

FINAL

**BURTON AND HIGHLANDS PARKS PROJECT  
ENVIRONMENTAL IMPACT REPORT  
RESPONSE TO COMMENTS DOCUMENT**

SCH NO. 2017052066

**LSA**

August 2018



FINAL

**BURTON AND HIGHLANDS PARKS PROJECT  
ENVIRONMENTAL IMPACT REPORT  
RESPONSE TO COMMENTS DOCUMENT**

SCH NO. 2017052066

Submitted to:

Amy Newby  
City of San Carlos Parks and Recreation  
600 Elm Street  
San Carlos, CA 94070

Prepared by:

LSA Associates, Inc.  
2215 Fifth Street  
Berkeley, California 94710  
510.540.7331



August 2018



## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
A.	PURPOSE OF THE RESPONSE TO COMMENTS DOCUMENT .....	1
B.	ENVIRONMENTAL REVIEW PROCESS.....	1
C.	DOCUMENT ORGANIZATION .....	2
II.	LIST OF COMMENTERS .....	3
A.	ORGANIZATION OF COMMENT LETTERS AND RESPONSES .....	3
B.	LIST OF AGENCIES COMMENTING ON THE DRAFT EIR .....	3
III.	COMMENTS AND RESPONSES .....	7
	MASTER RESPONSES .....	7
	A. AGENCIES .....	20
	B. INDIVIDUALS .....	34
	C. PUBLIC HEARING.....	115
	D. ORGANIZATIONS .....	178
IV.	DRAFT EIR TEXT REVISIONS .....	229

## APPENDIX

Appendix G:	Project Changes to Settlement Agreement Restrictions
Appendix H:	Emergency Calls Information
Appendix I:	Notice to Extend Comment Period

## TABLES

Table 1:	Operational Hourly Noise Levels With and Without Burton Park Project at Nearest Receptor.....	15
Table 2:	Operational Hourly Noise Levels With and Without Highlands Park Project at Nearest Receptor.....	16

*This page intentionally left blank*

## **I. INTRODUCTION**

### **A. 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 Burton and Highlands Parks Project (project) proposed for Burton Park and Highlands Park fields located in the City of San Carlos. The Draft EIR identifies the likely environmental consequences associated with development of the proposed project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides responses to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications in the Draft EIR. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

### **B. 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.

The City circulated a Notice of Preparation (NOP) to help identify the types of impacts that could result from the proposed project, as well as potential areas of controversy. The NOP was originally published on May 23, 2017, and was distributed to local, regional, and State agencies. A scoping session for the preparation of the EIR was held on June 13, 2017. Comments received by the City on the NOP were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for public review on November 20, 2017, and was distributed to local and State responsible and trustee agencies. The Draft EIR and an announcement of its availability were posted electronically on the City's website, and hard copies were available for public review at the San Carlos City Hall.

The 100-day public comment period ended on February 28, 2018. The City held a hearing before the Parks, Recreation and Culture Commission on the Draft EIR on December 6, 2017, at City Council Chambers. Copies of all written comments received during the comment period and a transcript of the oral comments received at the public hearing are included in Chapter III of this document.

## C. DOCUMENT ORGANIZATION

This RTC Document consists of the following chapters:

- *Chapter I: 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 II: List of Commenters.* This chapter contains a list of agencies, individuals and organizations who submitted written comments during the public review period and comments made at the public hearing on the Draft EIR.
- *Chapter III: Comments and Responses.* This chapter contains reproductions of all comment letters received on the Draft EIR, as well as a summary of verbal comments on the Draft EIR provided at the public hearing. 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 IV: Draft EIR Text Revisions.* Corrections 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. Double underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR.



## II. LIST OF COMMENTERS

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 Chapter III, Comments and Responses, of this document.

### A. ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter III includes a reproduction of each comment letter received on the Draft EIR. The written comments are grouped by the affiliation of the commenter, as follows: Federal, State, regional and local agencies (A), individuals (B), commenters (C) at the December 6, 2017, Parks, Recreation and Culture Commission hearing, and (d) organizations.

The comment letters are numbered consecutively following the A, B, C and D designations defined below:

Agencies .....	A#-#
Individuals .....	B#-#
Public Hearing .....	C#
Organizations .....	D#-#

Comment letters are numbered and comments within each letter are numbered consecutively after the hyphen. Each speaker at the public hearing has been designated with a number as well.

### B. LIST OF AGENCIES COMMENTING ON THE DRAFT EIR

The following comment letters were submitted to the City during the public review period.

#### Agencies

- A1 Department of Transportation, Patricia Maurice (February 2, 2018)
- A2 Governor's Office of Planning and Research, Scott Morgan (February 9, 2018)

#### Individuals

- B1a-f Dedo, Gus (November 29, 2017 – February 27, 2018)
- B2 Im, Fred (January 25, 2018)
- B3 Chatterjee, Amit (January 25, 2018)

- B4 Selwood, Sherry (January 25, 2018)
- B5 Miller, Megan (January 26, 2018)
- B6 Kodl, Ron (January 29, 2018)
- B7 Ramanathan, Srini (January 29, 2018)
- B8 Davis, Jeff (January 29, 2018)
- B9 Renda, Ben (January 29, 2018)
- B10 MacDonald, Brianna (January 29, 2018)
- B11 Kell, Kristen (January 29, 2018)
- B12 Kron, Chris (January 30, 2018)
- B13 Verma, Vishal (January 30, 2018)
- B14 Connolly, Ryan (January 30, 2018)
- B15 Tang, Anne (February 2, 2018)
- B16 Van Wert, Chris (February 4, 2018)
- B17 Brozek, Dawn (February 6, 2018)
- B18 Harris, Greg (February 11, 2018)
- B19 Assilian, Herica (February 15, 2018)
- B20 Dehner, Jean (February 17, 2018)
- B21 Dehner, Bob (February 26, 2018)
- B22 Wilke, Michael (February 27, 2018)
- B23 McMahon, Peter (February 28, 2018)
- B24 Molinari, Karen (February 28, 2018)
- B25 Szymanski, Filip and Lei (February 28, 2018)
- B26 Min, Art (January 29, 2018)
- B27 Ostrander, Craig (January 30, 2018)

B28 McMahon, Peter (January 31, 2018)

**Commenters on the Draft EIR, Public Hearing December 6, 2017**

C1 McMahon, Peter

C2 Tang, Anne

C3 Dehner, Bob

C4 Dehner, Jean

C5 Liebenguth, Heidi

C6 Crone, Richard

C7 Szymanski, Filip

C8 Dedo, Gus

C9 Klein, Jeff

C10 Inolinari, Karen

C11 Selwood, Sherry

C12 Langford, Brad

C13 Turner, Wendy

**Organizations**

D1 Save San Carlos Parks, Aqua Terra Aeris Law Group (February 28, 2018)

D2 Save San Carlos Parks, Matthew Jones (February 28, 2018)

*This page intentionally left blank.*

### III. COMMENTS AND RESPONSES

Written responses to each comment letter received on the Draft EIR are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety. Each letter is immediately followed by responses keyed to the specific comments. The letters are grouped by the affiliation of the commenting entity as follows: federal, State, regional, and local agencies (A), individuals (B); public hearings (C); and organizations (D). A summary of the oral comments provided during the January 25, 2016 public hearing and responses to comments related to CEQA are also provided (D).

Please note that text within individual letters that has not been numbered does not raise environmental issues or relate to the adequacy of the information or analysis within the Draft EIR, and therefore no comment is enumerated or response required.

Many of the comments received on the Draft EIR involve variations of the same key issues. In order to consolidate responses to questions and comments related to these topics, and to address concerns comprehensively, master responses have been prepared. Master responses are provided below and referenced in certain responses, as appropriate.

Where revisions to Draft EIR text are called for, the page is set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Deleted text is shown in ~~strikeout~~. Text revisions are summarized in Chapter IV of this Response to Comments Document.

Where comments on the Draft EIR concern issues requiring technical expertise, such as those related to transportation and circulation and noise, the responses to comments, like the Draft EIR's initial analysis, relies on the knowledge and professional analysis of qualified experts. Where the Draft EIR and responses to comments concern park policies, park operations or maintenance procedures, the Draft EIR and responses to comments rely on the expertise of City staff who have firsthand knowledge of the relevant issues.

#### MASTER RESPONSES

Many of the comments received on the Draft EIR involve variations of the same key issues. In order to consolidate responses to questions and comments related to these topics, and to address concerns comprehensively, the following Master Responses have been prepared. Master Responses are included below for the following topics and are referenced in certain responses, as appropriate.

1. Purpose and Definition of the Proposed Project
2. City Park Maintenance of Sports Fields
3. Settlement Agreement
4. Noise Analysis
5. Transportation Analysis
6. Parking and Emergency Access

## Master Response 1: Purpose and Definition of the Proposed Project

Some commenters opined that the proposed project (to provide new and upgraded night lighting at Burton and Highlands Parks) was improperly narrow as it should have included: 1) the addition of turf on Stadium Field at Highlands Park; 2) a review of the effects of all potential projects in the Mahady Report<sup>1</sup> and the *Parks, Open Space, Buildings, and other Recreational Facilities Master Plan 2009-2029*,<sup>2</sup> (“Master Plan” and included by reference in this document and available on the City’s website at <https://www.cityofsancarlos.org/home/showdocument?id=1295>, and the Field Use Policy (included in Appendix C of the Draft EIR), and 3) a monitoring and maintenance program component to evaluate and address the effects of additional use on the fields after the lighting is installed.

**Addition of Turf.** In response, CEQA allows a lead agency broad discretion to define the fundamental purpose (provide new and upgraded night lighting to allow for additional hours of use) and basic objectives of its project. As a public agency established to provide and maintain parks and recreation facilities for the City of San Carlos, the Park and Recreation Department’s mission is to serve all residents within its jurisdiction. The City considered the proposed project, as described and evaluated in the EIR, as the most feasible and cost-effective solution to meet the existing unmet community demand for field space.

The City specifically did not include the installation of artificial turf on Stadium Field (or Madsen and Flanagan fields) as part of the project as noted on page 21 of the Draft EIR, “The reader should note that the project evaluated in this Draft EIR and as defined by the City of San Carlos as Lead Agency, does not include the conversion of Flanagan, Madsen or Stadium Fields to artificial turf.” The addition of artificial turf was not included as part of the project in part because the City previously determined that there is no funding for the addition of artificial turf to existing fields, and that the best and most cost-effective use of existing City funds was to commission the design and evaluation of night lighting at Burton and Highlands Parks fields. If the City were to make a decision to install artificial turf in the future, it will not be for seven to ten years, as the City’s budget and funding have been mapped out for the next five (5) years. In that time, the consideration to install artificial turf will be subject to changed conditions that cannot be anticipated or studied at this time.

Indeed, the City’s parks serve the needs of a wide range of activities. While sports activities are a large part of the residents’ use of the parks, the City also supports the concept of “open space” and “open time” at its parks, outside of organized sports, (see also the discussion in the Mahady Report, page 2). Synthetic turf serves the purpose of supporting year-round sports activities because it can withstand inclement weather conditions and is not burdened by recurring maintenance and excessive use. The proposed project, however, does not encourage more intensive use than already occurs and would not make it reasonably foreseeable that artificial turf will be required. Highlands Field, located within Highlands Park, is an artificial turf field and is available for those activities that are best suited for artificial turf (e.g., use by teen and adult teams). Moreover, natural grass encourages uses different from those that are best suited for artificial turf and the additional hours of access provided by the

---

<sup>1</sup> Mark Mahady & Associates, 2001. *Parks and Sports Fields Field Use and Agronomic Specifications*.

<sup>2</sup> Harris Design Landscape Architecture, 2008. *City of San Carlos Master Plan for Parks, Open Space, Buildings and other Recreational Facilities*. Prepared for the City of San Carlos. August.

lighting improvement project will allow residents to engage in those other types of uses. Some examples are residents taking after dinner walks around the field, allowing residents and their pets to enjoy the expansive space for play or picnicking, (please note that the City prohibits pets and food on all artificial turf fields), and utilizing the field for play such as cartwheels, kite flying and non-competitive races, etc. These uses would not be as equally desirable on an artificial turf surface. Therefore, the installation of LED lights alone on grass fields does not make it reasonably foreseeable that the City will install artificial turf on the Burton and Highlands Parks grass fields.

Furthermore, when discussing alternatives considered but rejected from further study starting on page 132 of the Draft EIR, the Addition of Artificial Turf to Existing Fields alternative was rejected from further evaluation, in part because there was no funding to include turf either as part of the project or an alternative. As noted in the Draft EIR, while this alternative would meet the basic objectives of the project, the inclusion of an artificial turf alternative was not included for further consideration as it would not reduce or avoid any significant impacts identified for the proposed project. As stated on page 133 of the Draft EIR, “Should the City decide to convert any City field from grass to artificial turf in the future, staff will consider and evaluate the conversion as a separate project.” Should the City determine in the future that artificial turf should be installed, for whatever reason, it will evaluate that project per City and CEQA requirements. The inclusion, consideration and review in the Draft EIR of an alternative that would add turf to all the grass fields that would have night lighting (Madsen and Flanagan fields at Burton Park and Stadium Field at Highlands Park) is adequate per the requirements of CEQA Guidelines Section 15126.6.

The City does not consider the installation of artificial turf to be feasible, foreseeable or required in order to reduce or avoid project-related impacts at this time. The City is therefore not “piecemealing” or segmenting the project. As noted on page 22 of the Draft EIR and further described in Master Response 2, the City would continue to conduct ongoing field maintenance on the grass fields once they are lighted, (as it has done on the lighted grass fields since the 1960s) in order to ensure that field conditions are safe and useable. As an example of the efficacy of the City’s maintenance of lighted grass fields, Madsen Field at Burton Park is a natural grass field that has had night lighting since the 1960s. This field withstands the use of various sports including baseball, adult softball, youth softball, youth soccer and is also open for general community use. Madsen Field is also the location of several larger scale community events including Hometown Days, Family Campout and youth sport tournaments. Flanagan Field, which does not have lights, shares center field with Madsen Field, and both fields receive the same level of maintenance and support the same level and hours of use in summary, Madsen Field (with lights) is not closed more frequently for maintenance than is Flanagan Field (no lights). Therefore, the City has reasonable evidence to show that the wear and tear of grass fields whether lit or not would not require the installation of turf to allow for the proposed extended hours of use.

Because the installation of turf is considered infeasible and not reasonably foreseeable by the City at this time, the evaluation of the cumulative effects of installing new lights and new turf at all grass fields need not be evaluated. To that end, the City Council has not directed the installation of artificial turf as a result of this project. The reader should also note that contrary to the intent of the commenters, if the City were to include an analysis of the reasonable foreseeability of installing artificial turf at Stadium Field, or Burton and Flanagan Field, this would have the effect of *allowing* the City to install the artificial turf because it would have been studied in the EIR. Lastly, the reader should note that because field use would be conducted generally at the same times and at the same levels of use as defined for the project, and would conclude at 10:00 p.m. per City policy with or

without turf, there would be no increase or decrease in the severity of significant impacts identified in the Draft EIR related to traffic, air quality and noise associated with the project even if turf were installed on the grass fields.

Based on the City's analysis, there are sufficient policy reasons to maintain grass on the fields at this time and it is not reasonably foreseeable that the fields will require installation of artificial turf.

In response to community concerns and for informational purposes, the City has made the following revisions to the Draft EIR to provide more discussion and analysis concerning the Addition of Artificial Turf to Existing Fields alternative in Chapter V. Alternatives.

Page 133 of the Draft EIR is revised as follows:

## **2. Addition of Artificial Turf to Existing Fields Alternative**

To meet the project objectives of allowing additional hours of field use and maximize use of existing City fields, this alternative assumes that the proposed project would be implemented as described in the Draft EIR (i.e., existing lights at Madsen Field and Highlands Field would be replaced with improved LED lighting systems, new LED lights would be installed at Flanagan Field and Stadium Field, and proposed project changes in field use, parking and signage at Highlands Park fields would occur). In addition artificial turf would be installed on Flanagan, Madsen, and Stadium fields. Similar to the artificial turf field at Highlands Park on Highlands Field, the artificial turf infill material would be coconut husks. Timing and use of the fields would be the same as under the proposed project (see Tables III-1 and III-2 in Chapter III, Project Description) as all night use of the fields would need to stop at 10:00 p.m. per the City's Field Use Policy. Development of this alternative would not reduce or avoid any of the significant impacts identified for the proposed project (a requirement for the identification of CEQA alternatives). There could be beneficial savings in regards to water conservation with this alternative, as the artificial turf would not need to be regularly watered. However, this alternative would have adverse policy consequences related to curtailing the community's use of the grass fields and range of activities, such as general play, picnicking, and walking and exercising dogs, because food and animals are not allowed on artificial turf fields per City policy. Thus, this option is not feasible due to policy considerations, that the City would convert natural grass fields to artificial turf at Burton Park and Stadium Field at Highlands Park and/or other City fields. While this alternative would meet most of the basic project objectives allow more time that the fields were available for use, as stated in Chapter III, Project Description, the City has determined that there is no funding for implementation of this costly alternative, whereas there is funding for initiation of the proposed lighting improvement project. Additionally, the City has previously determined that conversion to artificial turf was not part of the proposed project being considered in this EIR. Should the City decide to convert any City field from grass to artificial turf in the future, staff will consider and evaluate the conversion as a separate project. Therefore, because it would not reduce or avoid any significant impacts, would reduce community benefits and use associated with existing grass fields, and is not reasonably foreseeable by the City, the Addition of Artificial Turf to Existing Fields alternative is not further evaluated in this EIR.

**Mahady Report, Park Master Plan, Field Use Policy.** As noted on page 21 of the Draft EIR:



“The City commissioned two reports that evaluated fields and facilities. The City considers the results and recommendations of the following reports still valid for 2017 conditions:

- Parks and Sports Fields Field Use and Agronomic Specifications report, prepared by Mark Mahady & Associates in 2001 that evaluated the current use, impact of each sport on the fields, best practices for maintaining quality playing fields, and provided recommendations for projected future demand. The current 2017 field use has increased 40 percent over the demand for field use that was calculated in the Mahady report. This report is available to view at the San Carlos Parks & Recreation Department.
- The City of San Carlos Master Plan for Parks, Open Space, Buildings and other Recreational Facilities, completed in 2008, included an inventory of existing parks and facilities and provided recommendations for future park planning. This report is available to view at the San Carlos Parks & Recreation Department”.

The Master Plan cites some of the findings of the Mahady Report, which was initially used by City maintenance staff to evaluate the 2001 maintenance program and make adjustments as needed. Recommendations were made from the Mahady Report in terms of scheduling processes, maintenance procedures, as well as optimization of field space options to consider down the road. The Master Plan, in more detail, evaluated each City park site to determine necessary/recommended improvements. Both reports have similar findings/recommendations for improvements at several City parks. The City has used the Master Plan and the Mahady Report for the past ten years as resources with recommendations and guidelines to identify, justify and prioritize individual capital improvements for City parks and facilities. Each specific project, including the proposed project, is evaluated under CEQA for the potential environmental effects specific to that project at the time it is actually proposed. There has been and continues to be no need to evaluate the whole of the Master Plan recommendations under CEQA. The EIR on the proposed project appropriately addresses the impacts and provides mitigation measures to address those impacts for the Burton and Highlands Parks Project. The City decided to evaluate the proposed lighting projects at both parks in one EIR because there are cost savings to doing both at the same time and economies of scale in the CEQA evaluation and design of the projects. Additionally, to the extent there were separate impacts associated with each park, such impacts and mitigation measures for them were identified in the Draft EIR (e.g., Impact TRA-1 which only relates to project-generated traffic at Burton Park.) The Field Use Policy is a standard City policy that addresses the use of fields and is not required to undergo CEQA review. The Field Use Policy does and would continue to apply to all City fields including the ones at Burton and Highlands Parks.

**Maintenance Program.** A number of commenters stated that the proposed project should also include a new and separate monitoring and maintenance program to address the effect of additional hours of play on the grass fields at Burton and Highlands Parks. In response, because the City currently has a comprehensive maintenance program for grass fields with and without lights and a long track record of maintaining those fields (as described more fully below in Master Response 2), there is no need to include a separate and duplicative monitoring and maintenance program as part of the project. As described in Chapter III, Project Description, the monitoring and maintenance of the existing grass fields at Burton Park and Highlands field are part of the existing conditions of the project.

In summary, the proposed project was appropriately identified and evaluated in the Draft EIR and a range of reasonable and feasible alternatives that would avoid or reduce significant project impacts were identified and evaluated in the Draft EIR per the requirements of CEQA.

## **Master Response 2: City Park Maintenance of Sports Fields**

As identified above, a number of commenters were concerned that the increase in use of grass fields associated with the project would result in overuse and field closures and a subsequent decision by City to install artificial turf on grass fields. Commenters especially noted this concern in regards to Stadium Field at Highlands Park. As noted in Master Response 1, the installation of turf is considered infeasible and not reasonably foreseeable by the City at this time and is not included as part of the project or an alternative to the project. Other commenters suggested that the Draft EIR should include an analysis of the wear and tear of the fields as a result of the project (new lights) and extended hours of use to determine if any impacts would result. In response, no significant project impacts related to the additional use of the grass sports fields at Burton or Highlands Parks were identified in the Draft EIR (including the Initial Study contained in Appendix B). Grasses on sports fields are not special-status biological species, and additional use of grass fields due to extended hours of play would not result in any significant impacts requiring mitigation measures per CEQA. As described below, the City regularly maintains lighted and unlighted grass fields to allow for safe use. As noted above, there is no need to identify a separate maintenance program for the proposed project as the City currently has a comprehensive maintenance program for grass fields with and without lights and a long track record of maintaining those fields. The following provides additional information in regards to the City's grass fields maintenance program.

