains a list of the agencies, individuals, and organizations that submitted written comments, and the public hearings that were held, during the public review period on the Draft EIR.
- *Chapter 3: Comments and Responses – Letters and Emails.* This chapter contains reproductions of comment letters received on the Draft EIR. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- *Chapter 4: Comments and Responses – Public Meeting Summary.* This chapter contains summaries of oral comments from the public meeting held on the Draft EIR by the County of San Mateo Parks Department on November 1, 2017. A written response to CEQA-related comments received at the meeting is provided. Each response is keyed to the corresponding comment.
- *Chapter 5: Draft EIR Text Revisions.* Corrections and additions to the Draft EIR that are necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are contained in this chapter. Underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ formatting has been deleted from the Draft EIR.

## 2 List of Commenters

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This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapters 3 and 4 of this document.

### 2.1 Organization of Comment Letters and Responses

The 78 letters are presented in chronological order, by date received. Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

### 2.2 Public and Agency Comments Received

The following comment letters were submitted to the County during the public review period from October 3, 2017 to November 16, 2017, except for the final comment letter (Letter 79), which was received after the public review period on March 28, 2018. Section 15088 of the *CEQA Guidelines* states that “the lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” Consistent with this guideline, the Final EIR includes a response to Letter 79 in the interest of public disclosure.

**Table 1 List of Letter Numbers and Commenters**

Letter Number and Commenter	Page #
1. Dan McMahon	14
2. Jim Sullivan	16
3. Alexis Bartlo	18
4. Matthew Siegel	20
5. Kyung Yoo	22
6. Jill Olson	24
7. Jacqueline Gaertner	26
8. Jill Baxter	29
9. Tom Bolich	31
10. Pradip Shankar	34
11. Elena Reese	36
12. Elizabeth Smith	39
13. Margaret Monroe	41
14. Henry Hilton	45
15. Skip Hilton	47
16. Brian Mansell	49
17. Rafael Avendano	51

<b>Letter Number and Commenter</b>	<b>Page #</b>
18. Carol Schultz	53
19. Gail Kittler	55
20. Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review, Caltrans	57
21. John Andrews	64
22. Douglas Bui	69
23. Robert Steinmetz	86
24. Nicholas Bott	88
25. Anna Rogers	90
26. Bernice van der Meer	92
27. Bob Baxter	94
28. Celine Sanie	96
29. Cristy Barnes	98
30. Hendrik van der Meer	100
31. Jeffrey Barnett	102
32. Keith Otis	104
33. Lindsay Bogue	106
34. Natalie Coupe	108
35. Rich Ferrick	110
36. Rod MacLeod	112
37. Stacey Jones	114
38. Stephanie Thomases	116
39. Taryn Lamm	118
40. Tracy Bianchi	120
41. Carolyn Ordonez	122
42. Joan Hilse	127
43. Karen Schiller	130
44. Kirsten Keith, Mayor, City of Menlo Park	132
45. Stefano Giovannetti	143
46. Alan Block	145
47. Alexander Haskin	148
48. Alice Newton	150
49. Alpine Strikers FC	162
50. Bobette Nicholl	164
51. Brian Roberts	166
52. Carol Schultz	168
53. Colin Quinton	177
54. Dan Burke	179
55. Dan Galles	181
56. Dan Siegel	183
57. Daniel Meehan – for Phil Corey	185



Letter Number and Commenter	Page #
58. Daniel Meehan	190
59. David Klein	194
60. Gabriel Jack	198
61. Gerardo Gonzalez	200
62. Julie Quinlan	202
63. Karen Wang	204
64. Katie Ferrick	206
65. Larry Nelson	208
66. Mark Ryan	210
67. Mike Haven	212
68. Monica Nicholl	214
69. Nettie Wijsman	216
70. Patrick Sullivan	238
71. Renee Ryan	240
72. Robert Zeien	242
73. Tim Cronin	244
74. Tito Bianchi	247
75. Clay Jones	249
76. Mark Meyer	251
77. Kari Ridel	254
78. John Keefer	256
79. Nettie Wijsman	258

In addition to soliciting written public and agency comments on the Draft EIR pursuant to CEQA, during the public review period verbal comments were taken on the Draft EIR at a public hearing held by the County of San Mateo Parks Department on November 1, 2017. Responses to environmental issues raised in this hearing are included in Chapter 4 following the written comments and responses.

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## 3 Comments and Responses

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Written responses to each comment letter received on the Draft EIR, as well as topical responses for recurring comments, are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety.

Please note that text within individual letters that has not been numbered does not specifically raise environmental issues nor relate directly to the adequacy of the information or analysis within the Draft EIR, and therefore no comment is enumerated or response required, per *CEQA Guidelines* Section 15132.

Revisions to the Draft EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are included in the responses. Underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR. All revisions are then compiled in the order in which they would appear in the Draft EIR (by page number) in Chapter 5, Draft EIR Text Revisions, of this document.

### 3.1 Topical Responses

This subsection includes topical responses, responses to recurring written and verbal comments relating to the environmental analysis and conclusions in the Draft EIR. These will be referred to in the individual responses in Section 3.2 and Chapter 4.

As a general introduction, it should be noted that the Final EIR's conclusions on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this Response to Comments document. The County acknowledges that some commenters disagree with some conclusions in the EIR. Consistent with the intent of CEQA and the *CEQA Guidelines* for its implementation, this Final EIR also includes the differing opinions presented by the commenters. 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 document.

#### **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 because they assume that this field would be located approximately 100 feet away from the nearest residences, yet it could be built as close as 30 feet away.*

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 approximately 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 approximately 100 feet away from the edge of residential backyards. 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. The noise analysis is based on a conservative assumption that residents would be sensitive to noise in their backyards directly adjacent to the park. Therefore, the Draft EIR relies on appropriate distances in estimating noise levels from the soccer/lacrosse field.

- *The Draft EIR's mitigation for noise from events at Flood County Park would be inadequate to protect nearby residents, permitting the use of air horns and sound amplification, while ignoring the option of installing a sound wall.*

As discussed under Impact N-3 in Draft EIR Section 4.8, *Noise*, events at the proposed athletic fields and gathering meadow would generate noise audible to nearby residents. Specific sources of high noise levels during events could include whistles, air horns, and sound amplification equipment that broadcasts commentary or music. However, sound amplification is typically not allowed in County Parks, even with procurement of a special event permit. Impact N-3 has been amended as follows in the Final EIR to discuss this limitation on the use of sound amplification in proposed Phase I facilities:

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. 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.

In addition, the discussion of sound amplification from Phases II and III of the Landscape Plan has been amended as follows in the Final EIR:

...the gathering meadow in Phase II would be a performance space suitable for concerts or ceremonies that could involve the use of sound amplification equipment for music or commentary, although the County typically does not allow this equipment during events at Flood County Park.

The Draft EIR determines that the noise impact from air horns and sound amplification equipment at park events would be potentially significant and requires two mitigation measures to reduce this impact to less than significant. Mitigation Measure N-3(a) in the Draft EIR would prohibit the use sound amplification and air horns with the procurement of a special event permit. This measure would substantially reduce the use of equipment that could generate high noise levels during large events. Mitigation Measure N-3(b) would restrict athletic practices and games to the hours of 9 A.M. to 8 P.M., preventing athletic activity that generates noise during early morning hours when the park is otherwise open to public use.

In the Final EIR, Mitigation Measure N-3(a) has been amended to revise the process for procuring a special event permit and to prohibit the use of air horns outright:

The County shall only allow the use of sound amplification equipment ~~and air horns~~ at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with ~~City of Menlo Park~~ County of San Mateo Parks Department procedures. The County shall notify all groups using the

proposed soccer/lacrosse field, ballfield, and 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 such 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.

With implementation of the amended Mitigation Measure N-3(a), the County would prohibit the use of air horns and follow the Parks Department's review process for permitting of sound amplification during special events. Furthermore, this measure would require periodic enforcement of these equipment restrictions during events.

Although residents would still be exposed to noise from events at athletic events and the gathering meadow even with mitigation, this exposure would be typical of areas where local parks with active recreational use are surrounded by residential neighborhoods. Section 4.88.360(c) of the San Mateo County Code of Ordinances exempts such noise from parks owned and operated by a public entity. Therefore, noise from events at Flood County Park would not be subject to quantitative standards in the County's noise ordinance. After mitigation, noise from park activities also would not substantially disturb the peace and quiet of people of normal sensitivity in the area, as required by Section 4.88.350 of the County Code of Ordinances. Therefore, the impact would be less than significant after mitigation. Further mitigation, such as installation of a sound wall adjacent to residential properties, would not be required to reduce noise levels to a greater extent.

### **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 in appropriate data and does not account for peak use of the park.*

As discussed under Impact T-6 in Draft EIR Section 4.9, *Transportation and Circulation*, parking demand under the Landscape Plan was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Parking Generation*, 4<sup>th</sup> Edition, 2010, for city parks. The ITE's parking demand rates for specific land uses are based on studies of parking demand at representative sites. The ITE's standard rate for city parks (5.1 parking spaces per acre) is based on a study of parking demand at a 25-acre park in Santa Barbara, which has multiple sports fields, a picnic area, and an administration building. The size and type of recreational use of this park are comparable to those of Flood County Park with implementation of the proposed athletic fields. It is also standard industry practice for traffic engineers to rely on ITE rates when estimating a project's demand for parking. Therefore, the Draft EIR's methodology for estimating parking demand at the park is supported by evidence. Applying the rate of 5.1 parking spaces per acre, estimated parking demand at Flood County Park would be 125 spaces. This level of demand would be less than the park's existing parking supply of 375 spaces.

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 within Flood County Park were not taken for the Landscape Plan. Nonetheless, as discussed above, the use of ITE parking demand rates is appropriate for the proposed project.

While the County acknowledges that individual large events or simultaneous events at Flood County Park could require the use of more than 125 spaces, overflow of the parking lot would be a rare occurrence. In managing the park, the County has found that parking overflow occurs fewer than 10 days per year. Although the proposed recreational improvement would increase parking demand beyond existing conditions, a substantial amount of parking would consist of brief pick-up and drop-off activity for athletic events. A designated drop-off area would cater to this parking activity, and the County would admit free drop-offs of athletic participants to promote use of the drop-off area. Therefore, the on-site parking lot would have sufficient capacity to accommodate parking demand except on rare occasions.

- *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 Draft EIR Section 4.9, *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 to Flood County Park. This behavior could increase as the proposed recreational improvements attract new visitors to the park. Furthermore, the proposed soccer/lacrosse field would be located much closer to the park's secondary 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, 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.

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 enforce parking violations. In the Final EIR, this mitigation measure has been amended as follows to clarify the County's responsibility to reduce on-street parking by park visitors:

The County shall ~~develop a mechanism to~~ 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 communication about large events and encouraging increased random enforcement of on-street parking restrictions.

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.

- *The EIR should consider lacrosse use when evaluating the Landscape Plan's impacts, especially with regard to traffic congestion.*

Draft EIR Section 2, *Project Description*, discusses anticipated use of the proposed athletic fields at Flood County Park, including the reconstructed ballfield and the new soccer/lacrosse field. As shown in Table 6, it is expected that baseball use would occur almost year-round, with peak use reaching an estimated 46 events per month in the summer. Soccer use is expected to occur from September through May, with an estimated 24 events per month. This table does not include projections of lacrosse use at the park. Nonetheless, the Draft EIR evaluates the impacts of lacrosse use related to protective lacrosse netting in Section 4.1, *Aesthetics*, and noise from lacrosse practices and games in Section 4.8, *Noise*. For the purpose of fully disclosing anticipated lacrosse use under implementation of the Landscape Plan, the County has researched demand from local lacrosse groups. Section 2, *Project Description*, has been amended as follows in the Final EIR, based on information from Menlo Atherton Youth Lacrosse:

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 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 athletic field improvements under the Landscape Plan (i.e., a reconstructed ballfield and new soccer/lacrosse field) would generally be highest during the summer, when the Menlo Park Legends or other athletic groups would be most active at the reconstructed ballfield. 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 baseball 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.

As discussed above, the County expects that the park would typically would accommodate either soccer or lacrosse at any given time. The local lacrosse season is predominantly in the spring and fall, overlapping with anticipated soccer use at Flood County Park. Soccer and lacrosse events would generate similar numbers of vehicle trips. Therefore, lacrosse trips would typically substitute for soccer trips without increasing overall trip generation from Flood County Park. However, the Traffic Impact Study prepared by W-Trans for the Draft EIR (Appendix H) has been amended to account for additional trips when soccer and lacrosse events could potentially be concurrent, assuming one event on the soccer/lacrosse field and another on the ballfield.

The revised Traffic Impact Study projects that two simultaneous soccer or lacrosse events would generate six more weekday P.M. peak hour trips as compared to a baseball and soccer event

scheduled concurrently. Overall trip generation from active and passive recreational use of Phase I facilities would increase from 91 to 97 P.M. peak hour trips, and from 48 to 66 Saturday peak hour trips. Despite this increase in estimated vehicle trips, the Traffic Impact Study finds that it would have minimal effect on traffic delay at nearby intersections. Estimated delay at the Bay Road/Ringwood Avenue under the Existing plus Project scenario would change from 25.7 to 25.9 seconds during the weekday P.M. peak hour and from 13.9 to 14.0 seconds during Saturday peak hours. Tables 35 through 37 in Section 4.9, *Transportation and Circulation*, have been amended to show updated projections of traffic delay at nearby intersection. However, the level of service (LOS) at the Bay Road/Ringwood Avenue intersection would still degrade from LOS C to LOS D under the Existing plus Project scenario. Therefore, additional lacrosse trips would not substantially worsen the significant and unavoidable impact already identified in Draft EIR at the Bay Road/Ringwood Avenue intersection.

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

As discussed above, the revised Traffic Impact Study analyzes a conservative scenario of vehicle trips generated by two simultaneous soccer or lacrosse events at Flood County Park. 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 EIR Section 4.9, *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. In addition, the Draft 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.

- *Many athletic participants would travel by bicycle to and from events at Flood County Park, reducing the number of vehicle trips generated by the Landscape Plan and their effect on traffic congestion.*

The Traffic Impact Study (Appendix H to the Draft EIR) makes a conservative assumption that all new trips associated with athletic use at Flood County Park would be by motor vehicle. In practice, however, a substantial number of athletic users would ride bicycles to and from events at the park. Class II bike lanes, which are separated from motor vehicle travel lanes, exist on Bay Road between Marsh Road and Van Buren Road, and on Ringwood Avenue between Middlefield Road and Bay Road. These bike lanes provide a complete transportation network for bicyclists near Flood County Park. In addition, Mitigation Measure T-5(a) in the Draft EIR would require that the County install at least six bicycle racks near the proposed gathering plaza, providing for safe on-site storage of bicycles. As discussed in Response 59.3, the director of the Menlo Park Legends baseball program asserts that most of his 13- and 14-year-old students ride bicycles to practice. It is anticipated that this baseball program would use the reconstructed ballfield at Flood County Park. Bicycling by athletic participants would substitute for motor vehicle trips to and from the park. Therefore, bicycling by athletic participants would result in less trip generation than estimated in the Traffic Impact Study. However, as acknowledged in Draft EIR Section 4.9, *Transportation and Circulation*, the Landscape Plan would still have a significant and unavoidable impact on traffic congestion at the Bay Road/Ringwood Avenue intersection.



## 3.2 Written Comments

10-07-2017 - 10:21

Letter 1

Dan McMahan

1. The EIR failed to take into account the Iris Lane entrances to the park and associated traffic on Del Norte and Van Buren Avenues. There is no doubt that this will become a primary pick-up/drop-off locale given traffic congestion on Bay Road. Without this the EIR appears to be incomplete.

1.1

2. The EIR did not address the issue of 'pull-over' drop-off/pick-ups on Bay road which block/create hazard on north bound Bay Road. This currently occurs as picnic-ers load and unload coolers etc. Mitigation will be required.

3. What are the rules for amplification at the park -during the walk through with SMC personnel last year I remember hearing that amplification was not allowed in the park. What impact would amplification have on non-sports users of the park as well as adjoining residential neighborhoods?

1.2

4. Is there an explicit hierarchy of park uses -do sports rank higher than picnics and group gatherings. It should be noted that the primary users of the park have always been group picnic-ers. This was true going back to when the baseball field was open. So what are the 'use-cases' associated with group picnic attendees versus sport field users and what impact/interactions are expected. Will one degrade the experience of the other? Will they enhance each other? This needs to be explicitly described.

1.3

## Letter 1

**COMMENTER:** Dan McMahon

**DATE:** October 7, 2017

### **Response 1.1**

The commenter states that the Draft EIR fails to account for pick-up and drop-off activity at the Iris Lane entrance to Flood County Park. In addition, the commenter states that the EIR does not address pick-up and drop-off activity on Bay Road, which could create a traffic hazard. Please see Topical Response B: Transportation Impacts for a response to comments about adverse effects from pick-up and drop-off activity.

### **Response 1.2**

The commenter asks what the County's rules are for sound amplification at Flood County Park, and what impact amplification would have on non-sports users of the park and local residents. Please refer to Topical Response A: Noise Impacts for a discussion of the applicable rules for sound amplification and resulting noise impacts.

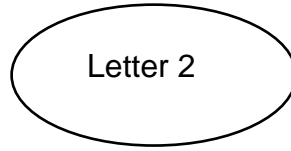
### **Response 1.3**

The commenter asks if the County prioritizes athletic use over picnics and group gatherings. As discussed in Draft EIR Section 2, *Project Description*, one of the Landscape Plan's objectives is to "provide a variety of uses for a range of user groups, including youth." Consistent with this objective, the proposed Landscape Plan includes both active recreational facilities that would cater to athletic events and passive recreational improvements such as renovated picnic areas and pathways with exercise stations.

The commenter also requests that the EIR discuss whether athletic use would degrade or enhance passive recreational uses, or vice versa. The effect of athletic activities on the recreational experience of picnickers and group gatherings is a social rather than environment impact. Therefore, the Draft EIR does not consider this issue in its environmental analysis. Nonetheless, all comments will be forwarded to the County's decision makers for their consideration.

10-08-2017 - 08:02

jim sullivan



Dog walking during allowed during the week, possibly restricted to certain areas on summer weekends.

Leash free dog run area please.

2.1

## Letter 2

**COMMENTER:** Jim Sullivan

**DATE:** October 8, 2017

### **Response 2.1**

The commenter requests that the Landscape Plan allow dog walking at Flood County Park during the week and provide for a leash-free dog run area. These comments do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

10-10-2017 - 12:28

Alexis Bartlo

Letter 3

Please, no dogs, no bikes. Keep this one place open just to hikers and equestrians. Thank you!

3.1

## Letter 3

**COMMENTER:** Alexis Bartlo

**DATE:** October 10, 2017

### **Response 3.1**

The commenter requests that Flood County Park be available to hikers and equestrians but not to dogs and bicycles. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

10-10-2017 - 21:00

Letter 4

Matthew Siegel

I am a resident and homeowner in suburban park. I fully support the full proposed landscape plan and am completely opposed to the do-nothing alternative. The park is in desperate need of an update. I drive my kids to other nicer parks for them to play despite living next to flood park. There is no more grass. The entire park is filled with foxtails. The baseball field sitting on millions of dollars of land is unkept and unused. The tennis courts have cracks and the nets sag. The paths are bumpy and cracked. I would love to live next to a park that people come to for sporting events. I would welcome increased traffic and noise if it is the sound of people enjoying themselves in a beautiful park. Please landscape and update flood park as it is in desperate need.

4.1

Ps. Please use soft rubber for a children's play area. Wood chips are splinter hazards and get caught all over kids clothing.

4.2



## Letter 4

**COMMENTER:** Matthew Siegel

**DATE:** October 10, 2017

### **Response 4.1**

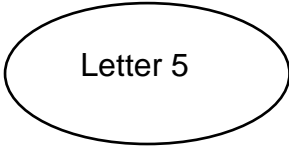
The commenter expresses support for the proposed Landscape Plan because of the need to revitalize Flood County Park, despite increased traffic and noise associated with use of the park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 4.2**

The commenter requests the use of soft rubber at the proposed children's play area, asserting that wood chips are hazardous to children. Although the County has not yet selected a surface for the new playground at Flood County Park, it intends to install a surface appropriate for an all-abilities play area. As with all comments, the request for a soft rubber surface will be forwarded to the County's decision makers for their future consideration.

10-12-2017 - 13:33

Kyung Yoo



I am a resident of the neighborhood that is near Flood Park. In fact, the back yard of our home borders the home plate of the baseball field. We will be directly impacted by the noise and inconvenience of the construction as well as the noise commensurate with increased use of an improved park. That being said, we feel that public recreation and green space is so important to our community that we are in wholehearted support of this plan.

5.1

## Letter 5

**COMMENTER:** Kyung Yoo

**DATE:** October 12, 2017

### **Response 5.1**

The commenter states that their family will be affected by noise and the inconvenience of construction at Flood County Park. Please see Topical Response A: Noise Impacts for a discussion of the project's noise impacts on nearby residents.

Despite these concerns, the commenter expresses support for the Landscape Plan because of the need for public recreation and green space. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

10-13-2017 - 12:20

Letter 6

Jill Olson

Dear San Mateo Parks: Thank you for notifying residents about the plan for Flood Park. I am delighted to read the online plans for the park and look forward to its revitalization. Many parties, churches, companies and families are seen using the park each week in good weather. It is a community treasure!

I live two streets away from Flood Park. My biggest concern regarding Flood Park's redesign is noise. It is October 13th, 2017 and I am sitting at my desk with all windows and doors shut due to the Napa/Sonoma fires and I can still hear loud music from the park here inside my home. Speaker systems with amplification are sometimes used in the park by groups renting picnic space. Speakers and music can be heard by neighbors blocks from the park. It is essential that all groups using the park now, and after Flood Park is refurbished, respect the neighbors of the park by limiting noise. I would like to encourage the parks department to ban amplification systems for parties, events and announcing sporting events. If these systems are currently banned in Flood Park, than the staff at the park do not enforce these rules as I have heard amplified church services, group events and music this year. Thank you for hearing my concern. -Jill Olson

6.1

## Letter 6

**COMMENTER:** Jill Olson

**DATE:** October 13, 2017

### **Response 6.1**

The commenter expresses a concern about noise from speakers and music at Flood County Park. The commenter asserts that this noise is currently audible at her residence two blocks away from the park, even with windows and doors closed. To address this issue, the commenter recommends that the County ban amplification systems for parties, events, and sporting events at Flood County Park and enforce such a ban. Please see Topical Response A: Noise Impacts for discussion of mitigation addressing noise from sound amplification equipment.

10-14-2017 - 10:54

Letter 7

Jacqueline Gaertner

We continue to have serious concerns about the expansion activities of Flood Park. As an Atherton resident living across Bay Road from Flood Park, we have experienced a significant increase in negative factors impacting our quality of life, such as:

- noise volume from the park has increased in multiples over the past 2 years; during the summer it's daily, rest of year its weekends. This goes beyond what is considered normal park noise volume of children playing and families enjoying the outdoors - mariachi bands almost daily during the summer and again on weekends throughout the year, and abnormally loud whooping and hollering like wild animals all day long.
- increased noise from landscaping crews on a DAILY basis
- increased smoke coming from the park
- increased garbage and debris along Bay Road
- helium balloons constantly landing in our trees and yard
- graffiti on our retaining wall on Bay Road directly across from Park
- homeless people camping out in bushes across from Park
- increased traffic and cars racing down Bay Road, during the day and at night, and/or honking insistently as they drive by the park
- every Sunday early morning noise disturbance from garbage trucks.

7.1

The ""improvements"" made at Flood Park to provide more park space for the public have seriously and negatively impacted the quality of homeowners and families near Flood Park. By comparison, the noise coming from Surf Air planes overhead is nothing compared to the noise, smoke, and trash coming from Flood Park across the street!

Another significant issue is that of who is responsible for policing the area? For example, who monitors the noise level at the park, both during the day and ""after hours""? Who should be stopping the cars racing down Bay Road, or the vandals defacing our property with graffiti, or the homeless people camping out in the bushes along the road? Who do we call? Menlo Park Police or San Mateo County sheriff's office?

7.2

While the county has focused on making a better Flood Park, it has lost sight of the negative impact on surrounding neighborhoods.

7.3

We urge the County of San Mateo to address the current issues of traffic, noise, trash, and loitering.

We are adamantly against any further expansion or enhancement of Flood Park.

7.4

Thank you for the opportunity to provide feedback.

## Letter 7

**COMMENTER:** Jacqueline Gaertner

**DATE:** October 14, 2017

### **Response 7.1**

The commenter, a local resident, asserts that noise, trash, smoke, balloons, graffiti, homeless people, and traffic noise associated with public use of Flood County Park has increasingly degraded her quality of life. Draft EIR Section 4.8, *Noise*, acknowledges that existing recreational use and maintenance activities at the park generate noise that is audible at nearby residences. Other adverse social effects from existing use of Flood County Park do not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 7.2**

The commenter asks who is responsible for policing the area and monitoring noise levels at the park during the day and after park hours. The County Park Department is responsible for enforcing public safety within Flood County Park, while the City of Menlo Park Police Department is responsible for policing areas outside the park.

### **Response 7.3**

The commenter asserts that the County has lost sight of the negative impact of park improvements on surrounding neighborhoods. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 7.4**

The commenter expresses opposition to "any further expansion or enhancement of Flood Park." This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.



10-14-2017 - 08:05

Letter 8

JILL BAXTER

Suburban Park Resident 20+years.

STRONG objection to Multi-Use Field with or without Reduced Athletic Programming.

8.1

Reasoning: FURTHER DEGRADATION of neighborhood due to increased traffic, noise, permanent removal of mature trees.

Additional point: Plan LACKS PARKING improvements, and places an INADEQUATE DROP-OFF point deep within the parking lot forcing drive-around traffic patterns in a long narrow lot.

8.2

## Letter 8

**COMMENTER:** Jill Baxter

**DATE:** October 14, 2017

### **Response 8.1**

The commenter objects to the Reduced Athletic Programming and Multi-Use Field alternatives to the proposed Landscape Plan because they would increase traffic, noise, and removal of mature trees. As discussed in Draft EIR Section 7, *Alternatives*, the Reduced Athletic Programming Alternative would involve removal of a similar number of trees to the proposed project, while the Multi-Use Field Alternative could preserve a grove of redwood trees near the existing tennis courts which would otherwise be demolished for the proposed soccer/lacrosse field. The Reduced Athletic Programming Alternative would prevent noise and traffic from athletic events during afternoon peak hours on weekdays. The Multi-Use Field Alternative would incrementally reduce noise and traffic associated with athletic event at Flood County Park, as compared to the proposed Landscape Plan.

### **Response 8.2**

The commenter asserts that the Landscape Plan lacks parking improvements and places an inadequate drop-off area deep within the parking lot, which would force “drive-around traffic patterns in a long narrow lot.” While the Landscape Plan would not expand the capacity of the park’s existing 375-space parking lot, it would add a pick-up and drop-off area near the existing playground. As discussed under Impact T-4 in Draft EIR Section 4.9, *Transportation and Circulation*, the proposed pick-up and drop-off area would represent a minor modification to the existing parking lot. This modification would not introduce potential design hazards such as sharp curves, dangerous intersections, or incompatible uses.

Letter 9

Tom Bolich

Our concerns remain primarily about the impact of additional NOISE (Section 4.8, pg. 123) from the future users of the proposed project on our existing residences along Hedge Road in Suburban Park, parallel to the park's parking areas, as well as the noise from the activities planned for the enlarged Group Picnic/Event area (#5 on the Legend Map).

9.1

None of the Noise Measurement stations were located along the existing parking areas adjacent to our homes along Hedge Road, and none of the readings taken included noise from amplified music and speakers. This oversight and lack of data needs to be addressed as the proposed project includes many improvements and additional facilities adjacent to the existing parking area closest to the Group Picnic/Event area.

The proposed noise impact mitigation measure that calls for "periodic policing" is far too vague and inadequate. Based on existing park ranger patrols, "periodic" could mean anything - ranging from once or twice a day to hourly or whatever the Parks Dept. budget would allow. Policing the park for noise violations, whether they be on the playing fields or the Group Picnic/Event area or the parking areas must be SPECIFIED so that it will be done CONTINUALLY, not periodically, and that funding be set aside to provide for this throughout the year for the life of the improvements.

9.2

Finally, the Noise Conclusions, Sec. 5.12, do not address any of these impacts or proposed mitigation measures. The only thing discussed in the conclusion about NOISE impacts is aircraft noise, which obviously has nothing to do with all the additional features being proposed to Flood Park. Therefore, your NOISE conclusions about Sec. 4.8 must be revised to include the actual noise impacts discussed in your DEIR or it must be considered incomplete and inadequate.

9.3

I look forward to your response and hope to attend future hearings to further discuss our concerns about the NOISE impacts of your proposed project on our neighborhood.

## Letter 9

**COMMENTER:** Tom Bolich

**DATE:** October 15, 2017

### **Response 9.1**

The commenter expresses concern about the impact of noise from parking areas and an enlarged group picnic/event area at Flood County Park on residences along Hedge Road. Residences near the park are currently subject to intermittent noise from on-site parking activity and gatherings at picnic areas. The proposed Landscape Plan would facilitate an increase in visitors to the park, which could incrementally increase noise-generating activity at the parking lot and picnic areas. However, noise levels from these sources would not substantially increase beyond existing levels. Furthermore, Mitigation Measure N-3(a) in the Draft EIR would reduce noise from park use by prohibiting sound amplification equipment except with procurement of a special event permit and enforcing this prohibition at the park. (Please refer to Topical Response A: Noise Impacts for a discussion of revisions to this mitigation measure in the Final EIR.) The Draft EIR finds that noise from on-site activities at Flood County Park would have a less than significant impact with implementation of mitigation measures.

The commenter claims that noise measurements taken at the park are insufficient because they were not located near the parking lot and do not account for noise from amplified music and speakers. As discussed in Draft EIR Section 4.8, *Noise*, Noise Measurement 1 was located at the children's playground, which is near the parking lot. All three on-site noise measurements at Flood County Park were recorded on a Sunday afternoon, which reflects noise from weekend recreational activities including use of the playground and picnic activities. It is acknowledged that noise levels may be higher during large summertime events at Flood County Park. However, the noise levels measured on-site are representative of typical park activities. Regardless of existing noise levels at the park, the Draft EIR evaluate the impact of noise generated by sound amplification equipment on nearby residents. As stated above, Mitigation Measure N-3(a) in the Draft EIR would reduce noise from park use by prohibiting sound amplification equipment except with procurement of a special event permit and enforcing this prohibition at the park. This mitigation measure would be expected to reduce noise from sound amplification to a less than significant level. Please refer to Topical Response A: Noise Impacts for further discussion of noise from sound amplification.

### **Response 9.2**

The commenter asserts that the periodic patrols of Flood County Park required by Mitigation Measure N-3(a) in the Draft would not suffice to enforce restrictions on sound amplification equipment and air horns. The commenter requests continuous policing for noise violations. Implementation of Mitigation Measure N-3(a) would reduce noise from sound amplification equipment and air horns to the extent feasible. This measure would require periodic enforcement while allowing flexibility in the timing of enforcement based on the availability of County staff and funding over the anticipated 10-year period of implementing the Landscape Plan. Continuous enforcement for noise violations during all park hours would not be feasible. As discussed in Draft EIR Section 4.8, *Noise*, noise from on-site activities at Flood County Park would have a less than significant impact with implementation of mitigation measures.

**Response 9.3**

The commenter asserts that the noise conclusions in Draft EIR Section 5.12 are incomplete because they do not address any noise impacts other than aircraft noise. However, this section is only intended to discuss Effects Found Not to Be Significant which are not otherwise analyzed in the main body of the EIR. Draft EIR Section 4.8, *Noise*, addresses all noise-related issues in San Mateo County's *Initial Study and Environmental Evaluation Checklist* with the exception of aircraft noise. As discussed therein:

Because Flood County Park is not located within the area covered by an airport land use plan, the proposed Landscape Plan would not increase recreational users' exposure to excessive aircraft noise. Criteria 5 and 6 related to aircraft noise are discussed in Section 5, *Effects Found Not to Be Significant*.

Therefore, Draft EIR Section 5.12 adequately addresses noise-related impacts that would be less than significant.

10-21-2017 - 21:57

Letter 10

Pradip Shankar

I was hoping that any changes to Flood Park would DECREASE the current noise levels. The measurements made to gauge current noise impact - 5 on a Sunday afternoon - are hardly representative of the noise when there are bands playing at every birthday bash or other celebration. Please do whatever you can to REDUCE the noise levels. Plant lots more trees to dampen noise perhaps? Perhaps along the perimeter - provide 50 feet of setbacks that is completely ""forested"". Thanks for asking for comments.

10.1

## Letter 10

**COMMENTER:** Pradip Shankar

**DATE:** October 21, 2017

### **Response 10.1**

The commenter states a desire for the Landscape Plan to decrease existing noise levels associated with park use and requests the planting of trees within 50 feet of the park's boundaries to dampen noise. Please refer to Topical Response A: Noise for a discussion of the adequacy of mitigation measures in the Draft EIR at reducing noise from on-site activities at Flood County Park. These measures would reduce the noise exposure of residents to a less than significant level based on County noise standards applicable to a park. Furthermore, implementation of Mitigation Measure BIO-2(a) would require the replacement of mature trees removed within 25 feet of residential property lines with trees that, upon maturity, would restore the pre-existing level of privacy. These replacement trees would incrementally reduce exposure to park noise.

The commenter also contends that a noise measurement cited in the Draft EIR from 5 p.m. on a Sunday is not representative of noise when bands are playing at celebrations. As discussed in Draft EIR Section 4.8, *Noise*, three noise measurements inside Flood County Park were taken on a Sunday afternoon between 1:50 P.M. and 2:47 P.M. This time period is representative of typical existing use of the park during weekend hours, which is sufficient to establish a baseline of existing ambient noise levels. The playing of music by bands is not a typical weekend activity at the park. Nonetheless, it is acknowledged that noise levels at the park would be intermittently higher than measured during large events with music. The Draft EIR finds that noise from new park activities facilitated by the Landscape Plan would be less than significant with mitigation.

Letter 11

Elena Reese

As a professional archaeologist, I have read over the Cultural Resources section of the DEIR submitted by Rincon Associates. I agree with their analysis that Flood Park is the only WPA project in Menlo Park and that it should be considered eligible for the CRHR (California Register of Historical Resources). What I object to is the complete separation of architectural and archaeological elements of the WPA project when considering the Cumulative Impacts of the current proposed Project. The Cumulative Impacts section only considers the prehistoric context for cumulative impacts. Although no surface signs of archaeological resources were observed, it is possible that buried historical archaeological features related to the construction of the WPA park building complex (such as borrow pits or other potentially significant hollow-filled features) may be present that might add to our knowledge of construction techniques used by the WPA or regarding WPA worker ethnicity or working conditions. These buried features would be part of the larger Flood Park WPA site feature system which would include both architectural and archaeological features. Most construction personnel are not qualified to recognize archaeological deposits that reflect adobe construction and therefore would be unlikely to stop construction leading to the potential destruction of any such feature. This would be an incremental cumulative impact to the eligibility of the Flood Park WPA site for inclusion in the CRHR.

11.1

11.2

Rincon Associates, in their discussion of Cumulative Impacts states: ""It is speculative to assume that cumulative development outside of the project site would or would not necessarily be able to avoid cultural resources. Each individual development proposal is reviewed by a jurisdiction and undergoes environmental review when it is determined that potential for significant impacts exist. In the event that future cumulative development would result in impacts to known or unknown cultural and paleontological resources, impacts to such resources would be addressed on a case-by-case basis in accordance with the requirements of the County's General Plan and CEQA. Therefore, impacts related to the incremental loss of cultural resources would not be cumulatively considerable."" Rincon Associates appears to be arguing that Cumulative Impacts are irrelevant. My understanding of a Cumulative Impacts Section is that the purpose of analyzing cumulative impacts is to avoid looking at a site in isolation (ie. on a case-by-case basis). The Flood WPA site should be considered in a regional historic and archaeological context to see if impacts to this site will degrade our overall resource base for knowledge about WPA projects of this type- how many similar WPA projects of this type are there in Menlo Park?, on the San Francisco Peninsula?, in the state of California? If the Flood Park WPA Project was a unique project or is the only one left, then demolishing the bathroom and writing off the exterior adobe wall should take that into account in the cumulative Impacts Section.

11.3

Overall, the Rincon Associates analysis of the architectural component of the Flood Park site is good, but they have not addressed the potential archaeological component of the WPA project in terms of cumulative impacts to a site they have just recommended as potentially eligible for the CRHR. As such, the cultural resources section of this DEIR is inadequate. Please have them address the potential cumulative impacts of this project proposal to WPA historical archaeology in the Final EIR.



## Letter 11

**COMMENTER:** Elena Reese

**DATE:** October 22, 2017

### Response 11.1

The commenter, a professional archaeologist, agrees with the Draft EIR's finding that Flood County Park is the only Works Progress Administration (WPA) project in Menlo Park and is eligible for the California Register of Historical Resources. This comment is noted and does not conflict with or challenge the analysis and conclusions of the Draft EIR.

### Response 11.2

The commenter objects to the EIR's separation of architectural and archaeological elements when considering the project's cumulative impacts. It is possible, the commenter contends, that buried historical archaeological features related to construction of WPA-era structures may be present. The commenter asserts that most construction personnel would not be qualified to recognize such archaeological deposits, and that their destruction would result in "an incremental cumulative impact" to the WPA site's historic eligibility.

Although buried features associated with construction of WPA-era structures may be present at Flood County Park, such features would not be essential to the park's eligibility as an historical resource. Nonetheless, Section 4.4, *Cultural Resources*, has been amended as follows in the Final EIR to evaluate the effect of potential buried archaeological features on cumulative impacts:

The cumulative context for cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for prehistoric archaeological resources and human remains is the former territory of the Costanoan people. Costanoan territory extends from the point where the San Joaquin and Sacramento rivers issue into the San Francisco Bay southward to Point Sur, with the inland boundary most likely constituted by the interior Coast Ranges (Kroeber 1925). The WPA buildings and potentially related historic archaeological elements can be considered in a regional historic context relating to "New Deal" projects. The cumulative context for paleontological resources is considered to be the San Francisco Peninsula.

The current study addresses the loss of Restroom D and that the removal of the building does not prohibit the remaining buildings and structures from conveying the park's significant associations with the WPA program and architecture. The identification of additional features would not result in a change to the WPA site's historic eligibility. Earth-disturbing activities during implementation of the Landscape Plan, in combination with other development in the region, could cause a substantial adverse change in the significance of a unique archaeological or paleontological resource, including historic archaeological resources relating to the WPA buildings. However, no known archaeological or paleontological resources are located within the boundaries of the project site. ~~With the proposed mitigation measures identified herein, the project would not considerably contribute to cumulative impacts to cultural resources.~~ The identification of any prehistoric or historic resources (e.g., resources relating to the WPA structures) would be treated on a case-by-case basis in accordance with the mitigation measures provided herein to reduce

impacts to less than significant levels. Thus, project impacts would not result in a significant cumulative impact to cultural resources.

It is speculative to assume that cumulative development outside of the project site would or would not necessarily be able to avoid cultural resources. Each individual development proposal is reviewed by a jurisdiction and undergoes environmental review when it is determined that potential for significant impacts exist. In the event that future cumulative development would result in impacts to known or unknown cultural and paleontological resources, impacts to such resources would be addressed on a case-by-case basis in accordance with the requirements of the County's General Plan and CEQA. Therefore, impacts related to the incremental loss of cultural resources would not be cumulatively considerable.

### **Response 11.3**

The commenter asserts that the EIR appears to argue that cumulative impacts on cultural resources are "irrelevant." The commenter recommends that Flood County Park be considered "in a regional historic and archaeological context" to determine if site-specific impacts would degrade the overall resource base for knowledge of WPA projects in the region and state. As discussed in Response 11.2, Draft EIR Section 4.4, *Cultural Resources*, does not imply that cumulative impacts to cultural resources are irrelevant, but rather that potential adverse impacts from cumulative projects would be treated on a case-by-case basis to reduce those impacts to a less than significant level. Thus, the potential impact would not result in a significant cumulative impact overall.

10-22-2017 - 16:27

Letter 12

Elizabeth Smith

I recommend that San Mateo County consider permitting pets in Flood Park and adding a dog run area. Pet ownership continues to rise in the U.S., and neighboring counties have parks that permit pets and include dog run areas. Permitting pets is another way that Flood Park can benefit the community.

12.1

## Letter 12

**COMMENTER:** Elizabeth Smith

**DATE:** October 22, 2017

### **Response 12.1**

The commenter recommends that the County consider permitting pets at Flood County Park and adding a dog run area. The commenter notes that neighboring counties have parks that permit pets and including dog run areas. These comments do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

Letter 13

10-22-2017 - 02:21

Margaret Monroe

I live 3 blocks north of flood Park, and am a long-time resident.

There are two big things wrong with your plan to make big changes to Flood Park:

- 1. You plan to destroy a number of large mature trees.

I do NOT want ANY trees to be cut down -- none. Yet you are planning to ""remove"" a grove of redwood trees and a number of oak trees -- all just to go along with the soccer mania that is so prevalent in this area. Those beautiful trees took decades to grow to the size they now are, and they also provide the oxygen we all need to breathe, as well as taking in CO2 -- both of which re essential to us and all creatures.

13.1

Yes your plan only states that the trees you destroy will be ""replaced 1:1"" --- and you never said how big any of the replacement trees would be or what species. I am sure that all you will plant in the place of those mature old and big trees will be tiny little saplings, all of which will take many decades to grow to the size of the trees you will destroy. We need those trees to stay where they are, and to be cared for by excellent professionals.

- 2. You plan to ""add a gathering meadow performance space"".

We do NOT need ANY loud outdoor concerts ANYWHERE in this area! Yet that is exactly what WILL happen in that area IF you ignore the needs of us local residents for a quiet and peaceful neighborhood. This area is zoned R-1, which means it is a residential area. and that even apartments are not allowed in this area. It is NOT a business or commercial or entertainment zone, and it must stay a 100% residential area.

13.2

And, no, I do not want even quiet spoken non-amplified events to be held in Flood Park. That would draw far far more people into this area than it can handle, and that means more people will drive in their CARS and will come from all over to attend the [probably frequent] performances that will be held in that meadow. Flood Park was meant primarily for those who WALKED in, with only some parking for cars.

And I KNOW that crime WILL go UP a LOT if your plan to make big changes to Flood Park happens, which I am worried it will, no matter how bad these changes will be for the neighborhoods around Flood Park. Crime will go up because far, far more people will come to Flood Park, and some of them will be criminals looking for people to rob and for cars and homes to break into and rob.

13.3

And the construction will take many years to complete, and WILL be VERY noisy -- 5 days a week, all day long. Good grief!

13.4

Flood Park is best if it is maintained well AS IT IS, with ALL the trees now there properly cared for, and NOT changed to cater to the currently popular fad for soccer, and to turn this peaceful and quiet area into a noisy and crowded entertainment zone, with the resulting traffic jams and high crime rates.

Please--- Leave flood Park as it is -- just maintain the old buildings and all the trees and the present parking lots.

13.5

## Letter 13

**COMMENTER:** Margaret Monroe

**DATE:** October 22, 2017

### **Response 13.1**

The commenter objects to the removal of any trees from Flood County Park because of their aesthetic appeal, benefit to air quality, and absorption of greenhouse gases. As discussed in 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. For this reason, among others, the Landscape Plan would have a less than significant impact on visual character or quality. 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 also states that the County does not specify the size of new trees to replace trees removed during implementation of the Landscape Plan. It is acknowledged that Mitigation Measure BIO-2(a) in the Draft EIR, which requires replacement of protected trees at a 1:1 ratio, does not specify the size of replacement trees. The commenter claims that this measure would allow the planting of small saplings that “take many decades to grow” to replacement size. Regardless of initial container size, newly planted trees would take a substantial amount of time to mature. Draft EIR Section 4.1, *Aesthetics*, notes that tree replacement would “preserve the park’s collection of scenic trees over the long term.”

### **Response 13.2**

The commenter opposes any outdoor concerts at the proposed gathering meadow because of the exposure of nearby residents to noise. The commenter adds that the area’s residential zoning means that commercial and entertainment uses are inappropriate at the park. However, as discussed on page 178 of the Draft EIR in Section 5, *Effects Found Not to Be Significant*, “Flood County Park is owned and operated by the County and not subject to the City of Menlo Park’s land use plans or policies.” Furthermore, the County is exercising its discretion to apply the County’s noise ordinance to the project. Section 4.88.360(c) of the San Mateo County Code of Ordinances exempts noise generated by activities conducted on parks from quantitative noise standards.

The commenter also opposes “even quiet non-amplified events” in Flood County Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 13.3**

The commenter claims that implementation of the Landscape Plan will greatly increase crime in neighborhoods. This concern about social issues does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

**Response 13.4**

The commenter asserts that construction will take years to complete and will be “very noisy” all day long on weekdays. Draft EIR Section 2, *Project Description*, acknowledges that construction of proposed recreational improvements would take place over a 10-year period. However, the most intensive construction activity would occur in the first two years during grading of approximately nine acres for Phase I improvements. As discussed in Section 4.8, *Noise*, “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.” Because of this timing restriction during the most sensitive evening and nighttime hours, construction noise would have a less than significant impact.

**Response 13.5**

The commenter requests that Flood County Park be left in its current condition. This comment does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.



10-24-2017 - 22:49

Letter 14

Henry Hilton

I am a Menlo Park resident and have lived in one of the neighborhoods adjacent to Flood Park for the past 20 years. I am a supporter of Flood Park, and served with my fellow neighbors on the Committee to Save Flood Park a number of years ago when the County was unsure if it would be able to maintain the Park due to budgetary constraints.

As a resident and neighbor of the Park, I feel the proposed Landscape Plan is the best plan for Flood Park, and the 3 Alternatives are sub-optimal and do not meet the needs of the community. We need more athletic fields in San Mateo county and the proposed Landscape Plan achieves this better than the alternatives.

14.1

The EIR notes that renovations to Flood Park are likely to create traffic impacts as more vehicles enter the area to attend and participate in athletic events. In addition to access points on Bay Road and Ringwood, Van Buren Road / Iris Lane can serve as a 3rd access point to the site from Willow Road to the south, and deliver visitors directly to the vicinity of the athletic fields. These roads are barely used today, and can absorb a good deal of additional peak traffic. Combined with auto access from Iris Lane and a well-designed drop-off and parking facility, this access point will mitigate traffic impacts to the site.

14.2

I would also suggest that SM County consider artificial turf for the soccer/lacrosse field and the ballfields so they can be used in all types of weather, and will hold up well against the elements and athletic use. The Landscape Plan includes acres of grass, trees, and natural landscaping that provides sufficient balance to the purpose-built, artificial athletic surfaces.

14.3

I would further suggest that SM County consider lighting both the ballfield and soccer/lacrosse field to extend their use through all seasons. The few lighted athletic fields in San Mateo county (e.g. Kelly Field and Nealon Park in Menlo Park, Mayfield and El Camino Park in Palo Alto, Red Morton in Redwood City) are fully used to capacity during daylight and nighttime hours. I know this may not be popular with the adjacent neighbors, but as a neighbor myself I believe this is worth the tradeoff to have a high quality athletic facility in our neighborhood - an asset which increases overall property values for those adjacent, and improves quality of life for the larger community.

14.4

Thanks for your consideration of community input.

## Letter 14

**COMMENTER:** Henry Hilton

**DATE:** October 24, 2017

### **Response 14.1**

The commenter, a neighbor of the park, supports the proposed Landscape Plan over the alternatives presented in the EIR because of the need for more athletic fields in San Mateo County. This opinion does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 14.2**

The commenter suggests that an additional access point to Flood County Park on Van Buren Road/Iris Lane could deliver visitors directly to the proposed athletic fields, mitigating traffic impacts. While adding vehicular access through the Iris Lane gate would redistribute trips to and from the park, shifting some trips away from the main gate on Bay Road, the County's goal is to minimize pick-up and drop-off activity at Iris Lane for the purpose of respecting neighbors' wishes to avoid traffic activity in that area. To this end, Mitigation Measure T-6 in the Draft EIR would require parking education and enforcement to reduce parking by visitors on neighborhood streets.

### **Response 14.3**

The commenter suggests that the County consider artificial turf for the proposed athletic fields because it can be used in all weather and holds up well against the elements and athletic use. This comment does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 14.4**

The commenter suggests that the County consider lighting both athletic fields to extend their use through all seasons. The County has few lighted fields, the commenter notes, and these are used to capacity during their available hours. The commenter asserts that the benefits of a higher-quality athletic facility are worth the tradeoff of adverse effects to neighbors of the park. This requested change to the Landscape Plan does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

10-24-2017 - 22:39

Letter 15

Skip Hilton

I am a Menlo Park resident and live in one of the neighborhoods adjacent to Flood Park, for the past 20 years. I am a supporter of Flood Park, and served with my fellow neighbors on the Committee to Save Flood Park a number of years ago when the County was unsure if it would be able to maintain the Park due to budgetary constraints.

As a resident and neighbor of the Park, I feel the proposed Landscape Plan is the best plan for Flood Park, and the 3 Alternatives are sub-optimal and do not meet the needs of the community. We need more athletic fields in San Mateo county and the proposed Landscape Plan achieves this better than the alternatives.

The EIR notes that renovations to Flood Park are likely to create traffic impacts as more vehicles enter the area so that visitors can attend and participate in athletic events. In addition to access points on Bay Road and Ringwood, Van Buren Road / Iris Lane can serve as a 3rd access point to the site from Willow Road, and deliver visitors directly to the vicinity of the athletic fields. Van Buren and Iris Lane are very lightly used today, and I believe they can absorb a good deal of additional peak traffic. Combined with auto access from Iris Lane and a well-designed drop-off and parking facility, this access point will mitigate other traffic impacts to the site.

I would also suggest that SM County consider artificial turf for the soccer/lacrosse field and the ballfields so they can be used in all types of weather, and will hold up well against the elements and athletic use. The Landscape Plan includes acres of grass, trees, and natural landscaping that provides sufficient balance to the purpose-built, artificial athletic surfaces.

I would further suggest that SM County consider lighting both the ballfield and soccer/lacrosse field to extend their use through all seasons. The few lighted athletic fields in San Mateo county (e.g. Kelly Field and Nealon Park in Menlo Park, Mayfield and El Camino Park in Palo Alto, Red Morton in Redwood City) are fully used to capacity during daylight and nighttime hours. I know this may not be popular with the adjacent neighbors, but as a neighbor myself I believe this is worth the tradeoff to have a high quality athletic facility in our neighborhood - an asset which increases overall property values for those adjacent, and improves quality of life for the larger community.

Thanks for your consideration of community input.

Skip Hilton

Suburban Park resident

Flood Park neighbor and supporter

15.1

## Letter 15

**COMMENTER:** Skip Hilton

**DATE:** October 24, 2017

### **Response 15.1**

The commenter repeats that same comments verbatim as those provided in Letter 14. Please refer to Responses 14.1 through 14.4 for a discussion of these comments.

10-31-2017 - 21:15

Letter 16

Brian Mansell

Looking at the layout of the baseball field and the soccer field and it isn't very logical to me. If you look at other facilities, Hoover Park in Redwood City for example, they have two baseball diamonds and two soccer fields in the same amount of space. To maximize the use and efficiency of the layout, I would suggest something like Hoover Park. TWO Baseball Diamonds that are kitty corner and TWO 11v11 soccer fields that have FOUR smaller 9v9 soccer fields inside the 11v11 fields. You could do it in the exact same amount of space you are committing to those fields anyways. I so often see fields built that could have been better if it was better researched. We have a shortage of field space for the kids and using a layout that maximized the space and provided more fields and opportunity would best serve the community.

16.1

Brian



## Letter 16

**COMMENTER:** Brian Mansell

**DATE:** October 31, 2017

### **Response 16.1**

The commenter asserts that the proposed layout of athletic fields at Flood County Park is illogical. As an alternative to maximize use, the commenter recommends that the County consider a similar layout to that of Hoover Park in Redwood City, which has two baseball diamonds and two soccer fields. The commenter states that maximizing athletic fields would best serve the community because of the existing shortage in field space for children. The Draft EIR considers alternatives that would redistribute athletic fields at the park. The Multi-Use Field Alternative would involve construction of a multi-use field that caters to softball, soccer, and lacrosse. As discussed on page 196 of the Draft EIR, another alternative to swap the placements of the proposed reconstructed ballfield and the new soccer/lacrosse field was considered but rejected. The Draft EIR did not consider an alternative that would increase the amount of athletic field space because this would conflict with the County's objectives to optimize preservation of oak woodland and to provide a variety of uses for a range of user groups (including passive recreational space). Nonetheless, the commenter's request to maximize the use of athletic fields will be forwarded to the County's decision makers for their consideration.

10-31-2017 - 22:36

Letter 17

Rafael Avendano

Thank you for including the bike pump track on phase 1 development for the youth of North Fair Oaks and Menlo Park to have a local place to learn how to better their cycling skills. The first of its kind in San Mateo County! Amazing!

17.1

## Letter 17

**COMMENTER:** Rafael Avendano

**DATE:** October 31, 2017

### **Response 17.1**

The commenter expresses support for the proposed pump track in Phase 1 of the Landscape Plan. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.



Letter 18

11-01-2017 - 12:22

Carol Schultz

Not being an expert on EIR reports, it looks good to me, but I have two concerns that I would like addressed.

For health reasons, artificial turf should NOT be used for athletic fields.

18.1

Since permeable surfaces are now possible for parking, walkways, etc., and are much better for the environment, I would like to NOT consider impermeable ones for these features.

18.2

Thank you.

## Letter 18

**COMMENTER:** Carol Schultz

**DATE:** November 1, 2017

### **Response 18.1**

The commenter states that artificial turf should not be used on athletic fields because of health concerns. Please refer to Response 52.2 for a discussion of health concerns associated with athletic use on artificial turf fields.

### **Response 18.2**

The commenter suggests the use of permeable surfaces for parking, walkways, and other areas because they are environmentally preferable to impermeable surfaces. This comment does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-02-2017 - 18:15

Letter 19

Gail Kittler

I am a mother of four and a resident in the Lindenwood neighborhood of Atherton. I am writing to express my support for the re-imagining of Flood Park. I believe that a park with athletic fields in this area would actually help to decrease traffic congestion and the subsequent loss of air quality. My four children were active in swimming, baseball, soccer, basketball and lacrosse. I was in my car from the moment they were picked up at school, approximately 3 pm until 6:30 pm. I drove to Portola Valley for AYSO soccer practice, Gunn and Paly High School for lacrosse practice, south Palo Alto for club soccer practice Burgess for basketball, baseball and swimming practice. We did carpool, and this required driving all over Atherton to pick up the lacrosse players traveling to Gunn High School. Imagine how wonderful it would be if these children could bike to practice and their parents could bike to games. I see everyday that more and more of our residents are getting out of their cars and onto their bicycles now that they are feeling safer with the bike lanes.

19.1

Additionally, I believe that Flood Park could become more beautiful with new landscaping enhancing the lovely oaks present. It would be a wonderful place for the neighbors to get out and meet each other and build community friendships.

19.2

These same excuses were used to turn down the opportunity for play on the VA grounds and also the Bayshore. This makes me very sad. More people are moving to our area and there has been an active decision by our local government to increase our housing density. Please, lets give all our neighbors more areas to meet and recreate and increase their quality of life.

19.3

Respectfully yours,

Gail Kittler

## Letter 19

**COMMENTER:** Gail Kittler

**DATE:** September 25, 2017

### **Response 19.1**

The commenter expresses support for the proposed Landscape Plan, asserting that the proposed athletic fields at Flood County Park would help to decrease traffic congestion associated with transporting children to more distant athletic facilities. The commenter adds that the park's proximity to local residents would encourage bicycling to athletic practices. Please refer to Topical Response B: Transportation Impacts for a discussion of the effect of bicycling by athletic users on traffic congestion.

### **Response 19.2**

The commenter expresses an opinion that new landscaping under the project could enhance the park's beauty and attractiveness to people. As discussed in Draft EIR Section 4.1, *Aesthetics*, the Landscape Plan would not substantially modify the park's overall visual character, as it would retain an open and spacious character while preserving most scenic mature trees, adobe buildings, and open fields. Therefore, the project would have a less than significant impact on visual character or quality. The commenter's opinion is consistent with this analysis in the Draft EIR.

### **Response 19.3**

The commenter states that residents should be given more areas to meet and recreate. This opinion does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

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Letter 20



*Making Conservation  
a California Way of Life*

November 3, 2017

SCH # 2016112040

GTS # 04-SM-2016-00136

GTS ID: 2139

SM- 101 - 3.621

Carla Schoof

Communications and Engagement Program Manager

County of San Mateo

455 County Center, 2nd Floor

Redwood City, CA 94063

**Flood County Park Landscape Plan - Draft Environmental Impact Report (DEIR)**

Dear Ms. Schoof:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Flood County Park Landscape Plan. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the September 2017 Draft Environmental Impact Report (DEIR). Additional comments may be forthcoming pending final review.

***Project Understanding***

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. It is anticipated that the proposed recreational facilities would be developed within ten years. The largest recreational facilities would be sited on the northern portion of the park, where the existing ballfield would be reconstructed and a soccer/lacrosse field would be installed at the northeast corner, replacing the existing pétanque court and a portion of the existing tennis courts. Picnic areas clustered in the southern half of the park would be reconstructed. 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. Flood County Park is located adjacent to, and just south of US Route (US) 101 (Bayshore Freeway), it is slightly over a mile away from interchanges in either direction (west and east). The network distance from State Route (SR) 84 (Bayfront Expressway) is less than two miles in either direction (west or east). Access to the park from the STN approaching from the west is achieved from US 101 or SR 84 via Marsh Road and Bay Road. Access to the park from the STN approaching on US 101 or SR 84 from the east is

achieved via Willow Road and Bay Road. Willow Road is designated SR 114 between SR 84 and US 101.

**Lead Agency**

As the Lead Agency, the County of San Mateo is responsible for all project mitigation, including any needed improvements to the STN. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

20.1

**Operational Analysis**

Flood County Park is located in a highly congested area facing heavy development pressure. It is important to understand if there will be any serious operational impacts on the STN, which could be exacerbated by increased park usage and the resumption of programmed events, especially occurring at peak commute times on weekdays. Because of the potential of storage issues at intersections, traffic analysis should include a 95<sup>th</sup> percentile queuing analysis for the intersections of Bay Road and Marsh Road, as well as Bay Road and Willow Road. Inadequate vehicle storage could cause vehicles to encroach on upstream intersections and freeways leading to speed differentials; the Lead Agency should provide a freeway segment analysis between Woodside Road and University Avenue, as well as freeway ramp analyses of the following ramps:

20.2

- Northbound (NB) US 101 at Marsh Road
- Southbound (SB) US 101 at Marsh Road
- NB US 101 at SR 114 (Willow Road)
- SB US 101 at SR 114 (Willow Road)

**Multimodal Planning**

The landscape plan should provide adequate bicycle parking facilities for park users. Municipal codes from Palo Alto and San Francisco, referenced in the 2005 *Menlo Park Comprehensive Bicycle Development Plan*, Appendix E: Sample Bicycle Parking Code Language, mandate bicycle parking in the vicinity of 25% of auto parking spots at a recreational facility. Consider providing bicycle parking consistent with this volume. In particular, the plan should allocate bicycle parking spaces in the immediate vicinity of the ballfield and soccer/lacrosse field, rather than solely near the gathering plaza, as recommended by MM-T5(B).

20.3

The landscape plan should also ensure pedestrian and bicycle access from the northeast via Iris Lane and Van Buren Road to serve users of the bicycle and pedestrian bridge over US 101. Please explicitly denote paths of access via this entrance. Bicycle and pedestrian facilities should be designed keeping in mind these facilities will be used by persons of all ages and abilities.

20.4

The plan should take measures to ensure ADA accessibility of sidewalks along the park frontage, including providing curb ramps at park entrances along Bay Road and maintaining a minimum clear width of three feet along the Bay Road park frontage. At present, most of the sidewalks along Bay Road appear to be ADA non-compliant.

20.5

The project's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. These smart growth approaches are consistent with MTC's Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

20.6

### ***Vehicle Trip Reduction***

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4d: Suburban Communities (Neighborhoods)** where location efficiency factors, such as community design, are weak to moderate and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. The measures listed below will promote smart mobility and reduce regional VMT.

20.7

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as an information kiosk;
- Real-time transit information system;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources; and
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8).

The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

***Transportation Impact Fees***

Please identify project-generated travel demand and estimate the costs of public transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

20.8

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

20.9

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or [jake.freedman@dot.ca.gov](mailto:jake.freedman@dot.ca.gov).

Sincerely,



PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse



## Letter 20

**COMMENTER:** Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review, Caltrans

**DATE:** November 3, 2017

### **Response 20.1**

The commenter asserts that all proposed mitigation measures to address improvements to State roadways should fully discuss the lead agency's fair-share contribution, financing, scheduling, and implementation responsibilities. As discussed in Response 20.2, the Landscape Plan would not result in a significant impact on traffic congestion on State roadways. Therefore, mitigation measures to improve State roadways would not be required.

### **Response 20.2**

The commenter states that increased park usage and new programmed events could exacerbate traffic congestion on State roadways, especially at peak commute times on weekdays. To evaluate this effect, the commenter requests a 95<sup>th</sup> percentile queuing analysis for the intersections of Bay Road with Marsh Road and Willow Road. The analytical approach of the Traffic Impact Study prepared for the Landscape Plan (Appendix H of the Draft EIR) is consistent with Caltrans, San Mateo County, the City of Menlo Park, and the City/County Council of Governments (C/CAG) of San Mateo County guidelines, in that these respective guidelines do not require an intersection queuing analysis, nor do any of these agencies have established thresholds of significance for such analysis. An intersection queuing analysis is typically completed at the request of the lead agency if the project has the potential to require the extension of left-turn storage or requires the addition of a new left-turn lane. The project would add four trips to the southbound left-turn movement at the intersection of Bay Road and Marsh Road and two trips to the northbound left-turn movement at the intersection of Bay Road and Willow Road during the P.M. peak hour. A queuing analysis for a small number of trips would not be expected to result in a noticeable change in the queue length for these movements.

Suggesting that inadequate vehicle storage could cause delay on upstream intersections and freeways, the commenter also requests a freeway segment analysis on the U.S. 101 between Woodside Road and University Road, as well as freeway ramp analyses.

The C/CAG Transportation Impact Analysis Policy Document contained in Appendix J of the 2017 Congestion Management Program (CMP) Report outlines when a freeway segment analysis is required for Land Development Projects. The TIA Policy states that a freeway segment analysis should be completed if it is expected to be impacted by the proposed project. The project is not expected to impact the above segment of 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. Caltrans Performance Measurement System (PeMS) data from the week of February 26 – March 2, 2017, showed that this segment of U.S. 101 had a bidirectional P.M. peak hour flow rate of approximately 12,000 vehicles. The estimated project-generated trips would add 0.06% additional vehicles, which would not exceed the C/CAG significance threshold of 1%. Additionally, these additional trips would not be expected to impact the operation of the ramp intersections.

**Response 20.3**

The commenter suggests that the County should provide bicycle parking equal to approximately 25 percent of the available vehicle parking, based on municipal codes for Palo Alto and San Francisco as referenced in the 2005 Menlo Park Comprehensive Bicycle Development Plan. This rate would translate to 94 bicycle parking spaces. As discussed in Draft EIR Section 1.5, *Standards of Review*, the County is not subject to local standards upheld by other governmental agencies. Therefore, the County would not be subject to the City of Menlo Park's bicycle parking standards unless it chooses to apply such standards. Mitigation Measure T-5(a) in the Draft EIR would require the installation of at least six bicycle racks near the proposed gathering plaza, providing for safe on-site storage of bicycles. In implementing this mitigation measure, the County would consider the commenter's request for bicycle parking equivalent to 25 percent of available automotive parking.

**Response 20.4**

The commenter requests that the Landscape Plan ensure pedestrian and bicycle access from the northeast via Iris Lane and Van Buren Road to serve users of the U.S. 101 bicycle and pedestrian bridge. The commenter requests that the County explicitly denote paths of access via this entrance. Under the Landscape Plan, the Iris Lane gate to Flood County Park would remain open to pedestrian and bicyclist access. As discussed under Impact T-5 in Draft EIR Section 4.9, *Transportation and Circulation*, the Landscape Plan would have a less than significant impact on pedestrian and bicycle circulation with implementation of Mitigation Measures T-5(a) and T-5(b). Mitigation Measure T-5(a) would require that the County install at least six bicycle racks near the proposed gathering plaza, providing for safe on-site storage of bicycles. Mitigation Measure T-5(b), as modified in Response 44.11, would require informing pedestrians visiting Flood County Park of a safer alternate route to walking on the shoulder of Bay Road between Del Norte Avenue and Ringwood Avenue. In addition to these measures, the County would consider the addition of a wayfinding sign for the Iris Lane gate during Phase I of the Landscape Plan.

**Response 20.5**

The commenter requests measures to ensure accessibility of sidewalks along the park frontage, compliant with the Americans with Disabilities Act (ADA). Requested measures included curb ramps at park entrances along Bay Road and maintaining a minimum clear width of three feet along the park frontage. As discussed under Impact T-5 in Draft EIR Section 4.9, *Transportation and Circulation*, the Landscape Plan would have a less than significant impact on pedestrian and bicycle circulation with implementation of Mitigation Measures T-5(a) and T-5(b). The County would review park facilities for ADA compliance during the final design process for the Landscape Plan.

**Response 20.6**

The commenter requests an evaluation of the project's effects on pedestrians, bicyclists, disabled travelers, and transit users, including tradeoffs resulting from mitigating increases in vehicle miles traveled (VMT). As discussed under Impact T-2 in Draft EIR Section 4.9, *Transportation and Circulation*, the Landscape Plan would have a negligible effect on VMT in San Mateo County. In fact, the proposed reconstruction of the existing out-of-service ballfield and addition of a new soccer/lacrosse field could shorten trips by local active recreational users who would no longer have to travel to more distant sites to access quality athletic fields. Therefore, the project would have a less than significant impact related to VMT. Impact T-5 in in Draft EIR Section 4.9, *Transportation and Circulation*, evaluates the project's impacts on pedestrian and bicyclist circulation. As discussed

in Response 20.5, the County would review park facilities for ADA compliance during the final design process for the Landscape Plan, to provide for appropriate access to disabled travelers.

### **Response 20.7**

Because of the location and size of the project, the commenter requests that the Landscape Plan include “a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions.” The commenter provides a list of suggested measures to promote smart mobility and reduce regional VMT. As discussed in Response 20.6, the project would have a negligible effect on regional VMT and could shorten trips by local active recreational users. Furthermore, Draft EIR Section 4.6, *Greenhouse Gas Emissions*, determines that the Landscape Plan would have a less than significant impact from greenhouse gas emissions during operation of the Landscape Plan. Therefore, implementation of a TDM Program to further reduce regional VMT would not be necessary.

### **Response 20.8**

The commenter requests that the EIR identify the project’s estimated trip generation, the costs of necessary public transportation improvements, and viable funding sources such as transportation impact fees. Please refer to Table 32 in Draft EIR Section 4.9, *Transportation and Circulation*, for estimated trip generation during Phase I of the Landscape Plan. It is anticipated that passive recreational trips would continue increasing proportional to regional traffic growth. While cost estimation for regional transportation improvement is outside the scope of the EIR’s analysis of environmental impacts, the County is committed to working with the City of Menlo Park, the Town of Atherton, SamTrans, C/CAG, and Caltrans to identify and jointly pursue funding for regional transportation projects.

### **Response 20.9**

The commenter advises that any work or traffic control that encroaches onto State right-of-way would require a Caltrans encroachment permit. Draft EIR Section 2.6, *Required Approvals*, describes the anticipated approvals for the proposed Landscape Plan. It is not anticipated that construction for the Landscape Plan would require encroachment of Caltrans right-of-way. Nonetheless, all comments will be forwarded to the County’s decision makers for their consideration.

11-06-2017 - 09:22

Letter 21

John Andrews

Please see my attached comments/suggestions.

<https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/My%20Feedback%20on%20the%20Flood%20Park%20EIR%20and%20Additional%20Comments.docx>

**My Feedback on the Flood Park EIR and Additional Comments**  
Submitted by John Andrews, UC Master Gardener & San Carlos Resident

Thank you for all of the work that so many have done in helping reimagine Flood Park – and thank you for this opportunity to provide feedback to the EIR. I will also provide some general comments and feedback to the overall plan.

My goals for the park include:

1. Minimize negative impact on the environment of any development/changes
2. Balance improved access and use of the park while honoring the interests and concerns of the immediate neighborhood
3. Provide educational and learning opportunities to those who use the park
4. Ensure that the park will be a safe, healthy place for everyone in our community

Here are some of my suggestions to help achieve each of these goals (many of which are inter-related).

**Goal 1.**

- Consider using water permeable hardscaping whenever possible to allow for appropriate drainage, water capture, and health of the ecosystem.
- Avoid using artificial turf which has many harmful environmental effects. For example, San Carlos recently created a large soccer field in Crestview Park using drought tolerant and durable natural turf.
- Minimize the removal of trees and shrubs to protect habitat for birds, bats, and pollinators such as bees (**I didn't see bees or other insect pollinators discussed in the EIR**).
- Use California Natives and other drought tolerant plants as new plantings.

21.1

**Goal 2.**

- I agree that two fields are necessary to meet the needs of children playing sports. To mitigate the noise and visual impact on the neighborhood, please plant new trees and shrubbery early on in the construction process so that they have some additional time to establish and grow around the perimeter of the fields.
- Provide free parking for users of the park. Perhaps include a donation box like the one at the Sawyer Camp Trail/Crystal Springs Park.

21.2

**Goal 3.**

- Continue to include a demonstration garden and a small fruit orchard framing the promenade in the plan.
- Provide educational signage in key locations throughout the park – identifying heritage trees, California natives, historical points of interest, demo garden and orchard plantings, etc. Use technology tools whenever possible to assist with this (QR codes on signs, websites, smart phone aps, etc.)

21.3

**Goal 4.**

- Consider installing cameras in key locations in the park. Have more than adequate signage about safety considerations.
- Install emergency call boxes in key locations around the park.
- Ensure that there is well-marked and accessible pedestrian access to the park (especially from Bay Rd.).

21.4

Please consider collaborating with the University of California Cooperative Extension Programs in San Mateo County (Master Gardeners, Nutrition Education, 4-H Youth Development, Urban Forestry, etc.) to advise the County on several of these suggestions.

21.5

Thank you for your consideration, for this public process, and for all you do for our County!

## Letter 21

**COMMENTER:** John Andrews

**DATE:** November 6, 2017

### Response 21.1

The commenter suggests several design features for the Landscape Plan to minimize environmental impacts:

- Water-permeable hardscaping to allow for appropriate drainage and water capture
- Natural turf on athletic fields
- Minimizing tree and shrub removal to protect habitat for birds, bats, and pollinators
- Landscaping with native and drought-tolerant plants

These comments on park design features do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration. It should also be noted, as discussed in Draft EIR Section 2, *Project Description*, that the County would preferentially use native trees when planting trees for accenting, screening, and other purposes. The County has also designed the layout of the Landscape Plan to optimize preservation of oak woodland while meeting demand for active recreation facilities.

In addition, the commenter notes that the EIR does not discuss bees or other insect pollinators. The Landscape Plan would have a minimal effect on pollinators because it would preserve most existing landscaping at Flood County Park. Mitigation Measure BIO-2(a) in the EIR also would require the replacement of protected trees, which may serve as habitat for birds and other animals, at a 1:1 ratio.

### Response 21.2

The commenter requests that the County plant new trees and shrubs early in the construction process to mitigate noise and visual impacts. Landscaping is usually planted late in the construction process to avoid adverse effects on plants from fugitive dust, strikes and soil compaction by construction vehicles, and water shutoffs. 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.

The commenter also suggests free parking for park users, with a donation box. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### Response 21.3

The commenter suggests that the Landscape Plan include a demonstration garden; a small fruit orchard framing the promenade; and educational signage identifying biological and cultural points of interest. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 21.4**

For security purposes, the commenter suggests installation of cameras and emergency call boxes, and well-marked and accessible pedestrian access to the park from Bay Road. As discussed in Draft EIR Section 5, *Effects Found Not to Be Significant*, “ten full-time park rangers currently serve Flood County Park on a rotational schedule such that two park rangers are on-site for a total of 8 hours per day.” Existing policing of the park would be sufficient to monitor proposed recreational facilities. In addition, path lights that could be manually turned on and off for special events may be installed, which would improve the visibility of pedestrian access to the park.

### **Response 21.5**

The commenter suggests that the County collaborate with the University of California Cooperative Extension Programs in San Mateo County on the above suggestions. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.



11-08-2017 - 13:51

Letter 22

Douglas Bui

Attached are my comments for the Flood Park EIR.

Douglas Bui

<https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Flood%20Park%20Comments.docx>

November 8, 2017

I have listed my comments in two sections. The first section relates to my email dated December 11, 2016 to Mr. Sam Herzberg concerning items which I believe should be incorporated in the draft EIR. The second section deals directly with my concerns and comments to the draft EIR dated September 2017. Statements from the draft EIR are in quote marks along with the appropriate reference page number. My comments in the second section are shown with all capital letters.

I would expect my comments to Mr. Herzberg will addressed in the EIR.

In addition, 4 pages from the 1983 Flood Park Master Plan are also attached. The primary purpose is to show the use patterns, attendance by activity, attendance ranges and group reservations by area of origin which provides an historical basis for Park activity.

**December 11, 2016 Comments to Sam Herzberg:**

1. To call this a "Landscape Plane" instead of a "Land Use Plan" is very misleading. Adding a full size soccer/lacrosse field, basketball court, pump track and expanding the use of the existing baseball field with soccer practice fields can only mean an increase in use as shown in the EIR with its adverse impact upon traffic and noise. The EIR specifically addresses "The Introduction Of New Activities" and specifically states that "the Landscape Plan would introduce additional activities to Flood County Park, including more active recreational use and occasional performances." (page 182) So this is really a Land Use Plan.

22.1

2. The EIR needs to include a full analysis of all three Phases to determine the full impact of the project. A detailed analysis was only done for Phase I whereas the environmental impacts of Phase II and III improvements are done at a programmatic level. Phase II and III will both have a significant impact on the use of the Park. Approval of the EIR is tantamount to approval of Phase II and III without fully knowing user population, frequency and impact on the local residents.

22.2

3. The term "Gathering Meadow" (performance space) needs to be defined as to types of "gatherings" which will take place including anticipated times and frequencies of performances. The first proposed plan called for an "amphitheater" which was subsequently changed to "Gathering Meadow."

22.3

4. The 1983 Master Plan shows the level of attendance for Saturday/Sunday for the various months. Park capacity was shown to be 1,800 people. Hi Season activity (mid April - mid October) showed 9,000 people per week with 1,200 - 2,400 people with a baseball doubleheader being played. Nowhere in the EIR is there a projection as to the total Park population for each of the Phases along with the cumulative impact of all 3 Phases when operational. I would highly recommend that a copy of Tables 1, 2 and 3 of the 1983 Plan be included along with the EIR to give some historical use context.

22.4

5. There has been no response from the Menlo Park police department with regard to the enforcement of parking restrictions on the adjacent residential streets. My December 12, 2016 email to the Menlo Park Chief of Police asking for coordination with the County has gone unanswered. It is imperative that the Menlo Park Police Department commit to actively responding to resident complaints to Park off-site parking. If there is no enforcement, then the mitigating measure recommended has no meaning.

22.5

**Comments on the September 2017 DEIR:**

There are several places in the EIR where it is stated that if ".....the proposed Landscape Plan is not implemented and that the County continues operating and maintaining Flood County Park in its current condition.(page 2).

22.6

IT SHOULD BE REASONABLE TO ASSUME THAT THE PARK WOULD BE PROPERLY MAINTAINED EVEN IF THE LANDSCAPE PLAN WAS REJECTED. THE PARK HAS BEEN EXTENSIVELY USED IN THE PAST AS SHOWN IN THE 1983 MASTER PLAN ANALYSIS.

1. "The County shall only allow the use of sound amplification equipment and air horns at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with City of Menlo Park procedures." (page 11).

22.7

NOW THE GATHERING MEADOW WILL HAVE AMPLIFICATION WITHOUT ANY IDEA AS TO WHAT WILL BE THE TYPES OF "GATHERING" AND FREQUENCY. YOU ARE NOW ALLOWING A DIRECT INTRUSION INTO A RESIDENTIAL AREA WHERE NONE HAS EXISTED BEFORE. NOW THE NOISE CAN BE FROM 9:00 AM TO 8:00 PM WHICH IS ESSENTIALLY ALL DAY LONG.

2. "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. 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." (page 11).

22.8

THE PROJECT DOES HAVE A SIGNIFICANT AND UNAVOIDABLE TRAFFIC IMPACT.

"It may be infeasible to reconfigure the intersection of Bay Road and Ringwood Avenue to avoid a significant impact from traffic congestion. To minimize queuing on Bay Road, Mitigation Measure T-1 would be required." (page 11).

SEE MY COMMENTS IN ITEM 14 BELOW.

**3. 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. Landscape Plan would have a significant and unavoidable impact." (page 12).

22.9

PLEASE EXPLAIN HOW T-1 AFFECTS THE BAY ROAD/RINGWOOD INTERSECTION?

**4. Impact T-6:**

"While the proposed on-site parking supply would be adequate based on standard parking demand rates for parks, 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." (page 12).

22.10

THERE IS A SERIOUS QUESTION AS TO WHETHER OR NOT THERE IS AN ADEQUATE ON-SITE PARKING SUPPLY SINCE THE EIR DOES NOT CONSIDER THE TOTAL OCCUPANCY OF THE PARK. THE 1983 MASTER PLAN DOES A MUCH BETTER JOB AND SHOULD BE THE FORMAT TO USE IN DETERMINING PARKING CAPACITY.

IN ADDITION, MENLO PARK RESIDENTS AFFECTED BY THE ON STREET PARKING RESTRICTIONS SHOULD NOT HAVE TO PURCHASE AN ANNUAL PERMIT. THERE SHOULD BE NO CHARGE.

22.11

5. THE HISTORICAL RECREATIONAL USE AND THE PROJECTED RECREATIONAL USE SHOWN ON TABLE 6, PAGE 29, SHOWS THAT THERE WERE A TOTAL OF 170 EVENTS HISTORICALLY PLAYED AND THE PROJECTED USE SHOWS 423 EVENTS. THIS PROJECTED USE IS A 249% INCREASE OVER PREVIOUS USE. IT IS INTERESTING TO NOTE THERE ARE NO BASEBALL GAMES PLAYED IN MAY NOR ARE THERE ANY SOCCER GAMES PLAYED IN JUNE, JULY OR AUGUST.

22.12

TABLE 6 DOES NOT SHOW ANY LACROSSE GAMES BEING PLAYED BUT LACROSSE HAS BEEN LISTED AS AN ADDITIONAL ATHLETIC USE.

6. "No additional lighting that would enable nighttime use of athletic facilities is proposed as part of the Landscape Plan....."(page 27).

22.13

THERE SHOULD BE NO NIGHT LIGHTING ALLOWED FOR ANY ACTIVITY AT THE PARK.

7. ".....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 encircle the proposed soccer/lacrosse field to retain balls on the field and protect the safety of adjacent residents. Because of its height, this netting would be a prominent feature from the perspective of residents. Tree removal and netting would have a potentially significant impact on residential views." (page 42).

22.14

IT IS DOUBTFUL THAT A 20 TO 30 FOOT NETING WILL BE AN AESTHETIC ADDITION TO AN AREA WHICH IS HEAVELY WOODED.

7. "It is important to acknowledge that noise-sensitivity varies not only among land uses but also among individual people at each land use (Menlo Park 2013)." (page 124).

22.15

8. "The Landscape Plan would add new sources of on-site operational noise from organized practices and games at the proposed athletic fields and performances at the proposed gathering meadow. Noise from whistles, sound amplification equipment, or air horns could disturb nearby residents." (page 136).

SEE MY COMMENT IN ITEM 9 BELOW.

22.16

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

"The County shall only allow the use of sound amplification equipment and air horns at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with City of Menlo Park procedures. The County shall notify all groups using the proposed soccer/lacrosse field, ballfield, and gathering meadow of this requirement. County staff shall periodically patrol the park during organized athletic events and performances to verify that park users are not operating such equipment without an approved special event permit." (page 138).

THERE SHOULD NOT BE ANY AMPLIFICATION SYSTEM FOR ANY PARK ACTIVITY. WHAT CRITERIA WILL BE USE IN SECURING A SPECIAL EVENT PERMIT FOR SOUND AMPLIFICATION IN THE EVENT IT IS PERMITTED

10. ...."However, the gathering meadow in Phase II would be a performance space suitable for concerts or ceremonies that could involve the use of sound amplification equipment for music or commentary." (page 138).

....." Nonetheless, the use of sound amplification equipment at high volume during large events could produce noise that disturbs nearby residents." (page 138).

22.17

THE WORD "COULD" IMPLIES THAT SOMETHING MIGHT OR MIGHT NOT HAPPEN SO DON'T WORRY ABOUT IT. THE REALITY IS THAT WHEN THE EIR SAYS "HIGH VOLUME DURING LARGE EVENTS" IT REALLY MEANS IT WILL DISTURB NEARBY RESIDENTS. PLEASE DEFINE "LARGE EVENTS."

11. "It was assumed that a majority of trips to and from Flood County Park under the Landscape Plan would originate locally in Menlo Park. These local trips would occur on local streets, while park trips from regional locations, accounting for 10% of all trips, would utilize U.S. 101 or I-280 before travelling on local streets to access the park." (page 152).

22.18

PLEASE EXPLAIN THE METHODOLOGY WHICH ASSUMES THE MAJORITY OF THE TRIPS WOULD ORIGINATE LOCALLY IN MENLO PARK. THE 1982 MASTER PLAN SHOWS MENLO PARK ORGINATING ONLY 17.6% OF THE TRIPS TO THE PARK. GRANTED THE ANALYSIS WAS DONE ONLY FOR GROUP RESERVATIONS BUT THE BASEBALL USE HISTORY SHOWS TEAMS COMING FROM OTHER AREAS AS WELL AS MENLO PARK. YOU ARE IN EFFECT SAYING MORE THAN 50% OF ALL PARK PARTICIPANTS LIVE IN MENLO PARK.

12. "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 this time period was assumed to represents the existing conditions at the park." (page 157).

22.19

USING HISTORIC VISITIOR DATA FROM 2011 THROUGH 2015 MISREPRESENTS THE TRUE HISTORIFAL USE OF THE PARK. DURING THIS TIME, THE PARK WAS NOT PROPERLY MAINTAINED AND THE FACILITY BECAME RUN DOWN. THIS IS NOT REPRESENTATIVE OF THE CORRECT BASELINE USE FOR THIS EIR.

13. " During weekday PM peak hours, the addition of new trips generated by the Landscape Plan are expected to degrade traffic conditions at the intersection of Bay Road and Ringwood Avenue from an acceptable LOS C to an unacceptable LOS D under existing plus project conditions and from an unacceptable LOS D to E under near-term 2021 plus project conditions. Furthermore, new vehicle trips at this intersection would exacerbate unacceptable LOS F conditions under cumulative 2040 plus project conditions." (page 157).

"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. It is anticipated that the Governor's Office of Planning and Research will publish final guidelines for implementation of SB 743 in 2017, at which point local agencies would have a two-year grace period to replace LOS standards with vehicle miles traveled (VMT) as the primary metric for evaluating traffic impacts under CEQA. As discussed in Impact T-2, project-generated traffic would have a negligible effect on VMT in San Mateo County."(page 158) .....

"Because the Landscape Plan would maintain active and passive recreational uses at Flood County Park, it is expected that the project would meet this criteria.

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." (page 158).

IT IS INTERESTING TO NOTE THAT THE LANDSCAPE PLAN DEGRADES TRAFFIC CONDITIONS AT BAY ROAD AND RINGWOOD AVENUE INTERSECTION USING THE LOS CRITERIA BUT THAT IF IT USES THE VMT CRITERIA WHICH HAS NOT YET BEEN ADOPTED, THEN, MAGICALLY THE LANDSCAPE PLAN HAS A LESS THAN SIGNIFICANT IMPACT. IN OTHER WORDS, NOW YOU SEE IT; NOW YOU DON'T.

22.20

14. ".....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 158).

22.21

THE EIR ASSUMES THE AFFECTED INTERSECTION CANNOT BE RECONFIGURED DUE TO CITY JURISDICTION ISSUES AND RIGHT OF WAY ISSUES.

15. "Flood County Park currently hosts social events that may include more than 50 participants at its group picnic areas. The proposed Landscape Plan could increase the frequency of events with more than 50 people by introducing a reconstructed ballfield, a soccer/lacrosse field, and a gathering meadow for performances." (page 182).

22.22

THE PROPOSED PLAN **WILL** INCREASE THE FREQUENCY OF LARGE PEOPLE EVENTS PARTICULARLY WHEN THE PARK UPGRADES IT FACILITIES. TO SAY IT "would not result in environmental impacts directly associated with the number of people at specific park events" (page 182) IS TO SAY THAT THERE IS NO RELATIONSHIP BETWEEN PEOPLE AND IMPACTS.

16. EXCERPTS TO 1983 MASTER PLAN ARE ON PAGES 8, 9, 10 AND 11

22.23



#### IV.

### LAND USE AND FACILITIES ELEMENT

#### LAND USE

Flood Park provides a variety of existing local and regional park facilities. The main land uses are the baseball field, picnic areas, multi-use lawns, softball field, tennis courts, petanque courts, playground, maintenance area, residence, and the parking areas. (Fig. 4)

#### Use Patterns

##### Low Season (Mid-October-Mid-April)

The low season attendance is highly influenced by the weather because there are no indoor facilities at the park. However, it can reach 2,000 persons/week, or 700 persons/day on Saturday or Sunday. Most of the activity occurs around the playground, in the loop area, and on the multi-use lawns. In March, Menlo-Atherton High School begins its baseball season.

##### High Season (Mid-April-Mid-October)

Normal attendance ranges from 4,000 - 9,000 persons/week, or 1,200 - 2,400 persons on Saturday or Sunday. Weekday use at Noon on a clear day can bring over 200 people for picnic lunches, but afternoons are not busy. Weekends bring people who arrive before Noon, and stay for at least a five-hour period. When Saturday or Sunday attendance reaches about 1,800 people, and a baseball doubleheader is being played, space for picnic activity is limited. The picnic areas, softball field, lawn areas, and volleyball courts receive intensive use throughout the high season. The ball field is used as an overflow area for the rest of the park when possible, but is rarely used for anything other than baseball.

Table 1

TOTAL ATTENDANCE BY ACTIVITY PER YEAR

<u>Activity</u>	<u>1982</u>	<u>1981</u>
Baseball	6,827	6,007
Birthday Party Land	1,346	1,777
Tennis	8,800	7,550
Softball	13,400	12,512
Volleyball	13,550	12,029
Spectators	7,818	7,346
Sightseeing	5,225	7,103
Playground	25,950	17,029
Horseshoes	3,400	2,561
Lawn Activity	35,950	26,915
Family Picnics	22,150	24,403
Group Picnics	44,844	36,484
Petanque	600	?
Bicycles	3,530	3,521
<u>Joggers</u>	<u>2,830</u>	<u>2,545</u>
Total	189,131	165,782

## USER GROUPS

Company Groups

Family Groups

Clubs and Organizations

Church Groups

Menlo-Atherton High School

Peninsula Winter League

Babe Ruth Baseball League

American Petanque Association

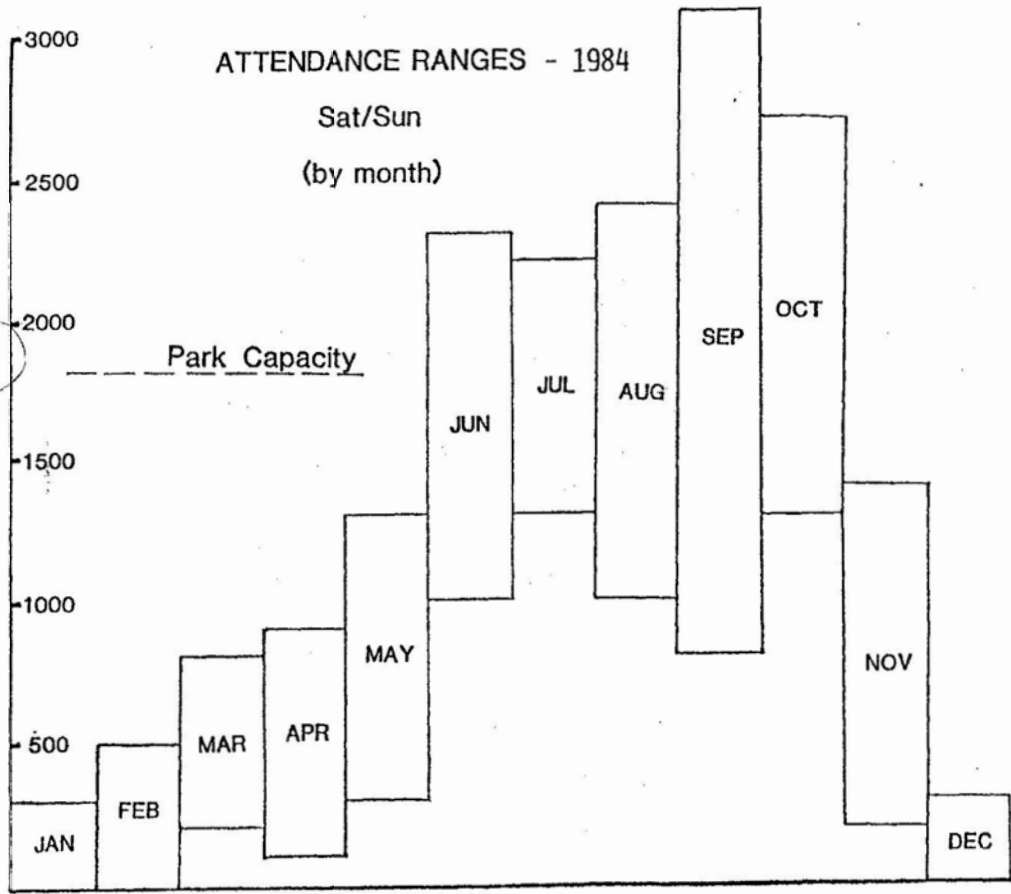


Table 2

Table 3

## ATTENDANCE BY GROUP RESERVATIONS BY AREA OF ORIGIN

Tabulated from 1982 Reservation Slips

<u>County</u>	<u># of Reservations</u>	<u>Out-Of-County</u>	<u># of Reservations</u>
Redwood City	79	San Francisco	41
Menlo Park	63	Palo Alto/Stanford	19
San Mateo	32	Mountain View	9
Burlingame	16	San Jose	5
San Carlos	14	Greenbrae	2
Daly City	13	Richmond	2
South San Francisco	12	Los Altos	1
Belmont	12	Newark	1
San Bruno	8	Santa Clara	1
Atherton	6	Fremont	1
Millbrae/S.F. Airport	5	Unknown out-of-county	1
East Palo Alto	5	<u>TOTAL OUT-OF-COUNTY</u>	<u>78</u>
Pacifica	5		
Foster City	3	78.3% From the County	
Brisbane	2	21.7% Beyond the County	
Portola Valley	1	11.1% San Francisco	
Half Moon Bay	1	6.7% Palo Alto, Mt. View, Los Altos	
Moss Beach	1	3.9% Others	
Hillsborough	1		
Unknown in County	1	<u>44,844</u> Group Picnickers' in 1982	
<u>TOTAL SAN MATEO COUNTY</u>	<u>280</u>		

TOTAL RESERVATIONS TABULATED - 358

## Letter 22

**COMMENTER:** Douglas Bui  
**DATE:** November 8, 2017

### **Response 22.1**

The commenter contends that it is misleading to call the proposed project a “Landscape Plan” rather than a land use plan because of its active recreation elements. This opinion about the project’s name does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR. Regardless of the project’s name, the Draft EIR evaluates the environmental impacts of implementing the proposed recreational features at Flood County Park. Nonetheless, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 22.2**

The commenter requests that the EIR provide a full analysis of all phases of the Landscape Plan. The commenter claims that certification of the EIR would be “tantamount to approval of Phase II and III without fully knowing” their impacts. As discussed on page 26 of the Draft EIR in Section 2, *Project Description*, the EIR does evaluate the environmental impacts of recreational improvements in Phases II and III of the Landscape Plan “at a programmatic level.” This is an appropriate level of review under CEQA because the Landscape Plan is a high-level plan which the County would implement over a 10-year period, and the precise design details for later phases are not available at this time. 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 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 22.3**

The commenter requests a description of the anticipated times and frequencies of performances at the proposed gathering meadow. This element of the Landscape Plan would be an open meadow. The County anticipates that it would be used for the occasional movie night (at most once a year) and could be reserved for special events.