The Parks Department has a weekly routine maintenance program for natural grass sports fields, along with an annual six-week renovation program. The weekly routine maintenance must be performed during active seasonal play, and in some instances, during short breaks in athletic scheduling to accomplish required natural turf care. The same weekly and annual maintenance program is conducted for all natural grass fields in the City, whether they are lighted or not. Parks Maintenance staff makes adjustments to the maintenance program as necessary in order to uphold the integrity of the natural grass turf depending on local conditions. For example, staff may add a topseed to the natural grass turf during a short break between sport seasons to promote growth and maintain the strength of the grass field. During inclement weather, Parks Maintenance staff closely monitors the field conditions before re-opening the field to active play in order to prevent significant wear to the play surface. The following weekly routine tasks are as follows:

- Turf will require mowing two days per week. Cut cool season turf grass 2½ inches during warm season, and reduce to 2 inches during winter or cooler seasons. In warm seasons, common Bermuda shall be mowed not to exceed 1 inch while hybrid Bermuda shall be mowed not to exceed ½ inch to ¾ inch. The variation depends on a site-by-site evaluation, as necessary. Rotary mowers shall be used to mow Tall Fescue or other cool-season turf areas. Reel mowers, with hydraulically driven reels, will be required to mow any Bermuda grass areas. Alternate mowing patterns whenever possible to prevent wheel ruts.
- Edging shall occur weekly.
- All irrigation systems are tested and inspected at least once per week and a written tracking report is documented.

- All turf areas are irrigated as required to maintain adequate growth and appearance. Irrigation is scheduled in accordance with current local Water Authority guidelines. Automatic irrigation is scheduled Sunday through Thursday, between the hours of 10:00 p.m. and 5:00 a.m. Manual irrigation, as needed, takes place between 7:00 a.m. to 4:00 p.m. Monday through Friday.
- Infield maintenance includes dragging of the infield twice per week, inspecting and repairing base pegs, maintaining infield/outfield grass level for safe play and post rain releveling of the infield, as needed. During annual field closures, infield is deep dragged which includes breaking up the clay and adding new infield material.

In conjunction with the weekly maintenance program described above, the Parks Department follows a fertilization program, recommended by a contracted Pest Control Advisor. Fields are fertilized up to six times per year to be able to keep fields in the best possible condition to accommodate the year-round use.

During a six to eight week field renovation closure, the following tasks are completed:

- Aerating of the field,
- Top seeding,
- Starter fertilizer application,
- Irrigation repairs or modifications,
- Infield material added,
- Fencing along perimeter of field to allow seed to germinate.

With weekly routine maintenance, scheduled fertilization applications, and field closures, integrity of the fields is maintained while keeping fields safe for the youth sports groups and general public in the community.

### **Master Response 3: Settlement Agreement**

In addition to the installation of new and upgraded lights on sports fields at Burton and Highlands Parks, a component of the proposed project evaluated in the Draft EIR also includes alterations to operational restrictions at Highlands Park (e.g., regarding field operations, parking, traffic facilities and signage). Background information concerning the Settlement Agreement is described on page 22 of the Draft EIR and a copy of the agreement is included in Appendix C of the Draft EIR. Proposed project alterations affecting the operational restrictions in the agreement are described starting on page 28 of the Draft EIR, and an updated Project Changes to Settlement Agreement Restrictions document is included in Appendix G of this Response to Comments document. The manner in which the requirements of the Settlement Agreement have been and are being implemented by the City is part of the existing conditions, and the proposed project's recommended revisions were compared to those existing conditions in the Draft EIR and no significant impacts associated with the recommended changes to the operational restrictions in the Settlement Agreement were identified or required mitigation measures. While some commenters have identified concerns with how the City has or has not implemented the agreement requirements, those concerns can be considered by the City.

The Settlement Agreement was never intended to prevent the City from making changes to Highlands Park or its programs, per Section 11 of the Agreement that states:

“the City retains jurisdiction to consider and approve a new and different project that could alter and supersede the Project as limited by this Agreement. Specifically, the City may take action to alter, amend, modify or otherwise change the traffic and operations restrictions contained in Section 2, Section 3, Section 4 or Section 5 of this Agreement to reflect the new or modified project at a noticed public hearing of the City Council, with notice provided to SSCP in accordance with Section 13, and after the completion of any environmental review under CEQA as may be necessary.”

As stated on page 28 of the Draft EIR, the Settlement Agreement itself need not be amended to change the operational restrictions; rather the City retained the option to alter the operational restrictions when it entered into the agreement. The City now desires to consider revisions to the operational restrictions as part of the proposed project evaluated in the Draft EIR, consistent with the project objectives especially those in regards to maximizing the use of Burton and Highlands Parks fields and ensuring that “City parks and fields are managed consistently per the Field Use Policy and general City practices for all fields.” Notice of the availability of the Draft EIR for public comment was provided to Save San Carlos Parks (SSCP) in accordance with Section 13 of the Settlement Agreement. The proposed project that includes this action will be presented for review and approval at a noticed public hearing before the City Council, and SSCP will also be provided with notice for that hearing. For informational purposes and clarity, an updated draft of the Changes to the Settlement Agreement Restrictions that sets forth proposed changes (shown in underlined and ~~strikeout~~ text) to the restrictions that were in Sections 2, 3, 4 and 5 (and thus includes also the restrictions that would not be revised) is provided in Appendix G of this document.

#### **Master Response 4: Noise Analysis**

In response to a number of comments regarding the noise analysis contained in the Draft EIR, the following master response was prepared to provide additional information regarding the methods used to take the noise measurements, how noise levels are averaged and reported, and the potential for an amphitheater effect due to local topography.

**Noise Measurements.** Short-term noise measurements were conducted during the daytime when events were occurring in order to capture event and spectator noise levels. In addition, long-term noise measurements were conducted at two locations at Highlands Park and one location at Burton Park, which captured noise levels during the evening and nighttime hours in addition to daytime noise levels. Monitoring data including the 24-hour/nighttime noise levels is included in Appendix F of the Draft EIR. Supplemental analysis determined that with implementation of the proposed project, there would not be any significant Lmax or hourly Leq noise level impacts at either Burton Park or Highlands Park.

**Averaging Noise Levels over a 24-Hour Period.** Noise level increases were averaged over a 24-hour period, consistent with City standards identified in Action NOI-1.4 of the City’s General Plan Noise Element. The 24-hour averaging period places a penalty on nighttime noise as the Ldn is defined as the 24-hour A-weighted average sound level from midnight to midnight, calculated with the addition of a 10 decibels penalty to sound levels occurring in nighttime hours (10:00 p.m. to 7:00 a.m.). During the nighttime period, 10 dB is added to reflect the impact of the noise. However, to

address the comments, a supplemental analysis provided below was conducted to determine the Lmax and hourly Leq noise level impacts based on the standards presented in Table 9-1, Non-Transportation Noise Standards of the City’s General Plan Noise Element (Table IV.C-6 of the Draft EIR).

As shown in Table IV.C-6, noise levels should not exceed 55 dBA Leq during the daytime (7:00 a.m. – 10:00 p.m.) or 45 dBA Leq during the nighttime (10:00 p.m. to 7:00 a.m.) at receiving residential land uses. In addition, noise levels should not exceed 70 dBA Lmax during the daytime or 60 dBA Lmax during the nighttime (10:00 p.m. to 7:00 a.m.). As discussed above, implementation of the proposed project would extend the hours that games and events would occur; however events would not occur past 10:00 p.m. Therefore, the nighttime noise level performance standards are not applicable to the proposed project. Table 1 identifies the extended evening (5:00 p.m. to 10:00 p.m.) hourly noise levels with and without implementation of the proposed Burton Park project and Table 2 identifies the extended evening hourly noise levels with and without implementation of the proposed Highlands Park project.

*Burton Park.* Implementation of the proposed project would extend the hours that games and events would occur. As discussed on page 117 of the Draft EIR, the closest noise-sensitive receptors to the Burton Park project site are the single-family residences located approximately 95 feet north of the project site along Woodland Avenue. As shown in Table IV.C-7 of the Draft EIR, the measured noise level 10 feet east of the spectators at the Highlands Park project site while games are occurring is approximately 70.4 dBA Leq. Due to distance attenuation, the nearest receptor would be subject to a noise level of approximately 51.8 dBA Leq generated by spectators. Therefore, this noise level would be below the City’s noise level performance standard of 55 dBA Leq during the daytime. In addition, as shown in Table 1 below, the contribution from the project’s operational noise levels would be less than existing noise levels.

**Table 1: Operational Hourly Noise Levels With and Without Burton Park Project at Nearest Receptor**

Time		Existing Noise Levels	Operational Noise Levels <sup>a</sup>	Existing Plus Project Noise Levels	Noise Level Increase
5:00 p.m.	Weekday	54.3 dBA Leq	51.8 dBA Leq	56.2 dBA Leq	1.9 dBA Leq
	Weekend	54.3 dBA Leq	51.8 dBA Leq	56.2 dBA Leq	1.9 dBA Leq
6:00 p.m.	Weekday	56.2 dBA Leq	51.8 dBA Leq	57.5 dBA Leq	1.3 dBA Leq
	Weekend	61.2 dBA Leq	51.8 dBA Leq	61.7 dBA Leq	0.5 dBA Leq
7:00 p.m.	Weekday	59.8 dBA Leq	51.8 dBA Leq	60.4 dBA Leq	1.6 dBA Leq
	Weekend	63.5 dBA Leq	51.8 dBA Leq	63.8 dBA Leq	0.3 dBA Leq
8:00 p.m.	Weekday	56.1 dBA Leq	51.8 dBA Leq	57.5 dBA Leq	1.4 dBA Leq
	Weekend	65.0 dBA Leq	51.8 dBA Leq	65.2 dBA Leq	0.2 dBA Leq
9:00 p.m.	Weekday	54.6 dBA Leq	51.8 dBA Leq	56.4 dBA Leq	1.8 dBA Leq
	Weekend	54.4 dBA Leq	51.8 dBA Leq	56.3 dBA Leq	1.9 dBA Leq

Notes: Leq represents the average of the sound energy occurring over the 1-hour time period.

<sup>a</sup> Operational noise levels are based on the ST-2 noise measurement results, which were taken approximately 10 feet east of spectators and are scaled for distance to the nearest sensitive receptor.

Source: LSA, April 2018.

As shown in Table 1, with implementation of the proposed Burton Park project and when combined with the existing hourly noise levels, noise level increases during the extended hours of use would be between 0.2 dBA and 1.9 dBA Leq. This noise level increase would be below the City’s significance criteria for noise-level increases of 3 dBA or more.

In addition, based on the noise monitoring conducted, the maximum noise level during these hours on weekdays is approximately 69.2 dBA Lmax and the maximum noise level during these hours on weekends is approximately 70.4 dBA Lmax. The maximum measured noise level 10 feet east of the spectators at the Burton Park project site while games are occurring is approximately 87.7 dBA Lmax. Due to distance attenuation, the nearest receptor would be subject to a maximum noise level of approximately 68.2 dBA Lmax generated by spectators. This maximum noise level is lower than the City’s noise level performance standard of 70 dBA Lmax during the daytime. In addition, this maximum noise level is below the existing current maximum noise level during these hours. Therefore, this impact would be considered less than significant.

*Highlands Park.* Implementation of the proposed project would extend the hours that games and events would occur. As discussed on page 117 of the Draft EIR, the closest noise-sensitive receptors to the Highlands Park project site are the single-family residences located approximately 70 feet north of the project site along Elson Court. These residences are located approximately 250 feet north of the spectator bleachers. As shown in Table IV.C-7 of the Draft EIR, the measured noise level 10 feet east of the spectators while games are occurring is approximately 70.4 dBA Ldn. Due to distance attenuation, the nearest receptor would be subject to a noise level of approximately 42.4 dBA Leq generated by spectators. Therefore, this noise level would be below the City’s noise level performance standard of 55 dBA Leq during the daytime. In addition, as shown in Table 2, the contribution from the project’s operational noise levels would be less than existing noise levels.

**Table 2: Operational Hourly Noise Levels With and Without Highlands Park Project at Nearest Receptor**

Time		Existing Noise Levels	Operational Noise Levels <sup>a</sup>	Existing Plus Project Noise Levels	Noise Level Increase
5:00 p.m.	Weekday	54.7 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	55.0 dBA L <sub>eq</sub>	0.3 dBA L <sub>eq</sub>
	Weekend	45.3 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	47.1 dBA L <sub>eq</sub>	1.8 dBA L <sub>eq</sub>
6:00 p.m.	Weekday	60.8 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	60.9 dBA L <sub>eq</sub>	0.1 dBA L <sub>eq</sub>
	Weekend	44.8 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	46.8 dBA L <sub>eq</sub>	2.0 dBA L <sub>eq</sub>
7:00 p.m.	Weekday	49.9 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	50.6 dBA L <sub>eq</sub>	0.7 dBA L <sub>eq</sub>
	Weekend	47.4 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	48.6 dBA L <sub>eq</sub>	1.2 dBA L <sub>eq</sub>
8:00 p.m.	Weekday	46.6 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	48.0 dBA L <sub>eq</sub>	1.4 dBA L <sub>eq</sub>
	Weekend	47.5 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	48.7 dBA L <sub>eq</sub>	1.2 dBA L <sub>eq</sub>
9:00 p.m.	Weekday	46.7 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	48.1 dBA L <sub>eq</sub>	1.4 dBA L <sub>eq</sub>
	Weekend	47.9 dBA L <sub>eq</sub>	42.4 dBA L <sub>eq</sub>	49.0 dBA L <sub>eq</sub>	1.1 dBA L <sub>eq</sub>

Notes: L<sub>eq</sub> represents the average of the sound energy occurring over the 1-hour time period.

<sup>a</sup> Operational noise levels are based on the ST-2 noise measurement results, which were taken approximately 10 feet east of spectators and are scaled for distance to the nearest sensitive receptor.

Source: LSA, April 2018.

As shown in Table 2, with implementation of the proposed Highlands Park project and when combined with the existing hourly noise levels, noise level increases during the extended hours of use would be between 46.8 dBA Leq and 60.9 dBA Leq and would result in an increase of between 0.1

dBA and 2.0 dBA Leq. This noise level increase would be below the City's significance criteria for noise-level increases of 3 dBA or more.

In addition, based on the noise monitoring conducted, the maximum noise level during these hours on weekdays is approximately 66.0 dBA L<sub>max</sub> and the maximum noise level during these hours on weekends is approximately 57.6 dBA L<sub>max</sub>. The maximum measured noise level 10 feet east of the spectators while games are occurring is approximately 87.7 dBA L<sub>max</sub>. Due to distance attenuation, the nearest receptor would be subject to a maximum noise level of approximately 59.4 dBA L<sub>max</sub> generated by spectators. This maximum noise level is lower than the City's noise level performance standard of 70 dBA L<sub>max</sub> during the daytime. In addition, this maximum noise level is below the existing current maximum noise level during these hours. Therefore, this impact would be considered less than significant.

**Amphitheater Effect.** Stadium Field at Highlands Park is bordered by residences to the north, a steep hill to the east, Highlands Field to the south, and a dense tree line to the west. Some commenters stated that the adjacent hill to the east is reported to create an amphitheater effect with echoing noise. The hill reflects noise from the field, and deflects noise upwards resulting in echoing. However, as described on page 125 of the Draft EIR, project noise levels, even when deflected would not exceed the noise criteria established by the City. Any noise level increase associated with hillside reflection would be minimal and would not be expected to expose persons to noise levels in excess of City standards.

### **Master Response 5: Transportation Analysis**

A number of commenters questioned why certain streets (e.g., Elston Court, Vista Del Grande, Coronado Avenue, Madera Avenue) and their related intersections were not evaluated for traffic impacts in the Draft EIR. All study intersections (including Elston Court/Coleman Court, see list of evaluated intersection on page 73 of the Draft EIR) were selected by City staff for review based on their proximity to one of the parks and the potential for there to be significant impacts (per the City's significance criteria identified on pages 92 and 93 of the Draft EIR) from project-related traffic. It was found that the proposed project would not result in a significant impact at the intersection of Elston Court/Coleman Court. The number of additional project-generated trips that would use Coronado Avenue to access the Elston Court/Coleman Court intersection is projected to be four in the PM peak hour and four in the weekend peak hour, as shown in Figure IV.B-6 on page 95 of the Draft EIR. The City determined that additional analysis and modeling was not warranted for other streets and intersections identified in the comments on the Draft EIR as it was determined that the additional trips related to the implementation of the proposed project would be minimal as compared to the existing conditions.

The City did not include smaller streets in the analysis as the City and the traffic consultant, based on experience and professional knowledge, determined that there would be so few trips related to the project using those streets that significant traffic impacts were very unlikely to occur due to their lack of proximity to the project sites and lack of the ability for through traffic to use those streets.

### **Master Response 6: Parking and Emergency Access**

A number of commenters stated that park users currently park on public streets in the vicinity of Highlands Park (e.g., Coleman Court, Elston Court, Coronado Avenue) and that some park users parked illegally (i.e., where signs were posted prohibiting parking or in private driveways, etc.).

Commenters were concerned that the installation of lights on Stadium Field would exacerbate that condition such that emergency vehicles would be blocked from accessing those streets. As noted on page 103 of the Draft EIR, parking deficiencies are not themselves CEQA impacts unless they result in physical impacts to the environment. In regards to the parking analysis provided by the City for informational purposes and due to public concern, Coleman Court, Elston Court and a portion of Coronado Avenue (200 feet on either side of the intersection with Coleman Court-Elston Court) were included in the April 2017 parking occupancy survey, as noted in Draft EIR Appendix E. The parking survey shows the extent that these streets are being used for parking during the survey time periods.

Three streets were inadvertently omitted from the list of surveyed street on page 88 of the Draft EIR, which should read as follows:

Highlands Park

10. Highlands Park south parking lot near tennis courts
11. Highlands Park north parking lot near North Baseball Diamond
12. Melendy Drive between Aberdeen Drive and Torino Drive
13. Aberdeen Drive between Melendy Drive and Dundee Lane
14. Glasgow Lane between Aberdeen Drive and Dundee Lane
15. Dundee Lane between Aberdeen Drive and the eastern end of Dundee Lane
16. Elston Court between Coleman Court and the end
17. Coleman Court between Elston Court and the end
18. Coronado Avenue from 200 feet west of Coleman Court to 200 feet east of Coleman Court

The tabulated results in Tables IV.B-7 and IV.B-12 in the Draft EIR on pages 88 and 103 respectively, included all of these streets (numbered 16, 17 and 18 above) in the totals.

Additionally, the sentence following Table IV.B-12 on page 103 had a typo, and should read “The parking utilization survey confirmed that approximately 180 to ~~204~~ 234 parking spaces are typically available during the study periods.”

In response to comments, the following changes are made to page 88 of the Draft EIR:

10. Highlands Park south parking lot near tennis courts
11. Highlands Park north parking lot near North Baseball Diamond
12. Melendy Drive between Aberdeen Drive and Torino Drive
13. Aberdeen Drive between Melendy Drive and Dundee Lane
14. Glasgow Lane between Aberdeen Drive and Dundee Lane
15. Dundee Lane between Aberdeen Drive and the eastern end of Dundee Lane
16. Elston Court between Coleman Court and the end
17. Coleman Court between Elston Court and the end
18. Coronado Avenue from 200 feet west of Coleman Court to 200 feet east of Coleman Court

In response to comments, the following changes are made to page 103 of the Draft EIR:

The parking utilization survey confirmed that approximately 180 to ~~204~~ 234 parking spaces are typically available during the study periods.



The projected number of additional project-generated trips for Highlands Park is shown in Table IV.B-8: Trip Generation Summary on page 94. Of the new trips, it is estimated that 5 percent (four peak hour trips, two inbound and two outbound) would access the park from the north side (i.e., the vicinity of Elston and Coleman Courts). Although on-street parking is restricted to one side of the street (at some locations), the parking surveys indicated that there is available on-street parking on these public streets (Coleman Court, Elston Court, and a portion of Coronado Avenue closest to Highlands Park). As on any public street, enforcement of parking rules by the Sheriff's Office is an important element so that vehicles are parked in a manner consistent with local and State laws.

Regarding dangerous situations including obstructed access for emergency vehicles, the parking analysis for the proposed traffic in the Draft EIR summarized on Table IV.B-12 reflects field observations, parking utilization surveys, as well as the additional parking generation of vehicles that would access each park from various directions. Additionally, regarding Elston Court, three calls were made to the Sheriff's Office to report parking problems in the past two years (see the listing of calls in Appendix H to this document). The effect on emergency access was considered as part of the proposed project (see page 102 of the Draft EIR) and it was determined that implementation of the project would not have a substantial effect on emergency access to streets in the vicinity of each park, and any impact would be less than significant. As is true for all City streets, the City would rely on existing enforcement procedures by the Sheriff's Office to ensure vehicles are not parked illegally.