### **Response 22.4**

The commenter cites historic visitor statistics at Flood County Park from the 1983 Master Plan and recommends that the EIR include these for context. Table 6 in Draft EIR Section 2, *Project Description*, provides historic context for the most recent use of athletic fields at the park. This data predates the indefinite closure of the existing ballfield in 2011. This recent historical data is useful as a point of comparison for projections of future athletic use under the Landscape Plan. 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. However, the Master Plan is available for public viewing on the Parks Department website: <https://parks.smcgov.org/documents/flood-park-master-plan>.

The commenter also states that the EIR lacks a projection of the total park population for each phase and the cumulative population after all phases. As discussed in Response 22.2, the EIR provides an appropriate level of review for the proposed long-term plan for recreational improvements at Flood County Park. Population projections are not essential to undertaking a programmatic analysis of the Landscape Plan’s environmental impacts. However, Table 32 in Draft

EIR Section 4.9, *Transportation and Circulation*, estimates the increase in vehicle trips generated by Phase I of the Landscape Plan, for which the precise parameters of development are known. This table can be used as a frame of reference for the project's effect on park visitation.

### **Response 22.5**

The commenter states that the Menlo Park Police Department must commit to responding to complaints about park visitors violating parking restrictions on adjacent residential streets. Although the County is not responsible for parking enforcement on City of Menlo Park streets, the Draft EIR acknowledges that implementation of the Landscape Plan could increase parking on residential streets. Therefore, Mitigation Measure T-6 in the Draft EIR requires that the County coordinate with Menlo Park to encourage increased random enforcement of on-street parking restrictions.

### **Response 22.6**

The commenter cites the Draft EIR's description of the No Project Alternative, under which it is assumed that the County would continue operating and maintaining Flood County Park in its current condition. The commenter states that is reasonable to assume that the County would properly maintain the park even if the Landscape Plan were rejected. This comment agrees with the Draft EIR's assumption of continued park maintenance under the No Project Alternative.

### **Response 22.7**

The commenter indicates that the type and frequency of events at the proposed gathering meadow should be described. Please refer to Response 22.3 for a discussion of anticipated events at the gathering meadow.

The commenter also states that amplification at the gathering meadow would result in a noise intrusion on residences from 9:00 A.M. to 8 P.M. Please refer to Topical Response A: Noise for a discussion of noise impacts from sound amplification.

### **Response 22.8**

The commenter expresses agreement with the Draft EIR that the project would have a significant and unavoidable impact on traffic conditions. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR, but will be forwarded to the County's decision makers for their consideration.

### **Response 22.9**

The commenter asks how Mitigation Measure T-1 in the Draft EIR would affect the Bay Road/Ringwood Avenue intersection. As discussed in Draft EIR Section 4.9, *Transportation and Circulation*, this mitigation measure would require the implementation of new practices to collect parking fees at Flood County Park, for the purpose of avoiding the back up of vehicles on Bay Road. While this measure would alleviate delays caused by queuing of vehicles on Bay Road approaching the main park entrance, it would not affect traffic congestion at the Bay Road/Ringwood Avenue intersection located approximately 0.4 mile to the southeast. The Draft EIR acknowledges that trips generated by the Landscape Plan would cause a significant and unavoidable impact on traffic congestion at that intersection.

### **Response 22.10**

The commenter contends that the EIR's analysis of parking impacts is inadequate because it "does not consider the total occupancy of the park." The commenter suggests using the 1983 Master Plan

to determine on-site parking capacity. Please refer to Topical Response B: Transportation Impacts for a discussion of the project's impacts related to parking.

### **Response 22.11**

The commenter states that Menlo Park residents affected by on-street parking restrictions should not have to pay for an annual permit. This comment about paying for parking permits does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, it will be forwarded to the County's decision makers for their consideration.

### **Response 22.12**

The commenter asserts that Table 6 in the Draft EIR shows a 249 percent increase in projected park use over historic use. The Draft EIR acknowledges that the proposed reconstructed ballfield and new soccer/lacrosse field would accommodate a level of active recreation use that exceeds historic use at Flood County Park. However, it should be noted that projected use in Table 6 are reflective of desired levels of use by local athletic groups and should be understood "as a predictor of potential maximum field usage."

The commenter also states that Table 6 does not show any projected lacrosse events even though lacrosse would be an additional use under the Landscape Plan. Please refer to Topical Response B: Transportation Impacts for a discussion of how the EIR evaluates lacrosse use, including the impact of lacrosse trips on traffic impacts.

### **Response 22.13**

The commenter recommends that no nighttime lighting be allowed for any activity at the park. As discussed in Draft EIR Section 2, *Project Description*, the Landscape Plan would not include nighttime lighting of athletic facilities, although path lights may be installed for special events and safety.

### **Response 22.14**

The commenter expresses doubt that the anticipated 20-to-30-foot-high netting around the proposed soccer/lacrosse field would improve the visual quality of the existing wooded area. Draft EIR Section 4.1, *Aesthetics*, acknowledges that the proposed netting would be a prominent feature that would have a potentially significant impact on the park's visual character. However, implementation of Mitigation Measure AES-1 would require the use of neutral-colored netting that blends in with the natural environment, which would reduce the netting's adverse visual effect. With implementation of this mitigation measure, it is expected that the Landscape Plan would have a less than significant impact on visual character and quality.

### **Response 22.15**

The commenter quotes a statement in the Draft EIR about the noise sensitivity of various land uses, without adding further comment. This comment does not address or challenge the analysis and conclusions of the Draft EIR.

### **Response 22.16**

The commenter objects to sound amplification for any park activity and asks which criteria would be used to approve a Special Event Permit for the use of amplification. Please refer to Topical Response A: Noise Impacts for a discussion of review process for Special Event Permits.

### **Response 22.17**

The commenter requests that the term “large events” on page 138 of the Draft EIR be defined. This term can be defined by the County’s CEQA threshold for “large congregations of people” that have more than 50 participants. In the context of the EIR’s noise analysis, “large events” may apply to organized events at the proposed athletic fields, to group events at the park’s picnic areas, or at the proposed gathering meadow.

### **Response 22.18**

The commenter requests explanation of the EIR’s methodology in distributing new vehicle trips associated with the Landscape Plan to nearby roadways. The commenter asserts that while the EIR assumes most trips would originate locally in Menlo Park, the Master Plan shows Menlo Park originating only 17.6 percent of trips to the park. As noted in Response 22.4, the 1983 Master Plan is approximately 35 years old and outdated for the purpose of establishing baseline environmental conditions in the EIR. The EIR’s traffic analysis relies on the Traffic Impact Study prepared by W-Trans for the proposed Landscape Plan in May 2017, which assumes that most new trips would originate locally in the Menlo Park area. This trip distribution is appropriate because of the extensive local demand for athletic fields and the availability of other athletic fields in greater San Mateo County that would be more convenient for most users who live outside Menlo Park. However, the Traffic Impact Study does assume that the athletic fields would be a regional draw, generating some vehicle trips that originate outside the City.

### **Response 22.19**

The commenter contends that the EIR should not apply historic visitor data from 2011 to 2015 as the baseline for environmental conditions because the park was improperly maintained and “run down” during this period. This statement is in reference to the EIR’s traffic analysis on page 157. Existing park use is most appropriate to establish the existing traffic baseline. Although the ballfield has been closed since 2011, reducing the number of park visitors in recent years, the proposed Landscape Plan would result in an increase in vehicle trips relative to existing traffic volumes. This analytical approach is consistent with *CEQA Guidelines* Section 15125 (Environmental Setting), which states that the environmental conditions existing when an EIR’s notice of preparation is published “will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Nonetheless, Table 6 in the Draft EIR provides historic data on use of the ballfield prior to its 2011 closure, for reference.

### **Response 22.20**

The commenter claims that the Draft EIR’s use of VMT as a threshold, rather than level of service (LOS), “magically” results in a less than significant impact related to traffic. However, Impact T-1 in the EIR applies the City of Menlo Park’s LOS standards to the project, finding a significant and unavoidable traffic impact based on those standards. Impact T-2 also evaluates the project’s effect on VMT, in the interest of public disclosure. As discussed in Draft EIR Section 4.9, *Transportation and Circulation*, this metric will become the statewide standard pursuant to State law during implementation of the Landscape Plan, once the Governor’s Office of Planning and Research updates the *CEQA Guidelines*. The EIR acknowledges that the City has not yet adopted VMT as its primary metric for traffic analysis.



**Response 22.21**

The commenter states that the EIR assumes that reconfiguration of the Bay Road/Ringwood Avenue intersection would be infeasible because of jurisdictional and right-of-way issues. This comment is consistent with the finding on page 158 of the Draft EIR that it would be infeasible to install a new turn lane at this intersection. The comment does not conflict with or challenge the analysis and conclusions of the Draft EIR.

**Response 22.22**

The commenter asserts that the Landscape Plan would increase the frequency of large events at Flood County Park. Because of additional park use, the commenter contends that page 182 of the EIR is misleading in finding that the project “would not result in environmental impacts directly associated with the number of people at specific park events.” The cited statement is in reference to the County’s CEQA threshold for “large congregations of people.” In addressing this threshold, the Draft EIR evaluates whether the Landscape Plan would increase events with more than 50 participants that could cause additional environmental impacts to those already evaluated elsewhere in the EIR. As discussed on page 182, large congregations of people would not result in additional environmental impacts. However, Section 4.8, *Noise*, evaluates the noise impacts associated with large events.

**Response 22.23**

The commenter attaches excerpts of the 1983 Master Plan. This comment does not, in itself, conflict with or challenge the analysis and conclusions of the Draft EIR, but will be forwarded to the County’s decision makers for their consideration.

11-11-2017 - 09:42

Letter 23

Robert Steinmetz

Hello,

Please prioritize nature and heritage trees over erecting new structures in the park--we believe a park should first and foremost be a place to enjoy nature. Indeed, the primary purpose of parks in urban areas is to give people a place to escape concrete and buildings, walk among trees, pastures, grass, etc...Please do not erect any sports field lighting or permit illumination for the sports fields. This is not natural and creates visual pollution. New urban office and parking lot developments nearby in particular east of the freeway have already created enough visual pollution, let's not make things worse. These types of lights can be seen from very far away, are ugly, and degrade the natural qualities of the park.

23.1

23.2

Thank you for your consideration.

## Letter 23

**COMMENTER:** Robert Steinmetz

**DATE:** November 11, 2017

### **Response 23.1**

The commenter requests that the County prioritize nature and heritage trees over new structures at Flood County Park. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 23.2**

The commenter requests that the County not erect any sports field lighting in order to prevent light pollution. As discussed in Draft EIR Section 2, Project Description, “no additional lighting that would enable nighttime use of athletic facilities is proposed as part of the Landscape Plan.”

11-12-2017 - 21:29

Letter 24

Nicholas Bott

Thank you for working on this project. We are neighbors of Flood Park and are excited to see it get a refresh. We love all the features outlined here. Would love to see a summer concert series in that gathering meadow!

24.1

Is there any possibility of including a pool in the plans?

## Letter 24

**COMMENTER:** Nicholas Bott

**DATE:** November 12, 2017

### **Response 24.1**

The commenter expresses support for the project and requests that a summer concert series be hosted in the proposed gathering meadow. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 21:28

Letter 25

Anna Rogers

I am writing today in excitement and support of your preferred plan of two separate and distinct fields at Flood Park. We have children in multiple sports and feel the desperate need of more baseball fields that are separate and distinct from other sports. Our teams fight for space and often have to drive out of our communtiy to find fields. Also, fields that are multi-use often get destroyed quickly as they are more difficult to maintain correctly. As community members we are grateful to all the hard work and service put in to make Flood Park a reality. Please consider our request for separate and distinct fields for our children as it will greatly impact our community as a whole. Thank you!!

25.1

## Letter 25

**COMMENTER:** Anna Rogers

**DATE:** November 14, 2017

### **Response 25.1**

The commenter expresses support for the preferred Landscape Plan with two separate athletic fields because of the need to meet demand and the difficulty of maintaining multi-use fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 18:32

Letter 26

Bernice van der Meer

I support the preferred plan with separate baseball and soccer/lacrosse fields. Menlo Park needs a full size baseball field that can be accessed year round (not shared).

26.1



## Letter 26

**COMMENTER:** Bernice van der Meer

**DATE:** November 14, 2017

### **Response 26.1**

The commenter expresses support for separate baseball and soccer/lacrosse fields as proposed in the Landscape Plan, stating that a year-round baseball field is needed in Menlo Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 14:32

Letter 27

Bob Baxter

Hello-

I am writing to let you know that I am in full support of the proposed ""preferred plan"" at Flood Park, with a new baseball field and a separate new field for soccer and lacrosse. The proposed plan looks thorough and well-designed, and having two separate fields will allow more community members to use the beautiful spaces at Flood. Flood Park is a gem, but many residents have never or rarely been there. These new fields will expand athletic access for many local baseball, soccer and lacrosse players/teams, and they could be the focal point for renewed interest in Flood Park as a sort of community hub.

27.1

I understand the concerns around traffic and congestion. I live on Ringwood Avenue, across from the sports fields at Menlo-Atherton HS. We experience high levels of traffic and congestion a couple of times each day (especially at 3:15-3:45 pm) during the school year, and we feel a particularly large amount of congestion during events such as football games, graduation, other sports and academic events, etc. In my mind, traffic is just a part of what we get by being close to (even part of) a vibrant community. I love being near the M-A campus when there are activities happening, and my family and I often walk across the street to take part. The M-A campus acts as the center of a larger community, and it is a place where many of us can be together. I think the same could happen at Flood Park. Yes, this benefit comes with downsides - traffic, noise, etc. But in my mind, the upsides of community-building, and expanded athletic field space, and a rejuvenation of Flood Park as a gathering place, all outweigh the downsides.

27.2

Thank you very much for your consideration.

Bob Baxter

410 Ringwood Ave.

Menlo Park, CA

## Letter 27

**COMMENTER:** Bob Baxter

**DATE:** November 14, 2017

### **Response 27.1**

The commenter expresses support for the proposed Landscape Plan because it would expand athletic access. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 27.2**

The commenter asserts that the project's benefits of community-building, expanded athletic space, and rejuvenation of Flood County Park would outweigh concerns about traffic and congestion. This comment about the project's social benefits does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 14:46

Letter 28

Celine Sanie

I became aware of the ball field shortage in Menlo Park when I started the softball program at Hillview Middle School 7 years ago (discontinued since). I support the construction of a full size baseball field at Flood Park, with a separate soccer/lacrosse field. Boys and girls have to leave Menlo Park when they age out of Little League at 12 years old because there isn't a single full size baseball field in Menlo Park. Adults also have to join leagues outside the city. Sharing a field between baseball and lacrosse doesn't make sense because they are played during the same season. There is a beautiful soccer/lacrosse field being built at the M-A high school that will open soon, in addition to field at the primary schools. Youth programs operate after school and on the weekend. I do not approve any limitation during 4-6PM peak hours that would keep youth off the field when they need it most.

28.1

Regards,

Celine Sanie

## Letter 28

**COMMENTER:** Celine Sanie

**DATE:** November 14, 2017

### **Response 28.1**

The commenter expresses support for the proposed construction of a full-size baseball field and separate soccer/lacrosse field. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

In addition, the commenter opposes any limitation of athletic field use during 4 to 6 p.m. weekday hours because of athletic demand during that time. Draft EIR Section 7, Alternatives, acknowledges that the Reduced Athletic Programming Alternative, which would prohibit organized use of athletic fields during afternoon peak hours, would not meet demand for active recreation facilities to the same extent as would the proposed Landscape Plan.

11-14-2017 - 14:41

Letter 29

Cristy Barnes

I'd like to express my support for the preferred plan of development of two separate fields at Flood Park. I believe the city needs separate (not shared) fields for baseball and other sports. Our family is very involved with the baseball leagues in Menlo Park (Little League and private travel teams) and therefore we realize space for the teams is limited and there are no full sized public baseball fields in town. Whereas, there are already full sized soccer and lacrosse (and other) sports fields available to the community. The high school is limited in its ability to offer Freshman the chance to join a Freshman baseball team right now, meaning less students can participate and represent their school. Thank you.  
Cristy Barnes

29.1

## Letter 29

**COMMENTER:** Cristy Barnes

**DATE:** November 14, 2017

### **Response 29.1**

The commenter expresses support for the proposed separate athletic fields at Flood County Park in order to meet athletic demand. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 15:05

Letter 30

Hendrik van der Meer

I am submitting this to express my interest in making sure that the ""preferred plan"" is chosen. I have been coaching both my son's baseball teams and there has always been shortage of fields in the area. This project would be instrumental in getting fields for practices and games. My oldest son just started MA highschool and found out that one of the only reasons they do not have a freshman team for baseball is because of field space in Menlo Park. This is a huge issue as he may now have to wait a year to play in high school since there are so many people trying out for the JV team.

Please consider my feedback as a resident of the Willows in Menlo Park.

Cheers,

Hendrik

30.1



## Letter 30

**COMMENTER:** Hendrik van der Meer

**DATE:** November 14, 2017

### **Response 30.1**

The commenter, a baseball coach, expresses support for the proposed Landscape Plan in order to address a shortage of athletic fields in the area. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

Letter 31

11-14-2017 - 15:39

Jeffrey Barnett

We urge you to adopt the ""preferred plan"" for Flood Park, which includes a full-size baseball field and a smaller combined Lacrosse and Soccer field.

Menlo Park and the surrounding region is in desperate need of another high-quality, full-sized baseball field. Already players at M-A High School are constrained, and there is no other full-sized field within city limits. Nearby towns such as Palo Alto are not much better off, and the fields they do have are already heavily booked.

Baseball is a beloved sport across our country and in Menlo Park. It is fitting that the city would work to develop a high-quality facility to support the sport that so many kids (and their parents!) enjoy.

Thanks!

Jeff Barnett

31.1

## Letter 31

**COMMENTER:** Jeffrey Barnett

**DATE:** November 14, 2017

### **Response 31.1**

The commenter urges that the County adopt the proposed Landscape Plan because of the community's need for a full-sized baseball field. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 14:03

Letter 32

Keith Otis

The Otis family supports The San Mateo County PREFERRED PLAN (2 separate fields - 1 baseball and 1 soccer/lacrosse) at Flood Park. We need more baseball fields in Menlo Park to keep our kids active, playing and being a part of their community. The field situation in Menlo Park and at M-A high school creates a very challenging situation to coach the kids with a thorough practice; we desperately need Flood Park to be updated in order to be usable. Thank you for hearing our position.

32.1

-Keith Otis

## Letter 32

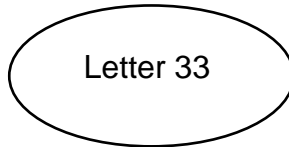
**COMMENTER:** Keith Otis

**DATE:** November 14, 2017

### **Response 32.1**

The commenter expresses support for the proposed Landscape Plan because of the need for more baseball fields in Menlo Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 13:21



Lindsay Bogue

I do not support a combined facility for baseball, soccer, and lacrosse. I support a separate baseball facility. There is not one full sized public baseball field in Menlo Park. There is only one in Atherton at M-A and it is shared with softball, as well as football and soccer outside of the primary high school spring season

33.1

## Letter 33

**COMMENTER:** Lindsay Bogue

**DATE:** November 14, 2017

### **Response 33.1**

The commenter opposes the Multi-Use Field Alternative presented in the Draft EIR and expresses support for a separate baseball field. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 13:01

Letter 34

Natalie Coupe

Definitely supporting TWO separate fields, one soccer/lacrosse and one baseball!! Thanks!

34.1



## Letter 34

**COMMENTER:** Natalie Coupe

**DATE:** November 14, 2017

### **Response 34.1**

The commenter expresses support for separate baseball and soccer/lacrosse fields as proposed in the Landscape Plan. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 15:51

Letter 35

Rich Ferrick

I support the Proposed Project with a rehabilitated baseball field and a separate lacrosse/soccer field. Baseball field space for older kids (12-17) and adults is practically non-existent in Menlo Park. The M-A baseball field is the only current alternative and has to be shared with other high school sports (soccer, football and softball depending on the season).

35.1

Rich Ferrick

## Letter 35

**COMMENTER:** Rich Ferrick

**DATE:** November 14, 2017

### **Response 35.1**

The commenter expresses support for the proposed reconstructed ballfield and separate soccer/lacrosse field at Flood County Park in order to address the scarcity of baseball fields in Menlo Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 13:46

Letter 36

Rod MacLeod

I fully support building two fields with one as a stand alone baseball field. The local high school is having to turn away numerous kids as freshmen who would have an opportunity to stay in baseball if the high school could support a freshman baseball team...something most high schools support. A lack of fields prevents MA from offering a freshman team. I would also encourage and be willing to help out in any way to make this happen sooner rather than later.

36.1

Rod MacLeod

408.425.7793

## Letter 36

**COMMENTER:** Rod MacLeod

**DATE:** November 14, 2017

### **Response 36.1**

The commenter expresses support for the proposed standalone ballfield in order to meet demand for baseball field space. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 13:28

Letter 37

Stacey Jones

I support the preferred plan for Flood Park which would include an additional separate, self-contained lacrosse/soccer field NEXT to the baseball field.

37.1

Thanks,

Stacey Jones

## Letter 37

**COMMENTER:** Stacey Jones

**DATE:** November 14, 2017

### **Response 37.1**

The commenter expresses support for the proposed separate athletic fields in the Landscape Plan. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 17:11

Letter 38

Stephanie Thomases

I strongly support the preferred plan, with separate baseball and soccer/lacrosse fields. I have children who play baseball and soccer and I think that a multi-use field is bad for both sports, in addition to reducing the number of fields available to kids in an area where field space is incredibly limited. When my kids play soccer on a multi-use field, they comment that the field is much harder, the turf is more torn up in the baseball paths/areas, and there is more crumb rubber (or other fill) on the field. As well, the multiple lines make it very difficult for kids to play without getting confused as to which line is important. When my kids play baseball on a multi-use field, they find that the surface is more difficult for sliding and does not have the feel of real baseball. In addition, the fact that we have very few baseball and soccer/lacrosse fields in Menlo Park strongly favors the preferred plan. There are no full-size baseball fields in Menlo Park/Atherton other than at M-A High School, which is often in use during the spring months due to the high school season. After having watched my kids play baseball and soccer on many different fields, I feel strongly that baseball and soccer/lacrosse fields should be separate. The lack of fields in this area, and the lack of space to put them, strongly favors two fields on this large property. It will be a great addition to our city.

38.1



## Letter 38

**COMMENTER:** Stephanie Thomases

**DATE:** November 14, 2017

### **Response 38.1**

The commenter expresses support for the proposed separate baseball and soccer/lacrosse fields at Flood County Park. The commenter asserts that multi-use fields have a harder surface, torn up turf in areas of baseball activity, and more crumb rubber. In addition, the commenter states that the multiple lines on multi-use fields cause confusion among athletic users. These comments do not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 16:53

Taryn Lamm

Letter 39

I fully support development of Flood Park for recreational and athletic use.

| 39.1

## Letter 39

**COMMENTER:** Taryn Lamm

**DATE:** November 14, 2017

### **Response 39.1**

The commenter expresses support for the development of Flood County Park for recreational and athletic use. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-14-2017 - 13:41

Letter 40

Tracy Bianchi

Flood Park can make an even stronger community experience for all of those living in the Menlo Park area as well as outside the community. It is my hope that in the efforts to re-imagine a new development of Flood Park that we support the concept of TWO separate fields rather than a single field. If you look at fields like Burgess and the success of community living and quality outdoor experiences it gives there, Flood can be a major addition to Menlo Park athletic and outdoor space by providing multiple field experiences and options instead of a limited one field, over scheduled with reduced land use. Having the preferred plan would be able to accommodate more experiences and opportunities with the two field options. I would like to support the preferred plan NOT the preferred alternative.

40.1

## Letter 40

**COMMENTER:** Tracy Bianchi

**DATE:** November 14, 2017

### **Response 40.1**

The commenter expresses support for separate athletic fields as proposed in the Landscape Plan, in order “to accommodate more experiences and opportunities” at Flood County Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

Letter 41

Carolyn Ordonez

I have read the EIR Draft for Flood Park, below are my comments regarding the report.

First, the report does not address Phases 2 and 3. Both of which remove trees, increase traffic and noise, and require construction. The cumulative impacts are significant. 41.1

I have lived in the Flood Triangle neighborhood of Menlo Park for over thirty years. Traffic has become a major problem in this part of the city. Bay Road is a "neighborhood" street for anyone living on the east side of Bay Rd. We have to use Bay Rd to exit our streets. Most weekdays, Bay Rd and Ringwood Avenue have extreme queues of cars at commute hours and at school drop off and pick up times. Traffic has been increasing steadily over the years. Now, with the reconfiguration of the freeway on and off ramps at Willow Road, traffic is exponentially worse. Being parallel to Marsh and Willow, Ringwood Ave is being used by Dumbarton Bridge commuters as an alternative route to traveling all the way down those gridlocked streets. As noted in the EIR, traffic cannot be mitigated with CalTrans travel demand analysis themselves saying the "cumulative impact cannot be mitigated." The gridlock of traffic prevents emergency vehicles from reaching our neighborhoods. There have been days when reaching my home has been difficult. Speeding drivers use my street as a cut through to Van Buren Road, only to get stuck yet again. Adding additional cars to Bay Rd in the Flood Park direction will only make traffic come to a standstill. Until we can convince our government to fund regional transportation the traffic will continue to increase. We cannot add trips to Flood Park. 41.2

I live three house from the 101 freeway. I hear the traffic 24/7. Recently, the FAA started sending their noise polluting SFO bound planes directly over our neighborhood. I do not hear noise from Flood Park now and I do not want to hear any noise from Flood Park in the future. 41.3

Kelly Park, located across the freeway, has summer concerts and events during the year with amplified noise. I hear it loud and clear. Any type of amplified noise cannot be allowed at Flood Park. No permits for special events allowing amplification can be allowed. The EIR does not mention how many events might be scheduled. The number of events could be weekly if a lacrosse field into the park. Local sports do not require amplification. 41.4

The tree report is lacking detail and content. It mentions 300 trees when there are over 900 trees in the park. The trees also have not been tagged properly. As noted in the EIR, "In some instances where the tree report states a number and letter to identify trees, only a number was on the tag; therefore, some trees were tagged with the same number". Also noted in the EIR, there are inconsistencies in the tree report and the arborist's assessment. The report is not specific about how many trees would be removed if the lacrosse field is implemented. With the reconfiguring of the Willow Rd freeway on and off ramps, all of the heritage trees were removed. Those of us who live near a polluting freeway and polluting jets need trees for our health. We should not be removing trees. To think that replacing mature heritage trees with 15 gallon trees is not mitigation, it is a joke. How many years will it take to actually "mitigate" the lost trees. Any attempts to replace trees should include the Genus, Species, 41.5

and Variety of tree, as well as the number and container size and a timeline to reaching the replacement size.



As mentioned in the EIR, no trees within 25 feet on each side of the Hetch Hetchy can be more than 25 feet tall and 15 feet wide. Trees planted here will never qualify as heritage trees. The tree report says it all--more trees removed than saved.

41.6

According to the EIR, the Biological Resources Assessment is also incomplete as they ""did not conduct field survey during blooming season,"" which was required. Also, ""protocol surveys to confirm the presence or absence of special status species were not performed.""

41.7

Just because no wildlife was seen during a five hour visit on one day doesn't mean it isn't there. That doesn't seem at all like adequate viewing. This neighborhood does have significant species like hawks that need to be considered.

In conclusion, Flood Park is not the appropriate location for a huge sports center. Repair the baseball field, repair the tennis courts or reconfigure the tennis courts and maybe add a new court instead of pétanque. Fix the volleyball courts. Do not reduce the number of picnic areas. These areas are used by the residents that live in North Fair Oaks and other not so affluent communities.

41.8

## Letter 41

**COMMENTER:** Carolyn Ordonez

**DATE:** November 15, 2017

### **Response 41.1**

The commenter contends that the Draft EIR does not consider Phases II and III of the Landscape Plan, both of which would involve tree removal, increased traffic and noise, and construction. However, the Draft EIR explicitly evaluates these environmental impacts associated with Phases II and III in Sections 4.1, *Aesthetics*; 4.3, *Biological Resources*; 4.8, *Noise*; and 4.9, *Transportation and Circulation*. As discussed on page 26 of the Draft EIR in Section 2, *Project Description*, the EIR evaluates the environmental impacts of recreational improvements in Phases II and III of the Landscape Plan “at a programmatic level.” This is an appropriate level of review under CEQA because the Landscape Plan is a high-level plan which the County would implement over a 10-year period, and the precise design details for later phases are not available at this time.

### **Response 41.2**

The commenter, a long-time resident of the Flood Triangle neighborhood, states that traffic congestion has become “exponentially worse” in recent years, with long queues of vehicles at commute hours and school drop-off and pick-up times on Bay Road and Ringwood Avenue. This comment is consistent with the Draft EIR’s analysis of existing traffic conditions in the area. As shown in Table 29 on page 147, motorists currently experience an average delay of more than 21 seconds at the Bay Road/Ringwood Avenue intersection and an unacceptable delay of more than 80 seconds at the Bay Road/Willow Road intersection.

Due to existing traffic congestion, the commenter objects to the addition of trips to Flood County Park. While this opinion does not conflict with or challenge the Draft EIR’s traffic analysis and conclusions, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 41.3**

The commenter states that Highway 101 and airplanes contribute to existing noise pollution near Flood County Park. This comment is consistent with the discussion of existing noise sources on page 125 of the Draft EIR.

The commenter also expresses a desire to continue hearing no noise from Flood County Park in the future. This opinion does not conflict with or challenge the Draft EIR’s noise analysis and conclusions; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 41.4**

The commenter states that summer concerts and events at Kelly Park can be heard from across freeway. The commenter states that amplified noise cannot be allowed at Flood County Park. This objection to amplified noise does not conflict with or challenge the Draft EIR’s noise analysis and conclusions; however, all comments will be forwarded to the County’s decision makers for their consideration.



The commenter also notes that the EIR does not estimate the number of special events with sound amplification that might be scheduled. The commenter speculates that amplification could be used on a weekly basis at the proposed soccer/lacrosse field. Please see Topical Response A: Noise Impacts for a discussion of sound amplification.

### **Response 41.5**

The commenter finds that the Tree Report cited in the Draft EIR is inadequate because it only mentions 300 of more than 900 trees at the park and is inconsistent with the arborist's assessment. It is true that Tree Report prepared by Gates + Associates for the proposed Landscape Plan in July 2016 inventories some but not all of the trees at Flood County Park, as noted by the peer review of this report in Appendix C of the Draft EIR. In response to this comment, Rincon Consultants has reviewed the results of its independent field survey of trees on October 31, 2016, and compared these to the trees identified in the Tree Report. Based on this additional review, the Tree Report provides a comprehensive inventory of trees within the footprint of recreational improvements in the Landscape Plan. This overall development footprint has not changed since preparation of the Tree Report. Although the report does not fully survey other areas such as the northern end of the park, the margins of the parking lot, and the park boundaries, the County does not anticipate removing trees in these areas as part of the Landscape Plan. Therefore, the Tree Report is adequate for the purpose of characterizing existing trees and expected tree removal.

The commenter also states that the report does not specify the number of trees slated for removal at the proposed soccer/lacrosse field. Section 4.3, *Biological Resources*, has been amended in the Final EIR to specify anticipated tree removal in this area:

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 built. Based on the Tree Report prepared for the project site by Gates + Associates (2016), approximately 50 trees would be removed during Phase I. At the proposed soccer/lacrosse field, approximately 36 trees would be removed, including 21 heritage trees (12 coast redwoods, three coast live oaks, three California bay laurels, two ash trees, and one London plane tree). 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.

With implementation of Mitigation Measures BIO-2(a) and 2(b) to replace removed heritage trees and protect remaining trees during construction, it is expected that the Landscape Plan would have a less than significant impact on protected trees.

The commenter also objects to the replacement of heritage trees with 15-gallon trees and asks for specification on the type, number, container size, and timeline to replacement size for new trees. Please see Response 13.2 for a discussion of mitigation measures requiring tree replacement.

### **Response 41.6**

The commenter states that trees planted within 25 feet of the SFPUC right-of-way cannot be more than 25 feet tall and 15 feet wide and therefore would never qualify as heritage trees. This comment is acknowledged, although the SFPUC's applicable height restriction for trees near the right-of-way is 20 feet. Mitigation Measure BIO-2(a) in the Draft EIR requires the replacement of heritage trees at a 1:1 ratio but does not specify the location of new trees at Flood County Park. In

planting replacement trees, the County would adhere to the SFPUC's Right of Way Landscape Vegetation Guidelines, which restrict tree size near the agency's right-of-way.

### **Response 41.7**

The commenter claims that the Biological Resources Assessment (BRA) prepared for the project is incomplete because the field survey was conducted outside of blooming season, protocol surveys for special-status species were not performed, and wildlife not seen during the field survey could still be present. However, the BRA is adequate for the purposes of evaluating the Landscape Plan's impacts on biological resources at Flood County Park. Although the park has a substantial number of mature trees that lend it a natural appearance, it lacks natural vegetation communities where special-status plant species would be expected to occur. For such project sites, a reconnaissance-level plant survey at any time of year is sufficient. As discussed in the BRA, suitable habitat for special-status animals also is generally absent, except for certain bird and bat species. Protocol-level surveys would not be necessary to further investigate biological resources on-site. Mitigation Measures BIO-1(a) and BIO-1(b) would protect nesting birds and roosting bats if present during construction, even those not already identified in the field survey.

### **Response 41.8**

The commenter asserts that Flood County Park is not an appropriate location for a "huge sports center." Instead of the proposed Landscape Plan, the commenter recommends minor improvements such as repairing the ballfield and tennis courts. These recommendations do not conflict with or challenge the Draft EIR's environmental analysis and conclusions; however, all comments will be forwarded to the County's decision makers for their consideration.

Letter 42

Joan Hilse

GENERAL

I appreciate the goal to increase park usage, to help address the needs for play- and sport-fields, and the recent plan updates regarding adobe structures. However, I think the current plans shortchange the original purposes of emphasizing the unique natural resources (trees, birds, walking paths) at the expense of organized sports. Secondly, many of the studies in the DEIR are based on comparisons to recent years when the park was either closed or drastically underused because of overall deterioration of facilities. Thirdly, although not a direct EIR issue, the increased costs for staff time, enforcement of noise and parking/drop-off regulations, and other new and increased responsibilities must be considered.

42.1

42.2

42.3

NOISE

Why even suggest the option of permits for air horns?? They seem unnecessary for the types of events (with mainly Menlo Park traffic analysis) anticipated. You must clarify the distance from nearest neighbors' back fences to the soccer/lacrosse field--is it 30 feet, 100 feet, or other? What consideration has been given to a sound wall behind the soccer/lacrosse field or other noise-producing activities?

42.4

TRAFFIC

Please revisit your analysis of traffic, especially drop-off, at the Iris/Del Norte gate and intersection. When some soccer/lacrosse activities are ending and others beginning, I anticipate a bottleneck since this entrance is much closer than the proposed free drop-off area in the parking lot. Free bicycle parking is an excellent idea. Access to Menlo Park, Redwood City, and area services for Suburban Park and Flood Triangle depend on Bay Road at all times!

42.5

COMMUNITY USAGE

Flood Park is and must remain an important resource for underserved members of nearby communities such as North Fair Oaks, Belle Haven, and East Palo Alto. Severely reducing the number of picnic tables, moving playground improvements beyond Phase I, and generally focusing only on sports improvements for Phase I are contrary to this need. Once facilities for community use are delayed or removed, such usage is unlikely to rebound later.

42.6

AESTHETICS

The 2 for 1 tree replacement program sounds great until the size and growth cycle are considered. Work harder to keep the redwood trees! The neutral netting is hardly attractive aesthetically although necessary for safety. A sound wall with fast growing greenery should be seriously considered.

42.7

## Letter 42

**COMMENTER:** Joan Hilse

**DATE:** November 15, 2017

### **Response 42.1**

The commenter asserts that the proposed Landscape Plan shortchanges the “original purposes of emphasizing the unique natural resources” of Flood County Park by focusing on organized sports. This opinion does not conflict with or challenge the Draft EIR’s analysis and conclusions; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 42.2**

The commenter states that the Draft EIR bases its analysis on recent years when the park was either closed or drastically underused. Please refer to Response 22.19 for a discussion of the appropriate baseline conditions for environmental review under CEQA.

### **Response 42.3**

The commenter contends that non-environmental issues such as the cost of staff time and noise enforcement should be considered. This opinion does not conflict with or challenge the Draft EIR’s analysis and conclusions; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 42.4**

The commenter asks why the Draft EIR retains an option for permitting air horns. As discussed in Topical Response A: Noise Impacts, Mitigation Measure N-3(a) has been amended in the Final EIR to prohibit all use of air horns at Flood County Park.

The commenter asks for clarification on the distance between the proposed soccer/lacrosse field and the nearest neighbors’ back fences. In response to this and similar comments on the Draft EIR, the County has reassessed and confirmed the proposed 100-foot distance. Flood County Park could accommodate a new soccer/lacrosse field located approximately 100 feet away from the nearest residential backyards while still making room for the SFPUC right-of-way for water pipelines and a path next to the reconstructed ballfield. Please refer to Topical Response A: Noise Impacts for further discussion of this distance and the noise impacts associated with use of the soccer/lacrosse field.

In addition, the commenter asks if a sound wall has been considered behind the proposed soccer/lacrosse field. Please refer to Topical Response A: Noise Impacts for a discussion of sound walls as mitigation.

### **Response 42.5**

The commenter expects a “bottleneck” at the Iris Lane gate when soccer/lacrosse activities are ending and other activities beginning, since this entrance is much closer than the proposed drop-off area to the proposed soccer/lacrosse field. Page 162 of the Draft EIR discusses measures to substantially reduce pick-up and drop-off activity near the Iris Lane gate. The County proposes to encourage on-site parking “by allowing participants in programmed athletic activities to be dropped off and picked up inside the park without paying an entrance fee.” In addition, Mitigation Measure

T-6 would require the County to inform park visitors of parking restrictions on nearby residential streets.

The commenter recommends free bicycle parking. Mitigation Measure T-5 in the Draft EIR would require installation of at least six bicycle racks near the proposed gathering plaza, which would provide free bicycle parking for park visitors.

### **Response 42.6**

The commenter asserts that reducing picnic amenities, moving playground amenities beyond Phase I, and focusing on athletic improvements for Phase I are contrary to the community's needs. The proposed Landscape Plan would not reduce the area of picnic space, but rather would involve renovating existing individual and group picnic areas. As discussed in Draft EIR Section 2, *Project Description*, the proposed athletic improvements would achieve a primary project objective "to meet demand for active recreation facilities in Sam Mateo County by increasing offerings of sports." The commenter's request to shift the playground replacement from Phase II to I of the Landscape Plan does not conflict with or challenge the Draft EIR's environmental analysis and conclusions; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 42.7**

The commenter requests that the County strive to keep redwood trees. This request to preserve additional trees than under the proposed Landscape Plan does not conflict with or challenge the Draft EIR's analysis and conclusions; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter states an opinion that neutral-colored netting for the proposed soccer/lacrosse field, as required by Mitigation Measure AES-1 in the Draft EIR, is "hardly attractive." It is acknowledged that such netting would not be a visually attractive or scenic resource; however, the purpose of this mitigation measure is to minimize the netting's visual prominence and have it blend in more with natural resources at the park. With mitigation, it is expected that the netting's visual impact would be less than significant.

In addition, the commenter recommends a sound wall with fast-growing greenery. Please refer to Topical Response A: Noise Impacts for a discussion of sound walls as mitigation.

11-15-2017 - 19:48

Letter 43

Karen Schiller

I have lived near Flood Park for 20 years, I love this park. As the area becomes ever more congested, noisy, and stressful, I have always counted myself lucky to be in such close proximity to the quiet escape that is Flood Park. This old park offers a serenity that is increasingly rare, and that is what makes it special.

It is difficult for me to imagine there is a demand for more recreational facilities given the number of parks nearby (i.e. City of Menlo Park) with playing fields, gym, skate park, etc. in addition to every elementary, middle school, high school, and community college which all provide many of the recreational offerings you speak of in your Landscape Plan.

I do not know the reasons why the park has fallen into disrepair and why the ball field cannot be maintained and used. Why is the option to simply maintain the park and leave the infrastructure 'as is' not offered? Therefore, my hope is that the park is left alone - NO PROJECT; all it really needs is some simple TLC.

43.1

## Letter 43

**COMMENTER:** Karen Schiller

**DATE:** November 15, 2017

### **Response 43.1**

The commenter expresses support for the Draft EIR's No Project Alternative in order to preserve "a serenity that is increasingly rare" at Flood County Park. The commenter doubts that there is sufficient demand for additional recreational fields, considering existing parks in the area with playing fields, gyms, and skate parks. These comments do not conflict with or challenge the environmental analysis and conclusions in the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.



Letter 44

November 15, 2017

Carla Schoof, Communications & Engagement Program Manager  
County of San Mateo Parks Department  
455 County Center – Fourth Floor  
Redwood City, California 94063

**RE: Flood Park Landscape Plan, Draft Environmental Impact Report Comments**

Dear Ms. Schoof,

Please find attached the City of Menlo Park's comments on the Flood Park Landscape Plan Draft Environmental Impact Report (EIR).

The City appreciates the opportunity to comment on the proposed project and the Draft EIR. Our comments are detailed in the attachment. Please contact us at 650.330.6770 with any questions.

The City looks forward to these issues being addressed in the Final Environmental Impact Report.

Sincerely,

Kirsten Keith  
Mayor



1. 7.3 Alternative 2: Reduced Athletic Programming Description - The Reduced Athletic Programming Alternative focuses on revising the programming of the recreational facilities to address 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. The proposed ballfield and soccer/lacrosse field would remain available for informal, non-programmed use at this time. This alternative would meet the proposed objectives to repair and update park features, to provide a variety of use for a range of user groups, and to optimize preservation of oak woodland. However, by closing athletic fields to programmed use during weekday late afternoons, it would not meet demand for active recreation facilities to the same extent as would the proposed project.

City of Menlo Park sports user groups rent fields from 4-7 p.m. Monday through Friday and 8 a.m.-5 p.m. on Saturday and Sunday. This is consistent with all youth sports groups across the country.

One unintended consequence of not managing programming during these hours will result in unsanctioned use by user groups. Based on the City's long time experience, this opens the door to conflict between user groups resulting in calls for services to the Menlo Park Police Department. The use of this strategy to mitigate traffic impacts during peak hours of play will have minimal benefit.

The City requests the reduction of athletic programming during peak hours be removed from consideration based on the two factors listed above.

44.1

2. 7.4 Alternative 3: Multi-Use Field Description - 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 soccer/lacrosse field. A multi-use field would cater to 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 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. This alternative would meet all four proposed objectives: to repair and update park features, to meet demand for active recreational facilities in San Mateo County, to provide a variety of use for a range of user groups, and to optimize preservation of oak woodland. It would meet demand for active recreational facilities to a lesser degree than would the proposed project because the multiuse field would have less capacity to host simultaneous athletic events.

The City of Menlo Park has single use sports fields and multi-use sports fields in the city. We designate that "in season" sports have priority for renting fields during their "in season."

44.2

Designated “in season: sports are as follow:

Baseball – spring

Lacrosse – spring

Soccer – fall

Football – fall

In the City’s years of experience allocating fields it is more difficult to allocate out multi-use fields. Having dedicated fields for individual sports allows for a seamless allocation process.

The City understands that the driving force behind the exclusion of the multi-use field is that neighbors do not want the soccer/lacrosse field to be located at a distance of 100 feet from their residences. The multi-use only field would locate the field at 300 feet from their residences. The City operates a number of sports fields within a 100 foot radius of nearby residences and since 2010 there have been few if any complaints regarding programmed activities.

The City requests that the soccer/lacrosse field not be removed from consideration based on our past experience programming sports fields and working with our user groups.

3. Parking is addressed in the EIR several times but, not as it relates to the parking procedures at Flood Park. Currently Flood Parks charges a vehicle fee for entering the park lot each time you enter the park.

Standard Operating procedures for the vast majority of active sports parks for the California Parks and Recreation Society (CPRS) and National Recreation and Park Association (NRPA) agency members provide free parking for sports park users. Parking fees are recouped through other methods.

Menlo Park sports field user groups typically use the field 2-3 times per week per child for practices and games. A per use fee for parking would be cost prohibitive for families that currently do not pay anything to park at Menlo Park sports fields.

It was mentioned in the public EIR meeting that collecting park fees at the entrance gate to the park would negatively impact traffic on Bay Road by vehicles waiting to enter the park entrance.

The City requests the County of San Mateo study alternative methods to the current parking fee collection, and supports the implementation of MM T-1 Parking Fee Collection Practices to eliminate potential queue spillback on Bay Road at the park entrance. This mitigation measure should also take into account the potential for drop-off, pick-up and parking on Iris Lane and adjacent streets. Although parking is currently restricted on these streets, the City requests the County to monitor and implement solutions if drop-off and pick-up activities and associated impacts like in-street turn-arounds, u-turns, or increased traffic on residential streets occur as a result of the project. The City of Menlo Park’s Community Services and Public Works



44.3



Departments are available to assist with this process.



4. 4.7 Hydrology and Water Quality / Regulatory Setting / Local (Page 117): Under local ordinances, the City of Menlo Park's Grading and Drainage Guidelines should be included.

44.4

5. 4.7 Hydrology and Water Quality / Impact Analysis / Project Impacts / Impact HWQ-3 (Page 120): The proposed project will incrementally increase the area of impervious surface at the park resulting in an increase in the volume of stormwater runoff. The City of Menlo Park's Grading and Drainage Guidelines require that post-development stormwater discharge volume must remain the same or be less than the predevelopment discharge. The proposed activity does not conform to the City's guidelines. Also, there is no assessment of the 10 year and 100 year storm flows and impact on the existing storm system.

44.5

6. 4.8 Noise: Impacts N-1 and N-2 (construction noise and vibration)  
The impacts are determined to be less than significant without mitigation based primarily on the allowed hours for construction activity. The County's standards for allowing noisy construction activities differ from the standards in the City of Menlo Park. The City believes that the City's standards should apply to the project given the proximity to Menlo Park neighborhoods. The City requests that the following standards and mitigations be considered.

44.6

- Require that the City noise standards be applicable to the project. The City standards limit noise to 60 dBA between 7:00 a.m. and 10:00 p.m. and 50 dBA between 10:00 p.m. and 7:00 a.m., as measured at a point on the receiving property nearest where the sound source at issue generates the highest sound level. The City does have an exclusion for construction activities between the hours of 8:00 a.m. and 6:00 p.m., Monday through Friday. Additionally, no equipment is allowed to generate noise in excess of 85 dBA at 50 feet. Please refer to Chapter 8.06 of the City of Menlo Park Municipal Code.
- Require signs containing the permitted hours of construction activities exceeding the noise limits to be posted at all entrances to the construction area upon the commencement of construction, for the purpose of informing contractors and subcontractors and all other persons at the construction site of the basic requirements.
- Require that when construction occurs near residents, affected parties within 400 feet of the construction area shall be notified of the construction schedule prior to demolition, grading or building permit issuance. Notices sent to residents shall include a project hotline where residents would be able to call and issue complaints. A Project Construction Complaint and Enforcement Manager shall be designated to receive complaints and notify the appropriate County staff of such complaints.



- Require the utilization of the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, etc.) when within 400 feet of sensitive receptor locations. Prior to demolition, grading or building permit issuance, a construction noise control plan that identifies the best available noise control techniques to be implemented, should be prepared by the construction contractor and submitted to the County for review and approval.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction should be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler shall achieve lower noise levels from the exhaust by approximately 10 dBA. External jackets on the tools themselves should be used where feasible in order to achieve a reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever feasible.

7. 4.8 Noise: Impact N-3 (operational noise)

The City appreciates the recognition of the noise generated by the planned activities, and specifically of the requirement that all athletic programming, including practices, and activities at the performance area be subject to the City’s Special Event Permit. It is somewhat unclear how this would work for regularly scheduled and ongoing athletic events and the City would appreciate more clarity on the County’s expectations for the issuance of Special Events Permits.

44.7

Similar to the County, the City’s noise regulations include an exemption from the noise standards for athletic fields, playgrounds, parks, public tennis courts and private recreation facilities. However, the City regulations also prohibit the use of amplified music or sound systems. The City would request that major sources of intermittent noise, such as air horns, be outright prohibited rather than subject to a Special Events Permit. Additionally, the City would recommend a change to the allowed hours for events, especially in the evening, from 8:00 p.m. to 6:00 or 7:00 p.m.

With regards to the use of leaf blowers, the City requests the County to consider the use of alternatives to gas-powered leaf blowers.

44.8

8. 4.9 Transportation and Circulation: The intersection of Bay Road/Ringwood Avenue is identified as experiencing a significant impact from additional evening peak hour traffic added to the intersection as a result of the Park improvements. The proposed mitigation is to add a left-turn lane on Ringwood Avenue at Bay Road. This corridor is a critical connection to Menlo-Atherton High School for access from Belle Haven, Flood Triangle, Suburban Park, Lorelei Manor, and nearby neighborhoods and the City does not support any improvements that would reduce or eliminate walking pathways or bike lanes on Ringwood Avenue. The DEIR and traffic analysis also suggests that a traffic signal was identified, but not found to be feasible. Staff

44.9

requests that the County meet with City staff to discuss proposed mitigation plans for this intersection and the County's contribution towards potential improvements prior to circulation of the Final EIR.

9. 4.9 Transportation and Circulation: The intersection of Bay Road/Willow Road is identified as experiencing a significant impact from additional evening peak hour traffic added to the intersection as a result of the Park improvements. However, mitigation is not required or discussed. Prior City studies of this intersection, including the El Camino Real/Downtown Specific Plan, identified feasible lane configuration changes to this intersection that the County should participate in as part of the Flood Park improvements, to mitigate the intersection impact. 44.10
10. 4.9 Transportation and Circulation: Impact T-4 and T-5 (Page 60): The text in T-4 describes existing bike lanes and sidewalks on Bay Road would safely accommodate bicyclists and pedestrians en route to the park, however, Impact T-5 describes that the sidewalk gap on Bay Road could result in unsafe conditions for pedestrians accessing the park. The City does not support MM T-5(B) Pedestrian Signage, which requires the County to coordinate to install signs informing motorists and bicyclists that pedestrians would be walking on the shoulder. The City requests the County coordinate to complete sidewalk installation along this section and the County contribute funds towards this improvement. 44.11
11. 5.18 Utilities and Service Systems (Page 188): Water Supply – The park is served by Menlo Park Municipal Water. The EIR does not include an assessment of potable water demand, its impact on existing supplies and impact on the distribution system that serves the site. An assessment of the hydraulic impacts to the existing water distribution is required to determine if the existing conditions can meet the increase in water demand. 44.12

## Letter 44

**COMMENTER:** Kirsten Keith, Mayor, City of Menlo Park

**DATE:** November 15, 2017

### **Response 44.1**

The commenter notes that the City of Menlo Park allows sports users to rent fields from 4 to 7 P.M. on Monday through Friday and from 8 A.M. to 5 P.M. on weekends, consistent with standard nationwide practices. By not managing programming during these hours, the commenter states that unsanctioned group use could occur, resulting in conflict between user groups. Because of unsanctioned use, the commenter asserts that restricting athletic programming during peak hours of play to mitigation traffic impacts would have minimal benefit. This comment is consistent with the Draft EIR's finding that the Reduced Athletic Programming Alternative would prevent new trips associated with organized athletic events. However, it is acknowledged that unprogrammed use of the athletic fields during restricted hours could add vehicle trips. Even assuming no vehicle trips associated with active recreation use during weekday P.M. peak hours, the Draft EIR still finds that the Reduced Athletic Programming Alternative would result in a significant and unavoidable traffic impact at the Bay Road/Ringwood Avenue intersection.

The commenter also requests that the Reduced Athletic Programming Alternative be removed from consideration because of the above factors. However, as discussed on page 198 of the Draft EIR, this alternative merits consideration because it would largely meet the proposed Landscape Plan's objectives of improving park features, providing a variety of uses, and optimizing preservation of woodland. The Draft EIR acknowledges that the alternative would not meet demand for active recreation facilities to the same extent as would the project.

### **Response 44.2**

The commenter states that in the City of Menlo Park's experience, it is more difficult to allocate use at multi-use fields than at single-use fields. The commenter adds that the City operates athletic fields within 100 feet of residences (the proposed distance of the soccer/lacrosse field to residences at Flood County Park) and has received "few if any complaints regarding programmed activities" at these fields. Impact N-3 in Section 4.8, *Noise*, of the Final EIR has been amended as follows to refer to the City's experience with athletic fields near residences:

Average sound energy levels during lacrosse and soccer games may exceed existing ambient noise levels in the vicinity of Flood County Park. As shown in Table 17, ambient noise was measured at approximately 55-56 dBA Leq on a Saturday afternoon at the southeastern edge of the park, next to residential backyards, and at approximately 56 dBA Leq on Del Norte Avenue on a weekday late afternoon. Anticipated noise levels of 59-65 dBA Leq during lacrosse and soccer games would exceed existing ambient noise levels by an estimated 3 to 9 dBA Leq. These short-term increases in ambient noise would be perceptible to residents adjacent to the park. However, perceptible athletic noise would not necessarily cause a nuisance at nearby residences. 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).

Based on the City's experience with athletic fields near residences, the commenter requests that the proposed soccer/lacrosse field be retained. This comment does not conflict with or

challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 44.3**

The commenter states that the vast majority of active sports parks provide free parking for users, and that per-use fee for parking would be cost-prohibitive for families that currently park for free at Menlo Park sports fields. The City supports implementation of Mitigation Measure T-1 to alter current fee collection practices. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts, including the potential for parking fee waivers.

The commenter also requests that the County monitor and implement solutions if drop-off and pick-up activities and associated in-street turnarounds, U-turns, and increased traffic occur as result of the project. As discussed on page 162 of the Draft EIR, the County would encourage on-site parking "by allowing participants in programmed athletic activities to be dropped off and picked up inside the park without paying an entrance fee." In addition, Mitigation Measure T-6 would require the County to inform park visitors of parking restrictions on nearby residential streets. These project features and mitigation measures would be sufficient to minimize pick-up and drop-off activity on residential streets. Please refer to Topical Response B: Transportation Impacts for further discussion of mitigation to reduce pick-up and drop-off activity on residential streets.

### **Response 44.4**

The commenter states that the City's Grading and Drainage Guidelines should be applied to the project. The City's land use authority over property in Menlo Park is acknowledged; however, Flood County Park is owned and operated by the County. As discussed of page 18 in Draft EIR Section 1, *Introduction*, "As a distinct governmental entity and lead agency for this project, the County has immunity from local standards upheld by the City of Menlo Park... Furthermore, the County has discretion as to which standards to apply to this project when reviewing its environmental impacts." Therefore, the County has the authority to apply its own grading and drainage standards to the Landscape Plan. During implementation of the Landscape Plan, it is anticipated that County standards for stormwater pollution prevention would be applied. These standards are consistent with the San Mateo County Water Pollution Prevention Program, in which the City of Menlo Park participates.

### **Response 44.5**

The commenter states that the project would incrementally increase the area of impervious surface, resulting in an increase in the volume of stormwater runoff. This effect would not conform to the City's Grading and Drainage Guidelines, the commenter notes. Please refer to Response 44.4 for a discussion of the County's immunity from local standards and guidelines.

In addition, the commenter states that there is no assessment of 10-year and 100-year storm flows. A quantitative assessment of storm flows is not necessary to evaluate the Landscape Plan's stormwater impacts. As discussed in Draft EIR Section 4.7, *Hydrology and Water Quality*, the Landscape Plan would create and/or replace at least 10,000 square feet of impervious surface and therefore would be subject to Provision C.3 requirements in the San Francisco Bay RWQCB's MS4 General Permit to control storm water flow. The County would be required to design and size storm water treatment systems to treat runoff from new and replaced impervious surfaces. In addition, Provision C.3 would require the implementation of Low Impact Development (LID) features to infiltrate, store, detain, or ensure biotreatment of storm water runoff. Compliance with Provision C.3 requirements in the San Francisco Bay RWQCB's MS4 General Permit would prevent excessive

storm water flow from the project site. Therefore, the Landscape Plan would have a less than significant impact related to changes in drainage patterns, storm water runoff flow, and storm water drainage systems.

### **Response 44.6**

The commenter notes that the County's standards for construction noise differ from the City's and believes that the City's standards should apply given the park's proximity to Menlo Park neighborhoods. The commenter requests the use of several City standards and mitigation measures. Please refer to Response 44.4 for a discussion of the County's immunity from the City's land use standards. The proposed Landscape Plan would be subject to the County Department of Public Works' specifications for noise control that apply to capital improvement projects. These specifications incorporate by reference the Caltrans Standard Specifications, which include measures to reduce noise from construction activities in Section 14-8.02 ("Noise Control"). In adhering to Section 14-8.02, the Parks Department or its construction contractor would control and monitor noise resulting from work activities, and construction noise would be prohibited from exceeding a maximum level of 86 dBA at 50 feet from the site between 9 P.M. and 6 A.M.. In addition, 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.

### **Response 44.7**

The commenter requests clarification on the County's expectations for issuance of Special Events Permits at Flood County Park. Please refer to Topical Response A: Noise Impacts for a discussion of the process of issuing Special Event Permits.

The commenter also requests a prohibition on the use of amplified music, sound systems, and major intermittent sources of noise (e.g., air horns) at the park. Please refer to Topical Response A: Noise Impacts for a discussion of impacts from amplified sound and air horns.

The commenter recommends prohibiting park events after 6 or 7 P.M. Mitigation Measure N-3(b) in the Draft EIR would restrict athletic practices and games at the park to the hours of 9 A.M. to 8 P.M. This measure would prevent organized athletic events for one hour after the park's daily opening time of 8 A.M., for the purpose of reducing the exposure of nearby residents to early-morning noise that could disturb sleep. Flood County Park's earlier closing times from September through March, due to limited daylight hours during those months, would further reduce the exposure of residents to noise from evening events. As per current practice, the County anticipates that the park would continue to close at 7 p.m. after Labor Day in September, 6 to 7 P.M. in October, 5 to 6 P.M. in November 5 P.M. from December through February, and 6 to 7 P.M. in March. The park's earlier closing times from September through March would effectively prohibit park events after 7 P.M. during that portion of the year. Although park events could last until 8 P.M. from April through August, the Draft EIR finds that noise generated by evening events would result in a less than significant impact with mitigation.

### **Response 44.8**

The commenter requests that the County consider alternatives to gas-powered leaf blowers. As discussed on page 138 in Draft EIR Section 4.8, *Noise*, current maintenance activities at Flood County Park include the use of leaf blowers at recreational facilities such as the existing tennis courts. New elements proposed in the Landscape Plan, such as asphalt paths and new tennis courts,



would also require maintenance with leaf blowers. However, leaf blowers would not be operated closer to nearby residences than under existing conditions. Therefore, the Landscape Plan would not result in additional exposure to noise from leaf blowers. However, the request for non-gas-powered leaf blowers for future maintenance activities at Flood County Park will be forwarded to County decision makers for their consideration.

### **Response 44.9**

The commenter states that the Bay Road/Ringwood Avenue intersection and its vicinity is a “critical connection” to Menlo-Atherton High School from neighborhoods near Flood County Park. Because of the importance of this connection, the commenter opposes any improvements that would reduce or eliminate walking paths or bike lanes on Ringwood Avenue. Neither the proposed Landscape Plan nor mitigation measures in the Draft EIR would involve the reduction or elimination of pedestrian or bicyclist access on Ringwood Avenue.

The commenter also requests a meeting between City staff and the County about mitigation for the Bay Road/Ringwood Avenue intersection, including contributions by the County toward future improvements. In response to this comment, the lead agency held a meeting with City staff to discuss potential improvements to the intersection. The County finds that it would be infeasible to expand the intersection’s capacity, due to the physical and jurisdictional constraints discussed in Draft EIR Section 4.9, *Transportation and Circulation*. The Draft EIR acknowledges that the project would have a significant and unavoidable impact on traffic congestion at the intersection.

### **Response 44.10**

The commenter states that prior City of Menlo Park studies of the Bay Road/Willow Road intersection, including the El Camino Real/Downtown Specific Plan, identified feasible changes to lane configuration to alleviate traffic congestion. Contending that it would be feasible to mitigate the Landscape Plan’s traffic impact at this intersection, the commenter recommends that the County make a fair-share contribution toward this improvement. As discussed in Draft EIR Section 4.9, *Transportation and Circulation*, the Bay Road/Willow Road intersection now operates at unacceptable LOS F conditions during the PM peak hour, without the addition of project-generated traffic, and would continue to operate deficiently due to “unserved demand” upon the addition of project-generated traffic. The project would not be responsible for pre-existing unacceptable traffic conditions at Bay Road and Willow Road and would not substantially exacerbate traffic congestion at the intersection.

### **Response 44.11**

The commenter states that the City does not support Mitigation Measure T-5(b) in the Draft EIR, which would require County coordination to install signage informing motorists and bicyclists on Bay Road of pedestrians walking on the shoulder. In response to this comment, the County has revised Mitigation Measure T-5(b) to inform park visitors of alternative pedestrian routes that avoid the use of Bay Road between Del Norte Avenue and Ringwood Avenue, rather than to require the installation of signage on Bay Road:

#### ***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 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 coordinate with the City of Menlo Park to install signage along the north side of Bay Road between Del Norte Avenue and Ringwood Avenue, informing motorists and bicyclists of pedestrians walking along the should and in the bike lane.~~

Implementation of Mitigation Measure T-5(b) would inform pedestrians visiting Flood County Park of a safer alternate route to walking on the shoulder of Bay Road between Del Norte Avenue and Ringwood Avenue. This measure would reduce the Landscape Plan's effect on pedestrian traffic safety to a less than significant level.

The commenter also requests that the County contribute funds toward completion of a sidewalk on Bay Road. It should be noted that the County neither has jurisdiction in the City of Menlo Park's right-of-way on Bay Road, nor available funding for the requested cost-share agreement. Furthermore, additional use of Flood County Park under the proposed Landscape Plan would not substantially increase existing use of sidewalks on Bay Road beyond existing use associated with park activities. However, the City of Menlo Park has identified a need to close the existing sidewalk gap on Bay Road in its Sidewalk Master Plan (2009) and has funding to implement this improvement. Future closure of the sidewalk gap would further improve pedestrian safety in the vicinity of Flood County Park.

#### **Response 44.12**

The commenter states that the park is served by Menlo Park Municipal Water and requests an assessment of the project's impacts to water distribution to determine if an increase in water demand can be met. As discussed in Draft EIR Section 5, *Effects Found Not to Be Significant*, the addition of new restrooms and gardens during Phase II of the Landscape Plan, as well as increased public use of the park, would lead to incrementally greater water demand from the site. New athletic fields also could demand water unless built with artificial turf. Nonetheless, the proposed recreational improvements at an existing County park would not substantially increase water demand beyond current conditions. Furthermore, the proposed recreational facilities would not generate more water demand than is typical of local parks. Therefore, the project would have a less than significant impact to the water supply.

## Letter 45

11-15-2017 - 09:43

Stefano Giovannetti

- We do not support a combined facility for baseball, soccer, and lacrosse. We support a separate baseball facility
- There is not one full sized public baseball field in Menlo Park. There is only one in Atherton at M-A and it is shared with softball, as well as football and soccer outside of the primary high school spring season
- There is currently ZERO availability for any baseball field rentals in Menlo Park.Schools, club teams, camps and community members are currently unable to rent baseball fields because they are always booked by user groups. (And Menlo Park wont even take new user groups because they are so short on fields) The Legends Baseball 501 (c) 3, which is the biggest local baseball provider besides Little League is forced to practice in Palo Alto, Woodside and on a shared field with limited availability at M-A. Demand is so great, a shared field will not suffice.
- There are numerous local soccer/lacrosse sized fields already and M-A is wrapping up the install of a state of the art lacrosse/soccer field with lights at M-A. This lowers the level of community need for soccer and lacrosse fields. M-A will actually have 2 full sized soccer/lacrosse fields with lights as the lit football field is used for soccer and lacrosse when not in season. Simply put, a smaller, self-contained soccer field at Flood will now suffice.
- Lacrosse and Baseball share the same primary season so a shared field barely helps both entities during their peak season of usage.
- M-A High School cannot add a Freshman team until there is more field access. Large amounts of baseball players will have to be cut from the program until they can create a 3rd Freshman team.
- With noise being a concern because of the soccer field close to the neighbors, a smaller, junior sized soccer field (instead of a full sized field) will alleviate some of the noise as it will be farther from the neighbors and not as many teams/players can be on the field at once (this is not currently in their plans, however we believe this is a great option they should look at)
- The project has consistently been about rebuilding and improving the baseball field, not a field combined with soccer and lacrosse

45.1

<https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Flood%20Park.docx>

## Letter 45

**COMMENTER:** Stefano Giovannetti

**DATE:** November 15, 2017

### **Response 45.1**

The commenter expresses support for a separate ballfield as proposed in the Landscape Plan because of the community's need for baseball fields and the prevalence of existing soccer/lacrosse fields in the area. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter also recommends a smaller, junior-sized soccer field, instead of a full-size field, to alleviate neighbors' concerns about noise. The commenter asserts that a smaller soccer field would be located farther from residents and would accommodate fewer teams and players on the field at once, which would reduce noise. While the Draft EIR does not consider an alternative with a junior-size soccer field, it analyzes a Multi-Use Field Alternative which would be located farther from neighbors than the proposed soccer/lacrosse field, reducing their exposure to athletic noise. As discussed in Draft EIR Section 7, *Alternatives*, a multi-use field under this alternative to the proposed Landscape Plan would be located about 50 feet farther from the nearest noise-sensitive receptors. This alternative would further reduce the project's already less than significant impact from athletic noise with implementation of mitigation measures to restrict noise-generating equipment and the timing of athletic events.

11-16-2017 - 23:26

Letter 46

Alan Block

Dear Carla,

Rebuilding the baseball field as a distinct and separate ballpark should remain as a primary and integral aspect of the overall Flood Park improvement project. We are not asking for a new field, we simply want to improve and rebuild the one that exists. Early on it was listed to have a higher priority than soccer in preference as identified in multiple community meetings and the online survey. A combined field was brought up late in the process virtually exclusively by some of the immediate neighbors to reduce their concerns about the noise a full size soccer/lacrosse field would generate located next to their properties. They have no objection to a separate ball field on its own.

46.1

A combined baseball, soccer, and lacrosse field will not meet the needs of the community as a whole or alleviate the sound or traffic concerns enumerated in the Draft EIR and voiced by the immediate neighbors. It is obvious that a combined field will simply turn into multiple soccer fields when baseball isn't using it which would likely be most of the time as a combined field would not meet the needs of the baseball or lacrosse community. Two soccer practices or games at the same time will generate as much traffic, and definitely more noise, than a single soccer game/practice and one baseball game/practice at the same time.

The practicality and usefulness of a combined field has been rebuked by baseball, lacrosse, and clearly, by the vast majority of the soccer community. Lacrosse and baseball share the same primary season while all three sports are largely year round in this area. Simply stated, for baseball as well as lacrosse, a combined facility is untenable and will not work. In order to have any tournaments and games at a Babe Ruth level, high school, or for college and above, there must be an outfield fence. Regardless, community demand is so great that a shared field will not suffice. There is not even one public full size baseball field in Menlo Park, and only one, at M-A High School, in Atherton. Summit and Everest, which do not have baseball fields, as well as Menlo-Atherton High School, the Menlo Park Legends, a non profit with hundreds of participants, and other club groups all want to use the baseball field. There is virtually no availability of a full size field in the immediate area for baseball. There are many soccer fields in the area including new ones such as Kelly Park and many others. M-A with two teams today and presently sharing a field with girls softball has more than sufficient demand to start a freshman baseball team but does not have a place for them to play. Observing this situation first hand over the course of many years it is clear that a baseball facility to be shared with soccer and lacrosse would never work for baseball or lacrosse.

The solution for Flood Park's surrounding community is a full size self contained baseball field. The situation in the area has changed since the Reimagining Flood Park process began several years ago. Menlo-Atherton High School is in the process of building a large and fully self-contained soccer/lacrosse field that should be completed prior to the end of this year, which the public will be able to use. It will be a fantastic facility and fully fenced; with a state of the art artificial turf surface and state of the art lighting so it can be used at night and year round. The field is large enough for multiple soccer or

lacrosse games and practices at any one time or in combination. Additionally, the lighted football field will continue to be available for soccer and lacrosse when football is not using it. This will substantially alleviate the community's need for a separate full size soccer and lacrosse field at Flood Park. We could rebuild the Flood Park baseball field as it is; remaining a separate fenced facility, and with an earlier suggestion revisited, put a relatively small junior sized soccer field next to it. This would also eliminate the need for nets, 30' or higher along the park property line, while substantially reducing overall noise levels. In combination with the new soccer/lacrosse facility at Menlo-Atherton High School this will go a long way towards meeting the needs of the bulk of the community and alleviate the loudly voiced concerns of the immediate neighbors.



46.2

Please do not hesitate to contact me if you have any questions about my comments. Thank you for giving this your full consideration.

Sincerely,

Alan Block (650) 787-7700

## Letter 46

**COMMENTER:** Alan Block

**DATE:** November 16, 2017

### **Response 46.1**

The commenter supports rebuilding the existing ballfield, as proposed in the Landscape Plan. The commenter also asserts that the Multi-Use Field Alternative would not meet the community's demand for athletic fields because lacrosse and soccer share the same primary season. These opinions about the project and an alternative do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

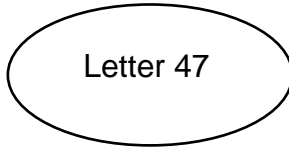
In addition, the commenter states that a multi-use field could accommodate two soccer events at once, generating as much traffic and more noise than simultaneous soccer and baseball events on separate fields. It is acknowledged that a multi-use field could host more than one non-baseball athletic field at one time, during times of peak demand. On the whole, however, as discussed in Draft EIR Section 7, *Alternatives*, the Multi-Use Field Alternative would allow for fewer simultaneous athletic practices and games on a single field than would the proposed separate ballfield and soccer/lacrosse fields. Therefore, it would generate incrementally fewer new vehicle trips for active recreation than would the proposed Landscape Plan.

### **Response 46.2**

The commenter suggests adding a junior-sized soccer field next to the proposed reconstructed ballfield, claiming that a smaller field would eliminate the need for netting reaching 30 feet in height and reduce overall noise levels. Whereas the proposed soccer/lacrosse field could require netting to prevent lacrosse balls from leaving the playing field, for safety purposes, a junior-sized field exclusively used for soccer would not require netting. As discussed in Draft EIR Section 4.1, *Aesthetics*, netting would have a minor adverse visual effect, although implementation of Mitigation Measure AES-1 to install neutral-colored netting would reduce this impact to less than significant. A soccer field without netting would incrementally reduce the project's already less than significant aesthetic impact. Nevertheless, the EIR does not evaluate the requested scenario because alternatives are intended to reduce a project's significant environmental impacts, and the Landscape Plan's aesthetic impacts would be less than significant.

A smaller field also could be sited farther from residences on Del Norte Avenue than would the proposed soccer/lacrosse field, which would incrementally reduce their exposure to noise from athletic events. However, the Multi-Use Alternative analyzed in the Draft EIR would result in the same effect, increasing the setback between residences on Del Norte Avenue and soccer and lacrosse uses from approximately 100 to 300 feet. As discussed in Draft EIR Section 7, *Alternatives*, 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 prohibit the loudest equipment without an approved special event permit and to further restrict the timing of athletic events.

11-16-2017 - 23:26



Alexander Haskin

I live near the park and I am not concerned about the traffic or noise impacts. Alternative 3 would be the best option to get the most out of Flood Park.

47.1



## Letter 47

**COMMENTER:** Alexander Haskin

**DATE:** November 16, 2017

### **Response 47.1**

The commenter favors Alternative 3: Multi-Use Field in the Draft EIR “to get the most of Flood Park.” This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 17:44

Letter 48

Alice Newton

[https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Alice%27s%20comments%20re.%20Flo  
od%20Park%20DEIR.docx](https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Alice%27s%20comments%20re.%20Flo<br/>od%20Park%20DEIR.docx)

11/16/17 Feedback on Flood Park DEIR sent to Parks Department from Alice Newton  
1023 Del Norte Avenue, Menlo Park.

We have lived at 1023 Del Norte Avenue immediately adjacent to Flood Park since 1987. We value the friendly, usually quiet environment and have been involved over the years during the various times our neighbors organized to address issues of traffic, parking on our streets, and safety issues. **Neighbors Nettie Wijsman and Doug Bui shared their DEIR feedback comments with me. I am in agreement with all that each of them wrote so, rather than repeating, I request that you consider their comments to represent my opinions as well and I will just submit some additional concerns.**

48.1

**You will see that I identify many issues as due to fees charged for parking.**

**Mitigation question: Would the Parks Dept. be willing to try not having parking fees for at least a year with this being highly advertised?**

48.2

**My other major concern has to do with the inevitable noise impact from the soccer/lacrosse field proposed in the northeast quarter of the park immediately adjacent to properties on my street, Del Norte Ave.**

### **PROBLEMS OF INCREASED TRAFFIC**

Regarding the DEIR analyses of traffic at the Marsh Road/Bay Road intersection, along Bay Road between Marsh and Ringwood, the entrance to the park, the Bay Rd./Ringwood/Sonoma intersection, and the neighborhood streets on both sides of the park:

1) As stated in the DEIR, the intersection at Bay Rd. and Ringwood is already at LOS C and the DEIR concludes that any additional trips would degrade it unacceptably and that there is no feasible mitigation.

48.3

2) I believe that the DEIR greatly underestimates the current and future traffic coming to the park from Marsh Road. People from Redwood City, North Fair Oaks, and Belle Haven as well as Atherton, parts of Menlo Park, and elsewhere must come that way. Groups listed in the DEIR such as the Sheriff's Activity League will come that way. Marsh Road is one of the main feeder roads to Hwy.101 and the Dumbarton Bridge and is already choked during both morning and evening commute hours.

48.4

3) Bay Rd. is already quite congested during both morning and evening commute hours. Cars coming from Ringwood will be turning right into the park from Bay while cars coming from Marsh will be turning left into the park. Simultaneously, some cars exiting the park will want to turn left onto Bay Rd. As games at the sports fields end and the next players set up many cars will be entering and leaving the park. This would be exacerbated if several sport events occurred in the park at the time party groups were arriving or leaving.

48.5

4) Bay Rd. is the only connection to streets in the neighborhoods between Marsh Rd. and Flood

↓ 48.6

Park. Being choked with traffic as it already is during commute hours is not only inconvenient but a safety hazard for those residents. Choked traffic has already occurred on Bay Rd. on weekends too such as Easter Sunday, 2016, when there were large events in Flood Park.



5) Cut-through traffic in Flood Triangle is an old and daily occurrence and will worsen with increased congestion. Cars coming east on Bay Rd. such as from Flood Park turn left onto Del Norte (my street), right on Oakwood Place, and right on Sonoma to get an advanced place at the Bay Rd./Ringwood/Sonoma intersection. They speed! Years ago, a “No Left Turn, M-F, 7-9 a.m.” was installed on Bay Rd. just west of Del Norte. Many cars don’t see it or ignore it. Tickets are only occasionally given. This problem will increase as traffic increases on Bay Road and left turns onto Del Norte Ave. may have to be prohibited and enforced during afternoon commute hours too.

48.7

Cut-through traffic is also increasing in other neighborhoods such as Lindenwood, North Fair Oaks, and Menlo Oaks.

**TRAFFIC MITIGATION QUESTIONS:**

A) I question that the stated possible mitigations regarding collecting parking fees will sufficiently counter this problem. Even if there is no parking fee or if people dropping off players are not required to pay a fee, this problem of lining up at the entrance choking traffic on Bay Road will likely happen. Heaven forbid an accident happening.

48.8

B) If the parking lot is at or near capacity which already occurs during busy party times both weekdays and weekends, cars will be waiting for a car to vacate a space which will also clog the lanes in the park. (If the parking lot were expanded, e.g. by purchasing and using the Flood School site, it would help the parking situation, but not the traffic congestion on Bay Road or the intersections. **What ways will you explore to expand the parking lot?**

48.9

C) Not allowing games or practices between 4-6 p.m. on weekdays would help relieve the above traffic congestion problems during those hours and would likely be essential because the Marsh/Bay Rd./Ringwood traffic commute congestion is probably going to worsen anyway, not improve in the foreseeable future.

48.10

The park closes at 5:00 during the winter months and at 6 or 7 p.m. until daylight is longer, so essentially the fields would not be available in afternoons for practices for about half of the school year. **This appears to be the only viable mitigation for the traffic congestion problem although it curtails the availability of the fields.** However, severe traffic congestion is not only inconvenient causing delays for all, including players trying to get to games and practices on time, it is unsafe for various reasons one of which is that parents might not be able pick up their kids on time especially if they have kids to pick up in several locations.

**PROBLEM OF PARK USERS PARKING ON NEIGHBORHOOD STREETS:**

This is also a historic and current occurrence which is why it is restricted Fri-Sun April 1-Oct. 31 on neighborhood streets near the park. Increased use of the park will happen due to increased amenities, especially new sports areas.

48.11

### **MITIGATION QUESTION**

**If “Educating park users” as stated in the DEIR would not be possible or effective. The parking restriction will need to be increased to daily, year-round, new signs made, and the restriction enforced. Residents of restricted streets will need new permits. Will the City of Menlo Park commit to doing this?**

48.12

A main reason some park users park on neighboring streets is avoidance of the parking lot fee. Availability of advanced purchase of parking fees (i.e. an entrance card) is not well known, but also the fees discourage low-income people and those who don’t plan to stay long from using the parking lot. (Examples are the regular M-F afternoon volleyball players and people bringing children to the playground after school.) Parks located within city limits don’t usually charge fees. What can the Parks Dept. propose to offset this fee?

48.13

**PROBLEMS AND MITIGATION QUESTIONS RE: PARKING AND DROP-OFFS AT THE PEDESTRIAN GATES ON 1) BAY ROAD AND 2) ON IRIS LANE Both are important to neighbors who walk to the park daily.**

1) Cars often park in the bike lane by the gate on Bay Road forcing bicyclers onto Bay Road. Although this is a Menlo Park safety and enforcement issue, the reason is people avoiding the parking lot fee. Again, what can the Parks Dept. propose to offset this fee?

48.14

2) Cars parking on streets near the Iris Lane and sometimes leaving trash are an old problem. Menlo Park rarely enforces the parking restriction. Again, currently the main reason is avoiding the parking lot fee, but if there is a sports field right inside that gate, people will both drop-off players and park to avoid both the traffic congestion and parking lot fee. This will greatly increase traffic on Iris Lane, Del Norte Ave, Tehama, Sonoma, Ringwood, and Van Buren. Also, it is not a safe location for young people to wait to be picked up. However, that gate is useful to neighborhood residents including people from Haven House and it would be a shame to lock it.

48.15

### **SUGGESTED MITIGATIONS:**

- A) **Eliminate the parking lot fee.**
- B) **Sports fields should be in the interior of the park such as in a multiuse field near the parking lot.**
- C) **Cameras should be placed near that gate for ticketing violators. (Residents would need to have their parking permit visible.)**  
**Will the City of Menlo Park commit to implementing this?**

**NOISE PROBLEMS:**

**Nettie Wijsman and Doug Bui both addressed noise concerns not adequately addressed in the DEIR. I agree with their concerns and questions.**

**ADDITIONAL CONCERNS OF MINE:**

- 1) Impulse noise from the basketball and volleyball courts located near Del Norte residents' back yards is not addressed in the DEIR but surely will have a negative impact on those neighbors.

48.16

**Mitigation question: Is the Parks Dept. willing to consider moving the basketball and volleyball courts to the center area of the park?**

- 2) Part of the new paved trail in the Preferred Plan is much too close to the back yards of residents on Del Norte Ave. Noise and dust from leaf blowers will have a negative impact on them. Continuing to use the existing paved trails will avoid this problem and will ensure that the long-established root systems of the trees many of which are lateral roots near the surface won't be needlessly disturbed.

48.17

The grove of heritage redwood trees at the Bay Rd/Del Norte Ave. corner of the park is the main pristine area of the park with the least development. A church group often brings chairs and has their service there. We like to hear them and are grateful for this special area in the park. The new paved trail in the Preferred Plan goes right through it and a new exercise station is located there.

**Mitigation question: Is the Parks Dept. willing to consider moving the new trail and exercise station away from that special redwood grove, possibly keeping the current trail?**

- 3) I regularly bring my young grandson to the playground. It is used daily by locals often pushing strollers or bringing kids on bikes and is a major feature drawing people to the park. The proposed new all-abilities adventure model would be even more of an attraction, and will be very helpful to parents who would benefit from a place to wait with younger kids while older ones participate in sports.

48.18

The parking lot fee discriminates against parents who don't live close enough to walk to the playground which is another reason I believe the fee should be eliminated.

**Mitigation questions: Is the Parks Dept. willing to consider moving the**



**development of the new playground to Phase I?**

**Is the Parks Dept. willing to consider the following significant features?**

- **all-abilities equipment**
- **a dedicated toddler play area**
- **a low drinking fountain**
- **low picnic tables (Burgess Park has perfect ones)**
- **location near to bathroom with changing tables**
- **shade**

**Is the Parks Dept. willing to consider eliminating the parking lot fee so more people will come to the playground?**

#### **IMPACT OF TOXIC FUMES FROM TRAFFIC ON CHILDREN IN THE PARK**

- 4) The DEIR does not address the impact of toxic fumes coming from Hwy. 101, congested Bay Rd. traffic, or the parking lot on park users, especially children playing sports and breathing deeply near these areas of higher air pollution levels. There has been a recent discussion on Nextdoor among neighbors of Flood Park questioning why Flood School is still closed. It was pointed out that being within 500 ft. of Hwy. 101, it is within the area prohibited by CA law to have a school.

If it is now known that it is not safe to have a school within 500 ft. of a highway, it is probably not prudent to have sports fields there either. (I realize that Greer Park in Palo Alto is near Hwy. 101, but that doesn't mean it is all right to build new fields near freeways.) Here is a link to an article on this by the American Lung Association:

<http://www.lung.org/our-initiatives/healthy-air/outdoor/air-pollution/highways.html?referrer=https://www.google.com/>

48.19

**MITIGATION QUESTION: Is the Parks Dept. willing to investigate possible health impacts of locating sports fields within 500 ft. of Hwy. 101?**

**What mitigation measures would the Parks Dept. be willing to consider regarding location of sports fields in Flood Park?**

#### **IMPACT OF PROPOSED PREFERRED PLAN ON THE HISTORIC AND HIGHLY VALUED NATURAL ENVIRONMENT OF FLOOD PARK INCLUDING ITS MANY BEAUTIFUL HERITAGE TREES**

The description of Flood Park on the Park Dept. website is that it is a natural retreat area with many heritage trees. This natural aspect of Flood Park was highly valued among attendees at the scoping meetings, yet the Preferred Plan proposes to remove around 80 trees, including heritage ones to accommodate the new design.

**MITIGATION QUESTION: Stated mitigations in the DEIR including planting new trees that would eventually be heritage ones. I didn't see mitigations in the DEIR to tweak the design and save many current heritage trees. Are there?**

48.20

**IMPACT ON CURRENT PICNIC AREAS**

Since I live next to Flood Park, I know it is currently used by many families and groups from the surrounding localities such as Belle Haven (Menlo Park), North Fair Oaks as well as corporate parties from various areas of the Peninsula. Especially on weekends during good weather, many are used. Again, **if there was no parking lot fee**, I believe more families would come to the park for picnics, especially once the playground is improved and expanded. The current picnic areas have historic tables and barbeque pits that I think with minor repairs could still be used. It is not clear to me in the DEIR which current picnic areas are slated to be eliminated, where picnic areas would be in the Preferred Plan, and for what size groups. The diagrams I have do not make that clear.

48.21

**Mitigation question: Can you please give us a more detailed diagram of the picnic areas and amenities that doesn't have them obscured by drawings of trees?**

Thank you,

Alice Newton  
1023 Del Norte Avenue  
Menlo Park



## Letter 48

**COMMENTER:** Alice Newton

**DATE:** November 16, 2017

### **Response 48.1**

The commenter expresses agreement with comments provided by Nettie Wijsman and Doug Bui. Please refer to the responses to Letters 22 and 69 for a discussion of comments provided by those individuals.

### **Response 48.2**

The commenter asks if the County would be willing to try waiving parking fees for at least a year and advertising this fee waiver. Please refer to Topical Response B: Transportation Impacts for a discussion of parking mitigation.

### **Response 48.3**

The commenter restates the Draft EIR's finding that additional vehicle trips would degrade the Bay Road/Ringwood Avenue intersection to unacceptable conditions, without feasible mitigation. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 48.4**

The commenter believes that the Draft EIR underestimates current and future traffic associated with Flood County Park from Marsh Road because it is one of the main feeder roads to Highway 101 and the Dumbarton Bridge. As discussed on page 10 of the Traffic Impact Study prepared for the Draft EIR (see Appendix H), existing traffic conditions were evaluated in the Vistro 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 three 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 and the County's anticipated increases in active and recreation use at the park. Therefore, the EIR's traffic analysis is based on the best available supporting evidence.

### **Response 48.5**

The commenter asserts that vehicle trips associated with simultaneous athletic events and other group events at the park would exacerbate existing traffic congestion on Bay Road during peak hours. Please refer to Topical Response B: Transportation Impacts for a discussion of the project's traffic impacts on Bay Road.

### **Response 48.6**

The commenter claims that traffic congestion on Bay Road, especially during large events at Flood County Park, poses a traffic hazard for residents. Impact T-4 in Draft EIR Section 4.9, *Transportation and Circulation*, analyzes potential traffic hazards attributed to the proposed Landscape Plan. As discussed therein, the Landscape Plan would not alter the offsite circulation system and would introduce minor modifications to the on-site surface parking lot, including a pick-up and drop-off area. No potential design hazards such as sharp curves, dangerous intersections, or new incompatible uses are proposed. Existing bike lanes and sidewalks on Bay Road would safely

accommodate bicyclists and pedestrians en route to the park. Therefore, the project would have no impact related to traffic hazards.

### **Response 48.7**

The commenter states that cut-through traffic in the Flood Triangle is an existing and worsening problem. Motorists who cut through the neighborhood speed and often ignore a “No Left Turn” restriction on Bay Road west of Del Norte Avenue, the commenter contends. It is acknowledged that motorists currently use Bay Road as a cut-through route between Willow Road and Marsh Road. However, new vehicle trips to and from Flood County Park under implementation of the Landscape Plan would not increase cut-through traffic because their destination would be within the Flood Triangle neighborhood. Please refer to Topical Response B: Transportation Impacts for a discussion of the project’s overall effect on traffic congestion.

The commenter also surmises that traffic congestion may require the prohibition of left turns from Bay Road onto Del Norte Avenue during P.M. peak hours. As discussed in Draft EIR Section 4.9, *Transportation and Circulation*, the Landscape Plan would increase existing traffic congestion near the park; however, it would not require new restrictions on turning activity to alleviate congestion.

### **Response 48.8**

The commenter asserts that queuing of vehicles on Bay Road near the park entrance would likely occur even if the County waives a parking fee or allows people to drop off athletic users without a parking fee. Impact T-1 in Draft EIR Section 4.9, *Transportation and Circulation*, states that the Landscape Plan 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. Queuing behavior could occur during peak summer months, especially with the operation of the proposed athletic fields in Phase I of the Landscape Plan. However, the County would allow participants in programmed active recreational activities to be dropped off and picked up inside the park without paying an entrance fee. This practice would substantially speed up the admission of vehicles into the parking lot during pick-up and drop-off times for athletic events. Mitigation Measure T-1 also would facilitate access to the parking lot by visitors paying an entrance fee. This measure would require implementation of new collection practices for parking fees such as automated fee machines, playing upon exiting the park, or a combination of both practices. With implementation of Mitigation Measure T-1, the County would reduce delays on Bay Road from queuing behavior at the park gate to a less-than-significant impact. Please refer to Topical Response B: Transportation Impacts for further discussion of parking-related impacts.

### **Response 48.9**

The commenter asks how the County will consider expanding the parking lot at Flood County Park to accommodate vehicles during peak use times. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 48.10**

The commenter states that prohibited athletic events between 4 and 6 P.M. on weekdays, as considered in the Draft EIR’s Reduced Athletic Programming Alternative, would help relieve traffic congestion. This comment is consistent with the Draft EIR’s finding that the Reduced Athletic Programming Alternative would incrementally reduce the project’s significant and unavoidable impact on traffic congestion.

The commenter also states that earlier closure of the park during part of the school year would curtail availability of the proposed athletic fields, reducing traffic congestion. This statement is acknowledged. Please refer to Response 44.7 for a discussion of how the park's earlier closing times from September through March would limit evening events.

In addition, the commenter claims that traffic congestion poses a traffic safety hazard, especially to children waiting to be picked up at the park. Phase I of the proposed Landscape Plan includes a proposed drop-off area in the park's parking lot near the playground area. This drop-off area would provide a safe location for children using the park, including participants in programmed athletic events, to be picked up. The County would encourage use of the drop-off area by allowing athletic participants to be dropped off and picked up there without paying an entrance fee. As discussed in Response 44.11, Mitigation Measure T-5(b) also would require the County to install signage informing park visitors of alternative pedestrian routes that avoid the use of the Bay Road segment that lacks a sidewalk. This measure would reduce the exposure of pedestrian park users to traffic safety hazards. Therefore, traffic congestion would not pose a substantial safety hazard to children using the park.

### **Response 48.11**

The commenter asserts that the project would result in increased parking on neighborhood streets. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 48.12**

The commenter speculates that educating park users of neighborhood parking restrictions, as required by Mitigation Measure T-6 in the Draft EIR, could be ineffective, and asks if the City of Menlo Park would commit to expanding permit parking to year-round. This comment is speculative and does not provide specific evidence that Mitigation Measure T-6 could be ineffective at educating park users. Please refer to Topical Response B: Transportation Impacts for further discussion of parking impacts.

### **Response 48.13**

The commenter states that the parking fee to enter Flood County Park discourages people from parking on-site and leads to parking on neighboring streets. The commenter asks how the County can offset the parking fee. Please refer to Topical Response B: Transportation Impacts for further discussion of parking impacts.

### **Response 48.14**

The commenter states that people currently park in the bike lane on Bay Road, forcing bicyclists into travel lanes, in an effort to avoid the parking lot fee. The commenter reiterates the same question of how the County can offset the parking fee. Please refer to Topical Response B: Transportation Impacts for further discussion of parking impacts.

### **Response 48.15**

The commenter asserts that the proposed athletic field near the Iris Lane gate would lead to increased drop-off activity there, traffic congestion on nearby residential streets, and unsafe conditions for children waiting to be picked up. The commenter suggests eliminating a parking fee, moving the sports fields to the interior of the park, and places cameras near the Iris Lane gate for ticketing violations. Please refer to Topical Response B: Transportation Impacts for further discussion of parking impacts.

**Response 48.16**

The commenter states that the Draft EIR does not address impulse noise from basketball and volleyball courts. Although basketball and volleyball activity would generate noise, Draft EIR Section 4.8, *Noise*, finds that the loudest athletic activity at Flood County Park would occur during games and practices at the proposed soccer/lacrosse field. This field would be located at least as close to adjacent residences as would the proposed basketball and volleyball courts. The Draft EIR quantifies the exposure of nearby residences to the loudest athletic events. Therefore, it provides an adequate analysis of noise impacts from athletic activity.

The commenter also asks if the County would consider moving the proposed basketball and volleyball courts to the center of the park. As discussed above, the proposed athletic fields would generate the loudest noise at nearby residences. However, the Draft EIR finds that athletic noise would be less than significant with implementation of Mitigation Measures N-3(a) and N-3(b) to restrict sound amplification, air horn use, and the timing of athletic events. Please refer to Topical Response A: Noise Impacts for further discussion of noise impacts and mitigation.

**Response 48.17**

The commenter asserts that noise and dust from leaf blowers would have an adverse impact on residents on Del Norte Avenue and recommends the continued use of existing paved trails. Please refer to Response 44.8 for a discussion of impacts from leaf blowers.