## A. AGENCIES

**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  
FAX (510) 286-5559  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

February 2, 2018

SCH # 2017052066  
GTS # 04-SM-2017-00143  
GTS ID: 8736  
PM: SM – 82 – 5.80

Kaveh Forouhi, Senior Engineer  
Public Works Department  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070

**Burton and Highlands Park Project – Draft Environmental Impact Report (DEIR)**

Dear Mr. Forouhi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Burton and Highlands Park Project. 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 November 20, 2017 DEIR.

***Project Understanding***

This is a project to improve the lighting at sports fields of two different parks in the City of San Carlos, Burton Park and Highlands Park. Burton Park is located in a residential area just under 0.5 miles from State Route (SR) 82 (El Camino Real) at Brittan Avenue. Highland Park is located in a residential area approximately one mile west of Burton Park, and is accessible from the STN via the same intersection at SR 82 via Brittan Avenue and various local collector streets.

This project will install new light emitting diode (LED) lights on the currently unlit Flanagan Field at Burton Park, and the unlit Stadium Field at Highlands Park, as well as safety lighting as necessary. The project also includes upgrading the existing lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights. The project also involves some traffic facility, parking and signage changes as well as changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other City fields through the identification and evaluation of a modified project as contemplated by the terms of a 2010

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 2

Settlement Agreement with Save San Carlos Parks.

**Multimodal Planning**

To reduce VMT, the Lead Agency should provide enhanced amenities for pedestrians and bicyclists. The San Carlos Municipal Code section 18.20.080 states the following bicycle parking requirements for areas with the “public” land-use designation:

- The number of short-term bicycle parking spaces shall be at least ten percent of the number of required automobile parking spaces, with a minimum of four parking spaces provided per establishment.

Please ensure that both parks provide at a minimum this volume of bicycle parking spaces (i.e bike racks). Where possible, provide bike parking volumes in excess of these minimums. Furthermore, the Municipal Code lays out the following requirements for bicycle parking spaces:

- Anchoring and Security: For each short-term bicycle parking space required, a stationary, securely anchored object shall be provided to which a bicycle frame and one wheel can be secured with a high-security U-shaped shackle lock if both wheels are left on the bicycle. One such object may serve multiple bicycle parking spaces.
- Size and Accessibility: Each short-term bicycle parking space shall be a minimum of two feet in width and six feet in length and shall be accessible without moving another bicycle. Two feet of clearance shall be provided between bicycle parking spaces and adjacent walls, poles, landscaping, street furniture, drive aisles, and pedestrian ways and at least five feet from vehicle parking spaces.

The bike racks at Burton Park on the corner Brittan Ave and Cedar Street are the “wheelbender” variety of rack, which is not acceptable under the above definitions. The Lead Agency should survey bike parking accommodations at both Burton and Highland Parks to ensure that adequate volumes are provided and that the style of bike parking facility is satisfactory. Replace racks or add parking capacity where necessary.

Mitigation measure TRA-3 includes pedestrian crossing enhancements. When providing new crosswalks, ensure that they are high-visibility “zebra” or “ladder” style crosswalks. Where possible, upgrade existing crosswalks to high-visibility crosswalks.

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.

1  
cont.

2

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 3

### ***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.

- Transit and trip planning resources such as an information kiosk;
- Real-time transit information system;
- Transit subsidies on an ongoing basis such as discounted fares for park employees and participants in regularly scheduled events such as sports leagues;
- Ten percent vehicle parking reductions;
- Paid parking;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Adequate bicycle storage dispersed throughout the park as described above;
- Sufficient bicycle access to the park as described above;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

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>.

### ***Lead Agency***

As the Lead Agency, the City of San Carlos is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing,

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 4

scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

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,



for PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

4  
cont.

## COMMENTER A1

Patricia Maurice  
Department of Transportation  
February 2, 2018

Response A1-1: This comment is introductory in nature. See Responses A1-2 through A1-4.

Response A1-2: The City concurs that providing amenities for pedestrians and bicyclists is an appropriate way to reduce vehicle miles travelled (VMT) associated with use of the lighted playing fields at the two parks. The City has taken care to ensure that the two parks include facilities, including sidewalks, pathways, crosswalks, and bike racks, to encourage access by walking and biking. The suggestions of the commenter for improving bicycle parking will be considered by the City before and during project implementation. Such topic does not raise CEQA impact concerns.

The project's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users was considered in the Draft EIR starting on page 102. A significant impact (Impact TRA-3) associated with potential conflicts between pedestrians and vehicles was identified at Burton and Highlands parks. The project would not affect existing access to transit facilities in the vicinity of the project sites.

In response to this comment, Mitigation Measure TRA-3 on page 102 in the Draft EIR is revised as follows:

Mitigation Measure TRA-3: The City shall implement the following pedestrian improvements to reduce the impact to a less-than-significant level:

- At Burton Park, the City shall construct pedestrian sidewalks and crosswalks along Baytree Road between Chestnut Street and Woodland Avenue. The crosswalks shall be high-visibility (i.e., zebra or ladder styles).
- At Highlands Park, the City shall enhance pedestrian crossing opportunities along Aberdeen Drive to include a high visibility crosswalk (with curb ramps) at the north side of the intersection of Glasgow Lane. The City shall install a new curb ramp on the west side of Aberdeen Drive across from the existing curb ramp at the northeast corner at Glasgow Lane. Additionally, the City shall initiate a program to prohibit on-street parking adjacent to existing driveways along Aberdeen Drive to improve driver sight lines and enhance safety in the areas nearest each driveway. (LTS)

Response A1-3: Many of the transportation demand management (TDM) strategies suggested by the commenter are typical of those required of private developments rather than for public facilities like parks, such as transit subsidies, provision of lower parking ratios, establishment of a Transportation Management Association (TMA), charging stations for electric vehicles. Such strategies can be effective at reducing auto use at uses like multi-family residential, office, and retail developments, but are not applicable to parks.

The traffic analysis completed for the project indicates the project-generated trips (see Table IV.B-8 on page 94) for the two park sites would affect local streets and create local circulation impacts, as analyzed in Section IV.B Transportation and Circulation. The project-related traffic would have no impact on regional and State facilities.

Response A1-4: The comment that the City is responsible for the implementation of mitigation measures is noted, and the City will be preparing a Mitigation Monitoring and Reporting Program for the project as well.





Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

February 9, 2018

Kaveh Forouhi  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070-3085

Subject: Burton and Highlands Park Project  
SCH#: 2017052066

Dear Kaveh Forouhi:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 8, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2017052066  
**Project Title** Burton and Highlands Park Project  
**Lead Agency** San Carlos, City of

**Type** EIR Draft EIR

**Description** Note: Review Per Lead

The proposed project is intended to provide additional and improved night lighting at fields, also referred to as the project site, at Burton and Highlands Parks to allow for additional hours of play and assist in meeting the unmet demand for field space. The proposed project involves the installation of new light-emitting diode lights on the currently unlit Flanagan Field at Burton Park and the unlit Stadium Field at Highlands Park, as well as safety lighting, as necessary. The project also includes upgrading the existing metal-halide lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights. The project also involves some traffic facility, parking and signage changes as well as changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other city fields, through the identification and evaluation of a modified project as contemplated by the terms of a 2010 Settlement Agreement with Save San Carlos Parks.

**Lead Agency Contact**

**Name** Kaveh Forouhi  
**Agency** City of San Carlos  
**Phone** (650) 802-4202  
**email**  
**Address** 600 Elm Street  
**City** San Carlos  
**Fax**  
**State** CA **Zip** 94070-3085

**Project Location**

**County** San Mateo  
**City** San Carlos  
**Region**  
**Lat / Long** 37° 29' 50.2" N / 122° 15' 28.8" W  
**Cross Streets** Brittan Ave & Woodland Ave (Burton) and Melendy Dr & Aberdeen Dr  
**Parcel No.** 051-321-190, 050-601-010  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** US 101, I-280, Hwy 82  
**Airports** San Carlos  
**Railways** Caltrain  
**Waterways** San Francisco Bay  
**Schools** Central MS, Brittan Acres ES, Heather ES, Arundel ES  
**Land Use** PLU: Both Burton and Highlands Parks used as parks and include soccer, baseball and soccer fields  
Z: park in the city's zoning map

**Project Issues** Traffic/Circulation; Noise

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; California Energy Commission; Public Utilities Commission

**Date Received** 11/20/2017 **Start of Review** 11/20/2017 **End of Review** 02/08/2018

**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

FAX (510) 286-5559

TTY 711

www.dot.ca.gov

Governor's Office of Planning & Research

clear  
2/8/18  
T



Making Conservation  
a California Way of Life.

FEB 02 2018

STATE CLEARINGHOUSE

February 2, 2018

SCH # 2017052066

GTS # 04-SM-2017-00143

GTS ID: 8736

PM: SM – 82 – 5.80

Kaveh Forouhi, Senior Engineer  
Public Works Department  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070

**Burton and Highlands Park Project – Draft Environmental Impact Report (DEIR)**

Dear Mr. Forouhi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Burton and Highlands Park Project. 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 November 20, 2017 DEIR.

***Project Understanding***

This is a project to improve the lighting at sports fields of two different parks in the City of San Carlos, Burton Park and Highlands Park. Burton Park is located in a residential area just under 0.5 miles from State Route (SR) 82 (El Camino Real) at Brittan Avenue. Highland Park is located in a residential area approximately one mile west of Burton Park, and is accessible from the STN via the same intersection at SR 82 via Brittan Avenue and various local collector streets.

This project will install new light emitting diode (LED) lights on the currently unlit Flanagan Field at Burton Park, and the unlit Stadium Field at Highlands Park, as well as safety lighting as necessary. The project also includes upgrading the existing lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights. The project also involves some traffic facility, parking and signage changes as well as changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other City fields through the identification and evaluation of a modified project as contemplated by the terms of a 2010

2  
cont.

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 2

Settlement Agreement with Save San Carlos Parks.

**Multimodal Planning**

To reduce VMT, the Lead Agency should provide enhanced amenities for pedestrians and bicyclists. The San Carlos Municipal Code section 18.20.080 states the following bicycle parking requirements for areas with the “public” land-use designation:

- The number of short-term bicycle parking spaces shall be at least ten percent of the number of required automobile parking spaces, with a minimum of four parking spaces provided per establishment.

Please ensure that both parks provide at a minimum this volume of bicycle parking spaces (i.e bike racks). Where possible, provide bike parking volumes in excess of these minimums. Furthermore, the Municipal Code lays out the following requirements for bicycle parking spaces:

- **Anchoring and Security:** For each short-term bicycle parking space required, a stationary, securely anchored object shall be provided to which a bicycle frame and one wheel can be secured with a high-security U-shaped shackle lock if both wheels are left on the bicycle. One such object may serve multiple bicycle parking spaces.
- **Size and Accessibility:** Each short-term bicycle parking space shall be a minimum of two feet in width and six feet in length and shall be accessible without moving another bicycle. Two feet of clearance shall be provided between bicycle parking spaces and adjacent walls, poles, landscaping, street furniture, drive aisles, and pedestrian ways and at least five feet from vehicle parking spaces.

The bike racks at Burton Park on the corner Brittan Ave and Cedar Street are the “wheelbender” variety of rack, which is not acceptable under the above definitions. The Lead Agency should survey bike parking accommodations at both Burton and Highland Parks to ensure that adequate volumes are provided and that the style of bike parking facility is satisfactory. Replace racks or add parking capacity where necessary.

Mitigation measure TRA-3 includes pedestrian crossing enhancements. When providing new crosswalks, ensure that they are high-visibility “zebra” or “ladder” style crosswalks. Where possible, upgrade existing crosswalks to high-visibility crosswalks.

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.

2  
cont.

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 3

### ***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.

- Transit and trip planning resources such as an information kiosk;
- Real-time transit information system;
- Transit subsidies on an ongoing basis such as discounted fares for park employees and participants in regularly scheduled events such as sports leagues;
- Ten percent vehicle parking reductions;
- Paid parking;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Adequate bicycle storage dispersed throughout the park as described above;
- Sufficient bicycle access to the park as described above;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

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>.

### ***Lead Agency***

As the Lead Agency, the City of San Carlos is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing,

2  
cont.

Letter

A2


Attach.

Mr. Forouhi, City of San Carlos  
February 2, 2018  
Page 4

scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

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,



for PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

2  
cont.

## **COMMENTS A2**

Scott Morgan  
Governor's Office of Planning and Research  
February 9, 2018

- Response A2-1: This comment states that the Draft EIR was submitted to selected State agencies for review and that the City has complied with State Clearinghouse review requirements pursuant to CEQA. This comment does not relate to the adequacy of the information or analysis within the Draft EIR. No further response is required.
- Response A2-2: This comment provides the letter from the Department of Transportation. See Commenter A1 and Responses A1-1 through A1-4.

## **B. INDIVIDUALS**



**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com)  
**To:** [Kaveh Forouhi](#)  
**Cc:** [Amy Newby](#); [Crystal Mui](#)  
**Subject:** Re: Highlands Park EIR REPLY  
**Date:** Wednesday, November 29, 2017 6:41:14 PM

---

Dear Kaveh:

Thank you for your prompt reply.

The wording on the meeting notice said "Comments should focus on discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives to the project in light of the EIR's purpose to provide useful and accurate information about such factors." Since this wording followed "The Public Meeting will be held on: Wednesday, December 6, 2017 at 7:00 p.m", it appeared to me that you were asking for comments at the meeting. I did not see any reference in the notice to your reply to me, "The purpose of the December 6 meeting is to present the findings and share with the residents the summary of the report ". Otherwise, I would have not contacted you about the short time period. Thanks for clarifying the purpose of the meeting.

Sincerely,

Gus Dedo

**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com) [mailto:[gusdedo@aol.com](mailto:gusdedo@aol.com)]  
**Sent:** Wednesday, November 29, 2017 3:10 PM  
**To:** \*City Clerk's Office <[CityClerk@cityofsancarlos.org](mailto:CityClerk@cityofsancarlos.org)>  
**Subject:** Highlands Park EIR

Dear Ms Mui:

Please forward the following email to Kaveh Forouhi, the members of the City Council, and Amy Newberry.

Thank you!

Gus Dedo

Dear Mr. Forouhi:

Amy Newberry offered me the opportunity to look at the EIR for Burton and Highlands Park in her office yesterday. I thought I would be able to pick up a copy, or at least read it at her office, until I saw that the report totaled 144 pages!!! That is "crazy" long. I can't help but wonder how many ordinary citizens will have enough time to read it and properly organize their thoughts in time for the December 6<sup>th</sup> meeting. This report took at least 4 months to complete (the initial EIR meeting that I know about was on July 13<sup>th</sup>). Yet we only received about 9 days notice for the first public meeting to discuss it. Timing seems a bit short for the public's first opportunity to make comments.

Sincerely,

Gus Dedo  
9 Coleman Court  
San Carlos, CA 94070  
650-814-3866

CC: City Council  
Amy Newberry

**COMMENTS B1a**

Dedo, Gus  
November 29, 2017

Response B1a-1: This comment is a discussion of the purpose of the Public Hearing held on December 6, 2017, and not a comment on the environmental analysis contained in the Draft EIR. No further response is required.

Response B1a-2: This comment is a request to the City to extend the comment period on the Draft EIR. On February 7, 2018, the City published a notice (included in Appendix I of this document) extending the comment on the Draft EIR to February 28, 2018, which allowed for a 100-day comment period.

**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com)  
**To:** [Kaveh Forouhi](#)  
**Cc:** [Amy Newby](#)  
**Subject:** Highlands EIR  
**Date:** Tuesday, December 05, 2017 9:56:17 PM

---

Dear Kaveh:

I was reviewing the EIR in preparation for Wednesday's meeting and I could not find any reference to the cost of adding lights to either Burton Park or Highlands Park. Since I believe that this information is an important component of any EIR discussion, please provide me with the cost of providing lights for each field broken out by major categories. In addition, please provide me with the costs of any mitigation items that would be required if lights are installed. I believe it is very important to know the total cost of providing the lights.

As always, thanks!!

Gus Dedo

**COMMENTS B1b**

Dedo, Gus

December 5, 2017

Response B1b-1: This comment requests information concerning costs associated with implementation of the project. CEQA does not require the review of economic effects related to a project or project alternatives, and that information does not need to be included in the EIR. No additional response is required.

**From:** gusdedo@aol.com [mailto:gusdedo@aol.com]  
**Sent:** Tuesday, December 05, 2017 2:08 PM  
**To:** Kaveh Forouhi  
**Cc:** Amy Newby  
**Subject:** EIR Stadium Field

Dear Mr. Forouhi,

I just finished my initial reading of the EIR. There is a lot to digest for someone who is new to EIR's. In the next few weeks after Wednesdays EIR meeting, I would like to go over various parts of the EIR with you or someone on your staff to make sure I understand it and that I can make intelligent comments. For example, I would like to better understand the noise and traffic statistics, especially why the noise information is averaged over a 24 hour period, not calculated for the evening hours where the noise is most troublesome. I would also like to review the "APPENDICES". According to the Table of Contents they are "included on a compact disk located on the inside back cover of this Draft EIR". How can I obtain a copy? Thanks!!

Sincerely,

Gus Dedo  
9 Coleman Court  
San Carlos, CA  
650-814-3866

**From:** gusdedo@aol.com [mailto:gusdedo@aol.com]  
**Sent:** Tuesday, December 05, 2017 2:59 PM  
**To:** Kaveh Forouhi  
**Cc:** Amy Newby  
**Subject:** EIR Stadium Field

---

Hey Kaveh:

Thanks for reply. I did not realize that the environmental consultant would be at the meeting.

Anything you and I would discuss after the meeting would only be to clarify things for me. I will be sending written comments.

Gus

2

**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Re: EIR Stadium Field  
**Date:** Wednesday, December 06, 2017 9:24:04 PM

---

Hey Kaveh:

As you suggested, I brought up the noise level calculation at the meeting but the representative from the company that prepared the EIR did not say anything. From your comment, I expected to be able to get a few answers to my concerns.

Since I am downtown on a regular basis, I would like to come in and introduce myself. It is best to make an appointment?

Sincerely,

Gus

3

**COMMENTS B1c**

Dedo, Gus

December 5, 2017

Response B1c-1: In regards to the noise calculations, see Master Response 4. The Draft EIR and all appendices were posted on the City's website at <https://www.cityofsancarlos.org/government/departments/parks-and-recreation/current-parks-recreation-projects>.

Response B1c-2: This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

Response B1c-3: Please see Response B1c-1.



**From:** gusdedo@aol.com [mailto:gusdedo@aol.com]  
**Sent:** Thursday, December 7, 2017 10:51 PM  
**To:** Amy Newby <ANewby@cityofsancarlos.org>  
**Subject:** Re: Highlands Park Weekend Hours REPLY

Hey Amy:

Thank you for your reply!!!

I did not realize that only Highlands North and South fields were included in the Settlement Agreement. The wording on Page 28 of the EIR sure sounded like all fields in Highlands Park were included in the Settlement Agreement. There was no mention anywhere in the on-line EIR that I can remember, that stated it was only Highlands North and South fields. That is very sloppy wording on LSA's part. Another example of sloppy wording on LSA's part was on page 3 where they stated "In addition, the proposed project also involves changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other City fields." I forget which member of the Park and Rec said that was incorrect, but it must have been, because the LSA rep quickly agreed. I wonder how many other inconsistencies there are in the report. We spent a lot of money on this report to have at least two basic errors. My comment on "lack of involvement from Park & Rec in the process" was due to the fact that three of the commissioners seemed to be upset that they are not included in the final process. To be honest, I am very surprised that Park and Rec is not included. One would think that if any department should have a role in the EIR, it is Park & Rec, the people that should know the most about the fields.

1

2

3

Another comment on the starting time for the soccer games on the weekend. My wife's morning walk through Highlands Park usually starts at 7ish and last until 8ish Monday through Saturday. She has seen, more often then not, that soccer players are on all fields at Highlands Park before 7:45 am on Saturday. You stated that "During tournaments, there is someone from the organizing team that is appointed to monitor Highlands North and South from roughly 7am to 7:45am". There does not appear to be anyone during non-tournaments to monitor the fields. I just hear the noise, I do not have any visual confirmation on which fields are being used.

4

As always, thank you for your reply!!!

Sincerely,  
Gus Dedo

**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com) [mailto:[gusdedo@aol.com](mailto:gusdedo@aol.com)]  
**Sent:** Thursday, December 7, 2017 3:04 PM  
**To:** [ANewby@cityofsancarlos.org](mailto:ANewby@cityofsancarlos.org).  
**Subject:** Highlands Park Weekend Hours

Hey Amy:

I thought there were some excellent comments in last night's meeting concerning not adding lights at Stadium Field. When will we be able to access the minutes from the meeting? I was surprised, however, to find out the lack of involvement from Park & Rec in the process.

5

I tried to access the Appendices but was still unable to do so. Help!!

6

As I said last night, I discovered the Settlement Agreement's rules about weekend start times at Highlands Park after I read the EIR (see quote below). From what I can tell from the noise I hear from the Highlands Park on the weekend, these rules are generally not followed. I would like to know what Park and Rec's policy is to make sure that the rules are followed so that the City can be in full compliance with the Settlement Agreement.

7

Sincerely,  
  
Gus Dedo

Page 28 of the EIR:  
"Game Schedule. The project proposes to remove the limitations on game schedules that were identified in the Settlement Agreement. As previously discussed, games are not currently allowed to begin prior to 8:00 a.m. and players may not use the field earlier than 15 minutes prior to their scheduled game if their game begins at 8:00 a.m., or no earlier than 45 minutes prior to their scheduled game if their game begins after 9:00 a.m."

8

## COMMENTS B1d

Dedo, Gus  
December 7, 2017

- Response B1d-1: The Draft EIR contained a description of the Settlement Agreement on page 22 and explained that it only pertained to Highlands Park fields. See also Master Response 3 regarding the Settlement Agreement. No further response is required.
- Response B1d-2: In response to this comment, page 3 of the Draft EIR is revised as follows:
- In addition, the proposed project also involves changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other City fields.
- Response B1d-3: This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B1d-4: See Master Response 4 regarding the analysis of noise. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. The comment concerns existing conditions in the morning, and those would not be altered or affected by the project. No additional response is required.
- Response B1d-5: In response to this comment, please see the transcript from the hearing on December 6 on the Draft EIR, which is included in this document as part of the comments. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B1d-6: The Draft EIR and all appendices were posted on the City's website at <https://www.cityofsancarlos.org/government/departments/parks-and-recreation/current-parks-recreation-projects>. Additionally, on February 7, 2018, the City published a notice (included in Appendix I of this document) extending the comment on the Draft EIR to February 28, 2018 which allowed for a 100-day comment period.
- Response B1d-7: See Master Response 3 in regards to the Settlement Agreement and Master Response 4 in regards to the analysis of noise.
- Response B1d-8: This comment provides a quote from page 28 of the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis.

**From:** [gusdedo@aol.com](mailto:gusdedo@aol.com) [mailto:[gusdedo@aol.com](mailto:gusdedo@aol.com)]  
**Sent:** Monday, January 22, 2018 12:55 PM  
**To:** \*City Clerk's Office <[CityClerk@cityofsancarlos.org](mailto:CityClerk@cityofsancarlos.org)>  
**Subject:** Tonight's City Council Meeting

Dear Crystal Mui:

Please forward my attached e-mail to the members of the City Council and to Amy Newby before tonight's meeting.

Thank you,

Gus Dedo

Dear City Council:

Unfortunately I will not be able to attend the City Council meeting tonight to discuss Highlands Park. I am particularly interested in the proposal to add lights. As I have stated in the initial EIR meeting and the Park & Rec EIR meeting, I am opposed to adding more lights at Highlands Park. I believe the EIR is flawed. For example, if lights are added to Stadium Field, turf will surely be next, as with the current lighted field. That "Cumulative Impact" should have been discussed in the first EIR, not done piece meal. I also believe that the reasoning behind adding the lights is flawed. For example, a sports stadium that allows people to be in the Park until 10:30 pm if activities conclude at or near the official 10:00 pm end in play is not compatible with this quite, established residential area. By the way, who is going to make sure this rule is maintained and people do not linger after 10:30 pm. I do know that on Saturdays people get on the fields well before 8:00 am. Another area where the EIR study is flawed is the noise study. The report uses a 24-hour average to gauge the noise effects, which does not take into effect the concentrated noise in the shorter time frame when games are played at night. The noise studies were also done during the day, not at night, when the noise is more troubling. The parameters of the noise study do not make any sense to me. Would we allow a construction project to make a lot of noise for 3-4 hours in the evening because the 24 hours average level is OK?

1  
2  
3  
4  
5

Please keep lights off Stadium Field!

Sincerely,

Gus Dedo  
9 Coleman Court  
San Carlos, CA

**COMMENTER B1e**

Dedo, Gus

January 22, 2018

- Response B1e-1: This comment does not express support for adding lights at Highlands Park. The commenter claims the EIR is “flawed,” but in this comment does not provide any additional information as to why that might be. This comment is noted.
- Response B1e-2: See Master Response 1 in response to the comment regarding the definition and analysis of the proposed project and installation of turf.
- Response B1e-3: See Master Response 1 regarding the installation of turf and evaluation of cumulative impacts.
- Response B1e-4: This comment concerns the merits of the project and the efficacy of City procedures and enforcement. City policies and procedures are described in Chapter III, Project Description of the Draft EIR as well as in Master Response 2. No further response is required.
- Response B1e-5: In regards to averaging noise levels over a 24-hour period, see Master Response 4.

**From:** gusdedo@aol.com [mailto:gusdedo@aol.com]

**Sent:** Tuesday, February 27, 2018 9:50 AM

**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>

**Subject:** Burton and Highlands Park EIR

Dear Kaveh:

The following are comments concerning the Highlands Park section of the Burton Park/Highlands Park EIR:

- 1) Page 7, "Table II-1: Summary of Impacts and Mitigation Measures from the EIR", there is no mention of Mitigation Measures for Highlands Park. It seems that the same level of noise will be at both locations. So, there should be similar measures. | 1
- 2) Page 19 and 20. What was the methodology used to calculate the number of new and current Participants? We need to know that so we can determine the cost benefit analysis of adding lights. | 2
- 3) Page 21: "Parks and Sports Fields Field Use and Agronomic Specifications report, prepared by Mark Mahady & Associates in 2001 that evaluated the current use, impact of each sport on the fields, best practices for maintaining quality playing fields, and provided recommendations for projected future demand." Why are we using a 2001 report as a base? Lots of things have changed since then. | 3
- 4) Page 21: The Mahady report recommended converting natural turf sports fields to artificial turf to improve the wear tolerance of existing sports fields. Since we are using this report for current use, why do we not use it for artificial turf? So, why isn't artificial turf in the EIR? | 4
- 5) Page 33: Each of the new poles would be 70 feet in height. What is the environmental impact of the lighting on homes in the hills above Highlands Park? For those homes, for example Elston and Coleman Court, the lights are less than 70 feet high from the ground. | 5
- 6) Page 38: CUMULATIVE ANALYSIS CONTEXT. After reading this section, it seems like we are splitting up the impact of lights and turf at Highlands Park into separate pieces versus doing an EIR for all lighting and all turf. Since turf and lighting are already at one field, it is not a major leap to see that lights and turf will be at the other field at Highlands Park. | 6
- 7) Page 53: "Areas that are rural in character (e.g. do not have street lights) and exhibit few existing sources of light, are more susceptible to impacts resulting from the installation of new lighting sources." On Coleman Court there is only one street light at the top of the hill. There is another street light on Elston Court near the entrance to Highlands Park and Coleman Court. Seems like "few existing sources of light" at Coleman Court. | 7
- 8) Page 57: Footnote 9, "Existing light spillover and glare at Highlands Park was calculated by Musco using available electrical as-built drawings and field verification from Arum Consulting Engineers. Based on the existing pole heights, fixture counts, and fixture configurations, the existing light conditions at Highlands Field were modeled based on designs from similar fields." Which fields were used? Were the fields in level terrain or in the hills similar to Highlands Park? | 8
- 9) Page 57: Footnote 9 "Because existing aiming diagrams for Highlands Park are unavailable, the existing light spillover and glare levels cannot be 100 percent accurate, but represent the most accurate representation by qualified professionals." How accurate are they. Are we talking about 90% or 40%? It makes a difference. | 9

- 10) Page 58: "b) Following installation of the synthetic field, evaluate performance over a two year period. If the Recreation Program continues to grow at the current pace and the synthetic field meets the expectations of the players, coaches and the Park and Recreation Administration, consider the installation of a second synthetic field with lights at Stadium. (page 19)." Sounds like we need a Cumulative Impact Study for lights and turf. **10**
- 11) Page 64: "However, as shown in Viewpoint 5 in Figure IV.A-2c and Viewpoint 8 in Figure IV.A-4d, for some of the residences, existing trees and structures would partially shield views of the light fixtures and poles." For many of the houses on Coleman and Elston Court, we can see the Park at light with little or no blockage from trees or structures. We will have very little mitigation from the lights. **11**
- 12) Page 81: "Table IV.B-3: Existing No Project Peak Hour Intersection Levels of Service." Coleman Court and Elston Court are shown but Coronado is not. Coleman and Elston Courts are one block long and run into Coronado at the entrance of the Park. Obviously there is not much traffic on those two courts unless there are events at the Park. Coronado is a narrow, dark, curvy road. It is difficult enough to navigate for those of us that live there and would be even more difficult for newbie's. In order to get to the park entrance on that side of the Park you must use Coronado. Therefore, it should be in the study. **12**
- 13) Page 88: "Existing Parking Conditions." Where are Coleman Court and Elston Court? People do park their cars there since that entrance to the Park is there. **13**
- 14) Page 97 "Table IV.B-10: Near-Term Plus Project Peak Hour Intersection Levels of Service." Again you need to include Coronado. **14**
- 15) Page 53: "TRANSPORTATION AND CIRCULATION": How will the addition of the traffic lights affect the normal flow of non-Park traffic? Will the traffic lights be on at all times, or flashing at non-peak times? How disruptive will the lights be during non-park hours? Should be considered. **15**
- 16) Page 107: "the predominant rating scales for human communities in the State of California ... noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) ... noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours)." Since people will be allowed until 10:30 p.m. for activities ending at 10:00 p.m., this will definitely impact the Sleeping hours. Relaxing hours are also likely to be impacted by teams being on the field from 7:00 p.m. to 10:00 p.m. Highlands Park is surrounded by a quiet residential area. **16**
- 17) Page 108. "The effects of noise on people can also be described in three categories: annoyance, interference with activities such as speech or sleep, and physiological effects such as hearing loss." What has been done to analyze these effects on the people who live around Highlands Park and mitigate any problems. **17**
- 18) Page 114: "Table IV.C-7: Ambient Noise Monitoring Results, dBA:." Why is the study done only in the daylight hours. We are talking about adding lights. So why are we not studying noise at night. Night time hours are the the ones that cause the most problems. I do not think you can compare noise during daylight to noise at night. **17**
- 19) Page 120: "Highlands Park. The closest noise-sensitive receptors to the Highlands Park project site are the single-family residences located approximately 70 feet north of the project site along Elston Court. " What about the other street next to the Park, Coleman Court? They also hear noise. **18**

20) Page 120 "As shown in Table IV.C-11, implementation of the proposed project would extend the hours that games and events would occur. When averaged over a 24-hour period..." Why is the noise averaged over a 24-hour period and not the period when the noise occurs? That is like saying loud construction noise over 3 hours is OK because over 24 hours there is no problem. In addition, nighttime noise is much worse than daytime noise.

19

21) Page 121: "Traffic Noise Levels" "Highlands Park". Coronado Avenue northwest of Elston Court/Coleman is mentioned here. It should have also been shown on Page 81: "Table IV.B-3: Existing No Project Peak Hour Intersection Levels of Service."

20

22) Page 125 "Operational Noise Levels." "Highlands Park" "When averaged over a 24-hour period, " This criterion makes no sense. Noise levels at night are worse than during the day. See Item 16 above.

23) Page 125: "Parking Lot Noise" "...due to the intermittent nature of parking lot activity, when averaged over a 24-hour period..." Again this criterion makes no sense. For example, If people are leaving between 10:00 and 10:30 PM people will hear the noise and will not consider a 24 hour average to be acceptable.

21

24) Page 128: "Highlands Park" "Implementation of the Mitigation Measure NOI-1 for project construction would reduce potential construction period noise impacts for the indicated sensitive receptors to less-than-significant levels." This should also been shown on my #1) Page 7, "Table II-1: Summary of Impacts and Mitigation Measures from the EIR",

22

25) Page 129: "Cumulative Impacts" "Additionally the proposed project would not exceed thresholds established by the General Plan for noise at nearby residential property lines for either project site." If this noise level is a 24 hour average, I again disagree. What is the City's "thresholds established by the General Plan for noise at nearby residential property lines for either project site" and how does that compare to the noise level expected at Highlands Park?

23

26) Page 133: "Addition of Artificial Turf to Existing Fields Alternative". "The City has determined that there is no funding for implementation of this alternative. Additionally, the City has previously determined that conversion to artificial turf was not part of the proposed project being considered in this EIR. Should the City decide to convert any City field from grass to artificial turf in the future, staff will consider and evaluate the conversion as a separate project." Since there have been several instances where synthetic turf on Stadium Field has been mentioned in the report, it is only a matter of time when City Council will consider it and ultimately find the funds. I find this to be disingenuous by the City. When the City is ready to turf, they will find the funds to turf. This is just getting around Cumulative Impact. I am disappointed that the City would use this as an excuse.

24

Sincerely yours,

Gus Dedo  
9 Coleman Court  
San Carlos, CA 94070



## COMMENTER B1f

Dedo, Gus  
February 27, 2018

Response B1f-1: In response to this comment, while the effects associated with construction noise at both Burton and Highlands Parks were described starting on page 127 of the Draft EIR following the impact statement NOI-1 and the clear intent of the Draft EIR was that the impact and Mitigation Measure NOI-1 would apply and be implemented at both parks, Highlands Park was inadvertently left out of the impact statement.

The Draft EIR is revised on pages 7 and 127, as follows:

NOI-1: Noise from construction activities at the ~~Burton Park~~ project sites would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Response B1f-2: In response to this comment, the existing and proposed with project participants and spectators were identified in Tables III-1 and III-2 on pages 19 and 20 in Chapter III, Project Description of the Draft EIR. The information in these tables was generated by City staff. As experts on the matter and based also on their experience at these and other City parks, City staff used their current scheduling data and best judgement in the determination of existing and additional project-related participants and spectators at Burton and Highlands Parks to identify the existing and proposed use levels for the project.

Response B1f-3: The Mark Mahady report and the City's use of it is described on page 21 of the Draft EIR and in Master Response 1.

Response B1f-4: See Master Response 1 regarding artificial turf.

Response B1f-5: The effects of the project on visual resources and the potential for light spillover and glare were evaluated in Section IV.A Visual Resources in the Draft EIR. The proposed project would have a less-than-significant impact associated with spillover light and glare from the new and improved LED lights.

Response B1f-6: See Master Response 1 regarding the installation of turf and analysis of cumulative impacts.

Response B1f-7: This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

- Response B1f-8: As noted in the comment, the primary sources of information to determine existing light spillover and glare at Highlands Park were “available electrical as-built drawings and field verification from Arum Consulting Engineers.” They also used their professional expertise to verify the available information based on their knowledge of similar lights and field conditions. The existing lights are part of the existing condition. The Draft EIR contains an analysis of the proposed lights and their effects regarding light spillover and glare in Section IV.A, Visual Resources. The potential effects of the new lights were evaluated and potential impacts were found to be less-than-significant.
- Response B1f-9: As noted above, the existing lights at Highlands Park on Highlands Field and the resultant glare and spillover light are part of the existing conditions and the estimated levels of glare and spillover were made by Aurum Engineers and Musco Lighting, both professional field lighting companies, in order to have a comparison to light levels after replacement with LED lights as part of the project analysis. Under any conditions, the existing metal halide lights produce more spillover light and significantly more glare than LED lights with visors, and therefore identifying the actual glare and spillover light levels of the existing lights was not necessary in order to conduct the analysis. The replacement LED lights would have significantly less light spillover and glare than the existing lights, as noted in the Draft EIR on page 67. The replacement of existing lights and installation of new lights would not result in any significant impacts as described and evaluated in Section IV.A, Visual Resources in the Draft EIR. See also Response B1f-8.
- Response B1f-10: This comment quotes the City’s Field Use and Agronomic Specifications Report identified as part of the City existing regulatory environment on page 58 of the Draft EIR. See Master Response 1 regarding the definition of the proposed project.
- Response B1f-11: See Responses B1f-8 and B1f-9.
- Response B1f-12: See Master Response 5 regarding the traffic analysis.
- Response B1f-13: See Master Response 6 regarding parking.
- Response B1f-14: See Master Response 5 regarding the traffic analysis.
- Response B1f-15: This comment appears to concern Mitigation Measure TRA-1, which identifies two options for the City to consider to reduce traffic impacts at the Cedar Street/Brittan Avenue intersection. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B1f-16: In regards to nighttime noise levels and averaging noise levels over a 24-hour period, see Master Response 4.
- Response B1f-17: In regards to noise measurements, see Master Response 4.

- Response B1f-18: The residences along Elston Court were determined to be the closest residences to the field and therefore noise level increases would be greatest at these residences. Evaluating potential impacts at the closest residences presents the worst-case scenario noise level increase. Based on the analysis presented in the Draft EIR and the additional analysis provided in Master Response 2, impacts at the closest sensitive receptor would not exceed the City's significance criteria for noise-level increases of 3 dBA or more and the resulting noise levels would be below the City's significance criteria.
- In addition, as discussed in the Draft EIR, short-term noise measurement ST-2 was conducted closest to the residences on Coleman Court, which are located approximately 100 feet east of the spectator seating. As shown in Table IV.C-7 of the Draft EIR, ST-2 indicated that noise levels near the Highlands Park Stadium Field while games are occurring are 70.4 dBA Leq, 87.7 dBA Lmax, and 46.2 dBA Lmin. Noise attenuates based on distance from the source of noise. Therefore, accounting for distance attenuation to the closest residence on Coleman Court which is 90 feet from where the noise was measured, noise levels would be approximately 50.4 dBA Leq, 67.7 dBA Lmax, and 26.2 dBA Lmin. Noise levels would be below the City's significance criteria as shown in Table IV.C-6 of the Draft EIR.
- Response B1f-19: In regards to averaging noise levels over a 24-hour period, see Master Response 4.
- Response B1f-20: See Response B1f-12.
- Response B1f-21: As discussed on page 125 of the Draft EIR, typical parking lot activities, such as people conversing or doors slamming, generates approximately 60 dBA to 70 dBA Lmax at 50 feet. Parking for both parks is currently provided in parking lots and on-street. Implementation of the proposed project would extend the hours that games and events would occur; therefore, there could be an increase in parking lot activity noise at both project sites. The City's hourly and maximum noise performance standards are for non-transportation noise sources. Therefore, impacts related to parking lot noise were assessed based on the 24-hour average significance criterion. As discussed on page 125 of the Draft EIR, parking lot noise is not expected to substantially increase noise over existing noise levels.
- Response B1f-22: See Response B1f-1.
- Response B1f-23: In regards to noise measurements and averaging noise levels over a 24-hour period, see Master Response 4.
- Response B1f-24: See Master Response 1.

**From:** Fred Im [<mailto:fred@imfamily.org>]  
**Sent:** Thursday, January 25, 2018 11:33 AM  
**To:** Kaveh Forouhi <[KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org)>  
**Subject:** Comment on the EIR for field lighting

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light “leakage” to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Fred & Amy Im  
116 Dundee

1

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

**COMMENTS B2**

Im, Fred  
January 25, 2018

Response B2-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Amit Chatterjee [mailto:amit.chatterjee01@gmail.com]  
**Sent:** Thursday, January 25, 2018 11:55 AM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** Lorena Flores Flores Chatterjee <lorenachatterjee@gmail.com>  
**Subject:** San Carlos Fields

January 25, 2018

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Amit and Lorena Chatterjee  
101 Normandy Court

**COMMENTS B3**

Chatterjee, Amit  
January 25, 2018

Response B3-1:           This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

---

**From:** Sherry Selwood

**Sent:** Thursday, January 25, 2018 1:48 PM

**To:** Bob Grassilli <[BGrassilli@cityofsancarlos.org](mailto:BGrassilli@cityofsancarlos.org)>; Jeff Maltbie <[JMaltbie@cityofsancarlos.org](mailto:JMaltbie@cityofsancarlos.org)>; Amy Newby <[ANewby@cityofsancarlos.org](mailto:ANewby@cityofsancarlos.org)>

**Subject:** Our conversation

Thank you for taking the time to speak with me yesterday, I appreciate it.

I've been turning the discussion over in my head, and something struck me. When we talk about lights and extended hours / higher density, the conversation seems to quickly go to turf and distrust. I can only speak for myself, but when I say I'd like to see the impact to the field included in the EIR I'm talking about the grass field: how would it stand up to the stated additional usage, what mitigations would we need to put in place to maintain safety and viability (additional rest periods?), would those reduce the expected additional hours to a point that it impacts the business case, etc. Perhaps that's somehow already baked in, but I have expectations, right or wrong, that the field could be severely impacted - I don't think we currently have extended, dense soccer play on a lighted grass field in town? - so when I don't see data to show whether the proposed usage will be OK, or to work from to manage it, my mind goes to turf. Imagine others do as well.

1

My 2 cents, for whatever they're worth.

Regards,  
Sherry



**COMMENTS B4**

Selwood, Sherry  
January 25, 2018

Response B4-1: See Master Response 1 regarding the definition of the project and installation of turf, and Master Response 2 regarding the City's maintenance procedures.

---

**From:** meganmil [mailto:meganmiller5@gmail.com]

**Sent:** Friday, January 26, 2018 5:57 PM

**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>

**Subject:** Lights on the field

Hi.

I am writing to express my support for lights at both fields. Both of my children use the fields in San Carlos for soccer (club and AYSO), flag football, baseball, and for recreation with family and friends. San Carlos is so very limited on field space and this would alleviate that issue a little bit. This is even more important given how much building the City is allowing and the increase in population we will see over the next few years. Thank you.

Megan Miller

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

**COMMENTS B5**

Miller, Megan  
January 26, 2018

Response B5-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Ron Kodl [mailto:ronjkodl@gmail.com]  
**Sent:** Monday, January 29, 2018 5:09 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** RE: San Carlos Fields

January 29th, 2018  
San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Respectfully,  
/Amy & Ron Kodl  
1733 Elizabeth Street  
San Carlos, CA  
650-832-1733

**COMMENTS B6**

Kodl, Ron  
January 29, 2018

Response B6-1:           This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Srin Ramanathan [mailto:srini.ramanathan@gmail.com]  
**Sent:** Monday, January 29, 2018 7:15 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** lights in park

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Srini Ramanathan  
1324 Oakhurst Avenue  
San Carlos, CA 94070

--

Srini Ramanathan  
650 814 9776

**COMMENTS B7**

Ramanathan, Srin  
January 29, 2018

Response B7-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Jeff Davis [mailto:jeffdavis628@yahoo.com]  
**Sent:** Monday, January 29, 2018 7:21 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** Sport field lights

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Thanks, Jeff Davis. 210 Manor Dr.