Additionally, the commenter asks if the County would consider moving the proposed trail and exercise station away from the redwood grove at the northeast corner of the park. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 48.18**

The commenter requests consideration of moving the proposed new playground to Phase I of the Landscape Plan and the addition of several new recreational features to the project. In addition, the commenter asks for elimination of the parking lot fee to increase use of the playground. These comments do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 48.19**

The commenter asserts that the Draft EIR ignores the exposure of athletic users located within 500 feet of Highway 101 to toxic fumes. The commenter links to article on air pollution by the American Lung Association and asks for mitigation to reduce exposure. However, Impact AQ-4 in the Draft EIR Section 4.2, *Air Quality*, analyzes the exposure of park users to toxic air contaminants (TACs). As discussed therein, the main source of toxic air contaminants (TACs) at the project site is U.S. 101, which runs approximately 410 feet northwest of the project boundary. Since the Landscape Plan would increase public use of the park, new users may be exposed to TACs near the project site. However, it is expected that, at a maximum, park users would only visit for a couple of hours per day (or even per week). Due to this low duration of exposure, park users would not be exposed to TACs for long periods of time that would affect health. The American Lung Association article cited by the commenter addresses long-term exposure of residents living near highways and does not conflict with the analysis of short-term park users. Therefore, the impact of exposure of new park users to TACs would be less than significant.

### **Response 48.20**

The commenter asks if the Draft EIR includes mitigation to alter the Landscape Plan's design and save heritage trees. Draft EIR Section 4.3, *Biological Resources*, evaluates the project's effect on protected heritage trees. With implementation of Mitigation Measures BIO-2(a) and 2(b) to replace removed heritage trees and protect remaining trees during construction, the Landscape Plan would have a less than significant impact on protected trees. Alteration of the Landscape Plan to retain additional heritage trees would not be required to avoid a significant impact.

### **Response 48.21**

The commenter asks for clarification on how the Landscape Plan would affect existing picnic areas. As shown in Table 5 in Draft EIR Section 2, *Project Description*, the Landscape Plan would involve renovations of the individual picnic areas during Phase II and of the ground picnic areas with shade shelters during Phase III. Existing picnic areas in the southern portion of the park would be reconstructed. The proposed Landscape Plan would not reduce the area of picnic space.

The commenter also asks for a more detailed diagram of the picnic areas and amenities that is not obscured by drawings of trees. The proposed Landscape Plan's layout, as shown in Figure 4 in Draft EIR Section 2, *Project Description*, labels the location of picnic areas (Item 15). This conceptual diagram of the Landscape Plan has a sufficient level of detail for the purpose of the EIR's programmatic analysis of long-term recreational improvements. More detailed plans for rehabilitation of the picnic areas would be developed during Phases II and III, prior to construction.

11-16-2017 - 09:55

Letter 49

Alpine Strikers FC

Alpine Strikers FC is a local soccer club serving a few communities in the San Mateo County and is directly impacted by the redevelopment of Flood Park. Alpine Strikers FC supports the Flood Park redevelopment with one of the fields being a soccer specific field. Alpine Strikers FC strongly advocates for a fair and transparent process for allocating the fields at Flood Park and negate any back room deals that might have already been made on the county government level. Our soccer organization consists of 750 players who reside in San Mateo County.

49.1

## Letter 49

**COMMENTER:** Alpine Strikers FC

**DATE:** November 16, 2017

### **Response 49.1**

The commenter, a local soccer club in San Mateo County, expresses support for redevelopment of Flood County Park with a soccer-specific field. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 23:37

Letter 50

Bobette Nicholl

I have been the owner of the house located at 307 Hedge Road, Menlo Park, CA 94025, for about the last 20 years. In fact, I grew up in that house, which was purchased by my parents in 1956. This property is adjacent to Flood Park and to James Flood School (located on Sheridan Drive). My house is immediately adjacent to the baseball field in the back corner of Flood Park.

I have read and I approve the Flood County Park Landscape Plan and Draft Environmental Impact Report, SCH#2016112040. However, my biggest regret about developing Flood Park is the loss of the 78 trees, as identified in the Draft Environmental Impact Report. It would be nice if those trees could be moved elsewhere in the park and within Menlo Park, instead of being killed.

50.1

50.2

Regards,

Bobette A. Nicholl



## Letter 50

**COMMENTER:** Bobette Nicholl

**DATE:** November 16, 2017

### **Response 50.1**

The commenter expresses approval of the proposed Landscape Plan and the Draft EIR. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 50.2**

The commenter recommends that existing trees at Flood County Park be relocated in the park and within Menlo Park instead of removed under implementation of the Landscape Plan. Although it is physically possible to transplant mature trees that would be removed from the park, this process is likely to involve major trimming of extensive root systems and can result in transplant shock, leading to branch dieback or mortality. In addition, suitable locations for transplanting must be found and the process is costly. Because of existing and proposed recreational facilities proposed at Flood County Park, there is minimal space to relocate the estimated 80 trees that would be removed during Phases I through III of the Landscape Plan. Furthermore, it would not be feasible to require relocation and post-transplantation care of all removed trees. However, Mitigation Measure BIO-2(a) in the Draft EIR would require replacement of removed heritage trees at a 1:1 ratio within the park. The Landscape Plan would also preserve the majority of existing heritage trees, especially specimen oak trees in the center of the park and redwood trees in the picnic area. Therefore, the project would have a less than significant impact on protected trees.

Letter 51

11-16-2017 - 17:16

Brian Roberts

I would like to express my support for the preferred plan upgrade to Flood Park.

This community is in dire need of baseball fields and having a dedicated option to support the Menlo Park and Atherton communities is critical. The expansion of M-A High School student population has impacted all sports teams, but the demand for baseball cannot be met by the current facilities. A full sized baseball field available to the community would dramatically help the footprint that M-A High School serves.

Menlo-Atherton Little League has done a tremendous job of building a baseball community for players 12 years and younger. The absence of a dedicated full sized complex restricts the further development of that community as players are left to look outside the community for development. A dedicated complex would allow for the continued matriculation of youth athletes.

This community will benefit greatly from the upgrade to Flood Park and the Preferred Plan does the best job of addressing the needs of all constituents.

Thank you for the opportunity to express my support for the Preferred Plan and dedicated baseball field.

Regards,

Brian Roberts

51.1

## Letter 51

**COMMENTER:** Brian Roberts

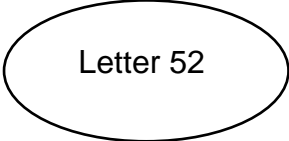
**DATE:** November 16, 2017

### **Response 51.1**

The commenter expresses support for the proposed Landscape Plan because of a “dire need” for dedicated baseball fields in the community. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 16:30

Carol Schultz



Feedback on the Flood Park EIR and additional comments

Submitted by Carol Schultz, Menlo Park resident of the Willows Neighborhood, and UC Master Gardener

Thank you for all the work that has gone into the refurbishing of Flood Park and for this opportunity to give feedback on the current plan.

I wish to second the considerate feedback given by John Andrews of San Carlos, which I have attached on my next feedback form, if you need it.

52.1

In particular I wish to emphasize the need to avoid using artificial turf, which he mentioned in his goal 1 for the park (to minimize the negative impact on the environment by any of the development).

At the meeting I attended on November 1, it was mentioned by another attendee that in choosing artificial turf for the new middle school, authorities were sure that the turf is of no danger to the health of children playing on it. I hoped that was now true, but did some research to confirm this fact. It could not be confirmed. I attach the statements from the Consumer Product Safety Commission that show they have not yet come to a definitive decision about the safety of artificial turf.

52.2

I realize that the fields may not be constructed immediately, and would strongly lobby for the measures taken by the city of San Carlos at Crestview Park, if the safety cannot be proven when construction approved. Our children are too precious a resource to put in danger.

52.3

[https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/www.SynTurf.org\\_.pdf](https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/www.SynTurf.org_.pdf)

## Sunshine is the best disinfectant -- L. Brandeis



Home	What's New	Index (alphabetical)	Introduction	Alternative Infill	Beckham's Lament	Bisphenol-A (BPA)	Boston College Brief	Braun Intertec Report	Breaking News				
Carbon Footprint	CDC	CMR.org	CPSC	Crumb Rubber	Disposal	EHHIBrief	EPA	Events	Fact Sheets	Forbidden Fields	Go, Slow	Grass Roots Notes	Health & Safety
Heat Effect	Heat Warning Signage	Industry Notes	Just Words!	Lawsuits	Lead	Lighting	Maintenance/Replacement	Migration	Miscellanea	Moratoriums	Nantucket Brief		
Newton Brief	Nitrosamines	Particulate Matter	Phthalates	Players' View	Precautionary Principle	Process	San Francisco Brief	Say, "No!"	Sciaca Heat Study	Silica			
Staph & Turf Brief	Staph News	Vandalism	Warnings!	Water Damage	Weights & Measures	Wellesley Brief	Westmount Brief	Westport Brief	Wrap Up Articles	Zinc	Contact		

**[No. 12] CPSC Chair changes tune about investigation of crumb rubber.** According to a news report by George Colli of Eyewitness News on *WFTV* (ABC-affiliate in Orlando, Florida, entitled “Watchdog group calls for federal investigation into crumb rubber,” dated 26 January 2016 at <http://m.wftv.com/news/news/local/watchdog-group-calls-federal-investigation-crumb-r/nqCwH/> -- Chairman Elliot Kaye of the Consumer Product Safety Commission ‘is calling for a multi-agency federal investigation into health hazards allegedly linked to tire crumb rubber artificial turf and playground mulch... With the product being used on playgrounds and athletic fields, Elliot says the long term health effects are impacting children of all ages.’ He is heard on the video uttering the following sentiments – “What I hope to see out of this is that all the federal agencies that have jurisdiction, including the Consumer Product Safety Commission, will come together and have the type of collaboration that we need to come together... Pooling resources and authorities to give parents the answers that they need... If there can be this federal effort, this joint effort, then we can do our part to assist in that... We can help more on the playground side, so if the other agencies can take the lead on the artificial turf side, that would be the ideal solution.”

See companion story “US Senators Blumenthal and Nelson ask POTUS to initiate a comprehensive study into the potential health risks posed by crumb rubber playing surfaces” at <http://www.synturf.org/crumb-rubber.html> (Item No. 53)

**[No. 11] U.S. Senators Richard Blumenthal (D. Connecticut) and Bill Nelsons (D. Florida) ask that Consumer Product Safety Commission to immediately conduct an independent, comprehensive investigation to determine the true health risks of exposure to crumb rubber.**

According to a press release by U.S. Senator Richard Blumenthal, dated 4 November 2015, Blumenthal and Bill Nelson (D-Fla.), Ranking Member on the Subcommittee on Consumer Protection, Product Safety, Insurance, and Data Security and Ranking Member of the Senate Commerce Committee respectively, have written to the Consumer Product Safety Commission (CPSC) to immediately conduct an independent, comprehensive investigation to determine the true health risks of exposure to crumb rubber made from scrap tires that is increasingly used across the country to make or fill playgrounds and artificial turf fields. In the senators’ letter to CPSC Chairman Elliot F. Kaye, they highlighted the current lack of conclusive evidence on health risks of crumb rubber and the urgent need to study full health effects from exposure, noting that athletes and young children are two groups that come in frequent contact with rubber turf and most vulnerable for any serious risks.” Read the letter <http://www.blumenthal.senate.gov/newsroom/press/release/blumenthal-nelson-demand-independent-federal-investigation-into-health-risks-from-childrens-playgrounds-and-artificial-turfs-made-with-crumb-rubber-from-scrap-tires> or [here](#).

**[No. 10] Public Employees for Environmental Responsibility (PEER): [Synthetic] Turf lobbyists cultivate Consumer Product Safety Commission.** On 28 April 2015, PEER posted the following commentary on how the CPSC depends on artificial turf industry for scientific and enforcement guidance!

Washington, DC —The principal information the U.S. Consumer Product Safety Commission uses to assess the health effects of synthetic turf is supplied by industry lobbyists, according to internal records released today by Public Employees for Environmental Responsibility (PEER). Emails and other records obtained by PEER in a Freedom of Information Act (FOIA) lawsuit detail how these lobbyists are allowed closed-door briefings and other direct contacts with key CPSC staff assigned to investigate their products.

In response to a PEER filing, the CPSC declared on September 27, 2013 that it had ordered its Office of Compliance and Field Operations to undertake a “review and determination of whether any enforcement action is appropriate” for artificial turf playgrounds containing lead at levels well above legal limits for a children’s product. More than a year later, CPSC would not answer requests for information about the

status of that enforcement review. In February of this year, PEER filed a FOIA lawsuit.

The thousand plus pages that CPSC has released in response to that suit do not provide an answer as to the outcome of the enforcement review but do reveal the extent of the agency's reliance on industry:

- CPSC possesses no independent information on toxicity of synthetic playgrounds. The only agency sampling has been for lead but it has taken no action when unsafe lead levels are found;
- After media reports of soccer goalies who have played for years on artificial turf contracting non-Hodgkin's lymphomas at an alarming rate, CPSC was briefed on the issue by the vice-president for marketing of a leading manufacturer; and
- Industry representations to CPSC on voluntary standards to address chemical exposure of children in contact with these surfaces are exaggerated or untrue.

"These records depict a consumer watchdog which has learned to play dead too well," stated PEER Executive Director Jeff Ruch, noting that CPSC has not indicated when it will complete document production in this case. "While industry gets unfettered access, consumer complaints about excess lead get the run-around before they are forgotten altogether."

The attitude inside CPSC may be encapsulated by an exchange in which one staffer tested a green tarp and got "Lead and chrome results similar to artificial turf, 3000ppm Pb, 1800ppm Cr." By contrast, the legal limit for lead content in a children's products is 100 parts-per-million (ppm). The emailed response from the CPSC's chief field investigator for artificial turf was "don't chew on it."

"Congress imposed stricter standards for children's products because of their special vulnerability to chemical exposure," added Ruch, pointing out that experts maintain there is no safe level of lead exposure for children. "For years now, we have tried to engage the Commission without apparent success in examining products marketed as play surfaces for very young children containing illegally high levels of lead. The agency appears to be captured by the industry it is supposed to regulate."

For the link to this piece as well as links to other PEER statements go to <http://www.peer.org/news/news-releases/turf-lobbyists-cultivate-consumer-product-safety-commission.html#.VWfNa9IzX2R.mailto> or click [here](#).

**[No. 9] Chairman of the Consumer Product Safety Commission has deep concerns with the (2008) press release that said synthetic turf fields OK to install, OK to play on.** According to a news report on *WSB-TV 2* (ABC affiliate, Atlanta, Georgia) (29 April 2015), "[t]he Consumer Product Safety Commission is no longer standing by the safety of crumb rubber used in artificial turf and playgrounds. In 2008, the agency posted an article called: "CPSC Staff Finds Synthetic Turf Fields OK to Install, OK to Play On." However, the agency appears to be re-evaluating its position." Scott Wolfson, the Communications Director for the Consumer Product Safety Commission, told WSB-TV that "[the CPSC] Chairman Elliot Kaye has deep concerns with the (2008) press release and it is not the agency's current position. What was done in 2008 was not good enough to make a claim either way as to the safety of those fields." Source: Rachel Stockman, "CPSC no longer stands by safety of artificial turf," on *WSB-TV 2* (ABC affiliate), 29 April 2015, at <http://www.wsbtv.com/news/news/local/cpsc-says-they-no-longer-think-crumb-rubber-artifi/nk6Ch/>.

**[No. 8] CPSC declares that synthetic turf is exempt from child safety standards because it is NOT a children's product: Video proof to the contrary!** According to a communication received from [www.ehhi.org](http://www.ehhi.org), as each branch of government washes its hands of dealing with the toxic issues in both synthetic turf and rubber tire mulch in toddler playgrounds -- children of all ages continue to be exposed to the chemicals in rubber tires used both as playground mulch and synthetic turf infill. Watch this: [http://www.youtube.com/watch?v=\\_0lAmHiMcqQ](http://www.youtube.com/watch?v=_0lAmHiMcqQ) (*Dear US Consumer Product Safety Commission, Synthetic Turf is a Children's Product*) from *SF Parks* (Published on 19 February 2014).

**[No. 7] Consumer Product Safety Commission "corrects" is earlier publication on artificial turf.** On 30 July 2008, the CPSC issued a press release [08-348]. On 21 March 2013, Public Employees for Environmental Responsibility (PEER) requested that CPSC "rescind and correct its online and printed information declaring artificial turf to be 'OK to install, OK to play on,'" and take other actions under the Information Quality Act (IQA) and the Consumer Product Safety Commission's (CPSC) Information Quality Guidelines (Guidelines). On 31 May 2013, the Assistant Executive Director of CPSC's Office of Hazard Identification and reduction denied PEER's request. On 28 June 2013, PEER appealed the denial, asserting that the CPSC's July 2008 *Analysis and Assessment of Synthetic Turf Grass Blades* and accompanying press release did not satisfy the Guidelines' standards for objectivity because it did not use reliable data sources; did not use sound analytic techniques; did not have a clear policy for correcting the errors in the study as they stood or in light of new reliable data from elsewhere; and the press materials were not supported by the admittedly limited study conducted by CPSC staff.

On 28 August 2013, the Executive Director of the CPSC dismissed the appeal, denying PEER's request that the CPSC to remove information, disseminate warnings, and commission an independent study. The July 2008 analysis, the Director ruled, described the assessment's limited scope, used best data available at the time, and relied upon valid analytic techniques. However, given the limitations of the CPSC's July 2008 assessment, CPSC found that an explanatory note was warranted at the start of the July 2008 bulletin. The language of the note as it now appears on the publication, states:

evaluated certain samples from synthetic athletic fields in 2008, and determined at that time that young children were not at risk from lead exposure on synthetic fields. As noted in the linked evaluation, staff's assessment was subject to specified limitations including sample size. The exposure assessment did not include chemicals or other toxic metals, beyond lead. CPSC staff continues to recommend that children wash their hands after playing outside, including after using synthetic athletic fields.

CPSC's ruling is available [here](#). The "corrected" version of the CPSC publication is available at <http://www.cpsc.gov/en/Newsroom/News-Releases/2008/CPSC-Staff-Finds-Synthetic-Turf-Fields-OK-to-Install-OK-to-Play-On/>.

[No. 06] **Consumer Reports criticizes CPSC's position on lead in artificial turf.** On September 5, 2008, *ConsumerReports.com* published a piece entitled "Federal agencies at odds over artificial turf recommendations." The article is available <http://blogs.consumerreports.org/safety/2008/09/lead-in-turf.html>. The article highlighted the positions taken by the U.S. Consumer Product Safety Commission, which thinks says turf fields are safe to play on, and the Centers for Disease Control, which recommends certain precaution and following certain hygienic protocols when playing on artificial turf fields. In questioning the CPSC's position, the article criticizes the agency's limited research and its inadequate methodology. The publication pointed out CPSC's belief that even some fields contain some lead, they do mostly fall within the acceptable range. Consumer reports pointed out that the American Academy of Pediatrics "has stated that there is no safe level of lead exposure. Yet, the CPSC's conclusions express risk in terms of what they have established as harmful levels. We think their analysis and conclusions should be consistent with those of the medical community. They should take into account that athletic fields are not the only source of exposure to lead and that it's important to eliminate avoidable sources of exposure." For the text of the article, go to <http://blogs.consumerreports.org/safety/2008/09/lead-in-turf.html> or click [here](#).

[No. 05] **Connecticut Attorney General slams CPSC's turf report as dangerously deceptive.** On August 19, 2008, the Connecticut Attorney General Richard Blumenthal called on the CPSC to remove and revise its recent turf study because it is "dangerously deceptive." "There is a clear and present danger that municipal and state decision makers -- as well as parents and citizens -- will rely on this unconscionably deficient report," which is "replete with unsound scientific methodology and conclusions, and unreliable findings." "It may lead to unsupportable and unwise commitments by towns and cities or their boards of education to build or replace athletic fields." The text of the press release is available at <http://www.ct.gov/ag/cwp/view.asp?A=2341&Q=421482> and [here](#).

[No. 04] **Connecticut Congresswoman slams CPSC's turf report as hasty and flawed.** On August 7, 2008, the U.S. Congresswoman Rosa DeLauro of Connecticut sent a letter to the acting chairwoman of the U.S. Consumer Product Safety Commission, slamming the agency's report on lead in synthetic turf fields as hasty and flawed. She called for a thorough investigation. The texts of the press release and letter are available at [http://www.house.gov/delauro/press/2008/August/Flawed\\_Report\\_8\\_8\\_08.html](http://www.house.gov/delauro/press/2008/August/Flawed_Report_8_8_08.html) and [here](#).

[No. 03] **CPSC says, 'Turf industry should get out the lead, but fields are okay to play on!'** SynTurf.org, Newton, Mass. August 3, 2008. On July 30, 2008, the Office of Information and Public Affairs at the U.S. Consumer Product safety Commission issued Release # 08-348: *CPSC Staff Finds Synthetic Turf Fields OK to Install, Ok to Play On*. The Release referenced an evaluation "of various synthetic turf fields" by the CPSC staff, which concluded that "young children are not at risk from exposure to lead in these fields." The Release is available on-line at <http://www.cpsc.gov/cpsc/pub/prerel/prhtml08/08348.html> (or [here](#)) and the Evaluation is available at <http://www.cpsc.gov/library/foia/foia08/os/turfassessment.pdf> (or [here](#)). Here are results of the Evaluation, as stated in the Release:

CPSC staff evaluation showed that newer fields had no lead or generally had the lowest lead levels. Although small amounts of lead were detected on the surface of some older fields, none of these tested fields released amounts of lead that would be harmful to children.

Lead is present in the pigments of some synthetic turf products to give the turf its various colors. Staff recognizes that some conditions such as age, weathering, exposure to sunlight, and wear and tear might change the amount of lead that could be released from the turf. As turf is used during athletics or play and exposed over time to sunlight, heat and other weather conditions, the surface of the turf may start to become worn and small particles of the lead-containing synthetic grass fibers might be released. The staff considered in the evaluation that particles on a child's hand transferred to his/her mouth would be the most likely route of exposure and determined young children would not be at risk.

The CPSC's evaluation concerned only the presence of lead in carpet fibers or paint that is applied to the carpet. It did not analyze lead that is often contained in the crumb rubber. No other aspect of artificial turf fields was considered. Nor did the CPSC consider the possibility of potential risk to children in whom the micron of lead ingested or inhaled from artificial turf may well be the tipping point for rendering the accumulated lead level in a child to an unacceptable level.

The presence to lead is not just in the old carpet. As the Release stated, "CPSC staff evaluation showed that newer fields had no lead or generally had the lowest lead levels." This is not exactly declaring the turf "lead free," particularly when it is not made clear what constitutes a "newer field." By all measure, the turf field at Saunders Stadium in South Boston (<http://www.synturf.org/lead.html> Item No. 9) that was ripped out in June of this year was "newer," it being in its fifth year. SynTurf.org collected a sample of field's yellow-lined turf and sent it to from that site was sent for a lead-test to the Center for Environmental Health in Oakland, California. Using a X-ray Fluorescence analyzer, the CEH reported the "yellow turf" to have 7,997 parts per million (mg/kg) of lead. The U.S. Environmental Protection Agency has established 400 ppm as allowable level of lead in children's play areas. The Massachusetts Department of Environmental Protection would allow soil in lined landfills with maximum lead contamination of 2,000 ppm, and only 1,000 ppm in unlined landfills.

The CPSC is nevertheless concerned about lead in artificial turf. The Release stated, "Although this evaluation found no harmful lead levels, CPSC staff is asking that voluntary standards be developed for synthetic turf to preclude the use of lead in future products. This action is being taken

proactively to address any future production of synthetic turf and to set a standard for any new entrants to the market to follow.” As for now, As an overall guideline, CPSC staff recommends young children wash their hands after playing outside, especially before eating.” On Wednesday, July 30, 2008, the U.S. House of representatives voted 424-1 to ban lead in kids’ products. The legislation “would impose the toughest lead standards in the world, banning lead beyond minute levels in products for children 12 or younger.” Associated Press, “House votes to ban lead in kids’ [products,” in *The Boston Globe*, July 31, 2008, Business section, page E3, available also at [http://www.boston.com/business/articles/2008/07/31/house\\_votes\\_to\\_ban\\_lead\\_in\\_kids\\_products/](http://www.boston.com/business/articles/2008/07/31/house_votes_to_ban_lead_in_kids_products/). Perhaps, with a Democrat in the White House, come January 2009, the CPSC could order the elimination of lead from artificial turf products.

Following the CPSC Release, the turf industry went into spin mode and extracted every ounce of propaganda for its cause – it took the point that CPSC had made about lead and turned it into a declaration or clean bill of health for the turf as a whole. See, for example, “FieldTurf Applauds 'Clean Bill of Health' Given to Synthetic Athletic Fields by U.S. Consumer Product Safety Commission,” in *PrimeNewswire*, July 30, 2008, available at

<http://www.marketwatch.com/news/story/fieldturf-applauds-clean-bill-health/story.aspx?guid=%7B9BADDF9B-C240-4A5E-8448-08BDB8EEFFDD%7D&dist=hppr>.

The CPSC’s characterization of turf fields as safe for kids drew fire from Environment and Human Health, Inc of North Haven, Connecticut, and the Center for Environmental Health, in Oakland, California.

David Brown, Sc.D., the Public Health Toxicologist, Environment and Human Health, Inc. ([www.ehhi.org](http://www.ehhi.org)) made the following preliminary observations about the the CPSC’s methodology and assumptions:

The USCPSC report sampled only 10 tests on four fields. There were three samples on three fields and one sample on one other field. How many fields are there in the United States? The answer of course is thousands.

The table is padded with other turf data (less than 10) from unspecified sources with no relevancy to the fields in actual use.

They wiped an area 50 cm long and 8 cm wide (18 inches long and 3 inches wide). Your hand is about 4 inches wide and 8 inches long.

Next they divided the amount of lead found by 5 -- because they assumed that the hand is not as efficient at picking up lead as their wipe. They then divided that number obtained again by 2 -- because they assumed that only half of the lead could be taken from one's hand and then become ingested.

Their determination of a safe reference exposure:

1.They compared the exposure to a blood level of 10 ug/dl as their level of concern - although current peer reviewed literature clearly demonstrate health effects in children below that level.

2.They than reference a position that chronic ingestion of lead should not exceed 15 ug/day. They then incorrectly assumed that the "not to be exceeded" level was an acceptable exposure level, which it is not.

This rationale makes no sense because of the following incorrect assumptions:

Assumption 1. The child has no other exposures to lead each day. The assumption is clearly incorrect based on population studies published by the centers for Disease Control and Prevention.

Assumption 2. During an athletic activity the child only touches the surface with one hand one time each day. This assumption is ludicrous if anyone has observed any athletic activity on any playing field.

Assumption 3. That four fields would be considered adequate to evaluate the safety of the thousands of fields in the United States and then to characterize to the American people that this is a NATIONWIDE evaluation. UNBELIEVABLE

Assumption 4. It is acceptable to ignore the key chemical reaction between the acidity in the moisture on the surface and the release of lead bound in the material. A reading in a basic high school chemistry text shows that highly soluble lead carbonate dust is formed when items containing lead are exposed to air containing carbon dioxide in humid atmosphere such as occurs every morning when dew forms on the surface of the fields

Assumption 5. Most of the lead on the surface is not released on the first pass over the surface. While there may be multiple passes over the surface there is no basis for a division by 5 or any other number, most of the lead is released by the first touch although additional lead is picked up with further wipes. If the CPSC had wiped the field 100 times would they have divided the amount obtains on their sample wipe by 100?

It should be apparent to even the most casual observer that the CPSC test report cannot support any conclusion with respect to the health risk of children to exposure to lead from artificial turf fields. Moreover, lead has never been the only or even major concern from the health scientists.

In an e-mail, dated 31 July 2008, Nancy Alderman, the President of EHHI wrote:

The story being told in response to the U.S. Consumer Product Safety Commission (USCPSC) declaring that synthetic turf fields safe because they do not contain lead, is extremely misleading. This declaration of "safety" is misinforming the public about what the potential risks from synthetic turf really are.

Environment and Human Health Inc. (EHHI) remains as concerned as ever about the synthetic turf fields that are being installed by schools



and towns all over the United States. EHHI is a 9 - member, nonprofit organization composed of physicians, public health professionals and policy experts dedicated to protecting human health from environmental harms through research, education and improving public policy. EHHI is supported by foundations and receives no funding from either businesses or corporations.

When Environment and Human Health, Inc., (EHHI) researched the health issues presented by synthetic turf fields it looked at the ground-up rubber tire in-fill that is a major component of synthetic turf. The in-fill is made of used rubber tires. In some states used rubber tires are considered a "hazardous" waste and in other states they are considered a "special" waste.

When the U.S. Consumer Product Safety Commission (USCPSC) tested the fields they only tested the plastic or nylon fake grass for lead. Not finding lead in their extremely small sampling of fields --- the USCPSC then declared all fields safe. They never even looked at the ground-up rubber tire in-fill for its health risks - which remain an enormous worry.

When the Connecticut Agricultural Experiment Station tested the ground-up rubber tire in-fill they found the following five compounds.

Benzothiazole: Skin and eye irritation, harmful if swallowed. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

Butylated hydroxyanisole: Recognized carcinogen, suspected endocrine toxicant, gastrointestinal toxicant, immunotoxicant (adverse effects on the immune system), neurotoxicant (adverse effects on the nervous system), skin and sense-organ toxicant. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

n-hexadecane: Severe irritant based on human and animal studies. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

4-(t-octyl) phenol: Corrosive and destructive to mucous membranes. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

Zinc: There is a very large amount of zinc that is added in the manufacturing of tires and therefore there is a great deal of zinc in ground-up rubber tire in-fill.

Besides those chemicals, rubber tires often contain:

Benzene - carcinogen, developmental toxicant, reproductive toxicant

Phthalates - suspected developmental toxicant, endocrine toxicant, reproductive toxicant

PAHs - suspected cardiovascular or blood toxicant, gastrointestinal or liver toxicant, reproductive toxicant, respiratory toxicant

Manganese - gastrointestinal or liver toxicants

Carbon Black - carcinogen

Latex - causes allergic reactions in some people

Saying these fields are now safe because they do not contain lead is like saying that diesel exhaust is safe because it does not contain lead - or cigarettes are safe because they don't contain lead - neither of course is true.

On July 30, 2008, the Center for Environmental Health ([www.cehca.org](http://www.cehca.org)), in Oakland, California, issued a press release calling attention to fatal flaws in CPSC's findings on artificial turf. "The Center for Environmental Health is disappointed but not surprised that the CPSC has today released a flawed analysis of the dangers to children from artificial turf." stated Executive Director, Michael Green. "CPSC's turf analysis uses a lead standard that is 30 times less protective than California law and an approach that was designed for testing arsenic-treated wood that was not developed for use with turf." said Caroline Cox, CEH Research Director. The CPSC evaluation is based on the outdated assumption that exposure of 15 micrograms of lead per day is acceptable for children. The California standard is 30 times more protective, and current science suggests that no level of exposure to lead is safe for children. For example, the U.S. Public Health Service states, "No safe blood lead level in children has been determined." The CPSC evaluation does not consider that children will contact turf multiple times while playing, thus making multiple exposures to lead likely. The CPSC, based only on what the agency calls "limited hand sampling," minimizes the potential for children to be exposed to lead, by assuming that children will be exposed to five times less lead than the agency's protocol actually found. The CPSC's data shows clearly that lead exposure increases dramatically as turf ages. CPSC ignores the problem that exposure estimates from new turf significantly underestimate real-life exposure. To date, CEH has tested over 150 turf samples, including dozens of samples sent to the nonprofit by concerned customers. By contrast, CPSC's report shows they tested only 14 samples. Source: CEH (Press release), "Consumer Watchdog Finds Fatal Flaws in CPSC Findings on Artificial Turf," July 30, 2008, available at <http://www.cehca.org/press-releases/eliminating-toxics/consumer-watchdog-finds-fatal-flaws-in-cpsc-findings-on-artificial-turf/> .



The U.S. Consumer Product Safety Commission is looking into the presence of lead in artificial turf fields. See <http://www.synturf.org/lead.html> (Item No. 01). This page is dedicated to the CPSC's proceedings in this regard. It is apt that the first item published here be the letter from the New Jersey Department of Health and senior Services to the CPSC that prompted the agency to begin an investigation in to safety of artificial turf fields.

For a news story on this subject, see Frank Luongo, "Turf lead levels to get federal scrutiny," in *Connecticut Post*, April 18, 2008, available at [http://www.connpost.com/brooks/ci\\_8972735](http://www.connpost.com/brooks/ci_8972735).

For the text of the letter from Dr. Eddy Bresnitz, Deputy Commissioner of New Jersey Department of Health and Senior Services and State Epidemiologist, dated Trenton, April 11, 2008, to Patricia Semple, Executive Director of the U.S. Consumer Product Safety Commission, Washington, D.C. [click here](#).

**[No. 02] CPSC testing of artificial turf results due in late summer.** According to U.S. Consumer Product safety Commission's spokesman, Scott Wolfson, a national survey of 50 fields – undertaken because of concern about lead levels in fields in New Jersey turf fields will be complete in late summer 2008. Source: John A. Gavin, Karen Sudol and Mathew van Dusen, "Tests find lead on more ballfields," in *The record*, June 17, 2008, available at [http://www.northjersey.com/environment/environmentnews/ALERT\\_Tests\\_find\\_lead\\_on\\_more\\_ballfields.html?c=y&page=1](http://www.northjersey.com/environment/environmentnews/ALERT_Tests_find_lead_on_more_ballfields.html?c=y&page=1).

**[No. 01] CPSC's roundtable on lead to meet May 13.** On May 13, 2008, the U.S. Consumer Product Safety Commission will host a roundtable on the current lead legislation about the use of lead in consumer products. Among those expected to participate in the roundtable is Hardy Poole, Director of Regulatory and technical Affairs of the national textile Association. Also featured is Rick Doyle, the President of the Synthetic Turf Council. Poole may well speak to the issue of lead in turf fibers, while Doyle is expected to address the presence of lead or its toxicity in artificial turf fields. For the agenda of the meeting and name of other participants, [click here](#).

## Letter 52

**COMMENTER:** Carol Schultz

**DATE:** November 16, 2017

### **Response 52.1**

The commenter expresses support for the comments provided by John Andrews (as shown in Letter 21). Please refer to Responses 21.1 through 21.5 for a discussion of the referenced comments.

### **Response 52.2**

The commenter recommends avoiding the use of artificial turf because research indicates that it could pose health problems to children playing on athletic fields. The commenter attaches a summary of press releases, blog entries, and articles about the potential health risks of synthetic turf, compiled by an advocate on the website [www.SynTurf.org](http://www.SynTurf.org). This compilation of other resources does not provide concrete evidence that synthetic turf poses a health risk to athletic users. Furthermore, it is uncertain whether synthetic turf would be installed at Flood County Park. The proposed Landscape Plan does not specify the type of surfaces at the reconstructed ballfield and soccer/lacrosse; these fields could be surfaced with either natural grass or synthetic turf.

Modern synthetic turf fields typically consist of synthetic fibers that resemble grass and a base (or “infill”) material that stabilizes and cushions the surface (New York State Department of Health 2017). Common base materials include granulated crumb rubber (usually from used tires), flexible plastic pellets, sand, and rubber-coated sand. A combination of sand and crumb rubber is often used. Pellets ranging in size from one-sixteenth to one-quarter inch in diameter are used on synthetic turf.

Consumer health advocates have raised concerns about the safety of recycled rubber tire crumb that can be used in synthetic turf fields (U.S. EPA 2018). While information about the chemicals present in tire crumb is available, the Toxics Use Reduction Institute at the University of Massachusetts finds that no direct research has been conducted to assess the human health effects of playing on artificial turf with tire crumb infill (2017). Research efforts to date have considered the general health risks from metals, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs) including benzo (a) (e) pyrenes and phthalates, and other components in tire crumb (Watterson 2017). The Norwegian Institute of Public Health has researched the risk of dermal (skin) and inhalation exposures to chemicals in synthetic turf fields, finding a low health risk (New York State Department of Health 2017). In addition, a French study found no health risk from volatile organic compounds emitted as gases from tire crumb. Tire rubber also contains latex allergens, which can cause an allergic reaction in about six percent of the general population. However, tire crumb has much lower levels of latex allergen than in latex gloves and other consumer products.

Forthcoming research will provide a more systematic understanding of the potential health risks of using artificial turf with tire crumb. In February 2016, the U.S. EPA, the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry, and the Consumer Product Safety Commission launched a Federal Research Action Plan to study human concerns associated with recycled tire crumb (U.S. EPA 2018). This would be the first large national study of the safety of synthetic turf fields, and its release is anticipated in mid-2018. On a state level, the California

Environmental Protection Agency is researching hazards in tire crumb and artificial grass blades, accounting for potential exposure times of athletes, and is expected to issue a report in 2019 (Watterson 2017).

Based on the available scientific research, there is no evidence that the potential installation of synthetic turf at athletic fields in Flood County Park could result in adverse health effects.

### **Response 52.3**

The commenter requests that the County adopt measures taken by the City of San Carlos at Crestview Park if the safety cannot be proven when construction of athletic fields is approved. As discussed in Response 52.2, there is no substantial evidence that the potential installation of synthetic turf at athletic fields in Flood County Park could result in adverse health effects. Nevertheless, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 16:19

Letter 53

Colin Quinton

I wish to show support for the preferred Flood Park plan. This plan would result in 2 brand new fields for the community (a dedicated, full size baseball field & a dedicated soccer/lacrosse field)

53.1

## Letter 53

**COMMENTER:** Colin Quinton

**DATE:** November 16, 2017

### **Response 53.1**

The commenter expresses support for the proposed Landscape Plan including dedicated baseball and soccer/lacrosse fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 12:46

Letter 54

Dan Burke

I support the preferred Flood Park plan. Which would result in 2 brand new fields for the community. | 54.1

## Letter 54

**COMMENTER:** Dan Burke

**DATE:** November 16, 2017

### **Response 54.1**

The commenter expresses support for the proposed Landscape Plan with two new athletic fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.



11-16-2017 - 16:58

Letter 55

Dan Galles

As a parent of 3 children in Menlo Park where we have struggled with the constraints of usable athletic fields, I fully support the proposed plan. Thanks!

55.1

## Letter 55

**COMMENTER:** Dan Galles

**DATE:** November 16, 2017

### **Response 55.1**

The commenter expresses support for the proposed Landscape Plan because of the need for usable athletic fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 20:24

Dan Siegel

Letter 56

I strongly support the preferred plan. Menlo Park needs a full sized baseball field. I was born and raised in Menlo Park. I work in Menlo Park and am raising my family in Menlo Park. Unlike when I was a child, today there are no full sized baseball fields in Menlo Park. When I was in high school the Flood Park baseball field was a place people wanted to play. Then later adult wood bat leagues played there. It would be great to have the field for the community to use again. Today my son doesn't not have the same opportunity. He and his Legends teammates have to travel to Palo Alto, and in the past to Redwood City, for practice and they do not have a field to play home games on. Instead of being able to bicycle to a local field directly from school, they are driven. This creates many unnecessary car trips. I look forward to the reopening of Flood Park.

56.1

## Letter 56

**COMMENTER:** Dan Siegel

**DATE:** November 16, 2017

### **Response 56.1**

The commenter expresses support for the proposed Landscape Plan because of the need for a full-sized baseball field in Menlo Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter adds that driving to more distant athletic fields, instead of being able to bicycle to a local field, creates unnecessary car trips. Currently, athletic users in the vicinity of Menlo Park typically drive to more distant athletic facilities. The proposed reconstructed ballfield and new soccer/lacrosse field at Flood County Park would serve as a more local destination for many nearby residents, enabling shorter trips for athletic use. Although the Draft EIR's traffic analysis makes a conservative assumption that all new trips associated with athletic use at Flood County Park would be by motor vehicle, in practice a substantial number of athletic users would ride bicycles to and from events at the park. Please refer to Topical Response B: Transportation Impacts for a discussion of bicycle use by local athletes. As discussed therein, the substitution of bicycle for motor vehicle trips could result in a regional reduction in vehicle trips associated with athletic use. In the vicinity of Flood County Park, however, Draft EIR Section 4.8, *Transportation and Circulation*, acknowledges that new vehicle trips generated by the Landscape Plan would have a significant and unavoidable impact on traffic congestion at the Bay Road/Ringwood Avenue intersection.

11-16-2017 - 17:20

Letter 57

Daniel Meehan

Hello,

My neighbor Phil Corey does not have access to a computer or the internet. He asked me to submit his thoughts for him.

Flood Park

.If Flood school is to be demolished, why not a soccer field there, if no other place is available then I say have it on the baseball hardball field on the south side of field.

.It is not good for both of us as homeowners, on the del norte block and where a field is already there with renovation done from damage from the Hetch Hetchy I believe it in all our best interest to share with baseball field if it has to be in Flood Park proper.

.Redwood trees on east side of the tennis court could be spared and some 10 to 12 rare pittosporum eugenioides on west side of the existing tennis court along with several old oak trees also could be spared, they are important

Phil Corey

1025 Del Norte Ave.

650 305 1858

[https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Response%20to%20DEIR%20for%20Flood%20Park\\_0.docx](https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Response%20to%20DEIR%20for%20Flood%20Park_0.docx)

57.1

Nov. 14, 2017

Hello,

This document is feedback to the Draft EIR for Reimagine Flood Park, and the Reimagine Flood Park project.

My name is Daniel Meehan, I live at 1023 Del Norte Avenue. I have lived here with my wife Alice Newton and my children, Carmela and Kenny for 30 years. My back yard borders Flood park.

I think it would OK to leave the park as is. It is one of the last pieces of open savannah on the Peninsula and with historical adobe structures from the WPA period. I usually walk through the park, and on weekends in the summer it is well used by many groups and parties of various sizes. We should remember that the people who use the park for parties or family picnics are not well represented in these changes. I think that some of the proposals would reduce the number of picnic areas. But I realize that “Doing nothing” is not realistic for most people.

57.2

I would prefer and support the following:

. A dual use play field for baseball and soccer, placed far from the homes on Del Norte and Hedge road. This can be done. It has been done in many places with good results. Having a dual use field will also help with traffic as it reduces visitors. Also, dual use moves the soccer field away from the residences and thereby reduces sound.

57.3

.The children’s play ground is heavily used by the community and the visiting picnickers. It would be wonderful to see it upgraded in Phase one. And please add picnic tables that are lower for children to sit at.

57.4

.The traffic here in this part of Menlo Park at morning and evening commute time is terrible. I don’t understand how an increase would work. This issue needs to be addressed before any increase to the parks visitors is made.

57.5

.Please consider free parking. This would help the neighborhood street parking related to activities in the park.

57.6

.The picnic areas could be improved, expanded and updated. Actually it would be fine to just take what is there now and cleaned it up and revitalized it. I like the old style or flavor of the park, and will miss it. The proposal shows 4 picnic sites, and there are currently 9. Can this be changed and increased?

57.7

.The Gathering Meadow, please insure that sound emitted from this area is directed away from the residences on Del Norte and Hedge Road.

57.8

.Number 16 on the proposed plan, the trail through the redwoods. Please keep the trail as far away as possible from the fence that borders the park and yards on Del Norte. Please leave this Redwood forest area in place.

57.9

General comments. I have been to most of the meetings, and have read many emails from many people regarding these changes to Flood park. I have been surprised by the small numbers of neighbors and residents of the two neighborhoods attending the meetings. At the last DEIR meeting there were two people, a couple from the Suburban Park – Lorelei Manor neighborhoods. Given the change to traffic on Bay Road, I would think more people would be concerned about an increase.

Regards  
Daniel Meehan

1023 Del Norte Ave.  
Menlo Park, CA

[meehandaniel@hotmail.com](mailto:meehandaniel@hotmail.com)

## Letter 57

**COMMENTER:** Daniel Meehan – for Phil Corey

**DATE:** November 16, 2017

### **Response 57.1**

The commenter, submitting a letter on behalf of his neighbor Phil Corey, asks if a soccer field can be built on the vacant school site adjacent to Flood County Park. This comment does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

The commenter also suggests saving redwood trees, 10 to 12 rare *Pittosporum eugenioides* trees, and several old oak trees on sides of the existing tennis courts. As discussed in Response 41.5, 12 heritage coast redwood trees would be removed in the vicinity of the proposed soccer/lacrosse field, which overlaps the existing tennis courts. The Tree Report prepared by Gates + Associates for the Landscape Plan (see Appendix D to the Draft EIR) identifies approximately 14 *Pittosporum undulatum* (Victorian box pittosporum) trees near the existing tennis courts, including four that would be removed and one that could potentially be removed. Several other *Pittosporum undulatum* trees are located farther from the tennis courts. The only other trees in the *Pittosporum* genus identified in the area covered by the Landscape Plan are seven *Pittosporum* spp. (mock-orange); however, these trees are not located near the existing tennis courts. The Tree Report also identifies approximately 20 mature heritage oak trees near the existing tennis courts, including 10 or 11 that would be removed under the Landscape Plan. The commenter’s suggestion to preserve the above trees that are slated for removal does not conflict with or challenge the analysis and conclusions of the Draft EIR; nonetheless, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 57.2**

The commenter suggests leaving the park in its current condition to preserve “one of the last pieces of open savannah on the Peninsula” and historical adobe structures. The proposed Landscape Plan would largely preserve existing open space with scattered trees in the southern portion of the park. As discussed in Draft EIR Section 4.4, *Cultural Resources*, the Landscape Plan would preserve four of the five adobe buildings that contribute to the park’s status as an eligible historic resource. The project also would involve a seismic retrofit of the adobe administrative office building in the center of the park. With implementation of Mitigation Measures CUL-1(a) and CUL-1(b) to document adobe structures before removal and to follow appropriate standards in retrofitting the office building, the impact on historic resources would be less than significant.

### **Response 57.3**

The commenter expresses support for a dual-use field for baseball and soccer, located far from homes on Del Norte Avenue and Hedge Road. The commenter states that this field would reduce visitors, traffic, and noise relative to the proposed Landscape Plan. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.



**Response 57.4**

The commenter recommends moving the proposed playground to Phase I of the Landscape Plan. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 57.5**

The commenter states that traffic congestion needs to be addressed before any increase in park visitors occurs. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 57.6**

The commenter requests consideration of free parking to reduce parking activity on neighborhood streets. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts, including the potential for parking fee waivers.