[Sent from Yahoo Mail on Android](#)



**COMMENTS B8**

Davis, Jeff  
January 29, 2018

Response B8-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [Ben Renda](#)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos  
**Date:** Monday, January 29, 2018 8:11:43 PM

---

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Thank you for listening.

Sincerely,  
Ben Renda

2233 Brittan Ave  
San Carlos, CA

Ben Renda

e: [ben.renda@gmail.com](mailto:ben.renda@gmail.com)  
c: 415.613.1174

**COMMENTS B9**

Renda, Ben  
January 29, 2018

Response B9-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [brie.sandoval@gmail.com](mailto:brie.sandoval@gmail.com) on behalf of [Brie MacDonald](#)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Field lights for San Carlos  
**Date:** Monday, January 29, 2018 8:39:53 PM

---

San Carlos City Council:

I'd like to express my strong support for the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. I myself enjoy using it as a member of the coed soccer league organized by San Carlos Parks & Rec. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

I also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

I urge the adoption of the proposal to add new LED lights to the two parks!

Thanks for your consideration, and for your service!

Best regards,  
Brianna MacDonald  
837 Elm Street  
San Carlos, CA  
[briemacd@gmail.com](mailto:briemacd@gmail.com)

**COMMENTER B10**

MacDonald, Brianna  
January 29, 2018

Response B10-1:        This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [Kirsten Kell](#)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Support for LED lights at fields  
**Date:** Monday, January 29, 2018 8:43:12 PM

---

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light “leakage” to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Sincerely,  
Kirsten Kell  
2073 Eaton Ave  
San Carlos

■

Sent from my iPhone

**COMMENTER B11**

Kell, Kristen

January 29, 2018

Response B11-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

-----Original Message-----

From: Chris Kron [mailto:ckron@me.com]

Sent: Tuesday, January 30, 2018 9:51 AM

To: Kaveh Forouhi <KForouhi@cityofsancarlos.org>

Subject: Support of LED Lighting

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Chris Kron  
212 Manor Drive  
San Carlos



**COMMENTS B12**

Kron, Chris

January 30, 2018

Response B12-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Vishal Verma [mailto:vav925@gmail.com]  
**Sent:** Tuesday, January 30, 2018 9:24 AM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** lighting of city fields

San Carlos City Council:

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Vishal Verma  
182 Crestview Dr

**COMMENTS B13**

Verma, Vishal  
January 30, 2018

Response B13-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

---

**From:** Ryan Connolly [mailto:ryan@pureirishstout.com]

**Sent:** Tuesday, January 30, 2018 11:11 PM

**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>

**Subject:** Lights for Stadium and Flanagan Fields

San Carlos City Council:

I enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Many Thanks,  
Ryan Connolly  
1905 Cedar St

**COMMENTER B14**

Connolly, Ryan  
January 30, 2018

Response B14-1:           This comment concerns the merits of the project and does not relate to the adequacy of the information or analysis within the Draft EIR. No further response is required.

**From:** Anne Tang [mailto:[annecarswell@yahoo.com](mailto:annecarswell@yahoo.com)]  
**Sent:** Friday, February 2, 2018 11:45 AM  
**To:** Kaveh Forouhi <[KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org)>  
**Subject:** Burton and Highlands Parks EIR

To Kaveh Forouhi

I'm sorry I was out of town and unable to attend the last City Council Meeting on Monday but I wanted to make sure my comments on the EIR for Burton and Highlands Park field were heard and so have put them in an email. I'm very concerned about Parks & Rec walking away from the settlement made in 2010 regarding Highlands Park installation of artificial Turf and the proposal to add lights at Stadium field. What Parks & Re is proposing at Highlands Park is a violation of the 2010 settlement agreement. I was part of that agreement which the city made when the court ruled in "Save San Carlos Parks" favor that there were issues that were not adequately addressed by the city at Highlands Park, particularly traffic and noise. The court ruled the use of artificial turf and lights at Highlands would worsen an already dangerous level of traffic and noise and put an undue burden on those who live near the park. A number of measures were agreed to and put in place to help with traffic and noise: staggering practices, not starting games before 8am, adding drop-off areas and carpool parking.

1

The city is now proposing to remove all those measures. Why? Nothing has changed. Now the city is also requesting the addition of lights on Stadium field, which if approved will increase the level of traffic and noise significantly. The measures are barely adequate today at mitigating the huge number of cars that arrive and depart as multiple practices and games start and finish. Removing the current restrictions on Highlands field and adding lights at Stadium field would be a safety nightmare.

2

As the court found in 2010 the mitigation measures were necessary, they are still necessary today. No additional routes in and out of the neighborhood have been built and the usage continues to increase. The city gave citizens their word that they would mitigate these issues. The restrictions have not hindered usage of the field or created hardships that the city cannot manage. Removing the restrictions when nothing has changed should NOT be allowed.

I would also like to make a second point about Stadium Field. The Parks & Rec department is being disingenuous when they say they only want lights at Stadium to increase usage. Their primary argument for putting turf in at Highlands was that natural grass could not withstand the increased usage that the lights enabled. The lights only make financial sense when coupled with turf, something the city has repeatedly argued. The city is being deliberately misleading by saying they are not considering turf on Stadium. They just want to break the project into two pieces to make it less controversial. Lights at Stadium Field should not be allowed. The original plans for Highlands and Stadium did not have lights on Stadium and there is no reason to add them now given the current usage of the field.

3

Parks & Rec made a settlement and now is trying to walk it back and is deliberately misleading us about their plans for Stadium. How can we trust anything Parks & Rec tells us? Please don't support changes to the settlement agreement or lights at Stadium. Use the money to try to acquire a new field which will actually increase available play time without safety and noise issues.

4

Thank you.

Anne Carswell Tang  
[annecarswell@yahoo.com](mailto:annecarswell@yahoo.com)

Home: (650) 598-9719  
Mobile: (650) 207-2406

**COMMENTS B15**

Tang, Anne  
February 2, 2018

- Response B15-1: See Master Response 3 regarding the Settlement Agreement. No additional response is required.
- Response B15-2: Traffic impacts associated with the project are evaluated in Section IV.B, Transportation and Circulation starting on page 73 of the Draft EIR, and noise impacts are evaluated in Section IV.C, Noise and Vibration starting on page 105 of the Draft EIR. See Master Response 3 regarding the Settlement Agreement. No additional response is required.
- Response B15-3: See Master Response 1 regarding definition of the project and the installation of turf.
- Response B15-4: This comment does not express support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. The commenter suggests the City should acquire and develop a new field. No additional response is required.

**From:** Chris Van Wert [mailto:chris.vanwert@gmail.com]

**Sent:** Sunday, February 4, 2018 8:55 AM

**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>

**Cc:** ICE Van Wert <daniellepvw@yahoo.com>

**Subject:** Lights and Stadium Field

Kaveh,

I am a parent of three young boys and have been a resident of San Carlos since 2004. One of the things my boys enjoy most is getting a chance to play and compete with their friends in youth sports. My wife and I also enjoy watching our sons as well as getting the chance to meet new people in the community. We have made many new friends through youth sports. We understand the City Council is considering adding lights at Highlands park to expand the useable field capacity when it is dark. My wife and I would enthusiastically support this plan as it will add capacity for youth sports without needing to find more land/field space which is always a struggle on the Peninsula.

Thanks so much,

Chris Van Wert  
909 Rosewood Avenue



**COMMENTS B16**

Van Wert, Chris  
February 4, 2018

Response B16-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Dawn Brozek  
**Sent:** Tuesday, February 6, 2018 5:43 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** EIR for Burton and Highlands Parks Project

Dear Kaveh Forouhi,

I am writing to address my concerns about the EIR for Burton and Highlands Parks Project. Among the alternatives to the proposed plan, listed on pages 4-5, I would support the No Project option.

1

However, one option not enumerated in the report is to only upgrade the existing lights at Madsen Field to LED. I would support this option.

Regarding the consequences of adopting the proposed plan, page six states that a significant known impact of adding lights to Burton Park would be unacceptable traffic levels at the Cedar/Brittan intersection. Mitigation measures offered are to either install a signal light, or install a mini-roundabout. Cost estimates for mini-roundabouts begin at \$250,000, while signal lights run \$400,000-\$500,000. It is important to question how much the taxpayers of San Carlos are willing to commit to this project. It would be far better to earmark the cost of night lights, along with traffic mitigation measures, and apply these sums to the purchase of property that is intentionally designed to be a sports complex, instead of converting neighborhoods into sports complexes.

2

In addition, the installation of lights for nighttime play at Highlands Field more than a decade ago, created a tipping point in field conditions, such that the additional wear and tear resulted in substandard field conditions. This was the catalyst for installing plastic turf on that field. Thus, the City has direct experience and explicit knowledge of what happens to field conditions when lights are added at grass fields to enable additional hours of use. It results in field conditions that make continued use at that level untenable. Given that this is the past experience in the City, and that the City will not rule out replacing grass fields with plastic in the near future, this is a violation of the CEQA requirement that projects cannot be strategically piecemealed, to avoid assessing the full impact of a project. Page twenty-two of the EIR states: "The City will continue to manage and maintain all fields including those at Burton and Highlands Parks to the best of their ability and ongoing field maintenance to address current and future use of the fields is considered part of the existing background conditions relative to the proposed project." Unfortunately, this vague and confusing language is the only portion of the EIR to attempt to directly address the impact of night play wear-and-tear on the grass fields. Additional heavy field use, in the absence of an explicit commitment to maintaining natural grass fields at an acceptable level, renders the effort to install lights for night play a Trojan Horse for plastic turf.

3

City effort and resources would be better spent securing a space for a true sports complex.

4

Thank you,  
Dawn Brozek

\*\*\*\*\*

(Dear Kaveh and City Administrators - I noticed that Appendix A includes full email addresses from fellow residents who have emailed the City with feedback. Not sure what City policy is, but it seems that publishing the email addresses of San Carlos residents to the web would not fall under best practices. I ask that when publishing my comments, you do not include or show my email address. Thanks!)

5

**COMMENTER B17**

Brozek, Dawn  
February 6, 2018

- Response B17-1: This comment supports the No Project alternative or only upgrading the existing lights on Madsen Field to LED lights. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B17-2: This comment is concerned with costs associated with implementation of Mitigation Measure TRA-1. CEQA does not require the review of economic effects related to a project or project alternatives, and that information does not need to be included in the EIR. The commenter also suggests a better alternative would be for the City to purchase property for a new sports complex. In Chapter V, Alternatives of the Draft EIR, an Off-Site alternative was considered but rejected from further study. The City determined that purchase of a new site and construction of new lit fields is infeasible, as the City does not own and has no control over a suitable site, and no City funds have been identified with which to purchase a site should one become available and construct new lit fields.
- Response B17-3: See Master Response 1 in regards to the definition of the project and installation of turf, and Master Response 2 in regards to the City field maintenance program. No additional response is required.
- Response B17-4: See Response B17-2.
- Response B17-5: The commenter requests that her email address be redacted. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Greg Harris [mailto:gregreyj@aol.com]  
**Sent:** Sunday, February 11, 2018 1:11 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** Highland Park EIR

Please put my remarks to the City Council on 1/22/18 in the record.

I am against the proposal to install turf and/or lights at Highlands Park.

Highlands park is not well managed today and any additional capacity requirements will have a detrimental impact on the neighborhood. This park is over used today.

Some specific points.

1) The need has not been properly established. The Parks & Rec Director testified that there is unmet demand for Lacrosse and Field Hockey but failed to establish how many people this might impact. The City regularly makes claims that they need more field time but has never once offered any evidence that we don't have enough fields. The City is misleading when they talk about how many people play on the fields. Most of these players are counted multiple times in multiple leagues. Most of these player are very young and use very little field space. An analysis of how Highlands Field is used will show that it's a relatively small population of year-round soccer players that dominate the usage. Any further enhancements to the park should demonstrate that this is something that will truly benefit the entire community.

2) The City has not its commitments with the Highlands neighbors to date. On 30 occasions the City has failed to keep teams out of the park prior to 7:45 in the morning. This time was set in stone and the City committed to neighborhood "quiet" time. The City has not been able to manage to this commitment. Similarly even when the lights turn off the park is typically noisy and crowded well past the quiet time. Since Stadium is difficult to patrol there are noise and safety concerns with lights on the Stadium field. On a dozen or so times the lights have been left on all night long again in violation of the "quiet" time commitment.

3) The City has not been able to manage Highlands Park demand. There are beer bottles scattered throughout the park. In fact there is at least once piece of trash (the old Little League nets) that has lain in a pile awaiting removal for over 2 years.

4) There is no community in San Carlos that comes close to hosting as much activity as the Highlands Neighborhood. We have more tennis courts, more baseball fields, more soccer fields and the city regularly strains this small one access point neighborhood. This neighborhood is already being stretched the limits.

5) Our city money is better spent in other areas for the benefit of a broader group of people.

Greg Harris

=====  
Greg Harris  
650-483-7216

1  
2  
3  
4

## **COMMENTER B18**

Harris, Greg  
February 11, 2018

- Response B18-1: See Master Response 2 regarding City management of parks and fields. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B18-2: In regards to the need for the project, the City has identified project objectives, described in Chapter III, Project Description in the Draft EIR, and two of the objectives relate to the need for the project to provide additional hours of play on existing fields to assist in meeting the unmet community demand for field space. A discussion of the City's known shortage of play fields is included on pages 16 through 21 of the Draft EIR. See also Master Response 1 in regards to the definition of the project.
- Response B18-3: This comment notes "City commitments" in regards to hours of play at Highlands Park associated with the Settlement Agreement restrictions. See also Master Response 3 regarding the Settlement Agreement. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B18-4: This comment regarding current conditions at Highlands Park is noted. The City has a schedule to regularly maintain its parks and fields, which includes trash collection. Per the City's Park Maintenance contract, litter pickup occurs at all developed parks Monday through Friday before 9:00 a.m. Trash cans within the City parks are also serviced Monday, Wednesday and Friday of each week. See also Master Response 2 regarding City management of parks and fields. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** Herica Assilian [mailto:herica1967@gmail.com]

**Sent:** Thursday, February 15, 2018 11:32 AM

**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>

**Cc:** Rafi assilian <assilian@gmail.com>

**Subject:** Burton and Highlands Parks Project

Hi Kaveh,

We reside right across the street from Burton Park on 1041 Woodland Avenue and we support the proposed project of improved night lighting at field at Burton Park. Looking forward to the park being lit at night as it is pretty dark on our side of the field.

1

If you have any questions, please let us know.

Thanks,  
Herica and Rafi Assilian

**COMMENTER B19**

Assilian, Herica  
February 15, 2018

Response B19-1: This comment expresses support for the Burton Park portion of the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** jrdehner@aol.com [mailto:jrdehner@aol.com]  
**Sent:** Saturday, February 17, 2018 10:13 AM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** Amy Newby <ANewby@cityofsancarlos.org>; Jeff Maltbie <JMaltbie@cityofsancarlos.org>; Sherry Selwood <SSelwood@cityofsancarlos.org>; Adrienne Werner <AWerner@cityofsancarlos.org>; wtaylor@cityofsancarlos.org; Brad Langford <BLangford@cityofsancarlos.org>  
**Subject:** Citizen Input on Draft EIR regarding lights and Stadium and Burton Park fields

To: [KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org) February 17, 2018  
Cc: [ANewby@cityofsancarlos.org](mailto:ANewby@cityofsancarlos.org)  
[JMaltbie@cityofsancarlos.org](mailto:JMaltbie@cityofsancarlos.org)  
[Sselwood@cityofsancarlos.org](mailto:Sselwood@cityofsancarlos.org)  
[awerner@cityofsancarlos.org](mailto:awerner@cityofsancarlos.org)  
[wtaylor@cityofsancarlos.org](mailto:wtaylor@cityofsancarlos.org)  
[blangford@cityofsancarlos.org](mailto:blangford@cityofsancarlos.org)

From: Jean Dehner [jrdehner@aol.com](mailto:jrdehner@aol.com) (165 Leslie Drive, San Carlos)  
RE: Citizen input on the Draft EIR regarding lights at Burton and Stadium fields

After reviewing the Draft EIR I am struck with the incomplete document that it is, despite its length. It needs to be redone from scratch and address every aspect of the environment impacted by the proposed project.

Environmental Impact Report, by its title, implies that the project under review examines every aspect of the environment that the Report is studying. Environment by definition covers everything in the environment impacted by the project. However, this draft completely bypasses the vegetation (plants, trees, grass, shrubs, flowers) that this project, once implemented, will impact. Therefore, it is an incomplete study.

Would a reasonable person be persuaded that vegetation, and how it is impacted by use, is not a vital component of city park's playing field? I doubt it. Therefore there has to be recognition that the additional hours of use under lights is an impact on the vegetation (ie, grass), particularly in the winter months where days are shorter and grass does not grow as fast as in the warmer months. The mitigation of that impact must also be included in the report for it to be complete.

I fail to understand why the review encompassed two separate, and different, parks and their playing fields in town, rather than studying them separately. The usage of these two spaces varies widely. Anyone who has lived in the town for any length of time is quite aware that they are used for quite different purposes, in addition to being playing fields. For the final Report the parks should be separated, and presented as two different projects.

1

2



**COMMENTER B20**

Dehner, Jean  
February 17, 2018

Response B20-1: All environmental topics identified in the CEQA Guidelines were addressed in the Draft EIR that includes the Initial Study included in Appendix B of the Draft EIR. See Section IV, Biological Resources starting on page 16 of the Initial Study for a discussion of biological resources. See also Master Response 2 in regards to City field maintenance practices.

Response B20-2: See Master Response 1 in regards to definition of the project.

From: Bob Dehner <rwdehner@aol.com<mailto:rwdehner@aol.com>>  
Date: February 26, 2018 at 5:16:22 PM PST  
To: <kforouhi@cityofsancarlos.org<mailto:kforouhi@cityofsancarlos.org>>  
Subject: Burton and Highlands Park EIR

To: Kaveh Forouhi  
Senior Engineer  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070

From: R. W. Dehner  
165 Leslie Drive  
San Carlos, CA 94070

Subj: Burton and Highlands Park EIR

There are areas in the draft EIR as relates to Highlands Park Stadium Field that need to be addressed to ensure an adequate evaluation of the impacts of this project.

One area is that it does not address the impact of the additional play on the playing surface due to the lighting. The playing surface is an integral component of the Environment. To not consider it results in an incomplete EIR. The major usage of the lighting on Stadium Field will occur in the wet winter months when grass does not grow well nor rejuvenate itself. So the playing surface at Stadium will degrade as it did at Lower Field and will result in additional 'down time' to rest. The net result may very well be no additional playing time. The Mark Mahady 'Report', commissioned by the City, is mentioned but there is no discussion of its content as related to this project. His 'Report' thoroughly discusses the effect of intense usage on the quality of the playing surface. That discussion needs to be included.

1

Since one of the intended purposes of the Draft EIR is to promote additional hours of available playing time, some indication of the amount of time needs to be included. This will require additional study. I call your attention to the Calender Associates Study commissioned by the City in 2006 for lighting and turfing the Heather School Field. It is revealing in that it provides a great amount of information on 'available' playing time and 'actual' playing time. There is significant discrepancy between what the City is proposing in this EIR and that Study. This needs correction.

2

The Draft EIR mentions the Mark Mahady Report's consideration of Artificial Turf for heavily used fields, then goes on to say that it is not being considered, nor are any alternatives because there is no money. There is a further statement in this document to the effect that the preparer was instructed by the City to not include mention of the playing surface nor artificial turf. This action renders the Draft EIR incomplete.

3

Another serious deficiency is the recommendation to UNDO the many years of mitigation efforts for the parking problem. Mainly, shortening the times between games will force more user parking on Aberdeen, Glasgow, and Dundee negatively impacting those residents. The mitigation efforts that I refer to are not those of the 'Settlement'. They are those instituted by the P&R Commission and approved by the City Council in the late 1990's which required additional time between games to allow the parking lots to clear before arrival of players for the ensuing games. Additionally, the number of parking spots identified as available in the surrounding neighborhood does not reflect the true situation as there are currently restrictions placed by the City on the adjacent streets.

4

This Draft EIR only addresses the situation of organized sports. It omits any consideration of the field use by the Community or Neighbors at large. This is a City Park, used by the entire Community. It is not a dedicated sports venue. There is no mention of the effect of this proposal on this and other other elements of the Park. The City has recently invested significant amounts of money in the children's play area. There is no mention as to how this aspect will be affected. The usage of this area be affected while games are being played.

5

Another consideration not addressed and that should be is that any changes to the usage of Stadium Field be constrained by the 1988 decision of the City Council approving the four houses on Elston Court. Those four houses were part of the agreement to obtain the park and the Stadium Field. This proposal seriously affects those houses, yet no mention of any affect is made.