**Response 57.7**

The commenter suggests cleaning up and retaining existing picnic sites, instead of decreasing the number of picnic sites. The proposed Landscape Plan would not reduce the area of picnic space, but rather would involve renovating existing individual and group picnic areas.

**Response 57.8**

The commenter requests that sound emitting from the proposed gathering meadow be directed away from residences on Del Norte Avenue and Hedge Road. Special events at the gathering meadow would infrequently generate noise that may be audible at residences neighboring the park. The County anticipates that it would be used for the occasional movie night (at most once a year) and could potentially be reserved for special events. As discussed in Draft EIR Section 4.8, *Noise*, the Landscape Plan would have a less than significant impact from noise by park use with implementation of Mitigation Measures N-3(a) to restrict the use of sound amplification and air horns and N-3(b) to limit the hours of athletic use. The requested measure would not be necessary to reduce the noise impact to less than significant. However, all comments will be forwarded to the County's decision makers for their consideration.

**Response 57.9**

The commenter requests keeping the proposed trail along the eastern border of the park "as far away as possible from the fence that borders the park" and retaining existing redwood trees there. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 17:03

Letter 58

Daniel Meehan

<https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/Response%20to%20DEIR%20for%20Flood%20Park.docx>

Nov. 14, 2017

Hello,

This document is feedback to the Draft EIR for Reimagine Flood Park, and the Reimagine Flood Park project.

My name is Daniel Meehan, I live at 1023 Del Norte Avenue. I have lived here with my wife Alice Newton and my children, Carmela and Kenny for 30 years. My back yard borders Flood park.

I think it would OK to leave the park as is. It is one of the last pieces of open savannah on the Peninsula and with historical adobe structures from the WPA period. I usually walk through the park, and on weekends in the summer it is well used by many groups and parties of various sizes. We should remember that the people who use the park for parties or family picnics are not well represented in these changes. I think that some of the proposals would reduce the number of picnic areas. But I realize that “Doing nothing” is not realistic for most people.

58.1

I would prefer and support the following:

. A dual use play field for baseball and soccer, placed far from the homes on Del Norte and Hedge road. This can be done. It has been done in many places with good results. Having a dual use field will also help with traffic as it reduces visitors. Also, dual use moves the soccer field away from the residences and thereby reduces sound.

.The children’s play ground is heavily used by the community and the visiting picnickers. It would be wonderful to see it upgraded in Phase one. And please add picnic tables that are lower for children to sit at.

.The traffic here in this part of Menlo Park at morning and evening commute time is terrible. I don’t understand how an increase would work. This issue needs to be addressed before any increase to the parks visitors is made.

.Please consider free parking. This would help the neighborhood street parking related to activities in the park.

.The picnic areas could be improved, expanded and updated. Actually it would be fine to just take what is there now and cleaned it up and revitalized it. I like the old style or flavor of the park, and will miss it. The proposal shows 4 picnic sites, and there are currently 9. Can this be changed and increased?

.The Gathering Meadow, please insure that sound emitted from this area is directed away from the residences on Del Norte and Hedge Road.

.Number 16 on the proposed plan, the trail through the redwoods. Please keep the trail as far away as possible from the fence that borders the park and yards on Del Norte. Please leave this Redwood forest area in place.



General comments. I have been to most of the meetings, and have read many emails from many people regarding these changes to Flood park. I have been surprised by the small numbers of neighbors and residents of the two neighborhoods attending the meetings. At the last DEIR meeting there were two people, a couple from the Suburban Park – Lorelei Manor neighborhoods. Given the change to traffic on Bay Road, I would think more people would be concerned about an increase.

Regards  
Daniel Meehan

1023 Del Norte Ave.  
Menlo Park, CA

[meehandaniel@hotmail.com](mailto:meehandaniel@hotmail.com)

## Letter 58

**COMMENTER:** Daniel Meehan

**DATE:** November 16, 2017

### **Response 58.1**

The commenter restates the same comments verbatim as provided in comments 57.2 through 57.9. Please refer to the responses to Letter 57.

11-16-2017 - 18:29

Letter 59

David Klein

Hello everyone. My name is David Klein and I am the Head Coach of Menlo-Atherton High School Baseball, in charge of the program both Varsity and Junior Varsity. I am also the Founder and Executive Director of the Menlo Park Legends 501 (c) 3 non profit community baseball organization.

Before I offer some input I want to commend Carla and the crew for the incredibly diligent and thoughtful process you have went through to capture all community input. While it will be hard to make everyone happy, I believe you will make the best possible decision for the community.

I have been working with San Mateo County to rebuild this field since 2011, partly because I went to Menlo-Atherton High School and grew up playing on this field and partly because the Legends baseball program could never find a field to play/practice on. I feel particularly invested in this field as I have some of my fondest memories playing baseball there.

As the largest provider of youth baseball in the Menlo Park area (besides M-A Little League) I have been working with San Mateo County on this project since 2011. My initial goal was to find a home for our nationally recognized collegiate team and our specialized youth summer baseball camp. Our collegiate team, which was equivalent to a A minor league, professional team, has been forced to go on hold for a summer due to there not being a suitable full sized field in the community, only Menlo-Atherton HS. Before I arrived at Menlo-Atherton the field was not suitable for the elite level collegiate baseball (and there is no fence). While Canada college was a nice playing surface, our primary fan base was based out of Menlo Park and we could not get enough fans to drive all the up there to generate the community support we needed to make sense to continue. In rebuilding Flood Park we would bring back our the Menlo Park Legends team and would again have teams travel from all over the West Coast to play in Menlo Park and the youth of the community could rally behind these future professional athletes right in their backyard!

59.1

In the 6 plus years we have constantly struggled to find consistent field space – most of the time utilizing fields in Palo Alto and Woodside at Canada College. In the last 3 years our Youth Academy has grown to provide unique development opportunities to around 100 kids in the community (our camps offer programs to about 500 kids per summer). We would take more kids in our Academy if we had more field space. We are currently practicing 2 teams at a time at Menlo-Atherton High School with the Football team using the outfield. We only have infield access and batting cage access in the Fall. No room to run full practices. Our other practice location is El Camino Field in Palo Alto and Woodside High School. The majority of our kids bike to practice from Menlo Park so the increased distance dose pose a bit of a safety risk. We would love to rent fields in Menlo Park however all the space is reserved by user group programs who have priority because they have been around longer. This last Spring, Summer and Fall (and basically always) all usable baseball fields which could accommodate 13/14 year olds (Burgess and Nealon Park) are 100% booked with soccer, softball or another program. Even at the youth level there are no fields in the Spring and in the Fall it is highly limited. There is a GIGANTIC unmet need.

59.2

Menlo-Atherton HS is increasing their student body to approximately 2400 kids. Baseball in this community is huge and this year I will be forced to cut a couple dozen talented ball players. Many have come forward to donate towards forming a freshman team. I have told them we are already completely cramped and don't have enough field space for our 2 teams as is. When I attended M-A Varsity practiced at Flood and Junior Varsity at M-A. Now we all practice at M-A and to make matters worse, the Softball program practices in our outfield. When they are playing games we have only half an outfield for 2 teams to practice on. It is not a good situation right now however with Flood Park we could definitely offer baseball opportunities to 15-20 more players due to the start of a Freshman team.

For the above mentioned reason, I believe that the increase of traffic may not be as great as one would think. For example, instead of 2 teams practicing at M-A, 1 team would practice at M-A and 1 would practice at Flood. This does not result in any more people in the road, in fact it spreads the cars out for pickup and drop off at different locations. Its also worth noting that the majority of my 13/14 year olds bike to practice, so as long as there bike racks, there would be limited additional cars on the road for Legends Academy High School Prep players.

The Legends have been working with Ravenswood Little League and the Ravenswood School district to offer baseball opportunities to their kids. We are also applying to a grant from Facebook to fund this effort in order to put kids from Ravenswood through the Legends Academy. Having a dedicated baseball only field at Flood would draw more kids to baseball from the Ravenswood community, where it is currently soccer dominant.

Im sure you have heard this plenty but there are numerous state of the art full sized soccer/lacrosse fields already existing in the community. Within less than 1 mile from Flood Park there are 3, 2 at M-A and 1 at Kelly Park. And these are all turf fields WITH lights – meaning they can practice/play at night and do not need to cancel due to rain. The new lit field at M-A only lessens the need for field space for soccer/lacrosse.

I could go on but I know you are busy sorting through plenty of emails. In sum, the Legends Baseball community, Menlo Atherton Baseball community and community in general is dying for a Full sized baseball field. We support the preferred plan and would recommend a junior sized field into full sized field in order to move the field further from the neighbors and limit the number of kids who can be on the field. I feel this is the best compromise.

A shared, multiuse field will barely make a dent in the amount of demand. This field is historic, the Dodgers practiced there in the 1980's when they came to town and should be rebuilt as a baseball only field as it will be packed with players all year round.

The initial purpose of multiuse fields was to make sure fields aren't dormant for multiple months during the year. Sports in California, especially baseball are year round sports so there is a great need year round.

As I have been in the past, I will continue to be a resource for the community to support this effort. Please feel free to let me know if you need anything whatsoever.

Thanks again for your hard work and all your are doing for the community.

Sincerely,

59.3

59.4

David Klein

650.387.4427



## Letter 59

**COMMENTER:** David Klein

**DATE:** November 16, 2017

### **Response 59.1**

The commenter, who coaches baseball at Menlo-Atherton High School and directs the Menlo Park Legends baseball program, expresses support for improving Flood County Park to allow baseball use. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 59.2**

The commenter states that there is a “giant unmet need” for consistently available baseball field space because existing fields in Menlo Park are reserved by other user groups that have priority while demand is increasing. This comment does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 59.3**

The commenter asserts that the proposed athletic fields at Landscape Plan would not increase traffic as much as anticipated because it would redistribute existing trips. For example, the commenter notes that instead of two teams practicing at Menlo-Atherton High School, the Landscape Plan would allow one team to practice at Flood County Park. It is acknowledged that the project would redistribute existing athletic trips in the Peninsula. However, the shift in vehicle trips to the vicinity of Flood County Park would increase traffic congestion in that area. As discussed in Draft EIR Section 4.8, *Transportation and Circulation*, new vehicle trips generated by the Landscape Plan would have a significant and unavoidable impact on traffic congestion at the Bay Road/Ringwood Avenue intersection.

The commenter also notes that most of his 13- and 14-year-old students ride bicycles to practice. The commenter asserts that these students would continue to do so if bike racks are provided at Flood County Park, resulting in fewer new vehicle trips. This comment is acknowledged. By implementing Mitigation Measure T-5(a), the County would install a minimum of six bicycle racks near the proposed gathering plaza, facilitating bicycle trips to and from the park. Please refer to Topical Response B: Transportation Impacts for a discussion of the effect of bicycle use by local athletes on motor vehicle trips.

### **Response 59.4**

The commenter expresses support for a full-sized baseball field as proposed in the Landscape Plan and recommends a junior-sized soccer/lacrosse field to move it farther from neighbors. The commenter reiterates that the community has great need for a baseball field. Several full-sized soccer/lacrosse fields with lights are located within one mile of Flood County Park, the commenter notes. The commenter also asserts that a multi-use field would be inappropriate because baseball programs have year-round need for a ballfield in California. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 17:15

Letter 60

Gabriel Jack

It would be a great idea to have a baseball field only park in Menlo Park at Flood Park. There is a great deal of excitement in our community for baseball, but one of the difficulties teams have is a lack of fields to play on.

60.1

## Letter 60

**COMMENTER:** Gabriel Jack

**DATE:** November 16, 2017

### **Response 60.1**

The commenter expresses support for a dedicated baseball field at Flood County Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 20:47

Letter 61

Gerardo Gonzalez

Gonzalez family of Menlo Park support, two separate fields one for baseball, one for lacrosse & soccer, at Flood Park...

61.1

Back in 1984 I played for Sequoia High School baseball team against Menlo Atherton Bears.

I played Big League in 1984,85

I played in the Roberto Clemente League

Latin League Adult Beisbol, we rented Flood Park for double headers and league championships in 1991.

I began my umpire career at Flood Park in 1993

American Legion

DiMaggio

Adult Baseball leagues

Roberto Clemente League

High School Baseball WCAL, PAL

PBUA,NCAA

Umpired high school softball , games at Menlo Atherton were dangerous the baseball field and softball fields were too close together often creating dangerous situations for everyone involved.

Full disclosure

My daughter Jackie Gonzalez played 4 seasons Varsity Softball 2009-2013 M-A and my son Michael Gonzalez is on the junior varsity M-A Baseball team.

I enjoyed my time at Flood Park as a player, manager, & umpire. In a couple of more years I will return to umpiring when my kid stops playing high school baseball ....

Our Two Cents...

Gerardo Gonzalez....

## Letter 61

**COMMENTER:** Gerardo Gonzalez

**DATE:** November 16, 2017

### **Response 61.1**

The commenter expresses support for separate baseball and soccer/lacrosse fields at Flood County Park, as proposed in the Landscape Plan. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 13:36

Julie Quinlan

Letter 62

It is very important for the entire community that additional fields be made available to our youth. I especially hope that more baseball fields (as many as possible!) will be developed as soon as possible, especially as increasing numbers of families move into the area.

62.1

## Letter 62

**COMMENTER:** Julie Quinlan

**DATE:** November 16, 2017

### **Response 62.1**

The comment expresses support for the development of more baseball fields available to youth in the community. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 12:50

Karen Wang

Letter 63

We fully support the preferred Flood Park plan - 2 separate fields (1 dedicated baseball field and 1 dedicated lacrosse/ soccer field). We have kids at MA and the fact that 3 teams have to share one field is indicative of their program's success.

63.1



## Letter 63

**COMMENTER:** Karen Wang

**DATE:** November 16, 2017

### **Response 63.1**

The commenter expresses support for the proposed Landscape Plan with two separate athletic fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 14:35

Letter 64

Katie Ferrick

Thank you! I am very supportive of the preferred alternative plan for Flood Park. The surrounding community is in great need of more dedicated sports fields, particularly baseball. We have lived on Bay Road in Suburban Park, just one-half block from Flood Park, for the last 15 years and understand traffic patterns associated with the park and other more active facilities such as M-A High School. This is a much needed facility that will reduce the need for hundreds of families to drive to out of town fields in order to play. There is plenty of parking at Flood Park and I have no concerns that traffic associated with this enhanced park will be a problem. As with any very busy day at Flood park, there are occasional and brief peak moments of delay that requires a driver to wait to pass by the park entrance, but to me this is a very worthwhile trade off to live next to a fantastic park that will be once again lively with both passive and active uses.

64.1

I greatly appreciate that the parts of the park that are open today such as picnic and playground areas will remain, and I feel the preferred alternative supports every objective outlined in the Flood Park Plan:

- To repair and update park features and core infrastructure components
- To meet demand for active recreation facilities in San Mateo County by increasing offerings of sports
- To provide a variety of uses for a range of user groups, including youth
- To optimize preservation of oak woodland

This has been a long time to get to this point; please don't delay in approving this plan. Children, youth, adults and families need this enhanced facility to be operational and enjoyable for all.

Thank you,

Katie Ferrick

Bay Road, Suburban Park neighborhood

Menlo Park

## Letter 64

**COMMENTER:** Katie Ferrick

**DATE:** November 16, 2017

### **Response 64.1**

The commenter expresses support for the proposed Landscape Plan, including athletic fields to meet the community's need and retained picnic and playground areas. The commenter also expresses no concern for traffic associated with the Landscape Plan. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter asserts that Flood County Park has plenty of parking. This comment is consistent with the Draft EIR's finding that the park's 375 parking spaces would be sufficient to accommodate demand. Please refer to Topical Response B: Transportation Impacts for further discussion of parking impacts.

Letter 65

11-16-2017 - 17:37

Larry Nelson

I'd like to express my support for the "preferred plan" (two separate fields, one being dedicated for baseball) vs. one shared, multi-use field for baseball, soccer, and lacrosse.

This project has consistently been about rebuilding and improving the baseball field, not a field combined with soccer and lacrosse. There are numerous local soccer/lacrosse sized fields already and M-A is wrapping up the install of a state of the art lacrosse/soccer field with lights at M-A. This will lower the level of community need for soccer and lacrosse fields. M-A will actually have two full sized soccer/lacrosse fields with lights and the football field can also be used when not in season. As a result, a smaller, self-contained soccer field at Flood will now suffice.

There is also not one full sized public baseball field in Menlo Park. There is only one in Atherton at M-A and it is shared with softball as well as football and soccer outside of the primary high school spring season. Menlo Park currently has zero availability for schools, club teams, camps and community members to rent baseball fields too.

Finally, Lacrosse and Baseball share the same primary season so a shared field doesn't really help both entities during their peak season of usage.

Thanks again for your consideration,

Larry Nelson

65.1

## Letter 65

**COMMENTER:** Larry Nelson

**DATE:** November 16, 2017

### **Response 65.1**

The commenter expresses support for the proposed Landscape Plan, including two separate athletic fields, and opposes a multi-use field. The commenter asserts that a smaller soccer field at Flood County Park would suffice because there are “numerous” local soccer/lacrosse fields and Menlo-Atherton High School is currently installing a state-of-the-art lacrosse/soccer field with lights. The commenter adds that lacrosse and baseball share the same primary season and would not truly benefit from a shared field. These opinions about the proposed athletic fields and the Multi-Use Field Alternative do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 14:18

Letter 66

Mark Ryan

We as a community are VERY excited about Flood Park being developed as there is a huge need for additional athletic field space, particularly a full-sized baseball field. As a longtime little league coach and parent of baseball player, there is no other full-sized baseball field in Menlo Park. To this end, I do not support a combined facility for baseball/soccer/lacrosse. Our community NEEDS a dedicated baseball field. Because M-A must share one baseball field with a host of other sports teams, there is no room for a freshman team. A school the size of M-A should have another field option. Instead, it must cut dozens of very good players because of limited field space.

We have a daughter that has played club soccer for many years and there is plenty of field space to accommodate soccer/lacrosse. This is not the case for baseball.

Please strongly consider building a separate baseball field at Flood Park rather than a combined facility!  
Thank you!

Mark Ryan

66.1

## Letter 66

**COMMENTER:** Mark Ryan

**DATE:** November 16, 2017

### **Response 66.1**

The commenter expresses support for adding athletic field space at Flood County Park, especially a separate, full-sized baseball field. The commenter adds that there is a need for additional baseball field space but plenty of soccer/lacrosse field space. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 13:19

Letter 67

Mike Haven

Thank you for the opportunity to submit feedback. I am the father of two multi-sport athletes in Menlo Park, ages 12 and 8. They play baseball, flag football, soccer and basketball. I have been a member of the Menlo-Atherton Little League ("M-A LL") Board of Directors for more than 7 years, and currently am in my second year of service as President of M-A LL.

I am writing to express my support for more than one sports field at Flood Park. We have many youth athletes in our community, and not nearly enough fields to support them. In particular, more baseball fields are sorely needed. Flood Park would be an ideal location for a full sized, stand-alone baseball field fashioned to accommodate multiple levels of play - from Little League through High School. The field would be highly utilized for baseball throughout the year.

One combined facility would have far less impact. Nor should that be necessary. There is plenty of space to build a separate lacrosse/soccer field, so that each sport can receive a significant boost in field availability.

Please make Flood Park as useful to the local sports community as possible. The kids are counting on it.

Sincerely,

Mike Haven

332 Trenton Way

Menlo Park, CA 94025

67.1



## Letter 67

**COMMENTER:** Mike Haven

**DATE:** November 16, 2017

### **Response 67.1**

The commenter, who serves as president of the Menlo-Atherton Little League, expresses support for new athletic fields at Flood County Park, in particular for the proposed ballfield. The commenter asserts that the ballfield would be “highly utilized for baseball throughout the year.” A multi-use field, the commenter claims, would not fully meet the community’s need and would be unnecessary because the park has space for a separate soccer/lacrosse field. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 23:16

Letter 68

Monica Nicholl

I approved the proposed plan to update Flood Park. I live around the border of the park and look forward to seeing it look new again.

68.1

## Letter 68

**COMMENTER:** Monica Nicholl

**DATE:** November 16, 2017

### **Response 68.1**

The commenter expresses support for the proposed revitalization of Flood County Park. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 10:18

Nettie Wijsman



Letter 69

<https://parks.smcgov.org/sites/parks.smcgov.org/files/webform/FLOOD%20PARK%20DRAFT%20EIR%20COMMENTS%2011-17-17.docx>

## FLOOD PARK DRAFT EIR COMMENTS

Comments in italics are quotations from the draft EIR or other documents. Comments in Capitals are my comments in relation to the comments in the documents.

### 2.6 Required Approvals

“The proposed project would require the discretionary approval of the County of San Mateo, who holds approval authority with respect to the Landscape Plan and EIR certification. In addition, the project may require approval by SFPUC of an updated Revocable License for secondary recreational use of its pipeline right-of-way”. pg 30. PLEASE EXPAND IN MORE DETAIL AND SPECIFY AND CLARIFY WHICH COUNTY AGENCIES WILL BE REVIEWING AND PROVIDING RECOMMENDATIONS ON THE EIR AND PROJECT APPROVAL AND WHETHER THIS REVIEW WILL OCCUR DURING THE NOTICED PUBLIC HEARINGS. ALSO, PLEASE CLARIFY IF THE UTIMATE APPROVAL WILL BE PROVIDED BY THE COUNTY BOARD OF SUPERVISORS, FOLLOWING APPROVAL BY THE SAN MATEO COUNTY PARKS COMMISSIONERS. IF THERE ARE ANY OTHER AGENCIES INVOLVED IN THE REIEW PROCESS, PLEASE DETAIL WHO THEY ARE AND THEIR SPECIFIC ROLES.

69.1

### NOISE

“The primary athletic facility of concern with regard to noise is the proposed soccer/lacrosse field, due to its proximity to residences and the prevalence of loud impulse sounds such as whistles, shouts, and air horns. Noise from the proposed soccer/lacrosse field would **occur as close as approximately 100 feet** from the backyards of single-family residences on Del Norte Avenue to the southeast, based on the proposed Landscape Plan shown in Figure 4 in Section 2, *Project Description*. It is assumed that this distance is representative of the nearest activity on the proposed field with respect to these residences, as well as of spectators lining the southeastern side of the field.” pg 136-137 **(THIS IS A COMPLETELY INACCURATE MEASUREMENT AS THE DISTANCE FROM THE BALL PARK FENCE TO THE BACK GATE ALONG NEIGHBOR’S PROPERTY LINES IS APPROXIMATELY 250 FT. ALTHOUGH THIS MEASUREMENT COUD CHANGE WITH MOVING THE BALL PARK FENCE, THE MEASUREMENT FROM THE PUC HATCH FARTHEST FROM THE BASEBALL FIELD TO NEIGHBORS PROPERTY LINES IS APPROXIMATELY 260 FEET. (THE PUC HATCHES ARE APPROXIMATELY 15 – 16 FEET FROM THE BALL PARK FENCE AND ARE NOT MOVABLE). GIVEN THAT A LACROSSE FIELD WIDTH IS 180 FT. PLUS AN ADDITIONAL 36 FEET (18’/SIDE FOR THE LIMIT LINE) AND AN ESTIMATED 10-15 FEET FOR SPECTATORS, LEAVES ONLY APPROXIMATLEY 19-24 FEET TO SPREAD BETWEEN THE 2 SIDES OF THE FIELD. WITHIN THIS SPACE ARE PATHWAYS ON BOTH SIDES OF THE FIELD. THE CURRENT PATH WIDTH BETWEEN THE SOCCER/LACROSSE FIELD AND THE BASEBALL FIELD FENCE IS 9 FEET WIDE. LEAD ARCHITECHT, MR. GATES, STATED WHEN ASKED ABOUT THE DISTANCE OF THE FIELD TO NEIGHBORS PROPERTY LINES AT A COMMUNITY MEETING ON 12/16/15, THAT THE DISTANCE WAS “ABOUT 30 FEET.” BUT IN LOOKING AT MEASURMENTS OF THE PUC HATCHES TO NEIGHBORS PROPERTY LINES, THERE IS UNLIKELY TO BE 30 FEET. THIS DISTANCE SEEMS TO ALSO ENCOMPASS SPECTATOR SEATING AS THE TRUE DISTANCE TO THE FIELD IS LIKELY TO BE WELL UNDER 30 FEET. THEREFORE, NOISE TESTS WOULD NEED TO ACCOUNT FOR THE SPECTATOR SEATING DISTANCE AND LEAVE ALMOST NO DISTANCFE TO NEIGHBORS YARDS.**

69.2

PLEASE POVIDE THE DISTANCE AS TO HOW CLOSE THE SOUTHEASTERN EDGE OF THE PATHWAY WILL BE TO NEIGHBORS PROPERTY LINES. ALSO PROVIDE THE DISTANCE FROM NEIGHBORS PROPERTY LINES TO THE OUTSIDE OUTERMOST EDGE OF SPECTATOR SEATING.PLEASE INCLUDE OUTSIDE MEASUREMENTS OF THE SOCCER/LACROSSE AND BASEBALL FIELDS.

“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 Leq at the edge of the stadium while a lacrosse practice creates noise levels of 55-60 dBA Leq (RGD Acoustics 2016). These noise measurements were taken at a distance of approximately 50 feet from the edge of the lacrosse field. Assuming that noise from athletic activity attenuates by 6 dBA per doubling of distance from the source, it is estimated that lacrosse activity at Flood County Park would generate noise levels of 59-64 dBA Leq during games and 49-54 dBA Leq during practices, as perceived at residences located 100 feet away on Del Norte Avenue.” Pg137 (THESE NOISE ESTIMATES ARE NOT ACCURATE PER THE CHANGE IN DISTANCE AS NOTATED ABOVE. THE Dba SHOULD INCREASE GIVEN THE CLOSE PROXIMITY OF THE DISTANCE OF THE FIELD TO RESIDENTS PROPERTY LINES. “According to Noise levels measured from the lacrosse playoff game are considered representative of noise from soccer games (RGD Acoustics 2016).” Pg 137 THIS ASSUMPTION MAY NOT BE ACCURATE, AS MORE PEOPLE MAY ATTEND SOCCER GAMES.

69.3

**SAN MATEO COUNTY NOISE ORDINANCE PROHIBITES NOISE IN EXCESS OF 75Dba DURING THE DAY AND ONLY ALLOWS 1 MINUTE OF USE AT 70dBA, 5 MINUTES AT 65Dba, 15 MINUTES AT 60 Dba AND 30 MINUTES AT 55dBA. WITH CHANGES TO THE DISTANCE TO NEIGHBORS PROPERTY LINES UTILIZING THE LACROSSE STUDY WILL PLACE THE NOISE LEVELS DURING A LACROSSE GAME BETWEEN 70 dBA TO 75DdBA.**

69.4

“Average sound energy levels during lacrosse and soccer games may exceed existing ambient noise levels in the vicinity of Flood County Park. As shown in Table 17, ambient noise was measured at approximately 55-56 dBA Leq on a Saturday afternoon at the southeastern edge of the park, next to residential backyards, and at approximately 56 dBA Leq on Del Norte Avenue on a weekday late afternoon. Anticipated noise levels of 59-65 dBA Leq (THIS MEASUREMENT IS NOT ACCURATE WITH CHANGES TO FIELD DISTANCE TO NEIGHBORS PROPERTY LINES) during lacrosse and soccer games would exceed existing ambient noise levels by an estimated 3 to 9 dBA Leq (IT WOULD BE GREATER THAN THIS). These short-term increases in ambient noise would be perceptible to residents adjacent to the park.”

69.5

“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).” Pg137 **IMPLUSE NOISE WILL DISTURB RESIDENTS.** “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. Although Section 4.88.360(c) of the County Code of Ordinances would exempt activities at Flood County Park from quantitative noise standards, 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 – between 9 A.M. and 8 P.M. – would minimize disturbance to neighbors by avoiding normal sleeping hours. However, the use of whistles, air horns, and sound amplification equipment could cause discomfort or annoyance to people of normal sensitivity 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.” **THE CONSTANT USE OF WHISTLES, AIR HORNS AND SOUND AMPLIFICATION AND YELLING (NOT LISTED ABOVE), WILL DISTURB THE PEACE AND QUIET OF NEIGHBORS AND CAUSE DISCOMFORT TO PEOPLE DURING THE DAY, NOT ONLY DURING THE EARLY MORNING HOURS AND LATE EVENING.YOU COULD MITIGATE THIS BY NOT ALLOWING ANY AMPLIFICAITON, AIR HORNS AND OR WHISTLES, HOWEVER YOU COULD**

69.6

**NOT CONTROL CROWD NOISE WITH THE DISTANCE BEING SO CLOSE. GIVEN THAT NOISE IS GREATER AT A GAME THAN A PRACTICE, INDICATES CROWD NOISE IS LIKELY THE CAUSE OF THE INCREASE IN NOISE. YOU COULD NOT MITIGATE THIS NOISE EXCEPT BY MOVING THE SOURCE(S) OF NOISE FARTHER FROM RESIDENTIAL NEIGHBORHOODS. I.E. NOT BUILDING FIELDS SO CLOSE TO RESIDENTIAL NEIGHBORHOODS.**



“The County also uses leaf blowers to clear paved surfaces such as the existing tennis courts and asphalt paths. Maximum noise levels from leaf blowers at Flood County Park’s existing tennis courts were measured at 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 81 dBA at a distance of 75 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 than the existing tennis courts to residences.” Pg 138 **WITH CHANGES TO THE PATHWAY ALONG THE SOCCER/LACROSSE FIELD, THE dBA WITH USE OF LEAF BLOWERS WOULD BE MUCH HIGHER THAN 81 Dba AS THE PATHWAYS ARE MUCH CLOSER. SOUND ABOVE 75dBA IS NOT ALLOWED PER SAN MATEO COUNTY NOISE ORDINANCE.**

69.7

“The County shall only allow the use of sound amplification equipment and air horns at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with City of Menlo Park procedures”. **ALLOWING PROCUREMENT OF A PERMIT FOR SOUND AMPLIFICATION IS AN OPEN BOOK FOR ALLOWING SOUND AMPLIFICATION. SOUND AMPLIFICATION IN THE PARK HAS BEEN INCREASING IN RECENT YEARS, AS PERMITS ARE NOT DIFFICULT TO OBTAIN.**

69.8

**PARK USE**

“The existing conditions at Flood County Park were derived using historic park visitor statistics from 2011 through 2015”. Pg 151. **THIS TIME PERIOD IS NOT A GOOD REPRESENTATION OF PARK USE AS THE BASEBALL FIELD WAS NOT IN USE AND THE PARK FACILITIES VERY RUN DOWN. THE PARK WAS CLOSED DURING 2011 AND THE FIRST HALF OF 2012 WITH USE OF THE PARK STARTING TO INCREASE IN YEARS FOLLOWING ITS CLOSURE.** USING STATISTICS DURING THIS TIME PERIOD WILL NOT GIVE AN ACCURATE PROJECTION AS TO USE. HISTORICAL DATA FROM THE 2013 MASTER PLAN GIVES A MUCH MORE ACCURATE IDEA OF USE, AS THIS IS WHEN THE BALL FIELD WAS IN USE AND THE PARK FACILITIES IN GOOD CONDITION. EVEN USING STATISTICS BEFORE THE PARK WAS CLOSED IN 2011 ARE NOT REPRESENTATIVE OF TRUE USE, AS THE BASEBALL FIELD HAS BEEN IN DISREPAIR FOR MANY YEARS, THEREFORE IT WAS USED MINIMALLY PRIOR TO ITS CLOSURE.

69.9

“The average daily number of visitors was determined for each month and then averaged over the four years, to account for annual variation in park visit. Average vehicle occupancy of 1.2 persons per vehicle was used to convert the average daily visitor total into average daily trips per month. In order to account for seasonal variation, these daily trips were averaged over 12 months to determine the number of daily trips the park generates. Driveway counts collected in November 2016 were used to validate this methodology.” Pg 151. **PARKING ESTIMATES WERE BASED ON AVERAGES FOR PARKS AND NOT DATA FROM FLOOD PARK. WHAT IS BEING PROPOSED ARE SPORTS FIELD USE, WHICH IS DIFFERENT THAN PARK USE. NOVEMBER IS LOW SEASON AND DOES NOT REPRESENT THE USE DURING THE PEAK SUMMER MONTHS. AVERAGING THE PARKING USE OVER 12 MONTHS DOES NOT GIVE A TRUE REFLECTION AS TO HOW MANY PEOPLE USE THE PARK AT ONE TIME DURING PEAK SEASON. THE EIR DOES NOT REFLECT USE DURING GAMES WHICH COULD BE MULTIPLE GAMES PLAYED**

69.10



**SIMULTANEOUSLY ALONG WITH EVENTS AT THE “GATHERING MEADOW,” INDIVIDUAL AND GROUP PICNIC USE, AND OTHER PARK USES.**



“This EIR has been prepared as a Project EIR (although limited in scope pursuant to CEQA, as discussed further below) pursuant to Section 15161. A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines* in Section 15161. This type of EIR should focus primarily on the changes in the environment that would result from the development project. **The EIR shall examine all phases of the project, including planning, construction, and operation.**”

69.11

**THERE ARE 3 PHASES LISTED IN THE EIR, YET THE EIR DOES NOT EVALUATE THE USES OF ALL 3 PHASES TOGETHER, AND ONLY EVALUATES THE USE OF PHASE I, AS IF PHASES II AND III WILL NOT HAVE ANY MEASURABLE AFFECT. PHASES II AND III ARE ONLY MENTIONED AT A PROGRAM LEVEL IN THIS EIR. THE ASSUMPTION THAT ONLY PHASE I SHOULD BE EVALUATED WAS BROUGHT UP AT THE NOP MEETING IN DECEMBER AND IN WRITTEN QUESTIONS, YET THE IMPACTS OF PHASES II AND III HAVE STILL NOT BEEN EVALUATED. THE IMPACTS OF ALL PHASES TOGETHER NEEDS TO BE FULLY EVALUATED IN ORDER TO MAKE AN INFORMED DECISION AS TO THE IMPACTS OF THE PROJECTS PROPOSED.**

**GATHERING MEADOW** - GIVEN THAT A “GATHERING MEADOW” IS PROPOSED FOR PHASE II AND IS LIKELY TO ATTRACT LARGE GROUPS OF PEOPLE, HOW CAN THE USES OF THIS AND OTHER PROJECTS IN PHASES II AND III NOT BE ANALYSED?

69.12

- WHO WILL BE AT THESE “GATHERINGS.”
- WHAT TYPE OF EVENTS WILL USE THIS SPACE?
- HOW MANY PEOPLE ARE ANTICIPATED TO USE THE GATHERING SPACE?
- HOW MANY PARKING SPACES WILL THE EVENTS REQUIRE

**PICNIC USERS** - THE AFFECT OF PICNIC USERS HAS NOT BEEN EVALUATED IN THE EIR AND IS ONE OF THE MOST FREQUENT USERS OF THE PARK PRESENTLY. PER PARK RANGER STEVE KRAEMER AT A MEETING AT FLOOD PARK ON 3/19/16 MR. KRAMER STATED “**THE PARKING LOT IS ALMOST FULL NOW DURING PEAK HOURS DURING THE SUMMER MONTHS.**” **THIS IS WITH NO BALL FIELD USE AT PRESENT. HOW MANY PARKING SPACES ARE UTILIZED BY PICNIC USERS? THE TOTAL USE OF THE PARK NEEDS TO BE EVALUATED WITH MULTIPLE ACTIVITIES OCCURRING AT ONE TIME.** LOOKING AT HISTORICAL DATA FROM THE 1983 MASTER PLAN, THE PARK SHOWED 1200 - 2400 PEOPLE ON WEEKENDS. (PG 23 1983 Flood Park Master Plan). WITH A COMPLETELY UPGRADED PARK, THERE IS NO REASON TO BELIEVE THE USE WILL NOT GO UP TO THESE LEVELS OR MORE.

69.13

WHAT IS THE MAXIMUM CAPACITY OF THE PARK?

**TRAFFIC**

“During weekday PM peak hours, the addition of new trips generated by the Landscape Plan are expected to degrade traffic conditions at the intersection of Bay Road and Ringwood Avenue from an acceptable LOS C to an unacceptable LOS D under existing plus project conditions and from an unacceptable LOS D to E under near-term 2021 plus project conditions. Furthermore, new vehicle trips at this intersection would exacerbate unacceptable LOS F conditions under cumulative 2040 plus project conditions. It is worth noting that existing traffic conditions at this intersection during weekday PM peak hours are already approaching the City of Menlo Park’s threshold of LOS D for un-signalized intersections. The addition of only 25 PM peak hour trips associated with active and passive recreational use at Flood County Park would push operating conditions from LOS C to D, causing an exceedance of



the City's traffic standards. However, a signal warrant analysis indicates that projected traffic volumes at this intersection would not necessitate installation of a traffic signal under any traffic scenario." pg 157

**"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. Although new parking fee collection practices would minimize queuing, mitigation measures at the affected intersection would be infeasible. Therefore, the Landscape Plan would have a significant and unavoidable impact on traffic under existing plus project, near-term plus project, and cumulative 2040 project conditions." pg 155 and 158

**THE PLAN INDICATES THAT RINGWOOD AND BAY RD, IS ALREADY AT A "C" GRADE BASED ON THE LOS SYSTEM CURRENTLY IN USE. IT IS EXPECTED TO BE AT A GRADE "D" PRIOR TO ANY ADDITIONAL USE BY THE PARK BY THE TIME THE PLAN IS EXPECTED TO BE DONE IN 2021 AND AT A GRADE "F" BY 2040. IT APPEARS THE NEIGHBORHOOD CANNOT HANDLE ANY MORE TRAFFIC DURING THE WEEKDAY PM TRAFFIC TIME. THE PARK WILL GENERATE MORE TRAFFIC WEITH NEARLY ANY UPGRADES. RESIDENTS ARE UNABLE TO ACCESS HOMES EXCEPT BY USING BAY ROAD. GIVEN THAT ONLY 25 MORE WEEDAY PM TRAFFIC TRIPS WOULD PUT THE INTERSECTION OF RINGWOOD AND BAY ROAD AT AN UNACCEPTABLE LEVEL, HOW CAN ANY INCREASED USE OF THE PARK DURING WEEKEDAY PM TRAFFIC HOURS BE ENCOURAGED? EVEN IF THE LANDSCAPE PLAN IS APPROVED WITH PM SCHEDULED USE RESTRICTIONS, IT STILL ALLOWS USE OF THE FIELDS, THEREFORE ENCOURAGES MORE TRAFFIC. IF THERE ARE 2 LARGE FIELDS THAT IS TWICE AS MUCH POSSIBILITY OF FIELD USE.**

69.14

THERE WAS NO EVALUATION OF AM TRAFFIC. DURNG THE SUMMER MONTHS. IT WOULD BE EXPECTED THAT THE PARK WOULD BE USED FOR SUMMER PROGRAMS DURING THE WEEK, MAKING EVALUATING THE AM TRAFFIC ALSO IMPORTANT.

69.15

**FIELD USE TIME RESTRICTIONS**

The current alternative Landscape Plan calls for restrictions for scheduled games/practices from 4-6PM.**IF GAMES OR PRACTICES ARE SCHEDULED AGAIN AT 6PM, THIS WILL PLACE CARS IN THE PEAK TRAFFIC HOURS BETWEEN 5-6 PM, DEPENDING ON THE COMMUTE TIME. IF FIELD USE ENDS AT 4PM, THEN TRAFFIC FROM USE BEFORE 4PM WOULD BE ON THE ROADWAYS DURNG THE PEAK TRAFFIC HOURS OF 4-6PM. FIELD USE RESTRICTIONS SHOULD BE LONGER THAN 4-6 PM TO ENSURE MORE CARS ARE NOT ON THE ROADWAY DURING THESE HOURS.**

69.16

**CUT THROUGH TRAFFIC**

**THE EIR HAS NOT ADDRESSED THE QUESTION OF CUT-THROUGH TRAFFIC IN NEARBY NEIGHBORHOODS WHICH WILL BE A PROBLEM, EVEN WITH EDUCATION. ACCESSING THE LARGE SOCCER/LACROSSE FIELD IS GOING TO BE TIME CONSUMING WITH DRIVING INTO THE PARK. THE BACK SOCCER/LACROSSE FIELD IS LOCATED AS FAR FROM THE ENTRANCE AS IS POSSIBLE. IT IS GOING TO BE LIKE GOING TO A MAJOR SHOPPING CENTER DURING THE HOLIDAY SEASON WITH CARS PULLING IN AND OUT AS THE CURRENT PARKING LOT HAS ONLY ONE LANE GOING IN EACH DIRECTION. DROP OFFS FOR THE SOCCER/LACROSSE FIELD WILL RESULT IN MORE USE OF THE IRIS LANE GATE RESULTING IN AN INCREASE IN TRAFFIC ON THE SOUTHEASTERN SIDE OF THE PARK. THIS MAY ALSO NOT BE A SAFE PLACE FOR KIDS TO HANG OUT AND THERE IS A POTENTIAL FOR NUISANCE TO NEIGHBORS. OTHER THAN EDUCATION WHICH WILL LIKLEY NOT WORK FOR EVERYONE, HOW WILL THE PLAN ENSURE THAT**

69.17

NEIGHBORS ARE NOT GOING TO BE FURTHER BOTHERED BY PARTICIPANTS USING THE BACK GATE AND PARKING ON OUR STREETS?

WILL ACCESSIBILITY FOR EMERGENCY VEHICLES BE AFFECTED WITH THE INCREASED TRAFFIC ON BAY RD AND RINGWOOD? THIS WAS A QUESTION PRIOR TO THE EIR AND NOT ANSWERED.

**WHAT WILL BE THE TRAFFIC IMPACT OF PEOPLE BOTH DROPPING OFF SPORTS PARTICIPANTS AND THOSE WAITING TO PICK UP SPORTS PARTICIPANTS, COMMONLY KNOWN AS THE COLLISION FACTOR? IF YOU WANT PEOPLE TO USE A PARKING LOT, YOU NEED TO MAKE SURE THE ACTIVITIES ARE CLOSE TO THE PARKING LOT.**

### TRIP DISTRIBUTION

“It was assumed that a majority of trips to and from Flood County Park under the Landscape Plan would originate locally in Menlo Park. These local trips would occur on local streets, while park trips from regional locations, accounting for 10% of all trips, would utilize U.S. 101 or I-280 before travelling on local streets to access the park. Table 33 shows the applied trip distribution assumptions.” Pg 152

**Impact T-3** “Vehicle trips generated by implementation of the Landscape Plan would not adversely affect roadways designated under the Congestion Management Plan for San Mateo County. Therefore, the project would have a less than significant impact related to conflicts with this plan.” pg 159 **HOW CAN YOU ASSUME THE MAJORITY OF TRIPS WILL BE FROM MENLO PARK AS THIS IS NOT CONSISTENT WITH THE HISTORICAL DATA AVAILABLE IN THE 1983 MASTER PLAN. THIS IS A SAN MATEO COUNTY PARK, NOT A MENLO PARK, PARK. IF NEW FIELDS ARE BUILT WON’T OTHER SPORTS TEAMS BE SCHEDULING USE OR PLAYING AGAINST LOCAL TEAMS?**

69.18

“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.” Pg 159. **WHO IS GOING TO BE USING THE SOCCER/LACROSSE FIELD? THE MENLO PARK LEGENDS ARE A BASEBALL TEAM. THE ONLY MENTION OF SOCCER IS THE SHERRIF’S ACTIVITY LEAGE AND THERE ARE NO GAMES LISTED JUNE – AUGUEST. WHAT OTHER SOCCER TEAMS WOULD BE USING THE FIELDS? WHERE WILL THE PLAYERS BE COMING FROM? HOW MANY PEOPLE WILL BE ATTENDING EACH GAME/PRACTICE?**

69.19

### LACROSSE -

**THERE IS NO MENTION OF SPECIFIC LACROSSE USAGE ANYWHERE IN THE EIR.**

- WHO ARE THE LACROSSE TEAMS?
- WHERE ARE THE PLAYERS COMING FROM?
- HOW MANY GAMES AND WHEN WOULD THEY OCCUR?
- HOW MANY PLAYERS/GAME?
- HOW MANY SPECTATORS/GAME?