**6**

The Draft EIR addresses terms of the 'Settlement'. It does not address nor acknowledge the previous agreement reached by the 2005 'Citizens Committee on Fields' with the City. That Committee which met for over a year to address the playing fields, consisted of some 28 citizens of the Community, interviewed and appointed by the City Council. was facilitated by two sitting City Council members, and agendized by the City's Park Director. The result was to install an all weather turf field at Lower Highlands under the lights. It was agreed that there be no lights nor turf at Stadium.

**7**

---

## COMMENTS B21

Dehner, Bob  
February 26, 2018

- Response B21-1: In response to the comment that additional playing time on the grass fields after lights have been installed would lead to a significant impact that should be evaluated, see Master Response 2. In regards to the City's use of the Mahady Report, see Master Response 1.
- Response B21-2: In regards to the project objectives including the need to provide more hours of play on existing fields, see Response B18-2. As part of the project description, the amount of time that the fields are currently used and the projected amount of time they will be used when the project is implemented is identified in Tables III-1 and III-2 on pages 19 and 20 in the Draft EIR. This information was used to analyze the project's potential environmental impacts. Additional analysis or estimates concerning available or actual playing time is not required for the CEQA analysis of the project or adequacy of the EIR.
- Response B21-3: See Master Response 1 in regards to definition of the project evaluated in the Draft EIR and how the City uses the Mahady Report and in regards to installation of artificial turf. The existing playing surfaces of all the fields was identified in the Draft EIR, and the consideration of the installation of turf was also considered and included in the Draft EIR.
- Response B21-4: A discussion and consideration of parking at the parks is included in Draft EIR Section IV.B, Transportation and Circulation. This comment is in regards to timing considerations for field use that the commenter says were instituted in the 1990s to alleviate parking; however, the commenter does not provide a copy of these requirements. The City and EIR authors are not aware of any such requirements, and the City does not enforce such requirements at any of their fields. See also Master Response 6 regarding parking. No further response is required.
- Response B21-5: The existing conditions at Burton and Highlands Parks (including the children's play area) were described in Chapter III, Project Description of the Draft EIR starting on page 16. The installation of lights at Burton Park and Highlands Park would not affect the use of the play areas at either park. See also Master Response 6 regarding parking.
- Response B21-6: See Response B21-5 regarding existing conditions. As required by CEQA, the Draft EIR through the use of text, tables and figures evaluates the potential significant impacts associated with the proposed project and provides mitigation measures that would reduce all significant impacts to a less-than-significant level.

Response B21-7:           The comment concerning the 2005 “Citizens Committee on Fields” is noted. The commenter also notes that there was an “agreement” between the Committee and the City regarding the fields at Highlands Park. As noted in Response B21-4 and B21-5, the existing conditions at Burton and Highlands Parks (including the regulatory conditions) were described in Chapter III, Project Description and the EIR topical sections. The City and EIR authors are unaware of a contractual agreement in regards to not installing lights or turf on Stadium Field.

**From:** Michael Wilke [mailto:wilke.michael@gmail.com]  
**Sent:** Tuesday, February 27, 2018 2:44 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Subject:** Burton and Highlands Parks EIR

Regarding the Burton and Highlands Parks EIR and specifically the Burton Park project, I have the following concerns I would like to document.

- |  |   |
|--|---|
| Lighting spill over into the adjoining neighborhood impacting the quality of life, property value and interruption of sleep patterns.  | 1 |
| Additional noise in the evening impacting the quality of life, property values and interruption of sleep patterns.   | 2 |
| Additional traffic, parking and litter resulting from extended use particularly on Woodland Ave and on the north end of the park adjacent to Flannigan Field.  | 3 |
| Safety concerns resulting from increased foot traffic and park hours particularly on the north end of the field and in the Les Mundel Grove after dark.  | 4 |
| Property damage and health hazards due to increased dirt and dust blowing from Flannigan field now that grass has been removed. This can be caused by participant use, field grooming by teams and park maintenance staff. | 5 |
| Proposed 10 PM weekday hours.  | 6 |
| Provisions to ensure lights are not left on overnight which happens on occasion.   |   |
| Light pole aesthetics and visual impact directly on adjacent park residents. Impeding current visual sight lines and home values.  | 7 |
| Additional maintenance budgets to cover increased park usage, e.g., fences, bleachers, dugouts, batting cage, landscaping  | 8 |

Thank you and regards,

Michael Wilke  
1013 Woodland Ave  
San Carlos, Ca. 94070

## COMMENTER B22

Wilke, Michael  
February 27, 2018

- Response B22-1: The effects of the addition of lights associated with the proposed project is evaluated in the Draft EIR in Section IV.A, Visual Resources.
- Response B22-2: The effects of noise associated with the proposed project is evaluated in the Draft EIR in Section IV.C, Noise and Groundbourne Vibration. The City has established noise level performance standards to protect public health, including protecting sleeping hours. As shown in pages 119 and 120 of the Draft EIR, the analysis evaluated the noise level increase associated with the proposed project averaged over a 24-hour period, based on the City's noise and land use compatibility standards identified in Action NOI-1.4 of the City's General Plan Noise Element. The 24-hour averaging period places a penalty on nighttime noise as the Ldn is defined as the 24-hour A-weighted average sound level from midnight to midnight, calculated with the addition of 10 decibels to sound levels occurring in nighttime hours (10:00 p.m. to 7:00 a.m.) to account for the disturbance associated with the sleeping hours.
- In addition, please see Master Response 4. Based on the analysis in the Draft EIR and the supplemental analysis in Tables 1 and 2, the project would not result in a significant noise impact and would not exceed criteria established by the City. Therefore, the project is not anticipated to result in an interruption of sleep.
- Response B22-3: Traffic and parking effects associated with the proposed project are evaluated in the Draft EIR in Section IV.B, Transportation and Circulation. The effects of the project on public services were evaluated in the Initial Study included in Appendix B of the Draft EIR in Section XIV starting on page 40. The City has a regular process and schedule in regards to maintenance of parks and fields that includes trash collection. See also Response B18-4.
- Response B22-4: The effects of the project on public services, including police services, were evaluated in the Initial Study included in Appendix B of the Draft EIR.
- Response B22-5: In response to this comment, the grass has not been removed at Flanagan field nor would it be removed as part of the project. Air quality impacts associated with the proposed project were evaluated in the Initial Study included in Appendix B of the Draft EIR starting on page 7. See also Master Response 2 regarding park and field maintenance procedures.
- Response B22-6: In regards to the existing and proposed timing for when the fields are currently used and would be used see Tables III-1 and III-2 in Chapter III, Project Description.

In regards to the City procedures for turning off field lights at 10:00 p.m., the City uses a web-based programmable time called Calsense for night lights. Parks & Recreation Athletics staff is responsible for scheduling the light use for all City-programs and receives requests from youth sport organizations for their lighting needs. Lights are never scheduled to be on past 10:00 p.m., and staff has set in place a secondary daily off-time at midnight as a failsafe. If lights are on past 10:00 p.m., it is either due to a downed server which breaks the communication between the controller and the server, or if lights have been manually turned on, which they should not be per City policy. See also Master Response 2 regarding park maintenance and operation procedures.

Response B22-7: See Response B22-1.

Response B22-8: See Master Response 2 regarding park maintenance and operation procedures.



**From:** Peter McMahon [mailto:peter@msllp.com]  
**Sent:** Wednesday, February 28, 2018 3:31 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** Amy Newby <ANewby@cityofsancarlos.org>  
**Subject:** Comments On Draft EIR

Dear Mr. Forouhi,

Please accept this email as additional comment to the Draft EIR regarding Highlands Stadium Field.

Traffic:

The Draft EIR is completely VOID of any discussion about the significant traffic problems at the North End of Stadium Field, including, Elston Court, Coleman Court, Coronado Ave., Vista Del Grande, Madera Ave., Manor Drive, Windsor Drive, Winding Way, and Torino Ave. The roads leading up to the North End of Stadium Field are narrow, winding, riddled with blind corners, and clogged with Resident parked cars. My neighbor – who attempted to sell his house at 14 Elston - actually had a standing offer to buy his house “pulled” because “the roads were too windy.”

A number of accidents have occurred on these streets. On some streets, including Elston Ct., which abuts the North End of Stadium Field, there are existing parking restrictions which prohibit parking on one-side of the street. These restrictions are routinely ignored by Field Users – which creates a SIGNIFICANT SAFETY issue for Fire and Rescue. Indeed, in the recent past an elderly couple who lived at the top of Elston had to call the ambulance often. On one occasion, on a weekend day (when Field Users are present – and a condition the City seeks to increase with Lights) – I personally witnessed the Ambulance stopped at the base of Elston because it could not proceed due to illegally parked cars – and two Rescue Personnel with oxygen and medical bags hoofing it up the hill. That is unacceptable. This proposal seeks to INCREASE THAT RISK EXPONENTIALLY.

1

Noise:

The noise measurements contained in the Draft EIR are inadequate and misleading. Currently, after sunset the ambient noise of the field is virtually 0. On a busy day on the weekend, the ambient noise level is much higher than measured.

2

In addition, the East side of Stadium field is a steep barren and rocky hill that towers 50-100 feet above the field. The North End of the field is bordered by a two-tiered hill with houses at the top of the first tier and the top of the second tier. The West side of the field is bordered by a contiguous dense tree-line that is 40-70 feet tall. The effect of this natural amphitheater is an exponential amplification of sound. None of this is considered in the Draft EIR.

3

Light:

The Draft EIR does not accurately or adequately consider the impact of light on Residents of Winding Way, Windsor, Torino, Elston, Coleman, Aberdeen, and Dundee.

4

Wildlife:

I can see no effort to analyze – let alone mitigate – the impact on wildlife that frequent the Stadium park, including, owls, the San Francisco garter snake, coyotes, migratory birds, deer, to name a few.

5

Regards,

Peter McMahon

**MCMAHON SEREPCA LLP**

985 Industrial Road, Suite 201

San Carlos, California 94070

Tel: (650) 637-0600 Fax: (650) 637-0700

[www.msllp.com](http://www.msllp.com)

---

NOTICE TO THE RECIPIENT: THIS EMAIL AND ANY DOCUMENTS ATTACHED TO IT HAS BEEN SENT TO YOU BY A LAW FIRM, AND MAY CONTAIN INFORMATION PRIVILEGED BY LAW. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISSEMINATION OR OTHER DISTRIBUTION OF THIS EMAIL OR ITS ATTACHMENTS IS STRICTLY PROHIBITED. PLEASE NOTIFY US IMMEDIATELY OF THE ERROR AND DESTROY THIS DOCUMENT AND ANY OTHER ACCOMPANYING PAGES IMMEDIATELY. THANK YOU IN ADVANCE FOR YOUR COOPERATION

**COMMENTS B23**

McMahon, Peter  
February 28, 2018

- Response B23-1: In regards to the transportation analysis, see Master Response 5. In regards to the parking and emergency access analysis, see Master Response 6.
- Response B23-2: In regards to the noise measurements, see Master Response 4.
- Response B23-3: In regards to the amphitheater effect, see Master Response 4.
- Response B23-4: Effects associated with the addition of new lights are evaluated in the Draft EIR in Section IV.A, Visual Resources. No significant project-related impacts were identified.
- Response B23-5: For an analysis of the project's effects on wildlife, see Section IV, Biological Resources in the Initial Study included in Appendix B of the Draft EIR starting on page 16.

**From:** Karen Molinari [mailto:karenmolinari@gmail.com]  
**Sent:** Wednesday, February 28, 2018 4:42 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** karenmolinari <karenmolinari@gmail.com>  
**Subject:** Highlands & Burton Park DEIR Comment

Hello Mr. Forouhi,

I am writing to submit comments on the Draft EIR for the installation of lights at both Highlands and Burton Parks.

- 1. I believe the City should include the installation of synthetic turf as part of this EIR process because:
  - 1. it is reasonably foreseeable that the current grass field will not sustain the increased use planned under lights,
  - 2. the City has not included an adequate maintenance and operation plan to sustain the current grass field,
  - 3. installation of lights at Highlands degraded that field to where synthetic needed to be installed, and
  - 4. the City's 2009 Parks and Recreation Master Plan states it is the city's intent to maximize the use of each park by installing synthetic turf on sports fields.
  
- 2. It seems contradictory for the City to believe that Stadium's existing field (which is also the original SC High School field) will sustain increased use under lights, when Highlands field (the newer field) did not. Please explain how that is possible.
  
- 3. I also encourage the city to work creatively across departments to ensure planning and community development are keeping pace with economic development in town and that community amenities such as new park and field space is included in new development agreements (specifically Level 3 and Kelly Moore developments occurring in the East side where we are park deficient). Please explain how the City is actively pursuing new park & field space to accommodate the current needs and future needs with our increased population, instead of saying in the EIR there is no space.
  
- 4. I also believe the City should take a holistic approach to our open space, parks and field space and recreation needs and consider investing in a new community center and park in East San Carlos.

I have mentioned at numerous meetings this project concerns me as it seems to segment the project into smaller pieces versus looking at all it encompasses. This leaves the City open for future litigation and potentially limits what can be done at Stadium Field.

Sincerely,  
Karen Molinari

1  
2  
3  
4  
5

**COMMENTER B24**

Molinari, Karen  
February 28, 2018

- Response B24-1: See Master Response 1 in regards to the installation of turf and Master Response 2 regarding the City's ongoing maintenance procedures. No additional response is required.
- Response B24-2: Master Response 2 regarding the City's ongoing maintenance procedures for grass fields. No additional response is required.
- Response B24-3: See Response B17-2 regarding the City purchasing a new site and constructing a new community center or new fields. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response B24-4: See Response B24-3.
- Response B24-5: See Master Response 1 regarding definition of the project. No additional response is required.

**From:** Filip Szymanski [mailto:filip@mylovely.com]  
**Sent:** Wednesday, February 28, 2018 8:10 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** Lei Wang <leiwlotus@gmail.com>  
**Subject:** Burton and Highlands Parks EIR

Dear Kaveh,

Please find our EIR comments attached via PDF. If you have any questions, please let us know.

Thank you,  
Filip & Lei

408-922-0661 m

--

>> Sent from PC

Filip Szymanski & Lei Wang  
21 Coleman Ct  
San Carlos, CA 94070  
(408) 922-0661

Dear Kaveh Forouhi,

Thank you for sharing the EIR report. As residents living next to Stadium Field, Highlands Park, we are very concerned about the conversion of the Park into a Sports Complex, which will introduce a significant impact to our daily life:

- Loud sports matches until 10pm every day
- Lights on the poles obstructing our hillside view (We live above field. Please see photo of our backyard below.)
- Crowded parking on Elston Ct and Coleman Ct (dead end streets)
- Dangerous traffic conditions on Coronado Ave (1.5 lane road)
- Up to 10% impact to our house resale value (~\$230k)
- Poor use of our taxes (artificial turf not considered given heavy field use expected)

**2**



**Loud sports matches until 10pm every day:**

The proposal will increase noise in the neighborhood for 8 months, March through June and August through November, Monday through Sunday (page 20). In total 240+ days of evening noise until 10pm (instead of 5pm). That's 5 hours a day, or 1,200 hours of extra sports games in our backyard every year! Including July which is already a busy month, the proposal is for evening sports matches every day for 9 straight months. Many of us living next to the park go to sleep by 10pm, which means there will be no rest in the evening to wind down and to enjoy quiet time for most of the year. Please note that most people return from work after 5pm, so the critical quiet time is taken away from us.

The data collected reaffirms how disruptive the games will be in the evenings. Our home is right behind ST2 monitoring location. The sound levels monitored between 1:26pm and 3:21pm on July 13, 2017 ranged from 46.2dB to 87.7dB, with the average over 15-minute period of 70.4dB (page 114). That's a typical soccer game, when there are quieter periods of gaming and louder shouts from the audience reflective of their excitement in the game. Now let's imagine the field is open until 10:00pm for games, every day, meaning that game noise can reach up to 87.7dB late in the evenings. Using the sound levels meter (page 107) as a reference, that means levels as high as a Diesel Truck at 50ft every few minutes, and not much lower than inside a subway train in New York city. I've been to New York city, and I can affirmatively say the noise would not be tolerable every day of the week until 10pm.

In addition, there is a critical flaw in the collection of the data. There are no short term noise measurements collected in the evenings. Most of the neighborhood residents come back from work after 5pm, so a valid test would 5pm-10pm to understand how much impact the extra noise levels would have on daily life. If the ST2 monitoring location was used to capture data between 5pm-10pm, and then compared to the ST2 data points captured during the July 13th daytime game, the difference would be far greater than the 3dB deemed acceptable by the city. It doesn't really matter what sports happen during the day if we are not there. We need our quiet evening time.

**Crowded parking on Elston Ct and Coleman Ct:**

There is no parking for game fans on Elston Ct and Coleman Ct. These are short dead end streets that can accommodate only a handful of cars for residents, and not hundreds that would be coming and going to games every day. The parking table on page 103 makes Highlands Field & neighborhood street assumptions for parking. The reality is that Stadium Field is on the other side of Highlands Park and a far distance away from the parking lot. Therefore, players/fans will be attempting to park on Elston Ct and Coleman Ct for easy access which is completely inadequate for the volumes of cars expected. In addition, the entry point from Coronado Ave to Elston Ct is a narrow choke point that has no room for a U turn or to safely park on both sides of the road. The end result will be unsafe parking conditions on narrow



streets leading to dangerous situations including obstructed access for Firetrucks and Ambulances.

4  
cont.

**Dangerous traffic conditions on Coronado Ave:**

Coronado Ave which leads to Elston Ct and Coleman Ct is a narrow, steep 1.5 lane road without sidewalks. Every week I watch as cars barely pass each other or dodge pedestrians jogging or walking their dogs. Coronado Ave is a dangerous road that is low traffic today and carefully navigated by residents, sometimes requiring one party to back up into a resident's driveway. I fear that a large influx of cars on this narrow road will increase the risk of accidents which could possibly lead to a fatality... and none of us want that to happen.

5

**Poor use of our taxes:**

Another concern is the lack of assessment and funding for the installation of artificial turf. Given our experience with Highlands Field, once games start happening every day until 10pm, there will be significant impact to the grass fields. In the case of Highlands Field, that necessitated the addition of artificial turf. Already at current playtime levels Stadium Field was closed multiple times the last couple of years to let the grass rejuvenate. The 1,200 hours of additional playtime on Stadium Field proposed will quickly deteriorate the grass requiring the additional expense of artificial turf. It's deceiving not to include artificial turf in the proposal.

6

Finally, we are confused who the sports complex is for. It's billed for San Carlos families and residents, but kids do their homework in the evenings and certainly most should be in bed by 9pm. That's our 8 and 12 year old kids. So who is going to be playing games until 10pm? And is that worth destroying the value of homes nearby and the quiet evenings the residents and wildlife enjoy in the San Carlos hills?

Sincerely,

Filip Szymanski & Lei Wang

## COMMENTS B25

Szymanski, Filip and Lei  
February 28, 2018

- Response B25-1: This comment is introductory in nature. See responses B25-2 through B25-6.
- Response B25-2: This comment is introductory in nature. See responses B25-3 through B25-6.
- Response B25-3: Noise level increases were averaged over a 24-hour period, consistent with City standards identified in Action NOI-1.4 of the City's General Plan Noise Element. This method also places a penalty on nighttime noise as the  $L_{dn}$  is defined as the 24-hour A-weighted average sound level from midnight to midnight, calculated with the addition of 10 decibels to sound levels occurring in nighttime hours. However, to address the comments, a supplemental analysis was conducted to determine the  $L_{max}$  and hourly  $L_{eq}$  noise level impacts. This supplemental analysis provided in Master Response 4, determined that with implementation of the proposed project, there would not be any significant  $L_{max}$  or hourly  $L_{eq}$  noise level impacts at either Burton Park or Highlands Park.
- In addition, as discussed in the Draft EIR, short-term noise measurement ST-2 was conducted closest to the residences on Coleman Court, which are located approximately 100 feet east of the spectator seating. As shown in Table IV.C-7 of the Draft EIR, ST-2 indicated that noise levels near the Highlands Park Stadium Field while games are occurring are 70.4 dBA  $L_{eq}$ , 87.7 dBA  $L_{max}$ , and 46.2 dBA  $L_{min}$ . Noise attenuates based on distance from the source of noise. Therefore, accounting for distance attenuation to the closest residence on Coleman Court, noise levels would be approximately 50.4 dBA  $L_{eq}$ , 67.7 dBA  $L_{max}$ , and 26.2 dBA  $L_{min}$ . This noise level would be below the City's significance criteria as shown in Table IV.C-6 of the Draft EIR.
- Response B25-4: In regards to the parking analysis, see Master Response 6.
- Response B25-5: In regards to traffic conditions on Elston Court and Coleman Court, see Master Response 5.
- Response B25-6: In regards to the installation of turf, see Master Response 1. In regards to wear and tear of grass fields and City maintenance procedures see Master Response 2. In regards to noise impacts see Response B25-3. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [Art Min](#)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Additional Lights to Stadium and Flanagan Field  
**Date:** Monday, January 29, 2018 9:15:25 PM

---

San Carlos City Council:

I am a resident very near Burton Park (I live on Greenwood) and support/advocate for the installation of LED lighting to Stadium and Flanagan Field.

We enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks!

Art Min  
Resident on Greenwood Ave

**COMMENTS B26**

Min, Art  
January 29, 2018

Response B26-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [Ostrander, Craig](#)  
**To:** [Kaveh Forouhi](#)  
**Subject:** Support for adding LED lighting to Stadium Field and Flanagan Field  
**Date:** Tuesday, January 30, 2018 6:23:17 AM

---

San Carlos City Council:

My wife and I enthusiastically support the proposal to add LED lighting to Stadium Field (North end of Highland Park) and Flanagan Field (East side of Burton Park) in San Carlos. This is a smart choice that is overdue for our City and its recreational offerings. LED lights are a great choice because they are substantially more efficient than the existing lighting on Burton and Highland and can be designed and selected to create a minimum of light pollution. This means they can be focused on the playing surface and glare and light "leakage" to our nearby neighbors can be substantially controlled and reduced. These lights have a long life-span resulting in reduced overall maintenance costs to our City as well as more consistent lighting on the fields, i.e., fewer burned out lights.

As we know, San Carlos has limited field and recreational space. It is challenging to provide ample field space for the current recreational needs and residents. But, as a community, and especially where we live on the Peninsula, outdoor recreational opportunities for residents is more and more valuable and contributes to a healthy overall community. The turf field at Highland has, with some limited exceptions, year-round and continuous daily use. What a treasure that field is to San Carlos! The addition of lights at Stadium and Flanagan will go a long way toward alleviating the field crunch. It is important to note that the addition of lights will not increase the overall number of users of these fields. Thus there would not be any increase in the current neighborhood parking or traffic use, which is a valid concern voiced by some of the park neighbors. The two fields are already being fully utilized during daylight hours, including into the long summer days. The addition of lights will allow the fields to be used more efficiently in the Spring and Fall, extending the use for a few extra hours into the evening.

We also think it is important to highlight that the benefits of the lighting plan is not only to the soccer, football, softball, and baseball fans. The lights will add value for other users who may just want to take a walk around the park in the evening, and perhaps sit on a bench and just enjoy being outdoors. Stadium in particular is quite dark at night. The proposal to add the lights will also evaluate the benefits of adding low level ambient lighting for such activities.

We urge the adoption of the proposal to add new LED lights to the two parks! We have lived in the San Carlos community for over 12 years and have 3 boys that attend San Carlos schools and play year round in various San Carlos sports programs that utilize these two fields.

Craig & Leslie Ostrander  
760 Knoll Drive  
San Carlos, CA 94070

**COMMENTS B27**

Ostrander, Craig and Leslie  
January 30, 2018

Response B27-1: This comment expresses support for the proposed project as described and evaluated in the Draft EIR. This comment is noted, and the commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

**From:** [Peter McMahon](#)  
**To:** [Amy Newby](#)  
**Subject:** RE: Public Meeting - Draft Environmental Impact Report for Burton & Highlands Parks Lighting Project  
**Date:** Wednesday, January 31, 2018 10:48:30 AM  
**Importance:** High

---

Amy,

The Link to the Draft Environmental Impact Report appears to have been disabled for some time now, which is severely impacting the Public's ability to review this critical document. I attempted to find the DEIR in several areas on the City Website but was unable to do so.

Can you please re-enable the Link; investigate the time that the Link has been disabled; and extend the comment period to adjust to the "down time"? Otherwise, the "public comment period" will not be fulfilled.

Please let me know.

Regards,

Peter McMahon

**MCMAHON SEREPCA LLP**  
985 Industrial Road, Suite 201  
San Carlos, California 94070  
Tel: (650) 637-0600 Fax: (650) 637-0700  
[www.msllp.com](http://www.msllp.com)

---

NOTICE TO THE RECIPIENT: THIS EMAIL AND ANY DOCUMENTS ATTACHED TO IT HAS BEEN SENT TO YOU BY A LAW FIRM, AND MAY CONTAIN INFORMATION PRIVILEGED BY LAW. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISSEMINATION OR OTHER DISTRIBUTION OF THIS EMAIL OR ITS ATTACHMENTS IS STRICTLY PROHIBITED. PLEASE NOTIFY US IMMEDIATELY OF THE ERROR AND DESTROY THIS DOCUMENT AND ANY OTHER ACCOMPANYING PAGES IMMEDIATELY. THANK YOU IN ADVANCE FOR YOUR COOPERATION

---

**COMMENTS B28**

McMahon, Peter  
January 31, 2018

Response B28-1: This comment is a request to the City to extend the comment period on the Draft EIR. On February 7, 2018, the City published a notice (included in Appendix I of this document) extending the comment on the Draft EIR to February 28, 2018 which allowed for a 100-day comment period.



## C. PUBLIC HEARING

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

PARKS, RECREATION AND CULTURE COMMISSION  
CITY OF SAN CARLOS

EIR PUBLIC HEARING

CERTIFIED  
TRANSCRIPT

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
COUNCIL CHAMBERS, CITY HALL  
600 ELM STREET, SAN CARLOS, CA 94070  
WEDNESDAY, DECEMBER 6, 2017

REPORTED BY:  
Tammy Moon, CSR No. 13184

UCCELLI & ASSOCIATES  
Certified Shorthand Reporters  
1243 Mission Road  
South San Francisco, CA 94080  
www.UccelliReporting.com  
E-mail: Reporters@UccelliReporting.com  
Tel: 650.952.0774 Fax: 650.952.8688  
Silicon Valley: 408.275.1122

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S :

CHAIRPERSON: SHERRY SELWOOD

COMMISSION: BRAD LANGFORD, WENDY TURNER, ADRIENNE  
WERNER

PARKS AND RECREATION DIRECTOR: AMY NEWBY

LSA REPRESENTATIVE: JUDY MALAMUT

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 December 6, 2017 7:17 p.m.

2 ---oOo---

3 P R O C E E D I N G S

4 MS. NEWBY: I would like to introduce Judy from  
5 -- I'm blanking on your last name. Judy from LSA, who  
6 has been our consultant working on the Environmental  
7 Impact Report with us. She's going to be giving a brief  
8 overview of the proposed project; the purpose of the EIR  
9 and the meeting tonight.

10 And then after her brief presentation, we will  
11 be taking the public comment and Judy can kind of  
12 explain further what the goal of tonight is.

13 MS. MALAMUT: Thank you, Amy. So I'm Judy  
14 Malamut. I'm a principal with LSA in our Berkeley  
15 office. And we have been the City's environmental  
16 consultant, and we're hired to prepare the Environmental  
17 Impact Report or EIR for the Burton Highlands Parks  
18 project per the California Environmental Quality Act for  
19 CEQA.

20 This slide provides an overview of tonight's  
21 presentation of what we'll be covering; in terms of the  
22 purpose of tonight's meeting. Brief project overview,  
23 description of where we are in the CEQA process, and  
24 what the timeline is. A summary of what we found in  
25 regards to the analysis contained in the draft EIR and

1 then next steps.

2           So the primary purpose of tonight's meeting is  
3 to provide you with an overview of the project,  
4 description of where we are in the CEQA process, and  
5 most importantly, to receive oral comments on the EIR.  
6 And any written comments that anybody might have, we'd  
7 be happy to have them as well.

8           We're going to -- the draft EIR itself was  
9 published on November 20th. Oral and written comments  
10 are accepted this evening and throughout the comment  
11 period. Written comments will be accepted through  
12 February 15th, which ends up being actually a very long  
13 comment period of about 87 days, whereas the standard  
14 review time in regards to CEQA is 45 days. So that's a  
15 good, long time for people to get their comments in.

16           We have a court reporter here tonight. So your  
17 CEQA-related comments will be accurately transcribed and  
18 we can then respond to them in a response to comments  
19 document that will be prepared after the comment period  
20 closes.

21           This slide provides an overview of the project  
22 that's evaluated in the draft EIR. And the primary  
23 components of the project are at Burton and Highlands  
24 Parks to allow for additional hours of play to assist in  
25 meeting the unmet demand for field space.

1 To do that, it would be to install new LED  
2 field lighting on unlit fields, which are Flanagan and  
3 Stadium Fields and replace existing metal halide lights  
4 with LED lights at Madsen and Highlands Field to improve  
5 playing conditions, reduce energy use, and spillover and  
6 light glare from the existing lights.

7 In general, the light poles -- everybody kind  
8 of knows what lighting -- field lighting looks like.  
9 The light poles arrange in height from 70 to 80 feet.  
10 They're constructed of galvanized field in the amount of  
11 about ten to 25 concrete bases.

12 What's really important is that all the light  
13 fixtures for that light cut off visors that are designed  
14 to direct lights on to the playing field and reduce  
15 light spillover and glare to all the areas surrounding  
16 the fields.

17 Another component of the project is to revise  
18 the use and operational restrictions on the Highlands  
19 Park Field to make a field use consistent with the rules  
20 governing all other city fields by preparing a Project  
21 Changes to the Settlement Agreement Restrictions  
22 Document as part of the project evaluated in the draft  
23 EIR. And I'll have a little bit more information about  
24 that later.

25 Looks like Commissioner Selwood has arrived.

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 MR. LANGFORD: Pardon me.

2 MS. MALAMUT: So I'll pause.

3 This slide shows project location at Burton  
4 Park. You can see where unlit field, Flanagan Field, is  
5 in relationship to the lit field, Madsen Field. And the  
6 surrounding uses.

7 This is the project location at Highlands Park.  
8 You can see the upper athletic field, the Stadium Field,  
9 which is the unlit field. And then the Highlands -- the  
10 lower athletic field or Highlands Field which is the lit  
11 field. It also has an artificial turf.

12 This figure shows where the existing light  
13 poles are, which are in black. And where the new light  
14 poles will be, in red. And this site plan shows for  
15 Highlands Park where the new light poles will be for the  
16 upper field and where the new -- where the existing  
17 light poles are for the lower fields.

18 The EIR has a lot more graphics showing every  
19 which way where the lighting is evaluated. So I would  
20 respectfully ask you to kind of go if you want to see  
21 the details about that.

22 This slide shows a little more information  
23 about the project changes to the settlement agreement.  
24 And the EIR evaluates changes to the restrictions at  
25 Highlands Park associated with the 2010 settlement

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 agreement. And the City is proposing to make these  
2 changes to align the use of the field with standard City  
3 practices, the Field Use Policy, and Municipal Code  
4 requirements.

5           The settlement agreement was never intended to  
6 prevent the City from making changes to the park or its  
7 programs after implementation of the terms of the  
8 settlement agreement per Section 11 of the CEQA  
9 agreement, which is on the slide. And the City did  
10 agree that if it intended to make such changes to the  
11 park or programs that might affect the terms of the  
12 agreement, the City would initiate a revised project in  
13 settlement agreement.

14           CEQA review and city counsel approval, which is  
15 what the City -- which is exactly what we're undertaking  
16 at this point. And why this -- the changes to the  
17 settlement agreement are specifically described in the  
18 EIR. And then there are potential environmental effects  
19 evaluated.

20           The settlement agreement is included in the  
21 EIR. It's in Appendix C. It's a draft form. The final  
22 form won't be finalized until the city counsel actually  
23 makes their final approval on the exact language that  
24 they want to include. So at this point, it's a draft.

25           This next slide just is a little refresher



REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 about the -- CEQA. So the purpose of CEQA is to  
2 identify and disclose to the decision makers, who are  
3 the lead agency for the project, and in this case, of  
4 course, the City of San Carlos City Counsel to  
5 responsible agencies and to the public a project  
6 significant environmental impacts.

7           It must also identify ways to mitigate or avoid  
8 those project impacts. It must identify a range of  
9 reasonable alternatives that meet basic project  
10 objectives and avoid project impacts. And it is an  
11 informational document for the public and decision  
12 makers about the environmental effects of the project.  
13 It is really important to remember that the EIR does not  
14 dictate approval or reject a proposed project. That is  
15 the purview. It is simply an informational document.

16           Here we are at the public hearing on the draft  
17 EIR. We started out with preparing a notice to  
18 preparation back in May. That started a 30-day scoping  
19 period. We had a scoping meeting on June 13th, at which  
20 we had oral comments. And we also collected a large  
21 number over the 30-day period of written comments. The  
22 notice of preparation, all of the notice of preparation,  
23 all of the written comments are in Appendix A of the  
24 draft EIR. So everybody can see exactly -- and what we  
25 took into consideration as we began the preparation of

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 the draft EIR, which was published on November 20th.

2           Again, the City will be accepting oral comments  
3 tonight and any written comments. And then after the  
4 close of the comment period, we will be preparing -- we  
5 will be preparing responses to all the comments we  
6 received in our response to comments document. And  
7 we'll also be preparing a mitigation monitoring  
8 reporting program with regards to what happens to all  
9 the mitigation measures and make sure that they are  
10 implemented.

11           Then after that, we will begin public hearings  
12 for certification of the final EIR in front of the  
13 planning commission first and then the city counsel.  
14 The final EIR is the draft EIR plus the response to  
15 comments document, because revisions can be made in  
16 response to the draft EIR and identified in the response  
17 to comments document and brought forward as a whole to  
18 the city counsel.

19           So the draft EIR includes an introduction, a  
20 summary of all the impacts. And it's like an executive  
21 summary. So it includes like a brief description of the  
22 project, and you know, what the alternatives are, what  
23 all the impacts are, and the mitigation measures. It  
24 includes three topical sections for visual resources,  
25 transportation and circulation, and noise.

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 We also included alternatives. There are three  
2 that are identified and evaluated in the EIR. And  
3 technical appendices, including the NOP and comments,  
4 the initial study environmental checklist, and other  
5 technical reports that were prepared.

6 The initial study environmental checklist is a  
7 checklist that identifies all of the CEQA topics and  
8 evaluates the project against all of them. So that is  
9 also an important part of the draft EIR and an important  
10 part of the CEQA analysis.

11 So this next slide identifies the results of  
12 the visual resources analysis of the proposed project.  
13 That truly focused on reducing spillover light and glare  
14 impacts to a less than significant level. And the way  
15 that was done, essentially, was with appropriate design  
16 and placement of the lighting systems. The analysis  
17 determined that the potential spillover light and glare  
18 effects would be less than mitigant for the new lights  
19 and that the conversion of metal halide lights, the LED  
20 lights, would provide a beneficial effect in regards to  
21 reducing existing levels of light spillover and glare.

22 There is a great deal of analysis and modeling  
23 that was undertaken by a special subconsultant who is an  
24 expert in light modeling. And all of that information  
25 is included in the EIR itself.

1 For the topic of transportation and  
2 circulation, one significant impact was identified for  
3 the weekday PM peak period under two different  
4 conditions. The Near-Term Plus Project and the  
5 Cumulative Plus Project Condition at the Cedar Street  
6 and Brittan Avenue intersection, which is currently an  
7 all-ways stop controlled intersection. And it was  
8 determined that project-related traffic would in fact  
9 exacerbate already-existing levels of S conditions to a  
10 degree that was significant.

11 And the mitigation measure that was identified  
12 to reduce that to a less-than-significant level was to  
13 change from an all-the-way stop controlled and install a  
14 traffic signal or a mini-roundabout at the intersection.  
15 And so the City would be undertaking one of those after  
16 additional study. And a determination of which one  
17 is -- would be the best. But either of those two  
18 mitigations would in fact reduce that impact to a  
19 less-than-significant level.

20 It was another significant impact related to  
21 potential conflicts with pedestrians. The additional  
22 pedestrians that would be coming and going to the parks  
23 and to practice and to games. But that also could be  
24 reduced to a less-than-significant level with pretty  
25 standard mitigation measures to improve existing

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 circulation patterns. So there was, you know, specific  
2 mitigations identified in different ways of describing  
3 things and lighting and signals.

4           The project would have less than significant  
5 impacts related to construction traffic, emergency  
6 access, or alternative plans or modes. All of that was  
7 evaluated as well.

8           In regards to noise, the results of the noise  
9 analysis determined that noise from the extended hours  
10 of operation from the fields would be less than  
11 significant in terms of the significant thresholds that  
12 were identified. But that noise from construction could  
13 be significant, but can be reduced with standard  
14 mitigation measures such as compliance with the City's  
15 noise ordinances in terms of the time that construction  
16 could be undertaken.

17           So three alternatives were identified and  
18 evaluated in the EIR. The first was the required --  
19 CEQA required no project alternative. And under this  
20 alternative, the project sites would remain in their  
21 current conditions under the existing operation and  
22 restriction. So there would be no change.

23           The second is the reduced project alternative.  
24 This alternative was designed to avoid the  
25 project-related traffic impact at the Cedar

1 Street/Brittan Avenue intersection. And if no new  
2 lights were to be included at Flanagan Field at Burton  
3 Park, then there would be less traffic. And therefore,  
4 the impact would not occur. So this one would avoid  
5 that significant impact.

6 But all other project-related changes, the  
7 lighting at Highlands Park, etc., the changes to the  
8 settlement agreement, all those would still continue  
9 under this alternative. The only field lighting  
10 alternative would be an alternative where only the field  
11 lighting would change, but the settlement agreement  
12 would stay in place. And all of the restrictions would  
13 continue and it would not be in compliance with the  
14 general city policies that are in place for all the  
15 other fields that the City -- manages.

16 So next steps in general, again, written  
17 comments will be accepted until February 15th. The City  
18 will review and consider all the comments received on  
19 the draft EIR. Then we will begin preparation and  
20 response to comments document after the close of the  
21 comment period.

22 I can take any questions --

23 MS. SELWOOD: I actually have a question.  
24 We're saying not in compliance with all the other fields  
25 in the City. And I could use clarification on that.

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 MS. MALAMUT: At this point, the City manages  
2 all the other fields, and Amy, you can jump in for sure.  
3 They manage all the other fields under the field use  
4 policy and under the city ordinances. However, there  
5 are special restrictions that are identified in regards  
6 to the timing of use, who can use. I have this all  
7 written down.

8 MS. SELWOOD: I guess what I'm trying to  
9 compare and contrast with is Crestview Park, which I  
10 know we close at -- basically at dusk.

11 MS. NEWBY: Correct. As she was saying, it's  
12 pertaining to the use of Highlands Park specifically  
13 that has certain use restrictions that were identified  
14 in the 2010 settlement agreement.

15 MS. SELWOOD: But we have said all other parks,  
16 and I'm trying to --

17 MS. NEWBY: To be consistent with all other  
18 park operations.

19 MS. SELWOOD: So the hours of operation. Is  
20 that what we're talking about? Or are we talking about  
21 something else?

22 MS. MALAMUT: General hours --

23 MS. SELWOOD: It's a field. Crestview Field.  
24 It's just a question. I'm not trying to be combative.

25 MS. MALAMUT: Right. The project didn't

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 evaluate the use and restrictions of -- to the use at  
2 Highlands Field against other parks. What it evaluated  
3 was -- and what it identified was the City has operation  
4 and management. The field use policy and ordinances in  
5 regards to the cover their management and ways of  
6 managing all the parks.

7 MS. SELWOOD: My question, I guess, is probably  
8 for Amy. How does the unlit Highland Field right now  
9 compare to the use allowed at Crestview?

10 MS. NEWBY: So the use at Stadium is pretty  
11 consistent -- very consistent with the use at Crestview  
12 in terms of timing. We're specifically talking -- the  
13 settlement agreement was the lower Highlands Field.  
14 North and south. The lit fields.

15 MS. SELWOOD: Right. Just trying --  
16 clarification. Because I saw all parks, and I did  
17 not -- wasn't clear on what the difference was.

18 MS. MALAMUT: And I probably -- certainly we're  
19 not -- when we're writing the EIR, we're much more  
20 careful in our exact wording. So I probably didn't say  
21 all parks, but --

22 MS. SELWOOD: You did, actually, in the EIR.  
23 That's the first place I saw it, and that's why the  
24 question came up.

25 MS. MALAMUT: All right. So that's good to



REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 know that there are certain anomalies in certain parks  
2 in terms of restrictions.

3 MS. SELWOOD: There may be. I'm not saying  
4 there are. I'm just asking the question.

5 MS. MALAMUT: All right. So the written  
6 comments -- I'm putting up Kaveh's information up here,  
7 because that's the information it would -- the comments  
8 should go to. And at this point, here we are in --  
9 unless there are other questions or comments. Okay.

10 At this point, I think we're ready for public  
11 comment.

12 MR. LANGFORD: Okay.

13 MS. MALAMUT: So I know you have gotten some.

14 MR. LANGFORD: Yeah. I have some speaker  
15 sheets here. So do you want to handle it that way?

16 MS. NEWBY: We'll go by the speaker sheets. I  
17 will ask when everyone comes up for their public comment  
18 if you could please state your first and last name prior  
19 to providing your comment.

20 We do have a transcriber here. We want to make  
21 sure that we get everyone's comments accurately  
22 documented, so we can provide the correct and thorough  
23 response in the final phase of this project. Our  
24 transcriber also might ask you to slow down or repeat  
25 something. So just take a look at her, you know. We

1 want to make sure everyone's comments are -- are  
2 documented.

3 We typically have a two-minute restriction on  
4 public comment. We're kind of waiving that tonight. We  
5 want to make sure we take in everyone's comments, but  
6 also please be respectful of everyone's time. We are  
7 still accepting written comments through February 15th,  
8 as Judy mentioned.

9 MR. LANGFORD: Okay. All right. Peter, at  
10 this time, it's show time. You can come on up.

11 MR. MCMAHON: Hi, there. Peter McMahon.  
12 Elston Court. 16 Elston Court. 20-year resident of San  
13 Carlos. Have lived on Park Avenue, Elmwood Avenue, now  
14 Elston. Also for 15 years have operated a business in  
15 San Carlos, a law firm down on the corner of Industrial  
16 and Brittan.