69.20

### PARKING

“Parking demand under the Landscape Plan was estimated using standard rates published by ITE in *Parking Generation*, 4th Edition, 2010, for city parks (ITE LU#412). The standard rates for city parks are based on a 25-acre park with softball and soccer fields, outdoor group meeting areas, and an administration building with 375 parking spaces.” Pg 162 **(THIS DOES NOT INCLUDE LEAGUE SIZE BASEBALL FIELD, LACROSSE, LARGE NUMBER OF PICNIC USERS AND WITH MULTIPLE GAMES BEING PLAYED SIMULTANEOUSLY).** “Based on the size of Flood County Park and proposed recreational uses, peak parking demand is anticipated to be 5.1 parking spaces per acre, or 125 parking spaces. Using this

69.21

69.22

standard rate, the existing parking supply of 375 spaces at Flood County Park would be adequate to accommodate peak demand on-site". Pg 162 **WHY IS FLOOD PARK DATA NOT BEING USED FOR THIS ANALYSIS (per Head Park Ranger Steve Kramer, THE PARKING LOT IS ALREADY ALMOST FULL DURING PEAK HOURS DURING THE SUMMER MONTHS). IF YOU VISIT THE PARK DURING PEAK HOURS DURING THE SUMMER, THE PARKING LOT IS NEARLY FULL.** "Historical data from the 1983 Master Plan shows Hi Season activity (mid-April – mid October) showed attendance ranges from 4,000 - 9,000 people/week with 1,200 – 2,400 persons on a Saturday or Sunday. When Saturday or Sunday attendance reaches about 1,800 people and a baseball doubleheader is being played, space for picnic activity is limited". (pg 23 Flood Park Master Plan). **375 SPACES WOULD BE INADEQUATE TO ACCOMMODATE 1,800 PEOPLE.**

69.23

"According to a six-hour weekday count of on-street parking conducted in November 2016, an average of seven cars per hour were parked without permits near the park. During the six-hour Saturday count, an average of 10 cars per hour, not displaying a permit, were parked on local streets." Pg 162. **THIS DATA IS INVALID AS THERE ARE NO DAY PARKING RESTRICTIONS DURING NOVEMBER.**

69.24

**PARKING ESTIMATES DID NOT INCLUDE PARKING REQUIRED DURING GAMES VS. PRACTICE AND WITH MULTIPLE ACTIVITIES TAKING PLACE AT THE SAME TIME I.E GATHERING MEADOW ACTIVITIES, PICNIC ACTIVITIES, ETC. THE LACROSSE STUDY STATED THERE WERE 162 SPECTATORS WHEREAS PRACTICES INVOLVE FEWER PARTICIPANTS THAN WHEN A GAME IS PLAYED.**

69.25

**THERE IS NO MENTION OF A "WORSE CASE" SCENARIO SHOWING SIMULTANEOUS USES, I.E CORPORATE BBQ, PRIVATE BBQ'S, BASEBALL GAME(S), SOCCER/LACROSSE GAMES(S), GATHERING MEADOW USE, FARMERS MARKET, WEDDINGS, PICNIC USERS ETC. AND THEIR EFFECT UPON ALL ENVIRONMENTAL ISSUES AND PARKING. AGAIN, THE EIR NEEDS TO EVALUATE ALL USES OF THE PARK TOGETHER, NOT JUST THOSE IN PHASE I. THIS QUESTION WAS BROUGHT UP BEFORE THE EIR WAS COMPLETED AND HAS NOT BEEN ADDRESSED.**

69.26

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

County Parks should work with the City of Menlo Park and the Town of Atherton to educate park visitors about the parking restrictions, as well as, increase random enforcement of the parking restrictions. Pg 162. **RESIDENTS BORDERING THE PARK HAVE A LONG HISTORY WITH MENLO PARK POLICE WITH MINIMAL RESPONSE TO RESIDENTS WHEN THE POLICE ARE CALLED DUE TO CARS PARKING WITHOUT A PERMIT. ALTHOUGH THE POLICE DID SOME ENFORCEMENT DURING THE EARLY YEARS OF THE NEIGHBORHOOD PARKING RESTRICTION PROGRAM, NOW THEY DON'T COME WHEN CALLED. THEREFORE, THIS MITIGATION MEASURE PROPOSED WOULD BE INADEQUATE TO CONTROL PARKING IN NEARBY NEIGHBORHOODS.**

69.27

#### **ECOSYSTEM AFFECTS**

**What will be the impact of increased development and activities on the long-standing ecosystems in the park?** The value of the natural environment and preservation of trees was of paramount importance to many people during the Parks Department "Reimagining Flood Park" meetings. This was rated as "high" importance. This area of nature is unique and important in our increasingly developed area. **FLOOD PARK IS DIFFERENT THAN A DEVELOPED PARK. PER THE FLOOD PARK MASTER PLAN OF 1983, THE MOST VALUABLE RESOURCE, THE HERITAGE TREES WERE DECLINING DUE TO EXTREME OVERUSE. I SEE NO DISCUSSION AS TO THE CURRENT HEALTH OF THE TREES AND WHAT IS LIKELY TO HAPPEN WITH THE DEGREE OF USE THAT IS PROJECTED IN THE LANDSCAPE PLAN. THIS QUESTION WAS BROUGHT UP AS A QUESTION IN THE NOP BEFORE THE EIR.**

69.28

WHAT IS CONVERTING TO TURF GOING TO DO TO THE HEALTH OF THE REDWOOD TREES NEAR THE BACKSTOP OF THE CURRENT BASEBALL FIELD, AS THOSE TREES ARE PLANTED WITH CEMENT SURROUNDING THEM ON ALL SIDES AND THE ROOTS ARE LIKELY GETTING MUCH OF THEIR WATER FROM THE LAWN AREA IN THE BASEBALL FIELD?

69.29

#### DUST

THIS QUESTION WAS INCLUDED IN THE NOP QUESTIONS AND NOT ANSWERED. **HOW ARE YOU GOING TO CONTROL DUST BEING BLOWN INTO NEIGHBOR'S YARDS? HOW ARE YOU GOING TO ENSURE THAT DUST FROM BLOWING LEAVES CLOSE TO NEIGHBOR'S YARDS IS NOT GOING TO AFFECT HEALTH NEGATIVELY (I.E. DUST ALLERGIES)?**

69.30

#### RESIDENTIAL VIEWS

"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 encircle the proposed soccer/lacrosse field to retain balls on the field and protect the safety of adjacent residents. Because of its height, this netting would be a prominent feature from the perspective of residents. Tree removal and netting would have a potentially significant impact on residential views. Mitigation Measure AES-1 would reduce the prominence of netting around the proposed soccer/lacrosse field." pg 42. **HOW CAN IT BE SUGGESTED THAT "NEUTRAL COLORED" ATHELETIC NETTING COULD EVEN ATTEMPT TO BE AN ADEQUATE MITIGATION FOR RESIDENTS USED TO LOOKING AT A GROVE OF REDWOOD TREES? HOW CLOSE TO NEIGHBORS PROPERTY LINES WOULD THIS ATHELETIC NETTING BE INSTALLED?**

69.31

#### MITIGATION MEASURES

"As discussed in Section 4.3, *Biological Resources*, Mitigation Measure BIO-2(a) would minimize adverse effects on residential views by requiring the replacement of removed 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." pg 42 **SINCE THE 100 FEET MEASUREMENT USED FOR THE DISTANCE OF THE SOCCER/LACORSSE FIELDS TO PROPERTY LINES IS NOT CORRECT, ARE YOU EVEN GOING TO BE ABLE TO RE-PLANT TREES THAT EVENTUALLY WILL RESTORE THE PRE-EXISTING LEVEL OF PRIVACY OF ADJACENT RESIDENTS? ARE YOU GOING TO BE ABLE TO RE-PLANT TREES THAT ARE WITHIN 25 FEET OF THE PUC LINES? ARE YOU GOING TO BE ABLE TO RE-PLANT TREES WHERE THE CANOPY MIGHT EVENTUALLY HANG OVER THE FIELDS? WHAT KINDS OF TREES ARE GOING TO BE PLANTED TO EVENTUALLY RESTORE THE PRE-EXISTING LEVEL OF PRIVACY OF ADJACENT RESIDENTS?**

69.32

#### REDUCTION IN CURRENT ACTIVITY USE

- What will be the impact on current regular volleyball players in decreasing the number of courts from 4 to 2 when the current courts are used frequently?
- What will be the impact of reducing picnic areas from 8 reservation spaces and one large non-reservation area along with many numerous walk-in picnic sites down to 4 picnic areas and one group area?
- Are there drop in picnic areas as well as reservation sites?
- How many individual/vs. group picnic sites?
- How many tables/each site/area?
- How many total number of picnic tables will be available after the plan is completed or what percentage of current picnic tables will remain?
- What will be the reduction of 4 tennis courts down to 2? (The tennis courts are in such disrepair they are rarely used, but they were used when in good shape).

69.33

- What will be the effect of eliminating the softball field?
- What will be the impact of new sports fields on the availability for parking for picnics and large gatherings?
- How will overflow parking be handled?

The EIR does not address any of these questions and they were posed before the EIR was completed.



**Playground Replacement/Picnic Table Replacement**

Playground replacement is scheduled for Phase II which means the implementation is 5 – 7 years later. The playground equipment is used very frequently and was listed in the high priority list following the community meetings. Why is this item not included in Phase I? Picnic table replacement is also scheduled for phase II and was also listed as a high priority per the community meetings. Why are these slated for phase II?

69.34

**Park Usage Change**

This park development has been called a Landscape plan when in affect it is a major change of the park use and users who will likely be using it. It is going from a park primarily used for passive recreation such as picnic/lawn user’s, playground use, volleyball and previous baseball games to continuous sports field use. Although passive uses will continue, it is clear the sports field uses will be the dominant use. Given that the park is used heavily by residents in lower income areas such as North Fair Oaks, East Menlo Park and East Palo Alto, changing the use to be dominated by sports groups is going to limit the availability of passive recreation that is there currently. The introduction of Lacrosse is also likely to take away from current community users, as Lacrosse is a game not as accessible as soccer or baseball, due to financial constraints.

69.35

**ALTERNATIVE 3 - MULTI-USE PLAN**

This alternative would meet all four proposed objectives: “to repair and update park features, to meet demand for active recreational facilities in San Mateo County, to provide a variety of uses for a range of user groups, and to optimize preservation of oak woodland.” Pg 203

“Similar to the proposed Landscape Plan, this alternative could involve the installation of 20-to-30-foot netting around the multi-use field to retain lacrosse balls and protect the safety of nearby people. This netting would be installed as close as an estimated 150 feet from residences on Hedge Road and Van Buren Road and an estimated 300 feet from residences on Del Norte Avenue. Because of its height, the netting could be a prominent feature in residential views of Flood County Park, especially from two-story residences. Mature trees in the 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”. pg 203. **THERE WOULD BE NO REASON TO REMOVE THESE TREES IF THE ALTERNATIVE PLAN IS APPROVED. THE SUGGESTION THAT THIS COULD BE NECESSARY FURTHER SUBSTATIATES THE LACK OF SENSITIVITIES TO NEIGHBORS EXISTING QUALITY OF LIFE.** 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 removal of mature trees along residential property lines. Pg 203. **THERE WOULD BE LESS LIKELIHOOD THAT ATHELETIC NETTING WOULD BE NEEDED WITH THE SOCCER/LACROSSE FIELD CONTAINED WITHIN THE EXISTING BALL FIELD SPACE AS IT IS WITHIN THE CENTER OF THE PARK.**

69.36

69.37

“The Multi-Use Field Alternative could reduce the loss of mature trees that serve as scenic resources

at Flood County Park. If the existing pétanque and tennis courts were left in place, the County would retain a grove of redwood trees between these facilities in the eastern corner of the park. However, other mature trees would (OR WOULD NOT) still be removed for construction of other facilities like volleyball courts and the multi-use field.” Pg 204.**THERE IS NO REASON THE VOLLEYBALL COURTS COULD NOT BE RE-LOCATED SOMEWHERE ELSE IN THE PARK. THEY ARE CURRENTLY MUCH TOO CLOSE TO RESIDENTS ON DEL NORTE AVE. AND WILL HAVE NOISE IMPACTS BECAUSE OF THE CLOSE PROXIMATLY TO RESIDENTS.** LEAD ARCHITECHT DAVID GATES STATED HE WAS PUTTING ALL OF THE SPORTS ACTIVITIES IN ONE GENERAL AREA, AGAIN SHOWING NO SENSITIVTY TO NEARBY RESIDENTS.

69.38

Despite incrementally reducing new vehicle trips, this alternative would not avoid the project’s 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 4.9, *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 game would generate an estimated 30 P.M. peak hour trips (Appendix H). 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 a significant impact under existing conditions.** Without construction of the proposed soccer/lacrosse field near residences on Del Norte Avenue, this alternative would reduce people’s exposure to operational noise.” pg 207 – 208

69.39

**ALTHOUGH THE ALTERNATIVE PLANS DID NOT PROPOSE THE MULTI-USE FIELD WITH PM USE RESTRICTIONS, APPROVING THE ALTERNATIVE MULTI-USE FIELD WITH LIMITATIONS ON PM PEAK HOUR USE IS THE BEST ALTERNATIVE AS IT WILL STILL MEET ALL OF THE PARKS OBJECTIVES WHILE HAVING MUCH LESS IMPACT ON NOISE, PARKING AND TRAFFIC WITHIN THE NEIGHBORHOODS.**

69.40

**CONTAINING THE FIELD USE TO ONE MULTI-USE FIELD COULD ALSO GREATLY REDUCE CONSTRUCTION COSTS AS MANY EXISTING FEATURES OF THE PARK SUCH AS THE TENNIS COURTS AND SOME OF THE PATHWAYS COULD REMAIN IN THEIR CURRENT LOCATIONS AND JUST BE UP GRADED.**

**ANOTHER ALTERNATIVE WOULD BE TO ELIMINATE LACROSSE FROM THE MULTI-USE PLAN. LACROSSE WAS NEVER IDENTIFIED FROM ANY COMMUNITY MEMBERS AS AN INTEREST WHEN THE PARKS DEPARTMENT WAS COLLECTING COMMUNITY INPUT, YET HAS BECOME ONE OF THE MOST CENTRAL FEATURES OF THE PARKS RE-DESIGN. LACROSSE ADDS MORE DIMENSIONS TO SOLVE THAN SOCCER, SUCH AS THE NEED FOR VERY HIGH NETTING TO CATCH HARD BALLS. SOCCER AND BASEBALL HAVE DIFFERENT SEASONS; THEREFORE, THEY CAN MORE EASILY SHARE FIELD SPACE. THE LACROSSE SEASON IS THE SAME AS BASEBALL. LACROSSE BALLS CAN DO DAMAGE IF THEY HIT SOMEONE ON THE HEAD WHEREAS SOCCER BALLS WILL NOT.**

69.41

**THE CURRENT PROPOSED PLAN IS AN ATTEMPT TO MAKE THIS PARK HAVE SOMETHING FOR EVERYONE, AT THE EXPENSE OF THE NEIGHBORS. PERHAPS A REDUCTION IN KINDS OF SPORTS WILL ALLOW ITS CHANGE TO BE MORE NEIGHBORHOOD FRIENDLY WHILE STILL INCREASING SPORTS IN THE PARK.**

69.42

It would be appreciated if I could receive an acknowledgement that you received this email.

Regards,

Nettie Wijsman

## Letter 69

**COMMENTER:** Nettie Wijsman

**DATE:** November 16, 2017

### **Response 69.1**

The commenter requests further discussion of which County agencies would review the EIR and approve the project, and when this review would occur. The County Parks Department has reviewed the Draft EIR and comments provided by the public and other agencies. The Final EIR would be reviewed at a County Planning Commission hearing, followed by a County Board of Supervisors hearing to decide on certification of the Final EIR. The Board of Supervisors also would decide on approval of the proposed Landscape Plan, which may occur at the same hearing as EIR certification or at a later hearing. In addition, as noted in Draft EIR Section 2, *Project Description*, the project may require approval by the San Francisco Public Utilities Commission of an updated Revocable License for secondary recreational use of its pipeline right-of-way through Flood County Park.

### **Response 69.2**

While the Draft EIR assumes a distance of approximately 100 feet between the proposed soccer/lacrosse field and neighboring residences, the commenter contends that this distance is likely to be “well under 30 feet,” considering measurements from the SFPUC hatches at Flood County Park to property lines. Based on this shorter distance, the commenter claims that the Draft EIR’s noise analysis is inaccurate. The commenter also requests clarification on the distances from neighboring property lines to spectator seating at the soccer/lacrosse field. As discussed in Topical Response A: Noise Impacts, this field would be located approximately 100 feet away from the property lines. Please refer to Topical Response A for further discussion of the soccer/lacrosse field’s distance to residential properties and its noise impacts.

In addition, the commenter seeks clarification on the distance from neighboring property lines and the proposed pathway at the eastern edge of the park. A precise distance is not available at this stage of project planning; however, the preferred Landscape Plan layout shown in Figure 4 of the Draft EIR indicates that this path would be located between the proposed soccer/lacrosse field and the eastern property line. It is estimated that the path would be located approximately 75 feet from the property line.

### **Response 69.3**

The commenter asserts that the Draft EIR’s estimates of residences’ exposure to noise from lacrosse activity are inaccurate because the proposed soccer/lacrosse field would be closer to residences. Please refer to Topical Response A for further discussion of the soccer/lacrosse field’s distance to residential properties and its noise impacts.

The commenter also disputes the Draft EIR’s assumption that noise levels measured from a lacrosse playoff game are representative of noise from soccer games, on the basis that more people could attend soccer than lacrosse games. Draft EIR Section 4.8, *Noise*, derives this assumption from an Environmental Noise Impact Report for the Marin Catholic High School Field Lighting Project, prepared by an acoustic engineering firm in August 2016. This source states that noise measurements taken during a lacrosse playoff game with 162 spectators are representative of lacrosse, soccer, and track meet noise (RGD Acoustics 2016). Therefore, it is reasonable for the Draft EIR to apply the same



assumption. Furthermore, the Draft EIR's use of crowd noise from a well-attended playoff game results in a conservative estimate of lacrosse and soccer noise at Flood County Park.

#### **Response 69.4**

The commenter states that the County's noise ordinance prohibits noise above certain levels for specified amounts of time. Lacrosse noise reaching 70 to 75 dBA could exceed these standards, the commenter claims. Although Section 4.88.330 of the noise ordinance does set exterior noise standards intended to protect sensitive receptors from noise generated at nearby properties, as disclosed in Table 18 in the Draft EIR, Section 4.88.360(c) specifically exempts noise generated on public parks. Therefore, the County's exterior noise standards would not apply to activities at Flood County Park. It should also be noted that estimated noise levels from lacrosse activity at the park would reach 64 dBA Leq at the nearest residences.

#### **Response 69.5**

The commenter reiterates a statement that the Draft EIR's estimated noise levels from soccer and lacrosse games are inaccurate because the proposed field's distance to residences would be closer. Please refer to Topical Response A: Noise Impacts for further discussion of the soccer/lacrosse field's distance to residential properties and its noise impacts.

#### **Response 69.6**

The commenter states that "the constant use of whistles, air horns, and sound amplification and yelling" would disturb the peace and quiet of neighbors during daytime hours, not just during early morning and late evening hours. It is acknowledged that noise associated with athletic games and practice at Flood County Park could affect nearby residents during midday hours. Nonetheless, such activities would be typical of local parks with active recreational use during daytime hours. Furthermore, the County's noise ordinance intends to protect the peace and quiet of "persons of normal sensitivities" (Section 4.88.220, San Mateo County Ordinance Code). Noise from athletic events during normal waking hours would not substantially disturb persons of normal sensitivities. However, Mitigation Measure N-3(b) in the Draft EIR would reduce noise exposure to the extent feasible during more sensitive early-morning hours, by prohibiting athletic events before 9 A.M. As discussed in Topical Response A: Noise Impacts, implementation of Mitigation Measure N-3(a), as revised in the Final EIR, would also restrict the use of equipment that generates noise during park events.

The commenter also claims that the only way to reduce exposure to crowd noise would be to move athletic fields farther from residences. The Draft EIR evaluates a Multi-Use Field Alternative which would serve this purpose, shifting the location of athletic fields away from the nearest residences to decrease their noise exposure.

#### **Response 69.7**

The commenter contends that the use of leaf blowers on the proposed path along the soccer/lacrosse field would generate higher noise levels than estimated in the Draft EIR. Page 138 of the Draft EIR in Section 4.8, *Noise*, states that new asphalt paths could be built as close as approximately 75 feet from the backyards of residences on Del Norte Avenue. At this distance, it is estimated that the use of leaf blowers on paths would reach a maximum noise level of 81 dBA. In response to this comment, it was determined that a proposed path between the soccer/lacrosse field and the eastern park boundary could potentially be located closer than 75 feet from residential backyard, depending on its exact alignment. Therefore, the Final EIR has been amended as follows:

Based on the proposed Landscape Plan shown in Figure 4, it is estimated that new asphalt paths would be built as close as approximately 75 feet from the backyards of residences on Del Norte Avenue, and the new tennis courts would be located about 115 feet from these noise-sensitive receptors. Maximum noise levels from leaf blowers at Flood County Park's existing tennis courts were measured at 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 81 dBA at a distance of 75 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 to residences.

As noted in the revised analysis above, the County currently uses leaf blowers to clear the surface of tennis courts located as close as approximately 15 feet to residential backyards. Regardless of the proposed path's alignment, it is not anticipated that the path would be located any closer than 15 feet to residential backyards. Therefore, leaf blower activity on this path would not typically occur any nearer to residential properties than at the existing tennis courts. It is not expected that leaf blower noise would increase above existing conditions at the park.

### **Response 69.8**

The commenter asserts that Special Event Permits are not difficult to obtain and would not adequately mitigate the noise impact from sound amplification at Flood County Park. Please refer to Topical Response A: Noise Impacts for a discussion of the adequacy of noise mitigation for sound amplification.

### **Response 69.9**

The commenter asserts that the Draft EIR's assessment of existing conditions is flawed because it relies on historical visitor data from 2011 through 2015, when the existing ballfield was closed. The commenter contends that historical data from the existing Master Plan would provide a more accurate basis on which to project future park use. The commenter also states that pre-2011 statistics would not be representative because the ballfield was in disrepair and minimally used for many years. Please refer to Response 22.19 for a discussion of appropriate baseline data for the EIR.

### **Response 69.10**

The commenter claims that the Draft EIR's parking estimates and parking counts at Flood County Park are inadequate for several reasons:

- They reflect average annual parking demand, not peak use during simultaneous events
- They are not based on parking counts at the park
- Athletic fields generate different parking demand than does general park use
- The November parking counts are not representative of peak use during summer months

Please refer to Topical Response B: Transportation Impacts for a discussion of the adequacy of the Draft EIR's parking estimates and parking counts.

### **Response 69.11**

The commenter states that the EIR needs to fully analyze all phases of the project, rather than considering Phases II and III at a programmatic level, to enable an informed decision about the Landscape Plan. Please refer to Response 22.2 for a discussion of the EIR's level of analysis.

### **Response 69.12**

The commenter asks why the Draft EIR does not analyze use of the gathering meadow during Phase II of the Landscape Plan because this space would likely attract large groups of people. However, the Draft EIR evaluates the environmental impacts of the gathering meadow during Phase II in Section 4.7, *Hydrology and Water Quality*, and Section 4.8, *Noise*. In particular, page 138 in Section 4.8 provides a detailed analysis of the potential exposure of residents to noise from events at the gathering meadow:

However, the gathering meadow in Phase II would be a performance space suitable for concerts or ceremonies that could involve the use of sound amplification equipment for music or commentary. 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. Nonetheless, the use of sound amplification equipment at high volume during large events could produce noise that disturbs nearby residents.

Please refer to Topical Response A: Noise Impacts for further discussion of the County's restrictions on the use of sound amplification at parks and mitigation to minimize use of this equipment.

The commenter also asks who would use the gathering meadow, which types of events would occur there, how many people could attend these events, and how many parking spaces would be required. The County anticipates that the gathering meadow would be used for the occasional movie night (at most once a year) and could potentially be reserved for special events. As discussed in Draft EIR Section 5, *Effect Found Not to Be Significant*, it is assumed that large events with more than 50 attendees could take place at the gathering meadow. Section 4.9, *Transportation and Circulation*, provides an analysis of the park's overall parking demand, which is an appropriate level of analysis for the long-term Landscape Plan.

### **Response 69.13**

The commenter states that the Draft EIR does not evaluate the project's effect on picnic users. The Landscape Plan's social effect on picnic users is not within the scope of the EIR's analysis of environmental impacts. However, the project would not reduce the existing amount of picnic space at the park.

The commenter raises several concerns about the EIR's analysis of parking impacts. The commenter cites a March 2016 statement by County Park staff that the parking lot at Flood County Park is "almost full now during peak hours during the summer months"; cites historical visitor data from the 1983 Master Plan; asks for the maximum capacity of the park; and asserts that the EIR needs to evaluate simultaneous activities at the park. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 69.14**

The commenter asserts that the neighborhood cannot handle any more traffic during the weekday P.M. peak hour. Because the Draft EIR identifies a significant and unavoidable traffic impact at Bay Road/Ringwood Avenue intersection, the commenter asks how the County can encourage any increased use of the park. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter also states that the Reduced Athletic Programming Alternative would still encourage more traffic. This comment is consistent with the traffic analysis in Draft EIR Section 7, *Alternatives*.

**Response 69.15**

The commenter states that the Draft EIR does not evaluate A.M. traffic, which would be important during use by summer programs. However, the weekday P.M. peak hour scenario evaluated in Traffic Impact Study prepared for the Landscape Plan (see Appendix H of the Draft EIR) is representative of the project's most adverse effects on existing traffic congestion, as new vehicle trips associated with athletic events after school hours would add to afternoon rush hour traffic. The project's effects on traffic congestion during the morning rush hour would be no more adverse than analyzed for the P.M. peak hour scenario.

**Response 69.16**

The commenter recommends that the Reduced Athletic Programming Alternative restrict field use before 4 P.M. and after 6 P.M. because it would still result in vehicle trips during PM peak hours. It is acknowledged that this alternative could result in minimal vehicle trips from pick-up and drop-off activity just after 4 P.M. or just before 6 P.M. However, such trips would not substantially contribute to P.M. peak hour traffic because of the prohibition on programmed athletic activities from 4 P.M. to 6 P.M. on weekdays.

**Response 69.17**

The commenter states the project would result in increased drop-off activity at the Iris Lane gate, creating unsafe conditions for children and a potential nuisance to neighbors. The commenter asserts that educating park users about residential parking restrictions would not suffice to avoid adverse effects from drop-off activity. Please refer to Response B: Transportation Impacts for a discussion of impacts related to pick-up and drop-off activity by athletic users at the Iris Lane gate.

The commenter asks if increased traffic on Bay Road and Ringwood Avenue would affect accessibility for emergency vehicles. As discussed on page 187 in Draft EIR Section 5, *Effects Found Not to Be Significant*, the Landscape Plan would not modify the existing transportation network and would retain emergency access to the park through the main entrance gate and the fire lane at the Iris Lane gate. Therefore, the impact to emergency access would be less than significant.

In addition, the commenter recommends locating activities close to the parking lot to facilitate on-site parking. This suggestion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 69.18**

The commenter asserts that the Draft EIR's assumption that most vehicle trips would originate from Menlo Park is inconsistent with historical data from the 1983 Master Plan. The commenter also suggests that regional sports would still use athletic fields at Flood County Park. Please refer to Response 22.18 for a discussion of trip distribution assumptions.

**Response 69.19**

The commenter asks who would use the proposed soccer/lacrosse field other than the Sheriff's Activity League, where players would come from, and how many people would attend events. Please refer to Topical Response B: Transportation Impacts for a discussion of lacrosse and soccer trip assumptions.

### **Response 69.20**

The commenter states that the Draft EIR does not describe anticipated lacrosse use, including which lacrosse teams would use the proposed soccer/lacrosse field, where the players would travel from, when and how many games would occur, and the number of players and spectators per game. Please refer to Topical Response B: Transportation Impacts for a discussion of the timing of lacrosse events, the number of athletes per event, and the vehicle trips generated by lacrosse use.

### **Response 69.21**

The commenter states that the Draft EIR's estimate of parking demand, which is based on the Institute of Transportation Engineers' trip rate for city parks, does not account for a "league size baseball field," lacrosse use, picnic use, and simultaneous games. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 69.22**

The commenter asks why the Draft EIR does not use parking data from Flood County Park to estimate parking demand, suggesting that historical data from 1983 Master Plan would be more appropriate. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 69.23**

The commenter asserts that the park's 375 existing parking spaces would be inadequate to accommodate 1,800 people. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts.

### **Response 69.24**

The commenter contends that the parking count conducted on residential streets near Flood County Park in November 2016 is "invalid" because there are no day parking restrictions that month. It is acknowledged that this parking count is not representative of parking violations during the permit parking season on residential streets. However, the Draft EIR's analysis of the Landscape Plan's impact on the availability of on-street parking does not depend on this exact parking count. As discussed in Impact T-6 in Draft EIR Section 4.9, *Transportation and Circulation*, "Under existing conditions, some visitors park on local streets like Del Norte Avenue rather than pay for on-site parking." Because the proposed recreational improvements in the Landscape Plan would increase parking demand, the Draft EIR assumes that the project would increase parking activity on residential streets without mitigation. However, the County would allow free short-term access to the on-site drop-off area for athletic events, reducing the incentive to seek free parking on neighborhood streets. In addition, Mitigation Measure T-1 to implement parking fee collection practices, such as automated fee machines and paying upon exiting the park, would have a similar effect on parking on nearby streets. Mitigation Measure T-6 also would require education of park visitors about on-street parking restrictions and coordination with the City of Menlo Park on enforcement of parking violations. With implementation of these measures, the project would have a less than significant parking impact.

### **Response 69.25**

The commenter states that the Draft EIR's parking estimates do not distinguish between lower parking demand for athletic practices and higher demand for games, and do not account for simultaneous events at the park. Please refer to Topical Response B: Transportation Impacts for a discussion of the methodology for estimating parking demand.

**Response 69.26**

The commenter claims that the Draft EIR fails to address the environmental and parking impacts of “worst case” scenario of multiple simultaneous events at Flood County Park. However, the EIR does analyze the environmental impacts of simultaneous events. Please refer to Topical Response B: Transportation Impacts for a discussion of the traffic impacts of simultaneous events. Draft EIR Section 4.8, *Noise*, evaluates maximum noise generated by individual lacrosse and soccer events at the park. Although simultaneous events could generate additional noise, this would not substantially affect the average noise level to which residents would be exposed. The components of athletic noise are impulse sources, such as whistles and shouting by athletes and spectators, that occur for short bursts of time, rather than continually.

The commenter adds that the Draft EIR needs to address all uses, not just Phase I. Please refer to Response 22.2 for a discussion of the EIR’s approach to analyzing all phases of the project.

**Response 69.27**

The commenter asserts that the Draft EIR’s parking mitigation would be inadequate because the City of Menlo Park police have historically failed to provide an adequate response to residential complaints about on-street parking permit violations. Please refer to Topical Response B: Transportation Impacts for a discussion of the adequacy of mitigation for parking impacts.

**Response 69.28**

The commenter states that the Draft EIR fails to discuss the current health of trees at Flood County Park and evaluate the effects of increased park use on tree health. Draft EIR Section 4.3, *Biological Resources*, focuses on the effect of construction activity on tree health because this phase of the Landscape Plan would have the main impact. After implementation of the proposed recreational improvements, the increase in park use would have minimal effect on tree health. Most remaining mature trees would be located in open areas with dispersed passive recreational use, such as the picnic areas, and pervious surfaces that allow infiltration of rainwater to roots. Large groups of people could result in a minimal increase in soil compaction, affecting the root zone of trees. However, this minor effect would not substantially impair tree health.

**Response 69.29**

The commenter asks how the installation of turf would affect redwood trees near the backstop of the current baseball field, as their roots are likely getting water from the lawn areas in the existing ballfield. The reconstructed ballfield could have either a natural grass or artificial turf surface. A natural grass surface would be permeable, allowing water infiltration to underlying tree reports. Although an artificial turf field would be impermeable, rainwater would be collected and discharged away from the field. Therefore, the installation of a new field surface would not substantially affect water availability to nearby trees. Implementation of Mitigation Measure BIO-2(b) would minimize adverse effects on remaining trees during ground disturbance, including turf installation, by avoidance of sensitive root zones.

**Response 69.30**

The commenter asks how the County would control dust being blown into neighbors’ yards. As discussed in Draft EIR Section 4.2, *Air Quality*, construction of the Phase I of the Landscape Plan, including athletic improvements in the northern portion of the park, would generate daily particulate emissions at levels far below the Bay Area Air Quality Management District’s thresholds. Phases II and III would involve less intensive grading activity and less dust generation. Therefore, construction

emissions would have a less than significant impact. However, the EIR recommends implementation of the Bay Area Air Quality Management District's Basic Construction Mitigation Measures, which are best practices for controlling fugitive dust. These measures would further reduce the exposure of residents to dust during construction.

### **Response 69.31**

The commenter claims that the Draft EIR's Mitigation Measure AES-1 for neutral-colored netting around the soccer/lacrosse field would be inadequate, compared to existing redwood grove in the area. Draft EIR Section 4.1, *Aesthetics*, acknowledges that tree removal and netting around the proposed soccer/lacrosse field would have an adverse visual effect on residential views. However, as shown in the Tree Report (Appendix D of the Draft EIR), it is anticipated that the County would preserve existing trees along the eastern boundary of the park next to residential property lines. The preservation of these trees would partially preserve existing residential views of natural vegetation. Mitigation Measure AES-1 would also reduce the obtrusiveness of lacrosse netting, if installed, from the perspective of residents. Furthermore, Mitigation Measure BIO-2(a) would involve the replacement of mature trees within 25 feet of residential property lines with trees that would restore pre-existing privacy levels upon maturation. These measures would preserve residential views and privacy over the long term. It should also be noted that although the County's CEQA checklist addresses the effects of a project on "views from existing residential areas," CEQA case law holds that effects on private residential views are generally outside the purview of environmental analysis; rather, CEQA focuses on whether a project would affect the public environment.

### **Response 69.32**

The commenter asks if there would be room to replant trees to restore the existing level of privacy to residents, and what kind of trees would be planted. Because the proposed soccer/lacrosse field would be located approximately 100 feet from residential properties, there would be adequate room to plant additional trees near the eastern boundary of the park. The County would determine which species are appropriate to plant in this area. Pursuant to Mitigation Measure BIO-2(a), replacement trees for heritage trees, if planted in this area, would be species specified as heritage trees.

The commenter also asks if trees can be planted within 25 feet of the SFPUC pipelines or overhanging the athletic fields. Please refer to Response 41.6 for a discussion of tree planting near the SFPUC right-of-way. The County would maintain and trim trees near athletic fields as necessary to protect the safety of athletic users.

### **Response 69.33**

The commenter asks for a discussion of the impacts on current park users of decreasing tennis, volleyball, softball, and picnic space. As discussed in Response 57.7, the Landscape Plan would not decrease picnic space, but rather would involve renovating existing individual and group picnic areas. In any event, the commenter is referring to the project's social impacts, which are outside the scope of the EIR's environmental analysis under CEQA.

The commenter also asks how many picnic tables would be at each site. This level of detail about the proposed renovation of picnic areas, which is a long-term component of Phases II and III of the Landscape Plan, is not available at this time.

In addition, the commenter asks for a discussion of the impact of new athletic fields on parking availability for picnics and other large gatherings, and how overflow parking would be handled. Please

refer to Topical Response B: Transportation Impacts for a discussion of the adequacy of mitigation for parking impacts.

**Response 69.34**

The commenter recommends shifting the replacement of the existing playground to Phase I of the Landscape Plan. This opinion does not conflict with or challenge the Draft EIR's analysis and conclusions; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 69.35**

The commenter asserts that the Landscape Plan would transform the character of Flood County Park, which is currently used mainly for passive recreation, to a place dominated by active recreational use. This change in the type of recreational use does not amount to an environmental impact subject to CEQA; however, Draft EIR Section 4.1, *Aesthetics*, evaluates that effect of proposed active recreational improvements on the visual character of the park. As discussed therein, the Landscape Plan would have a less than significant impact on visual character with implementation of mitigation.

**Response 69.36**

The commenter claims that the Multi-Use Field Alternative's potential removal of mature trees in eastern part of the park for passive recreational facilities would be unnecessary and disrespectful to neighbors. This opinion does not conflict with or challenge the Draft EIR's analysis and conclusions; however, all comments will be forwarded to the County's decision makers for their consideration.

**Response 69.37**

The commenter asserts that it is less likely that athletic netting would be needed for a multi-use field in the center of the park. This comment is acknowledged. Lacrosse netting would be intended to protect people outside the area of play from errant balls. A multi-use field would be located farther from residences, reducing the likelihood that netting would be necessary to protect them from errant lacrosse balls. However, the Draft EIR takes a conservative approach to evaluating the Multi-Use Field Alternative's impacts, assuming that lacrosse netting may still be required.

**Response 69.38**

The commenter states that volleyball courts would result in noise impacts and should be relocated. Please refer to Response 48.16 for a discussion of noise impacts from volleyball activity.

**Response 69.39**

The commenter quotes the Draft EIR's discussion of the Multi-Use Field Alternative's impacts on traffic congestion, without providing further comment. This quotation does not conflict with or challenge the analysis and conclusions of the Draft EIR.

**Response 69.40**

The commenter asserts that the Multi-Use Field Alternative is preferable because it would still meet the County's objectives while reducing noise, parking, and traffic impacts, as well as construction costs. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.



### **Response 69.41**

The commenter suggests eliminating lacrosse from the Multi-Use Field Alternative because community members never identified this use as a priority, the need for obtrusive netting, and safety concerns. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

### **Response 69.42**

The commenter asserts that the proposed Landscape Plan is an attempt to make the park “something for everyone, at the expense of neighbors,” and suggests reducing athletic activity. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County’s decision makers for their consideration.

11-16-2017 - 13:13

Letter 70

Patrick Sullivan

Good afternoon,

Our community needs a full size baseball field. This plan would result in 2 brand new fields for the community (a dedicated, full size baseball field & a dedicated soccer/lacrosse field). Again, this would allow Menlo Atherton High School the option to start a Freshman team. This will serve the community well.

70.1

Sincerely,

Patrick T. Sullivan, Menlo Park

## Letter 70

**COMMENTER:** Patrick Sullivan

**DATE:** November 16, 2017

### **Response 70.1**

The commenter states that the community needs a full-sized baseball field at Flood County Park, as is proposed in the Landscape Plan. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 19:27

Letter 71

Renee Ryan

please bring baseball fields back to Flood Park. The community and MA needs it

71.1

## Letter 71

**COMMENTER:** Renee Ryan

**DATE:** November 16, 2017

### **Response 71.1**

The commenter requests that baseball fields be brought back to Flood County Park. Consistent with this request, the proposed Landscape Plan would involve rehabilitation of the existing ballfield which has been out of use since 2011.

11-16-2017 - 20:14

Letter 72

Robert Zeien

I'm in favor of the Flood Park Preferred Plan, with a full size dedicated baseball field and a separate dedicated soccer/lacrosse field. I have seen the need in the community for more playing fields, and I believe this plan would be a significant step in addressing that need.

72.1

## Letter 72

**COMMENTER:** Robert Zeien

**DATE:** November 16, 2017

### **Response 72.1**

The commenter expresses support for the proposed Landscape Plan with a full-sized baseball field and a separate soccer/lacrosse field in order to meet the community's need for more playing fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-16-2017 - 17:37

Tim Cronin

Letter 73

To County of San Mateo, Parks Department -

As a long-time Menlo Park and current Atherton resident with four very active kids, I write to express my enthusiastic support for the Flood Park renovation Preferred Plan.

The Preferred Plan, which includes 1 full-size baseball field and a separate combined soccer/lacrosse field, would be a terrific "win" for our community and go along way to solving many problematic issues presented by the lack of availability of local fields.

73.1

Having coached for more than a dozen years, I'm well aware that there isn't one full sized public baseball field in Menlo Park. There is only one in Atherton, at M-A High School, and it is shared with softball, as well as football and soccer outside of the primary high school spring season. There are currently NO fields available to rent in Menlo Park because they are always booked by user groups. Menlo Park will not book new user groups because demand is so great, and shared fields is not workable.

A combined soccer/lacrosse field, and separate baseball field also makes sense. There are currently many local soccer/lacrosse sized fields, and M-A is installing a state of the art lacrosse/soccer field with lights. M-A High School will actually have 2 full sized soccer/lacrosse fields with lights as the lit football field is used for soccer and lacrosse when not in season. This lowers the level of community need for soccer and lacrosse fields. As such, a smaller, self-contained soccer field at Flood Park will certainly suffice.

The Preferred Plan and separate fields also makes sense since lacrosse and baseball share the same primary season. A shared field would, again, be unworkable.

A HUGELY important issue that will be resolved for the betterment of our community kids involves high school baseball. All high schools should - and most have - a Freshman Baseball team. M-A High School doesn't. This not only puts M-A at a competitive disadvantage, but also, deprives kids of the ability to seamlessly continue to participate in baseball following middle school. M-A High School cannot add a Freshman team until there is more field access. Large amounts of baseball players will have to be cut from the program, never to rerun once they are out of the system, unless there are fields to support a Freshman team.

Noise concerns will also be reduced under the Preferred Plan. A smaller, junior sized soccer field, instead of a full sized field, will alleviate some of the noise as it will be farther from the neighbors and not as many teams/players can be on the field at once.

73.2

Lastly, as I understand it, the project has consistently been about rebuilding and improving the baseball field. The focus should remain on this terrific goal and not a field combined with soccer and lacrosse.

for these reasons, I put my enthusiastic and unequivocal support behind the Preferred Plan!



Respectfully,

Tim Cronin

## Letter 73

**COMMENTER:** Tim Cronin

**DATE:** November 16, 2017

### **Response 73.1**

The commenter expresses support for the proposed Landscape Plan, including a separate ballfield and soccer/lacrosse field to meet community demand for athletic facilities. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response 73.2**

The commenter suggests a junior-sized soccer field that would be farther from neighbors, for the purpose of reducing their exposure to noise. Please refer to Response 45.1 for a discussion of the noise impacts of a junior-sized soccer field.

11-16-2017 - 17:08

Letter 74

Tito Bianchi

My family and I are encouraged by the plans to improve Flood Park. We are Menlo Park residents, and heavily involved in all sorts of community/youth sports (soccer, baseball, lacrosse, etc).

We want to advocate for a remodel plan that includes a separate, stand alone baseball field. Baseball field access, particularly for full sized baseball fields, are in high demand and EXTREMELY low supply.

A field remodel plan that would be for multi-sports will result in several teams that share the same seasons fighting for space. Please install a full size baseball field, with the understanding that there is space for an adjacent soccer/lacrosse field that is slightly less than regulation size.

Simply put, demand for baseball fields are so great, that a shared field will not suffice.

I appreciate your taking the time to read my input,

Tito Bianchi

74.1

## Letter 74

**COMMENTER:** Tito Bianchi

**DATE:** November 16, 2017

### **Response 74.1**

The commenter expresses support for the proposed Landscape Plan with a separate ballfield to meet community demand for baseball facilities. The commenter opposes a shared field because of the level of demand for baseball fields. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-17-2017 - 11:37

Letter 75

Clay Jones

Thank you for reaching out to the community. I feel we should have more sports fields and this should provide more revenue for upkeep. Additionally, the “quieter” parts of the park should be next to the residential homes on the south side. Put the “louder” parts including sports fields / courts by streets.  
Thanks.

75.1

## Letter 75

**COMMENTER:** Clay Jones

**DATE:** November 17, 2017

### **Response 75.1**

The commenter expresses support for adding sports fields. This opinion does not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

The commenter also requests that the louder uses at Flood County Park, including athletic fields and courts, be placed by streets instead of next to residences on the south side of the park. The Draft EIR considers a Multi-Use Field Alternative which would locate athletic uses farther from residences to the south, incrementally reducing their exposure to noise.

Letter 76

11-17-2017 - 07:38

Mark Meyer

Over the past 10 years as a Menlo Park resident I have been actively involved in coaching and administration of youth sports programs, including 7 years as a coach and Player Agent for Alpine West Menlo Little League. I have experienced first hand the shortage of dedicated baseball fields in our community. As such, I am writing to express my strong support for the preferred plan - 2 separate fields - as opposed to the alternative of 1 shared-use facility.

There are a number of reasons why I believe 2 separate fields, each built to properly serve specific sports, is the better choice.

The most important, and this comes out of my experience as an administrator in Little League, is that we have a severe shortage of baseball fields in this community. I have first-hand experience working with the various local leagues and other baseball organizations who have consistently had to settle for less practice and game time than any of them would like due to the field shortage. At higher levels than Little League, we have only 1 full-sized public baseball field in the entire community for 14-yr olds and above to compete on. While the proponents of every sport would always like to see more fields, there are clearly many more options already available to the lacrosse and soccer leagues in this community.

Secondly, a multi-use field that includes baseball is not really a baseball field. This community desperately needs another full-size dedicated baseball field, one that is built to proper dimensions with a infield and fences required for our high-school aged kids to play real baseball. The Menlo Atherton High School baseball program is already hamstrung by the shortage of space on their campus, forcing them to use a combined field that has to be reconfigured several times a week to accommodate baseball and softball. They would love to add a freshman team to their baseball program, getting more kids out on the field during those important early high school years, but cannot due to the current lack of space. Access to this field would make a huge difference to that program. A dedicated full-size baseball field would be a huge asset to this baseball-loving community.

Finally, while multi-use fields generally sound like a great idea, the benefits do not really add up in today's sports environment. Here on the peninsula where we enjoy such great year-round weather most sports are now ""in season"" for all but a couple of months during the year. Whereas 25 years ago multi-use fields ensured that our valuable space didn't just sit dormant during the off-season for a particular sport, they now actually end up creating conflict among various sports agencies all competing for time on the same piece of ground. Baseball and lacrosse share the same primary season, and baseball and soccer teams that compete year round would have one more point of conflict in the community under the alternative plan. Again, I have experienced this first hand as a league administrator over the past several years - the various sports will all fill their separate facilities all year long.

I would be happy to speak further on behalf of Alpine West Menlo Little League with any agencies / committees involved in making this important decision for our community. Thank you for your thoughtful consideration.

76.1

Best regards,  
Mark Meyer  
650-208-3537



## Letter 76

**COMMENTER:** Mark Meyer

**DATE:** November 17, 2017

### **Response 76.1**

The commenter expresses support for the proposed separate ballfield and soccer/lacrosse field because of community demand for baseball facilities. The commenter opposes the Multi-Use Field Alternative because it would result in conflict between baseball and lacrosse, which share the same primary season. These opinions do not conflict with or challenge the analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

11-18-2017 - 20:04

Letter 77

Kari Ridel

There is great demand for dedicated baseball fields in our community. Our children currently travel to Palo Alto and Woodside which adds to car traffic flow across El Camino. We'd rather have more local fields where our kids can easily bike to practice.

77.1

## Letter 77

**COMMENTER:** Kari Ridel

**DATE:** November 18, 2017

### **Response 77.1**

The commenter expresses a preference for local dedicated baseball fields where children can easily ride bicycles to practice, reducing traffic congestion. The proposed Landscape Plan would involve reconstruction of the existing ballfield at Flood County Park for programmed practices and games by baseball groups. Please refer to Topical Response B: Transportation Impacts for a discussion of bicycling by athletic users.

11-19-2017 - 08:56

Letter 78

John Keefer

Why have you not reached out to all Park & Recreation Commissions in San Mateo County for a county project? Millbrae has not received notification and last I checked our tax dollars are going to San Mateo County. Please include us when sending out updates and meeting times. I will share my concerns with other cities in San Mateo County.

78.1

John Keefer

jdkeefe@comcast.net

## Letter 78

**COMMENTER:** John Keefer

**DATE:** November 19, 2017

### **Response 78.1**

The commenter asks why the lead agency has not reached out to all Parks and Recreation Commissions in San Mateo County, since the Landscape Plan is a County project. The County notified other public agencies of the Draft EIR's release in accordance with procedures in the State *CEQA Guidelines*. In addition to notifying neighbors of Flood County Park, the County notified the City of Menlo Park and the Town of Atherton, and presented on the Draft EIR's findings at a Menlo Park City Council hearing on November 7, 2017. The Draft EIR was also made available for viewing on the County Parks website. During implementation of the Landscape Plan, the County would coordinate with the local Parks and Recreation Departments of the Town of Atherton and the City of Menlo Park, the City of Menlo Park's Park and Recreation Commission, and the North Fair Oaks Community Council.

3-18-2018 – 11:59 PM

Letter 79

Nettie Wijsman

Jonathan, I have a few questions about the 2 noise ordinances referenced in the DEIR. Given that there are 2 noise ordinances in San Mateo, can you explain how they work together? It appears the county is exempt from 4.88.360(c) but 4.88.350 of the County Code of Ordinances, on site operational noise would be significant if it “disturbs the peace and quite of any neighborhood or which causes any discomfort or annoyance to any person of normal sensitivity residing in the area. Is the San Mateo County Code of Ordinances used to help define what would be an “annoyance to any person of normal sensitivity?”

79.1

Given that an incorrect assumption was made that noise from the proposed soccer/lacrosse field would occur as close to approximately 100 feet from the backyards of single family residences on Del Norte Avenue to the southeast, as well as noise from spectators, how does this change the the dBA calculated? (The house on Iris Ln next to the edge of the park is no farther than 5 feet from the property line).

79.2

Thank you

Nettie Wijsman

## Letter 79

**COMMENTER:** Nettie Wijsman

**DATE:** March 28, 2018

### **Response 79.1**

The commenter asks how Sections 4.88.360(c) and 4.88.350 of the San Mateo County Code of Ordinances interact and apply to the project. As discussed in Draft EIR Section 4.8, *Noise*, Section 4.88.360(c) exempts from the County's noise standards activities on parks that are owned and operated by a public entity. Flood County Park fits this category of land use and is not subject to the County's exterior and interior noise standards. However, Draft EIR Section 4.8 notes that notwithstanding this exemption, Section 4.88.350 prohibits "any unreasonably loud, unnecessary, or unusual noise which disturbs the peace and quiet of any neighborhood or which causes any discomfort or annoyance to any person of normal sensitivity residing in the area." The Draft EIR applies this qualitative noise standard to the Landscape Plan.

The commenter also asks if the San Mateo County Code of Ordinances is used to define an "annoyance to any person of normal sensitivity." The San Mateo County Code of Ordinances does not explicitly define this phrase. However, Section 4.88.350 cites several criteria to consider when determining if a noise source disturbs the peace and quiet of a neighborhood or people of normal sensitivity:

- a) The sound level of the objectionable noise source.
- b) The sound level of the background noise.
- c) The proximity of the noise to residential sleeping or hospital facilities.
- d) The nature and zoning of the area from which the noise emanates and upon which the noise impacts.
- e) The number of persons affected by the noise sources.
- f) The time of day or night the noise occurs.
- g) The duration of the noise and its tonal, informational, or musical content.
- h) Whether the noise is continuous, recurrent, or intermittent.
- i) Whether the noise is produced by a commercial or non-commercial activity.

As discussed in Topical Response A: Noise Impacts, the Landscape Plan would not violate these noise criteria in Section 4.88.350 of the San Mateo County Code of Ordinances after implementation of Mitigation Measures N-3(a) and N-3(b). Furthermore, the County would control noise through conditions placed on holders of Special Event Permits and enforcement by park rangers.

### **Response 79.2**

The commenter asserts that the Draft EIR made an incorrect assumption about the distance of the proposed soccer/lacrosse field to the backyards of residences on Del Norte Avenue and asks how this affects estimated noise levels at these residences. Please refer to Topical Response A: Noise Impacts for a discussion of this distance and its effect on the exposure of residents to athletic noise.

## 4 Public Meeting Comments

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Verbal comments received at a public meeting on the Draft EIR (November 1, 2017) that pertain to environmental issues are summarized below and individually numbered, with responses following.



**Flood County Park Landscape Plan Draft EIR:  
Summary of Public Meeting Comments**

**Project Description:**

- Park visitor projections:
  - Use historic data from Master Plan to project future visitors associated with baseball
- Playground: move to Phase I
- Athletic fields:
  - Soccer/lacrosse field netting can be raised during game and then taken down.
  - Athletic fields should have lighting.
  - Want more than one soccer field to meet high demand from kids.
  - Turf is good for year-round field use and active recreation.
  - Consider kids' 7x7 fields instead of full soccer field.
- Park hours: The A.M. and P.M. hours should be longer. Redwood City is denser earlier and later hours (i.e., 10 P.M.).
- Use permeable paving surfaces.

PM.1

**Biological Resources:**

- Heritage trees:
  - How many and which would be removed?
  - What is ratio of planting to removed trees?
  - Plant trees ahead of construction to get them going, for a screening perimeter.
- Pittosporum trees:
  - Would these trees behind tennis courts be removed?

PM.2

PM.3

PM.4

**Noise:**

- Soccer/lacrosse field:
  - Double-check distance from soccer/lacrosse field to Del Norte backyards: EIR assumes 100 feet, but David Gates originally said 30 feet
  - Sound of shouting from athletic events travels far
- Volleyball courts:
  - Move away from neighbors
- Mitigation:
  - Consider sound wall
  - Sound amplification measure is too permissive (permit would legitimize noise, and people would apply for lots of permits)

PM.5

PM.6

PM.7

PM.8

**Traffic:**

- Parking availability: | PM.9
  - Assumed demand during events is not conservative enough
  - Should allow free parking to prevent parking on residential streets and make park more accessible
- Drop-off activity at Iris Lane gate: | PM.10
  - Need to directly address whether this would be a problem after mitigation
- Traffic safety at Bay Road pedestrian gate: | PM.11
  - Can you do something to prevent people from parking here and blocking the bike lane?
- Traffic congestion: | PM.12
  - Could van be used for sports team to avoid traffic impact from single cars?
- Mitigation: | PM.13
  - Bike rack is great idea because half of Menlo Park Legends kids bike
  - Parking enforcement may be ineffective because of history of lax enforcement by Menlo Park | PM.14
  - Nominal fee for teams to park?

**Alternatives:**

- Multi-Use Field Alternative: | PM.15
  - Does not meet full demand because baseball and lacrosse share the same season and users would not be happy splitting one field
  - Sharing a multi-use field between different sports works well
  - Concern about how ballfield is designed for multi-use and clear play outline.
- Reduced Athletic Programming Alternative: | PM.16
  - The 4-6 p.m. time period is very important to ballfield users – big impact during winter.
  - Traffic exists no matter what. Ballfield use shouldn't be limited as a result.
- Other alternatives: | PM.17
  - Prefer to have 2 baseball fields and 2 soccer fields in smaller area (e.g., Hoover Park).

**MEETING:** San Mateo County Parks Department

**DATE:** November 1, 2017

### **Response PM.1**

The commenter requests the use of historic data from the park's 1983 Master Plan to project the number of future visitors associated with baseball use. Please refer to Response 22.4 for a discussion of the adequacy of visitor data from the 1983 Master Plan for use in the EIR.

### **Response PM.2**

The commenter asks how many and which heritage trees would be removed. As discussed in Draft EIR Section 4.3, *Biological Resources*, Phases I through III of the Landscape Plan would involve removal of approximately 80 trees overall. Please refer to Response 41.5 for a discussion of the estimated number and type of heritage trees to be removed for the proposed soccer/lacrosse field.

The commenter also asks for the ratio of planted to removed trees. Mitigation Measure BIO-2(a) in the Draft EIR would require the replacement of removed heritage trees at a 1:1 ratio.

### **Response PM.3**

The commenter requests that new screening trees at the park's perimeter be planted ahead of construction. 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, 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.

### **Response PM.4**

The commenter asks if *Pittosporum* trees behind the tennis courts would be removed. Please refer to Response 57.1 for a discussion of preservation and removal of *Pittosporum* trees.

### **Response PM.5**

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 for a discussion of this distance and its effect on the exposure of residents to athletic noise.

### **Response PM.6**

The commenter requests that the County move the volleyball courts away from neighbors to reduce their exposure to noise. Please refer to Response 48.16 for a discussion of the noise generated by volleyball courts and their placement relative to residences.

### **Response PM.7**

The commenter requests consideration of a sound wall to reduce the exposure of residences to noise from park activities. Please refer to Topical Response A: Noise Impacts for a discussion of the need for a sound wall as mitigation.

### **Response PM.8**

The commenter asserts that the Draft EIR's mitigation measure for sound amplification is too permissive. The commenter contends that Special Event Permits allowing sound amplification would legitimize noise, and that people would apply for a large number of permits. Please refer to Topical Response A: Noise Impacts for a discussion of the adequacy of Mitigation Measure N-3(a) to restrict sound amplification at park events.

### **Response PM.9**

The commenter asserts that the Draft EIR's estimate of parking demand during events at Flood County Park is not conservative enough. Please refer to Topical Response B: Transportation Impacts for a discussion of the adequacy of parking estimates in the Draft EIR.

The commenter also requests free parking to prevent on-street parking and make the park more accessible. Please refer to Topical Response B: Transportation Impacts for a discussion of parking impacts, including the potential for parking fee waivers.

### **Response PM.10**

The commenter states that the Draft EIR needs to address whether drop-off activity at the Iris Lane gate would be a problem after mitigation. Please refer to Topical Response B: Transportation Impacts for a discussion of traffic impacts related to drop-off activity after implementation of mitigation.

### **Response PM.11**

The commenter asks if the County can prevent people from parking at the pedestrian gate on Bay Road and blocking the bike lane. As a City of Menlo Park roadway, Bay Road is subject to police enforcement by the City's Police Department. The County is responsible for enforcement activities within Flood County Park itself, not on local roadways. However, as discussed in Topical Response A: Transportation Impacts, the waiver of parking fees for use of the proposed drop-off area within the park and mitigation measures in the Draft EIR would minimize on-street parking activity.

### **Response PM.12**

The commenter asks if sports teams can use vans to avoid a traffic impact from the use of single cars. The use of vans rather than cars to transport athletic participants to and from the park would reduce trip generation under the Landscape Plan. However, as discussed in Draft EIR Section 4.9, *Transportation and Circulation*, the "addition of only 25 PM peak hour trips associated with active and passive recreational use at Flood County Park would push operating conditions from LOS C to D, causing an exceedance of the City's traffic standards." 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 EIR acknowledges this significant impact.

### **Response PM.13**

The commenter expresses support for the bike racks required by Mitigation Measure T-5(a) in the Draft EIR, stating that half of the children participating in Menlo Park Legends events travel by bicycle. Please refer to Response 59.3 for a discussion of the effect of bicycling on transportation impacts. The commenter's opinion about bike racks does not conflict with or challenge the analysis and

conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response PM.14**

The commenter asserts that parking enforcement may be ineffective because of a history of lax enforcement by the City of Menlo Park. Please refer to Topical Response B: Transportation Impacts for a discussion of the adequacy of mitigation measures for parking impacts.

The commenter also asks for consideration of a nominal fee for athletic teams to park on-site. As discussed in Draft EIR Section 4.9, *Transportation and Circulation*, the County would allow people to freely access the parking lot to briefly drop off and pick up participants in programmed athletic events.

### **Response PM.15**

With respect to the Multi-Use Field Alternative evaluated in the Draft EIR, commenters variously assert that a multi-use field would not meet full demand for athletic fields and it could be shared effectively among different sports. Draft EIR Section 7, *Alternatives*, acknowledges that this alternative would not meet demand for active recreational facilities to the same extent as would the proposed Landscape Plan. A commenter also expresses concern about whether the design and markings of a multi-use field would confuse athletic users. These opinions about social impacts of multi-use fields do not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response PM.16**

The commenter asserts that the 4 P.M. to 6 P.M. time period in which the Reduced Athletic Programming Alternative would prohibit organized use of athletic fields is very important to ballfield users, especially during the winter. Draft EIR Section 7, *Alternatives*, acknowledges that this alternative would not meet demand for active recreational facilities to the same extent as would the proposed Landscape Plan.

The commenter states that ballfield use should not be limited because of traffic congestion, which exists regardless of the project. This opinion does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

### **Response PM.17**

The commenter expresses a preference for providing two baseball field and two soccer fields in a smaller area at Flood County Park. This opinion does not conflict with or challenge the environmental analysis and conclusions of the Draft EIR; however, all comments will be forwarded to the County's decision makers for their consideration.

## 5 Draft EIR Text Revisions

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Chapter 5 presents specific changes to the text of the Draft EIR that are being made to correct errors or omissions or clarify information presented in the Draft EIR in response to comments received during the public review period. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page section number are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted from the Draft EIR is shown in ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

### 5.1 Draft EIR Text Revisions

Page 11 of the Draft EIR in the Executive Summary is 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 amplification equipment ~~and air horns~~ at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with ~~City of Menlo Park~~ County of San Mateo Parks Department procedures. The County shall notify all groups using the proposed soccer/lacrosse field, ballfield, and 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 such equipment without an approved ~~Sspecial Eevent~~ 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 EIR in the Executive Summary 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 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. ~~coordinate with the City of Menlo Park to install signage along the north side of Bay Road between Del Norte Avenue and Ringwood Avenue, informing motorists and bicyclists of pedestrians walking along the shoulder and in the bike lane.~~

Page 27 of the Draft EIR in the Executive Summary is amended in the Final EIR as follows:

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 athletic field improvements under the Landscape Plan (i.e., a reconstructed ballfield and new soccer/lacrosse field) would generally be highest during the summer, when the Menlo Park Legends or other athletic groups would be most active at the reconstructed ballfield. 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 baseball 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.

Page 71 of the Draft EIR in Section 4.3, *Biological Resources*, is amended in the Final EIR as follows:

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 built. Based on the Tree Report prepared for the project site by Gates + Associates (2016), approximately 50 trees would be removed during Phase I. At the proposed soccer/lacrosse field, approximately 36 trees would be removed, including 21 heritage trees (12 coast redwoods, three coast live oaks, three California bay laurels, two ash trees, and one London plane tree). 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.

Page 91 of the Draft EIR in Section 4.4, *Cultural Resources*, is amended in the Final EIR as follows:

The cumulative context for cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for prehistoric archaeological resources and human remains is the former territory of the Costanoan people. Costanoan territory extends from the point where the San Joaquin and Sacramento rivers issue into the San Francisco Bay southward to Point Sur, with the inland boundary most likely constituted by the interior Coast Ranges (Kroeber 1925). The WPA buildings and potentially related historic archaeological elements can be considered in a regional historic context relating to "New Deal" projects. The cumulative context for paleontological resources is considered to be the San Francisco Peninsula.

The current study addresses the loss of Restroom D and that the removal of the building does not prohibit the remaining buildings and structures from conveying the park's significant associations with the WPA program and architecture. The identification of additional features would not result in a change to the WPA site's historic eligibility. Earth-disturbing activities during implementation of the Landscape Plan, in combination with other development in the region, could cause a substantial adverse change in the significance of a unique archaeological or paleontological resource, including historic archaeological resources relating to the WPA buildings. However, no known archaeological

or paleontological resources are located within the boundaries of the project site. ~~With the proposed mitigation measures identified herein, the project would not considerably contribute to cumulative impacts to cultural resources.~~ The identification of any prehistoric or historic resources (e.g., resources relating to the WPA structures) would be treated on a case-by-case basis in accordance with the mitigation measures provided herein to reduce impacts to less than significant levels. Thus, project impacts would not result in a significant cumulative impact to cultural resources.

Page 119 of the Draft EIR in Section 4.7, *Hydrology and Water Quality*, is corrected in the Final EIR as follows:

The installation of Phase I elements also would change the area of impervious surface at Flood County Park. While the County would replace the existing tennis courts and asphalt paths with new facilities of similar surface area, the proposed basketball court, tree-lined promenade, and a drop off location would incrementally increase the net area of impervious surface. In addition, the reconstructed ballfield could have an impervious artificial turf surface, although rainwater would be collected and discharged away from the field. During the operation of Phase I elements, storm water runoff from new impervious surfaces could wash pollutants and chemicals such as sediments, particulate matter, and oil into the local drainage system. Polluted runoff from impervious surfaces would degrade water quality. Exposed soil at the proposed pump track also could lead to erosion and siltation during storm events. In addition, the maintenance of trees lining the proposed promenade and new and replaced athletic fields (if natural surface) could involve fertilizer and pesticide applications that degrade water quality.

Page 137 of the Draft EIR in Section 4.8, *Noise*, is amended in the Final EIR as follows:

Average sound energy levels during lacrosse and soccer games may exceed existing ambient noise levels in the vicinity of Flood County Park. As shown in Table 17, ambient noise was measured at approximately 55-56 dBA Leq on a Saturday afternoon at the southeastern edge of the park, next to residential backyards, and at approximately 56 dBA Leq on Del Norte Avenue on a weekday late afternoon. Anticipated noise levels of 59-~~64~~5 dBA Leq during lacrosse and soccer games would exceed existing ambient noise levels by an estimated 3 to ~~8~~9 dBA Leq. These short-term increases in ambient noise would be perceptible to residents adjacent to the park. However, perceptible athletic noise would not necessarily cause a nuisance at nearby residences. 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).

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. 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.



Page 138 of the Draft EIR in Section 4.8, *Noise*, is amended in the Final EIR as follows:

Based on the proposed Landscape Plan shown in Figure 4, it is estimated that new asphalt paths would be built as close as approximately 75 feet from the backyards of residences on Del Norte Avenue, and the new tennis courts would be located about 115 feet from these noise-sensitive receptors. Maximum noise levels from leaf blowers at Flood County Park's existing tennis courts were measured at 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 81 dBA at a distance of 75 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 to residences.

Page 138 of the Draft EIR in Section 4.8, *Noise*, is also amended in the Final EIR as follows:

However, the gathering meadow in Phase II would be a performance space suitable for concerts or ceremonies that could involve the use of sound amplification equipment for music or commentary, although the County typically does not allow this equipment during events at Flood County Park.

Pages 138 and 139 of the Draft EIR in Section 4.8, *Noise*, are amended in the Final EIR as follows:

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

The County shall only allow the use of sound amplification equipment ~~and air horns~~ at organized athletic games and practices and at the gathering meadow with the procurement of a special event permit in accordance with ~~City of Menlo Park~~ County of San Mateo Parks Department procedures. The County shall notify all groups using the proposed soccer/lacrosse field, ballfield, and 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 such equipment without an approved ~~S~~pecial ~~E~~vent ~~P~~ermit.

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 151 of the Draft EIR in Section 4.9, *Transportation and Circulation*, is corrected in the Final EIR as follows:

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 this time period was assumed to represent the existing conditions at the park.

Page 152 of the Draft EIR in Section 4.9, *Transportation and Circulation*, is amended in the Final EIR as follows:

**Table 1 Phase I Average Trip Generation Summary**

Park Use	Daily Trips	PM Peak Hour			SAT Peak Hour		
		Trips	In	Out	Trips	In	Out
<b>Baseline</b>							
Passive Recreation	149	15	8	7	14	7	7
<b>Proposed</b>							
Growth in Passive Recreation	15	2	1	1	2	1	1
Programmed Active Recreation	143	<u>7480</u>	<u>3740</u>	<u>3740</u>	<u>3250</u>	<u>1625</u>	<u>1625</u>
<b>Phase I Average Trips</b>	<b>307</b>	<b><u>9197</u></b>	<b><u>4649</u></b>	<b><u>4548</u></b>	<b><u>4866</u></b>	<b><u>2433</u></b>	<b><u>2433</u></b>

Source: W-Trans 2017; see Appendix H.

### Trip Distribution

It was assumed that a majority of trips to and from Flood County Park under the Landscape Plan would originate locally in Menlo Park. These local trips would occur on local streets, while park trips from regional locations, accounting for 10% of all trips, would utilize U.S. 101 or I-280 before travelling on local streets to access the park. Table 2 shows the applied trip distribution assumptions.

**Table 2 Trip Distribution Assumptions**

Route	Percent	Daily Trips	PM Trips	SAT Trips
To/From Marsh Road east of Bay Road	12%	37	12	<u>87</u>
To/From Marsh Road west of Bay Road	8%	25	7	<u>54</u>
To/From Bay Road north of Marsh Road	5%	15	4	<u>42</u>
To/From Flood Park Triangle	9%	28	<u>98</u>	<u>54</u>
To/From Ringwood Avenue west of Bay Road	48%	147	<u>474</u>	<u>3223</u>
To/From Willow Road east of Bay Road	13%	40	<u>132</u>	<u>86</u>
To/From Willow Road west of Bay Road	5%	15	4	<u>42</u>
<b>Total</b>	<b>100%</b>	<b>307</b>	<b><u>9197</u></b>	<b><u>4866</u></b>

Source: W-Trans 2017; see Appendix H.

Pages 156 to 157 of the Draft EIR in Section 4.9, *Transportation and Circulation*, are amended in the Final EIR as follows:

**Table 3 Existing and Existing Plus Project Peak Hour Intersection Level of Service**

Study Intersection	Existing Conditions				Existing Plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	16.0	B	13.7	B	16.54	B	<del>13.9</del> 14.0	B
Bay Road/Ringwood Avenue	21.2	C	8.8	A	25.97	D	9.1	A
Addition of Northbound Left-Turn Lane	-	-	-	-	13.8	B	9.1 <del>0</del>	A
Bay Road/Willow Road	>80*	F	9.4	A	>80*	F	9.5	A

Source: W-Trans 2017; see Appendix H.

Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.

\* LOS is based on unserved demand.

**Table 4 Near-Term 2021 and Near-Term 2021 Plus Project Peak Hour Intersection Level of Service**

Study Intersection	Near-Term Conditions				Near-Term Plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	19.1	B	14.2	B	19.32	B	14.43	B
Bay Road/Ringwood Avenue	29.4	D	9.1	A	36.96	E	9.44	A
Addition of Northbound Left-Turn Lane	14.3	B	9.0	A	15.1	C	9.32	A
Bay Road/Willow Road	>80*	F	9.9	A	>80*	F	10.0	A

Source: W-Trans 2017; see Appendix H.

Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.

\* LOS is based on unserved demand.

**Table 5 Cumulative 2040 and Cumulative 2040 Plus Project Peak Hour Intersection Level of Service**

Study Intersection	Cumulative Conditions				Cumulative Plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	29.1	C	16.0	B	<del>30.9</del> <u>31.2</u>	C	<del>16.6</del> <u>5</u>	B
Bay Road/Ringwood Avenue	95.7	F	9.7	A	<del>111.8</del> <u>3</u>	F	<del>10.2</del> <u>0</u>	A
Addition of Northbound Left-Turn Lane	22.4	C	9.5	A	<del>27.5</del> <u>24.8</u>	<del>D</del> <u>C</u>	<del>9.9</del> <u>8</u>	A
Signalization	30.8	C	12.0	B	<del>34.5</del> <u>31.2</u>	C	<del>12.6</del> <u>4</u>	B
Bay Road/Willow Road	>80*	F	10.9	B	>80*	F	11.0	B

Source: W-Trans 2017; see Appendix H.

Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.

\* LOS is based on unserved demand.

Page 161 of the Draft EIR in Section 4.9, *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 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. ~~coordinate with the City of Menlo Park to install signage along the north side of Bay Road between Del Norte Avenue and Ringwood Avenue, informing motorists and bicyclists of pedestrians walking along the shoulder and in the bike lane.~~

Page 161 of the Draft EIR in Section 4.9, *Transportation and Circulation*, is amended in the Final EIR as follows:

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

The County shall ~~develop a mechanism to~~ 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 communication about large events and encouraging increased random enforcement of on-street parking restrictions.

Page 201 of the Draft EIR in Section 7, *Alternatives*, is amended in the Final EIR as follows:

**Table 6 Existing and Existing Plus Alternative 2 Intersection Level of Service During P.M. Peak Hours**

Study Intersection	Existing Conditions		Existing Plus Project		Existing Plus Alternative	
	P.M. Peak		P.M. Peak		P.M. Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	16.0	B	16.54	B	16.0	B
Bay Road/Ringwood Avenue	21.2	C	25.97	D	24.7	C
Addition of Northbound Left-Turn Lane	-	-	13.8	B	-	-
Bay Road/Willow Road	>80*	F	>80*	F	>80*	F

Source: W-Trans 2017; see Appendix H.

Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.

\* LOS is based on unserved demand.

Page 202 of the Draft EIR in Section 7, *Alternatives*, is amended in the Final EIR as follows:

**Table 7 Near-Term 2021 and Near-Term 2021 Plus Alternative 2 Intersection Level of Service During P.M. Peak Hours**

Study Intersection	Near-Term Conditions		Near-Term Plus Project		Near-Term Plus Alternative	
	P.M. Peak		P.M. Peak		P.M. Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	19.1	B	19.32	B	18.8	B
Bay Road/Ringwood Avenue	29.4	D	36.96	E	35.4	E
Addition of Northbound Left-Turn Lane	14.3	B	15.1	C	14.9	B
Bay Road/Willow Road	>80*	F	>80*	F	>80*	F

Source: W-Trans 2017; see Appendix H.

Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.

\* LOS is based on unserved demand.

**Table 8 Cumulative 2040 and Cumulative 2040 Plus Alternative 2 Intersection Level of Service During P.M. Peak Hours**

Study Intersection	Cumulative 2040 Conditions		Cumulative 2040 Plus Project		Cumulative 2040 Plus Alternative	
	P.M. Peak		P.M. Peak		P.M. Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
Bay Road/Marsh Road	<u>29.119.1</u>	<u>CB</u>	<u>31.219.2</u>	<u>CB</u>	<u>30.118.8</u>	<u>CB</u>
Bay Road/Ringwood Avenue	<u>95.729.4</u>	<u>FD</u>	<u>111.836.6</u>	<u>FE</u>	<u>113.435.4</u>	<u>FE</u>
Addition of Northbound Left-Turn Lane	<u>22.414.3</u>	<u>CB</u>	<u>24.815.1</u>	C	<u>25.314.9</u>	<u>DB</u>
Bay Road/Willow Road	>80*	F	>80*	F	>80*	F

Source: W-Trans 2017; see Appendix H.  
 Note: Delay is measured in average seconds per vehicle; LOS = Level of Service.  
 \* LOS is based on unserved demand.

Page 205 of the Draft EIR in Section 7, *Alternatives*, is corrected in the Final EIR as follows:

Both the proposed Landscape Plan and this alternative would preserve existing adobe buildings that contribute to Flood County Park’s eligibility as an historical resource, while rehabilitating the adobe administrative office building for seismic safety. ~~Similar to the proposed project, this alternative~~ This alternative could enhance preservation of adobe buildings. ~~While the project would involve demolition of one adobe building (Restroom D) to clear room for the proposed soccer/lacrosse field in the eastern corner of the park but would preserve other adobe buildings at the park., the Multi-Use Field Alternative could leave this building intact if no additional recreational facilities are built in that area. Also~~ Similar to the proposed project, this alternative would be subject to Mitigation Measure CUL-1(a) to document historical resources ~~if upon demolition of Restroom D is demolished~~ and to Mitigation Measure CUL-1(b) to ensure that rehabilitation of the administrative office building adheres to the Secretary of the Interior’s *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*. Therefore, the impact on historical resources would still be less than significant with implementation of these measures, as applicable.

Page 208 of the Draft EIR in Section 7, *Alternatives*, is corrected in the Final EIR as follows:

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 impact on traffic congestion. Without construction of the proposed soccer/lacrosse field near residences on Del Norte Avenue, this alternative would reduce people’s exposure to operational noise. ~~In addition, this alternative could enhance preservation of adobe buildings that contribute to the park’s eligibility as an historical resource.~~ This alternative would meet all four proposed objectives: to repair and update park features, to meet demand for active recreational facilities in San Mateo County, to provide a variety of use for a range of user groups, and to optimize preservation of oak woodland. It would meet demand for active recreational facilities to a lesser degree than would the proposed project because the multi-use field would have less capacity to host simultaneous athletic events.

Page 209 of the Draft EIR in Section 7, *Alternatives*, is corrected in the Final EIR as follows, in the row listing cultural resource impacts under Table 43:

**Table 9 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)
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	Less than Significant with Mitigation	+/= (Less than Significant with Mitigation)	= (Less than Significant with Mitigation)	+/= (Less than Significant with Mitigation)
Transportation and Circulation	Significant and Unavoidable	+ (Less than Significant)	+/= (Significant and Unavoidable)	= (Significant and Unavoidable)
Tribal Cultural Resources	Less than Significant with Mitigation	+ (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

Page 214 of the Draft EIR in Section 8, *References*, is amended in the Final EIR as follows:

Keith, Kirsten. 2017. City of Menlo Park. Re: Flood Park Landscape Plan, Draft Environmental Impact Report Comments. November 15, 2017.

Page 215 of the Draft EIR in Section 8, *References*, is amended in the Final EIR as follows:

Massachusetts Toxics Use Reduction Institute. 2017. *Sports Turf Alternatives Assessment: Preliminary Results, Infill Made from Recycled Tires*. May 2017. Available at: <https://www.turi.org/content/download/10940/179156/file/Infills%20Artificial%20Turf.%20Recycled%20Tires.%20May%202017.pdf>

Page 215 of the Draft EIR in Section 8, *References*, is also amended in the Final EIR as follows:

New York State Department of Health. 2017. Fact Sheet: Crumb-Rubber Infilled Synthetic Turf Athletic Fields. April 2017. Available at: [https://www.health.ny.gov/environmental/outdoors/synthetic\\_turf/crumb-rubber\\_infilled/fact\\_sheet.htm](https://www.health.ny.gov/environmental/outdoors/synthetic_turf/crumb-rubber_infilled/fact_sheet.htm)

Page 217 of the Draft EIR in Section 8, *References*, is amended in the Final EIR as follows:

. 2018. Federal Research on Recycled Tire Crumb Used on Playing Fields. February 2018. Available at: <https://www.epa.gov/chemical-research/federal-research-recycled-tire-crumb-used-playing-fields>

Watterson, Andrew. 2017. *Artificial Turf: Contested Terrains for Precautionary Public Health with Particular Reference to Europe?* Published in *International Journal of Environmental Research and Public Health*, Vol. 14, Issue 9. September 2017. Available at: <http://www.mdpi.com/1660-4601/14/9/1050/pdf>

Page 15 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

It is anticipated that the programmed active recreation would be implemented as soon as the construction for Phase I is complete. The anticipated schedule of events at Flood County Park was developed for the Menlo Park Legends baseball program, adult soccer games, and the Menlo-Atherton Youth Lacrosse Club and included an estimate of the number of events per month, the events' anticipated time of day, and the number of active users. Both games and practices for the Menlo Park Legends baseball program are expected to occur during the week and on weekends throughout the year with the main season in the spring. The adult soccer games would typically occur in the evening during the week and on the weekends throughout the year. The Menlo-Atherton Youth Lacrosse Club has two seasons, in the spring and the fall, with practices typically occurring during the week and all-day use of the field on weekends for multiple games back-to-back. Concurrent use of the baseball and soccer/lacrosse field is anticipated. There is also the potential to also have concurrent soccer and lacrosse practices during the week if one group were to use the baseball outfield. Given the potential for concurrent use, the peak number of active users during the week was based on two soccer or lacrosse activities starting at the same time. Two soccer or lacrosse events would be expected to generate approximately six more weekday p.m. peak hour trips as compared to a baseball and a soccer event scheduled concurrently. ~~However, youth practices would typically occur on weekdays and youth games would more often occur on weekends, while adult league games occur on both weekdays and weekends. It is also anticipated that passive recreation park trips would increase proportional to regional traffic growth, 0.8 percent per year through Phase I.~~

Page 15 of Appendix H to the Draft EIR (Traffic Impact Study) is also amended as follows:



The weekday p.m. peak hour is largely dependent on programmed active recreation while passive recreation on the weekend would be expected to vary depending on the time of year and weather. The peak visitation periods for the Park are not expected to overlap with other peak periods throughout the year with lower visitation during the winter months. Peak visitation would also be expected to occur outside of commute hours.

Trip generation estimates are presented in Appendix C and summarized in Table 8. Overall, the park would generate an average of 974 weekdays p.m. peak hour trips and 6648 Saturday peak hour trips.

Page 17 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

Table 8 – Phase I Average Trip Generation Summary							
Park Use	Daily Trips	PM Peak Hour			SAT Peak Hour		
		Trips	In	Out	Trips	In	Out
<b>Baseline</b>							
Passive Recreation	149	15	8	7	14	7	7
<b>Proposed</b>							
Growth in Passive Recreation	15	2	1	1	2	1	1
Programmed Active Recreation	143	<u>7480</u>	<u>3740</u>	<u>3740</u>	<u>3250</u>	<u>1625</u>	<u>1625</u>
<b>Phase I Average Trips</b>	307	<u>9197</u>	<u>4649</u>	<u>4548</u>	<u>4866</u>	<u>2433</u>	<u>2433</u>

**Trip Distribution**

Flood County Park is expected to be both a local-serving passive recreation park and a regional programmed active recreation park. It was assumed that a majority of project trips would originate locally in Menlo Park. Traffic utilizing ~~local~~ local streets, while regional park trips, accounting for ten percent of all trips, would utilize US 101 or I-280 before travelling on local streets to access the park. During the p.m. peak hour approximately four trips would travel be oriented to/from US 101 northbound and approximately four trips would travel be oriented to/from US 101 southbound. These trips represent approximately five-one hundredths of a percent (0.05%) of the estimated directional capacity of US 101 based on five travel lanes. As part of the analysis, no trips were directly routed to I-280. The applied distribution assumptions and resulting trips are shown in Table 9.

Table 9 – Trip Distribution Assumptions				
Route	Percent	Daily Trips	PM Trips	SAT Trips
To/From Marsh Road east of Bay Road	12%	37	12	<del>87</del>
To/From Marsh Road west of Bay Road	8%	25	<del>87</del>	<del>54</del>
To/From Bay Road north of Marsh Road	5%	15	4	<del>42</del>
To/From Flood Park Triangle	9%	28	<del>98</del>	<del>54</del>
To/From Ringwood Avenue west of Bay Road	48%	147	<del>474</del>	<del>3223</del>
To/From Willow Road east of Bay Road	13%	40	<del>132</del>	<del>86</del>
To/From Willow Road west of Bay Road	5%	15	4	<del>42</del>
<b>TOTAL</b>	<b>100%</b>	<b>307</b>	<b><del>9197</del></b>	<b><del>4866</del></b>

Page 20 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

Table 10 – Existing and Existing plus Project Peak Hour Intersection Levels of Service

Study Intersection	Existing Conditions				Existing plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	16.0	B	13.7	B	16.54	B	<del>13.9</del> 14.0	B
2. Bay Road/Ringwood Avenue	21.2	C	8.8	A	<del>25.97</del>	D	9.1	A
Addition of Northbound Left-Turn Lane	-	-	-	-	13.8	B	9.10	A
3. Bay Road/Willow Road	>80* <sup>1</sup>	F <sup>1</sup>	9.4	A	>80* <sup>1</sup>	F <sup>1</sup>	9.5	A

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

Page 21 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

Table 11 – Near-Term 2021 and Near-Term 2021 plus Project Peak Hour Intersection Levels of Service

Study Intersection	Existing Conditions				Existing plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	19.1	B	14.2	B	<del>19.32</del>	B	<del>14.43</del>	B
2. Bay Road/Ringwood Avenue	<b>29.4</b>	<b>D</b>	9.1	A	<b>36.96</b>	<b>E</b>	<del>9.44</del>	A
Addition of Northbound Left-Turn Lane	14.3	B	9.0	A	15.1	C	<del>9.32</del>	A
3. Bay Road/Willow Road	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	9.9	A	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	10.0	A

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

**Finding** – The study intersections are expected to continue operating at the same levels of service upon the addition of project-generated traffic, with the exception of Bay Road at Ringwood Avenue which is expected to operate at LOS E. The significant impact would remain significant and unavoidable.

Page 21 of Appendix H to the Draft EIR (Traffic Impact Study) also is amended as follows:

Table 12 – Cumulative 2040 and Cumulative 2040 plus Project Peak Hour Intersection Levels of Service

Study Intersection Approach	Existing Conditions				Existing plus Project			
	PM Peak		SAT Peak		PM Peak		SAT Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	29.1	C	16.0	B	<del>30.9</del> <u>31.2</u>	C	<del>16.6</del> <u>5</u>	B
2. Bay Road/Ringwood Avenue	<b>95.7</b>	<b>F</b>	9.7	A	<b>111.8</b> <del>3</del>	<b>F</b>	<del>10.2</del> <u>9</u>	A
Addition of Northbound Left-Turn Lane	22.4	C	9.5	A	<del>27.5</del> <u>24.8</u>	<del>D</del> <b>C</b>	<del>9.9</del> <u>8</u>	A
Signalization	30.8	C	12.0	B	<del>34.5</del> <u>31.2</u>	C	<del>12.6</del> <u>4</u>	B
3. Bay Road/Willow Road	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	10.9	B	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	11.0	B

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

Page 22 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

Table 13 – Alternative Existing plus Project Peak Hour Intersection Levels of Service

Study Intersection	Existing Conditions		Existing plus Project		Alternative Existing plus Project	
	PM Peak		PM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	16.0	B	<del>16.5</del> 16.4	B	16.0	B
2. Bay Road/Ringwood Avenue	21.2	C	<del>25.9</del> 25.7	<b>D</b>	24.7	C
Addition of Northbound Left-Turn Lane	-	-	13.8	B	-	-
3. Bay Road/Willow Road	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

Page 23 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

**Table 14 – Alternative Near-Term plus Project Peak Hour Intersection Levels of Service**

Study Intersection	Near-Term Conditions		Near-Term plus Project		Alternative Near-Term plus Project	
	PM Peak		PM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	19.1	B	<u>19.3</u> <del>19.2</del>	B	18.8	B
2. Bay Road/Ringwood Avenue	<b>29.4</b>	<b>D</b>	<u><b>36.9</b></u> <del>36.6</del>	<b>E</b>	<b>35.4</b>	<b>E</b>
Addition of Northbound Left-Turn Lane	14.3	B	15.1	C	14.9	B
3. Bay Road/Willow Road	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

Upon the addition of the passive recreation trips to the Cumulative volumes, the intersection of Bay Road and Ringwood Avenue is expected to continue operating unacceptably at LOS F during the p.m. peak hour. The intersection of Bay Road and Willow Road is expected to continue operating at LOS F during the p.m. peak hour due to “unserved demand.” These results are summarized in Table 15.

Table 15 – Alternative Cumulative plus Project Peak Hour Intersection Levels of Service

Study Intersection	Cumulative Conditions		Cumulative plus Project		Alternative Cumulative plus Project	
	PM Peak		PM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS
1. Bay Road/Marsh Road	29.1	C	<del>31.2</del> 30.9	C	30.1	C
2. Bay Road/Ringwood Avenue	<b>95.7</b>	<b>F</b>	<del>111.8</del> 111.3	<b>F</b>	<b>113.4</b>	<b>F</b>
Addition of Northbound Left-Turn Lane	22.4	C	<del>24.8</del> 27.5	<b>CD</b>	<b>25.3</b>	<b>D</b>
Signalization	30.8	C	<del>31.2</del> 34.5	C	31.5	C
3. Bay Road/Willow Road	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>	<b>&gt;80*<sup>1</sup></b>	<b>F<sup>1</sup></b>

Notes: Delay is measured in average seconds per vehicle; LOS = level of service; **Bold** text = deficient operation; Shaded cells = conditions with potential improvements; \* Indicates LOS based on unserved demand. At these locations, upstream & downstream congestions results in delay not captured by VISTRO analysis.

Source: <sup>1</sup> Public Review Draft EIR Connect Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update

Page 30 of Appendix H to the Draft EIR (Traffic Impact Study) is amended as follows:

- The proposed project is expected to generate an average of 307 new trips per day including ~~974~~ trips during the weekday p.m. peak hour and ~~6648~~ trips during the Saturday peak hour.



# Appendix B

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Errata to the Final Revised EIR

## Errata to the Final Revised EIR

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The County has prepared this Errata sheet to clarify and correct information in the Final Revised Environmental Impact Report (Final Revised EIR) for the Flood County Park Landscape Plan. These minor changes do not introduce new or more severe adverse environmental effects and do not address feasible alternatives to the Project or mitigation measures beyond those considered in the Draft Revised EIR and Final Revised EIR. 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 EIR.

Page 16 of the Revised Final EIR is amended as follows:

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

Landscape Plan Element	Weekend Summer		Weekday Summer		Weekend Assumptions	Weekday Assumptions
	Daily	Maximum Capacity per Event	Daily	Maximum Capacity per Event		
Shade/market structure	200	75	N/A	N/A	1 event/day	N/A
Play area universal (2-5)	60	20	30	15	4 cycles/day	2 cycles/day
Play area universal (5-12)	120	40	60	30	4 cycles, 1 parent/2 kids	4 cycles, 1 parent/2 kids
Adventure play	70	35	40	20	2 cycles/day	2 cycles/day
Event/group picnic area	200	200	N/A	N/A	1 event	N/A
Small group picnic	120	120	N/A	N/A	8 areas, 15 people/area, 1 cycle/day	N/A
<u>Drop-in picnic area</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>24</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>	<u>20 sites, 25 percent primary use, 6 people per site</u>
Tennis courts	<del>64</del> <u>48</u>	16	32	16	<u>2 courts, 8 playing, 8 waiting, 4 cycles/day</u> <del>10 playing, 10 waiting, 3 cycles/day</del>	<u>2 courts, 8 playing, 8 waiting, 2 cycles/day</u> <del>10 playing, 10 waiting, 1 cycle/day</del>
Basketball	60	20	10	10	<u>10 playing, 10 waiting, 3 cycles/day</u> <del>2 courts, 6 playing, 1 cycle/day</del>	<u>10 playing, 10 waiting, 1 cycle/day</u> <del>N/A</del>
Sand volleyball	12	12	<del>48</del> <u>N/A</u>	<del>48</del> <u>N/A</u>	<u>2 courts, 6 playing, 6 spectators, 1 cycle/day</u> <del>Ancillary use</del>	<u>2 courts, 6 players, 6 spectators, 4 cycles/day</u>
Pump track	60	30	40	20	N/A	N/A
Ballfield	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	30	15	10	10	N/A	N/A
<b>Total</b>	<del>1,470</del> <u>30</u>	<del>757</del> <u>33</u>	<del>414</del> <u>342</u>	<del>313</del> <u>241</u>		

Source: Gates + Associates 2019

Page 31 of the Revised Final 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 and stripping for an addition of 49 parking spaces on already paved and gravel surfaces. 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 in a chain-link fence 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. 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 stripped outside of the pétanque court and 26 stalls stripped 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.

Page 28 of the Revised Final EIR is amended as follows:

Figure 1 Proposed Landscape Plan

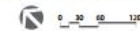
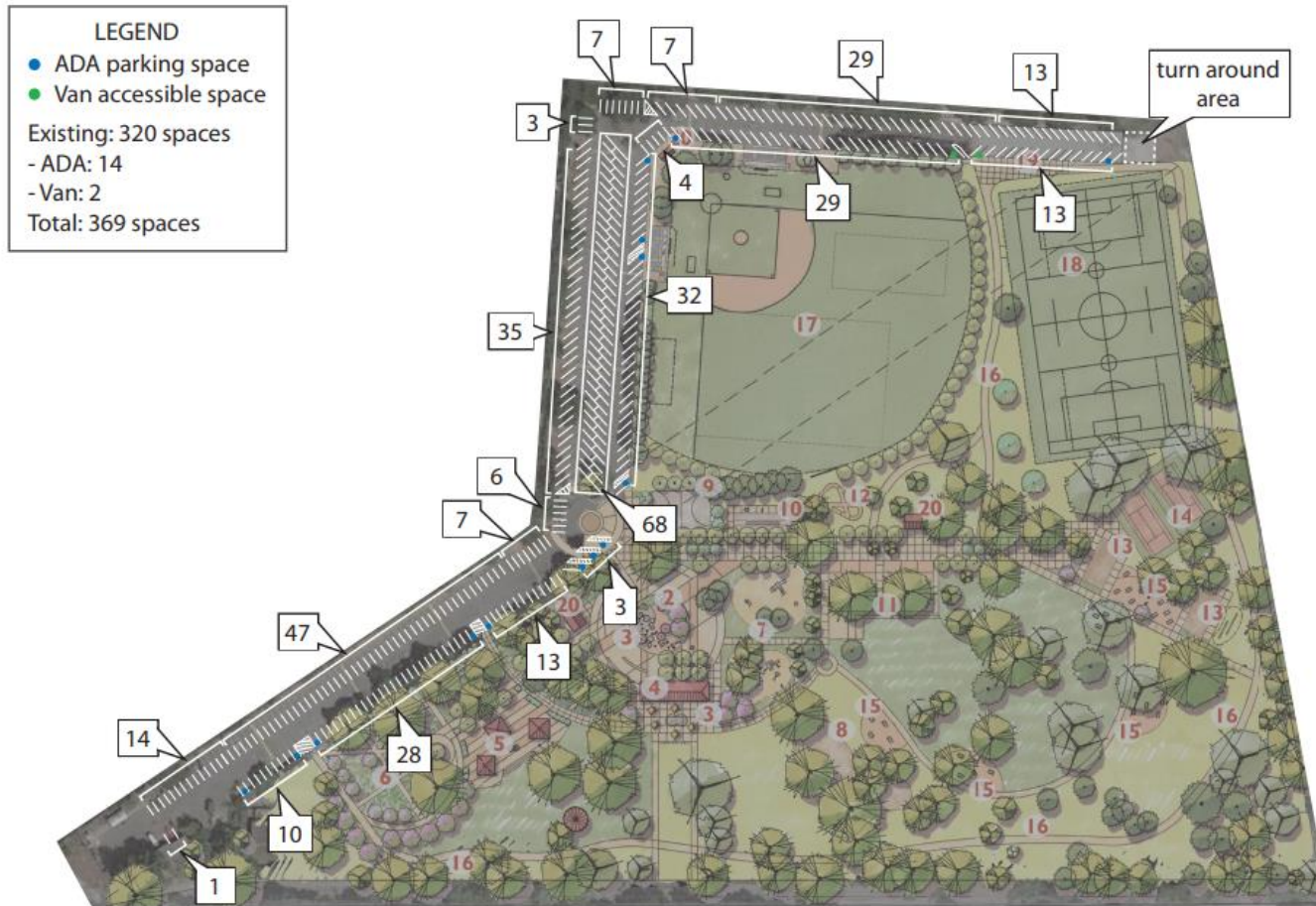


Figure 5 Proposed Parking Map



Source: Gates + Associates, 2019

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**Flood Park Traffic Impact Study  
Proposed Parking Map**



Page 120 and 121 of the Revised Final 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 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.

Based on this data, the anticipated typical peak parking demand for the proposed project is 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 344 parking spaces would ~~not~~ exceed the 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 spaces 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 Park would have a total of 369 parking spaces. Therefore, it is anticipated that the existing parking supply would be adequate to accommodate peak parking demand under the Landscape Plan. However, it should be noted the parking demand could still potentially exceed the capacity during very large scheduled events.