17 I'm here today to speak sort of against the  
18 lights at Stadium. That's where my comments are limited  
19 to. I have reviewed the draft EIR. I'm only about two  
20 thirds of the way through, because it came out on  
21 November 20th. I have many questions, which I would  
22 actually like to address some of them to the drafters of  
23 the document. And I also have comments and other  
24 things.

25 But I -- the draft that came out and was

C1

C1-1

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 publicly available on the website is this. It does not  
2 include the five appendices that are on the end. And so  
3 it has no way -- I have no way to look at that and then  
4 analyze that. And I have -- subsequently am trying to  
5 figure out where to get that; have discovered that  
6 there's a CD that I can make a copy of or something.  
7 It's a little unusual. I'd like that to be put up on  
8 the website.

9 MS. NEWBY: So there was a delay in adding  
10 those. The appendices have been added to the website.  
11 They were added, I think, just yesterday afternoon. So  
12 those are now available online. We apologize for the  
13 delay in getting those online.

14 MR. MCMAHON: Okay. So that effectively makes  
15 the release of the EIR not November 20th, but yesterday.  
16 That takes out about almost three weeks of time to  
17 properly analyze this, plus we have Thanksgiving, New  
18 Year's, Christmas. All those kinds of holidays in  
19 there. So part of what I'm going to respectfully  
20 request is to extend the public comment until the end of  
21 February.

22 And then also, I have noted in what I saw over  
23 there that there is another meeting scheduled for  
24 February 7th. And I'd like to propose that that be --  
25 that we have the opportunity to do what we were supposed

C1-1  
cont.

C1-2

C1-3

1 to do today with them here to do that again at that  
2 time.

3           Because once we get some more questions, then  
4 I'd like to have a little more time to analyze that,  
5 make any final comments, and -- and get that before the  
6 commission. So I'd respectfully request that.

7           In what I have gone through, I'm going to move  
8 through to my next thing. I know I have limited time,  
9 and I know -- I'm a lawyer, so I can talk forever. So  
10 the -- the analysis that I have looked at so far has  
11 very little. It's very thin on the impact to traffic  
12 and safety on the north side of the park.

13           I don't know if any of you have ever driven up  
14 the roads of Vista Del Grande or Coronado or Madera or  
15 Elston and Coleman. They are extremely narrow, winding.  
16 There's cars parked. You can barely get one or two cars  
17 passed there most of the time. You can check police  
18 records.

19           There have been many accidents along those  
20 roads. I have personally witnessed, because Elston is a  
21 very narrow street -- there's only one -- you are only  
22 supposed to park on one side. But when these teams come  
23 in, there's constantly people parked on both sides of  
24 the road and only one car can get through.

25           Earlier -- this was several years ago, there

C1-3  
cont.

C1-4

1 was a neighbor up the street who was elderly, an elderly  
2 couple. And she often required medical assistance. And  
3 they would have to get the ambulance up there. On one  
4 occasion, I watched the paramedics running up the street  
5 carrying their stuff with the ambulance parked down the  
6 road, because they couldn't get the ambulance through  
7 the two sides of parked cars.

8           So this isn't some sort of nimby thing; "I  
9 don't like cars parked in front of my house." It has  
10 significant safety impacts to our neighborhood, and so  
11 that needs to be thoroughly looked at and considered.  
12 Because if you take an event that brings more people to  
13 the park, as the EIR looks at it, it examines they're  
14 going to park here and park there.

15           It doesn't take into account the massive number  
16 of people that park on that side of the park most of the  
17 time. And who I call constantly or put a sign on their  
18 car, please, you know, move your car. And don't park  
19 here on this side of the street again. So there's that.

20           I want to also comment on the settlement  
21 agreement. It's a misnomer that that's really a  
22 settlement agreement. So before, when the investigation  
23 went through, the Save San Carlos Parks people won that  
24 case. There was a -- the judge's ruling was in favor of  
25 those people. And rather than go through the whole

C1-4  
cont.

C1-5

C1-6

1 process again, the City came to those people and said,  
2 hey, instead of us going through this, why don't we make  
3 this agreement.

4           There were -- there's much more to that  
5 agreement than might be written in words. There's what  
6 people represented to other people. There's the spirit  
7 of the thing. And that is not -- this project violates  
8 the spirit of that. And I -- as a lawyer, I completely  
9 disagree that there's this sort of I can do it.

10           The City can do anything it wants with respect  
11 to the settlement agreement and get out of what it  
12 agreed to. If that were true, then the settlement  
13 agreement would be void to start with, because it would  
14 be -- there's no consideration. The City can do what it  
15 wants when it wants. That's going to generate a lot of  
16 issues. That sort of stance. So I want you to be aware  
17 of that.

18           Also, I met with Neil to talk about -- actually  
19 positive things. Because I don't want to be in a  
20 position where I'm the sort of spear tip of a lot of  
21 people that are against this. And focusing on the  
22 negative of deflecting or stopping this.

23           Amy knows. I have dealt with Amy for years as  
24 a coach. I coached for 15 or 20 years here so far. Two  
25 city championships in soccer, a third appearance. A

C1-6  
cont.

1 city championship in baseball. And -- I love sports.  
2 I'm a lifelong athlete. I had a tournament team here  
3 for five years. If anybody knows field space  
4 constraints, it's me.

5           And I want to be cooperative. I want to be a  
6 force to solve this problem. When this -- we went  
7 through this before, I proposed many things that were  
8 just ignored. I think the opportunity to have those --  
9 to develop the east side is before the commission and  
10 before the City.

11           And rather than fight the teams that  
12 desperately want this and fight the City that needs  
13 another park, I'd rather join forces with all that and  
14 look for creative ways to solve a problem by dealing  
15 with the developers from PG&E. There's massive amounts  
16 of lands. The City took a bunch of money from PG&E.

17           Why didn't it say, look, you have this  
18 three-acre facility down there you park trucks on. Give  
19 us that, and we'll put in a brand new massive complex  
20 there. It would add park space and solve the problem.  
21 That's what I want to dedicate my energy to.

22           And I don't want to be, you know, that guy in  
23 the City that's being the jerk. But I'm going to have  
24 to go there for the benefit of my neighbors, and the  
25 people that don't think this is a good, you know -- it's

C1-7

C1-8

1 a waste of money. It's not a good return of investment.

2 So thank you for your time. I probably  
3 exceeded mine. Thank you.

4 MR. LANGFORD: Thank you, Peter.

5 Next up. Anne Tang.

6 MS. TANG: Hi. I'm Anne Tang. I'm also a  
7 20-year resident of San Carlos, and was actively  
8 involved in previous settlement agreement. I want to  
9 talk about the -- my concerns about lights at Stadium.  
10 I'm very concerned about the increases in traffic and  
11 parking and safety of the kids.

12 The reason that there was a settlement  
13 agreement was to address those issues. And by  
14 staggering practices and many of the other things that  
15 we -- the City agreed to, it helped reduce the number of  
16 cars that would come and go at exactly the same time  
17 through a very narrow channel. One entrance. One exit.  
18 Hundreds of cars.

19 There are five or six practices just on  
20 Highlands Field alone going on at the same time. Every  
21 team has ten or 15 kids. That's -- means there's 600 --  
22 cars going in each direction, at every switch of kids  
23 for all these sports. And there's a huge amount of  
24 traffic.

25 And the staggering of practices was done

C1-8  
cont.

C2

C2-1



1 specifically to try to alleviate those traffic concerns.  
2 And I think to walk away to say it's not consistent, the  
3 goal wasn't consistent. It was child safety. And I  
4 think there's a huge issue.

5           Looking at the EIR, which I am also not all the  
6 way through because it's quite lengthy, the proposal  
7 says there's going to be several hundred more kids  
8 coming in. There are no additional parking spots. In  
9 fact, they're talking about taking away more parking on  
10 Aberdeen.

11           As Pete already mentioned, coming in the other  
12 side, there's really no good parking options. The roads  
13 are narrow and dangerous. And I think that adding  
14 lights is just going to really exacerbate this problem.

15           Additionally, and because I went through this  
16 whole thing with Highlands Park, the whole reason the  
17 City put in turf on Highlands Park was because of the  
18 Mahady report, which said that the grass could not  
19 sustain heavy use. And if you put in lights, you are  
20 going to use the grass; that the grass would die. And  
21 therefore, the only efficient way to do it was  
22 artificial turf.

23           You are now going in to say you are going to  
24 want to put in lights in a field of grass that will not  
25 be able to sustain the usage that you say you want to

C2-1  
cont.

C2-2

C2-3

1 add, which is five hours at the end of the day or --  
2 from five to ten. And so I -- you won't get the usage  
3 for adding the lights. It will be a waste of money  
4 unless you put in turf.

5 If you put in turf, that needs to be addressed  
6 now, because it is a single project. And I think it's  
7 disingenuous to say you can get a lot of extra field use  
8 at night on grass, because the grass will die.

9 Additionally, if it rains, you can't use the  
10 fields. And you can't use them for multiple days, and  
11 you can't use them during the rainy season. These are  
12 all reasons why the City asked to put in turf, which I  
13 opposed but that was -- it was a package deal. Lights  
14 and turf. At the time that the deal was reached, we  
15 were basically told that you would leave Stadium Field.  
16 It was verbal, grass.

17 So I am concerned about numerous things. The  
18 safety; going back on the agreements that were made in  
19 good faith. And I think that the amount of traffic and  
20 noise that the lights would bring are -- is unreasonable  
21 to expect us to deal with.

22 And additionally, it's not a good return on the  
23 investment. I mean, I agree with Pete. What we should  
24 be looking for is a place where we can build new fields,  
25 and then you have fields or you can use them 15 extra

C2-3  
cont.

C2-4

C2-5

C2-6

1 hours every day because they're new.

2 So thanks.

3 MR. LANGFORD: Thank you, Anne.

4 Next up we have Bob Dehner.

5 MR. DEHNER: I'm Bob Dehner. For the record, I  
6 have been around this town for 46 years now. San Carlos  
7 since I was nine years old.

8 To start, I wish I had more than the two  
9 minutes to address the deficiencies in this EIR that  
10 need to be addressed to ensure an adequate evaluation of  
11 the impact of this project on our community.

12 The one area of deficiency that -- EIR does not  
13 address is the impact of judicial play on the playing  
14 surface due to the lighting. The major surface of the  
15 -- usage of the lighting will occur in the wet winter  
16 months when grass doesn't grow well nor rejuvenate  
17 itself.

18 So the playing surface at Stadium would  
19 degrade, just as it did at lower field. And will result  
20 in additional down time to rest. The net result may  
21 very well be no additional playing time.

22 You ruin the field in the wintertime. You  
23 close it, fence it off. In the spring, three, four  
24 months like we do at Crestview. We used to do that at  
25 Stadium. We used to do that at lower field. And that's

C2-6  
cont.

C3

C3-1

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 a given.

2 I used to sit up here for nine years. Now the  
3 EIR mentions Mark Mahady's reports consideration of  
4 artificial turf for heavily-used field. Then goes onto  
5 say it is not being considered. Nor are any  
6 alternatives considered in this EIR. Because the City  
7 says there's no money. That in itself can be considered  
8 intentionally dishonest.

9 A second deficiency is a recommendation to undo  
10 the many years of mitigation efforts for the parking  
11 safety problem at Highlands, a problem that has existed  
12 since the park's inception. Mainly shortening the time  
13 between games was what was recommended, will force more  
14 user parking on Aberdeen, Glasgow, and Dundee,  
15 negatively impacting those residences. Previous park  
16 commissions spent a great deal of time trying to  
17 mitigate this problem.

18 Another consideration should be any changes to  
19 usage of Stadium be constrained by the 1988 decision of  
20 the city counsel approving the four houses on Elston  
21 Court. We were always sensitive to those, and this  
22 report doesn't take care of that being sensitive to  
23 those people.

24 My recollection from the inception of Stadium  
25 and the subsequent design changes and the 2005 citizen's

C3-1  
cont.

C3-2

C3-3

C3-4

C3-5

1 committee on fields, all of which I have been part of,  
2 lighting of Stadium was never to be considered. That  
3 was always considered to be a given.

4 With the EIR's written, one cannot make an  
5 adequate evaluation of the effects of our community. As  
6 such, moving forward will serve to be what I consider a  
7 divisive issue in our community. We need to follow the  
8 path of least environmental impact on this project.  
9 Thank you.

10 MR. LANGFORD: Thank you, Bob. Jean Dehner.

11 MS. DEHNER: My name is Jean Dehner. I have  
12 lived in San Carlos for 40 years, but I have worked here  
13 for -- I have lost track. A lot more.

14 This is my opinion. Of course, I get lots of  
15 input from the other side. The proposal for licensed  
16 Stadium Field is but a band aid for the overused parks  
17 and fields in San Carlos.

18 The EIR states, apparently with these  
19 alternatives, that there's no money. I actually  
20 disagree. The City does have money from PG&E settlement  
21 that is purported to be about \$6 million.

22 Further, a look at the extensive commercial and  
23 residential development in San Carlos ensures that tax  
24 revenues will be on the rise for this community for  
25 years to come. All you have to do is drive around San

C3-5  
cont.

C3-6

C4

C4-1

1 Carlos and you will see that.

2           Yet the land that's for sale on the east side  
3 -- and I think that there's still some land -- I know  
4 some of it has already been spoken for. There's still,  
5 I think, some land available. And then I just heard  
6 Peter mentioned that parking area that PG&E has is  
7 another possibility. So there's land on the east side  
8 of this town that clearly -- it is not on the City's  
9 radar.

10           As far as the east side is concerned, that's a  
11 neighborhood which is entitled to another park, and a  
12 space large enough for a sports complex might very well  
13 be there. Like I say, this City is not looking at  
14 prospective park space at all. I don't know where  
15 they're planning to take -- use all the tax revenues  
16 that are going to come from all these new developments,  
17 but it takes a little forethought to try to figure that  
18 out.

19           So in my opinion, the City needs to make a  
20 commitment to utilize a portion of the increased  
21 revenues coming to the City to purchase land on the east  
22 side and at a park rather than making proposals that  
23 overuse the ones that we already have.

24           MR. LANGFORD: Thank you.

25           Next speaker -- few more to go here. We have

C4-1  
cont.

C4-2

1 Heidi Liebenguth.

2 MS. LIEBENGUTH: Thank you. My name is Heidi  
3 Liebenguth. And I have lived in San Carlos for over  
4 20 years. And I do have a couple of things that I'd  
5 like to contribute to this discussion. I feel that,  
6 like a couple of the prior speakers, the City here in  
7 page 21 of the EIR which I have not completed reading,  
8 states that the City does not currently have and is  
9 unlikely to purchase in the future available suitable  
10 land on which to build new fields and therefore  
11 continues to look for ways to increase the use of  
12 existing fields.

13 What I'd like to say, first of all, is that the  
14 City will never have the ability to purchase without a  
15 commitment to do so and a plan to do so. And the City  
16 in just this last election cycle was willing to buy the  
17 Black Mountain property and do -- I don't know what  
18 there with hiking trails when clearly there's a very  
19 strong need in the community for more sports fields, not  
20 higher density on the sports fields that we have.

21 The EIR also states on page 33 that the --  
22 putting artificial -- the lighting at Stadium would  
23 increase the usage of the field from a maximum of 242  
24 participants to 368. And that the Stadium spectators  
25 would go from a maximum of 310 -- no. A maximum now of

C5

C5-1

C5-2

1 190 to a maximum of 310. Now I suggest to you that  
2 there will be more spectators than participants for that  
3 additional playing time. So I think this is an  
4 underestimate of the impact number of participants plus  
5 number of spectators.

C5-2  
cont.

6 And currently, the traffic there at the  
7 Highlands Park in its entirety is already at its  
8 maximum. If there are games going on, the parking lots  
9 are completely filled. The streets surrounding are  
10 completely filled with cars. There are cars going up  
11 and down Melendy Drive. And as Mr. McMahon stated  
12 earlier, there is absolutely no consideration of the  
13 need for emergency vehicles to get in and out of the  
14 area should that need come to be.

C5-3

C5-4

15 And I was quite surprised that in the  
16 discussion of traffic and circulation in the EIR itself,  
17 there is consideration of the corner of Cedar and  
18 Brittan there at Burton Park, but there was no  
19 discussion at all of the bottleneck that is Highlands  
20 Park.

C5-5

21 Highlands Park is in a neighborhood where there  
22 is one street ingress and egress. It's a narrow street.  
23 There is not the large two lanes going each direction  
24 street that you have on Brittan. It's -- Melendy is  
25 quite narrow. And then the neighborhood around



1 Highlands Park, those streets are small. And then  
2 certainly on the far side of the park, which would be  
3 the most heavily hit by additional usage at Stadium  
4 Field -- those streets are completely incompatible with  
5 any kind of traffic.

6           Anyone who has driven there or walked there  
7 will know that you just can't fit a steady stream of  
8 cars coming up through those twisty narrow roads. It's  
9 just not realistic at all.

10           So it doesn't seem to make a lot of sense to  
11 light a field. And on this same page 33, it says that  
12 the other uses of a field will include soccer -- be that  
13 most of these events will end by 9:00 p.m. if it's  
14 baseball. 10:00 p.m. if it's soccer. And that --  
15 that's during those two seasons, fall and spring. And  
16 that in the summer months, there may be some soccer  
17 tournaments and summer camp uses which will not require  
18 field lighting.

19           I would say to you that if there is lighting on  
20 the field, people will come up with events that use the  
21 field at night in the summer. You know, particularly.  
22 And I would think that the summer will bring in bigger  
23 crowds of people who will be cheering for their children  
24 than the fall and spring.

25           So I think the nighttime usage in the summer

C5-5  
cont.

C5-6

1 would be even higher. So I don't think that the EIR  
2 really considers realistically the actual impact that  
3 this would have on the field on the neighborhood, on the  
4 streets surrounding it, and the safety of those streets.

5 Now I would also like to comment on the  
6 description of Highlands Park as being in an urban and  
7 built-out area of the City of San Carlos. Far from it.  
8 If you have -- look at the picture of Highlands Park  
9 that was used in the EIR, you will see that it is  
10 surrounded by open space and wild land.

11 And it was an important corridor for wildlife  
12 and animals in San Carlos. There are raccoons. There  
13 are lots of deer that graze on the field at Stadium.  
14 And there are, you know, numerous other animals. And  
15 it's an important area where they are moving from the  
16 area that is the black mountain water property across  
17 and up into the hills.

18 And so to light that, I would say that there is  
19 an impact to nature that's not considered at all in this  
20 EIR. This is not an urban environment that you have  
21 there in the hills. I think that's just wrong. And I  
22 don't know how they can describe it that way.

23 Thank you.

24 MR. LANGFORD: Thank you.

25 Next, Richard Crone.

C5-6  
cont.

C5-7

C5-8

C6

1 MR. CRONE: Thank you. My name is Richard  
2 Crone. I have lived in San Carlos more than 21 years.  
3 As part of the original Save The Parks and settlement  
4 team, I lived in the Highlands Park area.

5 We are referring to a park. Highlands Park.  
6 The last remaining part of the park is the grass field  
7 in Stadium. Light that, and you remove its park status  
8 in order to turn it into a complex or sports facility  
9 exclusively.

10 You are all referring to it as a park. But  
11 this proposal is to eliminate the park in Highlands  
12 Park. The lights are simply a Trojan horse in order to  
13 get to artificial turf.

14 The argument's on both sides. You have heard  
15 people that oppose the lights clearly state the capacity  
16 issues of natural grass. So we know where this is  
17 going. And in good conscience, without addressing this  
18 EIR as a wholesale effort to turn it into a sports  
19 complex is simply false. The EIR is completely  
20 inadequate if you do not address the fact that you are  
21 changing this from a park to a sports complex. Light  
22 that grass field, and you remove the park.

23 The surrounding part of this park are natural  
24 pine trees. Something that the EIR would never even  
25 address by looking at Stadium as well as the lower field

C6-1

C6-2

1 was the impact of natural rain and water seepage for  
2 nourishing the surrounding area. Look at the trees.  
3 I -- I contend that the people who wrote this report  
4 never even looked on lower Stadium or tried to walk  
5 around there and see the impact of those trees since  
6 their artificial turf has been put in.

7           On top of that, we are losing the natural  
8 ground even around the Stadium Field. What's the latest  
9 improvement that's been made there? Cement pads to  
10 support -- store. Soccer field goals? Why do we need  
11 cement pads? Again, taking away the natural terrain  
12 from there.

13           I think it is completely inappropriate and  
14 irresponsible by this commission and the consultants  
15 that they have engaged to not address the fact that what  
16 you are trying to do is turn this and convert this into  
17 a sports complex.

18           Call a spade a spade. You want to change this  
19 from being a park to a sports complex? Then address  
20 that in the scope of the EIR. Otherwise, you are simply  
21 being, unfortunately, not honest.

22           Thank you.

23           MR. LANGFORD: Thank you, Richard.

24           Next, Filip Szymanski.

25           MR. SZYMANSKI: Hello. Thank you. So I'm

C6-2  
cont.

C6-3

C7

1 Filip Szymanski. And I have the honor of being the  
2 youngest member here in San Carlos. 11 years. That  
3 doesn't mean I didn't move here with this "lumen hier"  
4 of city of good living. I'd like to keep that in good  
5 context.

6 One of the things -- Judy, is it okay if I back  
7 up your slides to the picture of Stadium?

8 MS. MALAMUT: I'd go to the chair and Amy.

9 MR. SZYMANSKI: I want to ask for permission.  
10 It helps to --

11 MS. SELWOOD: I think it's fine to put up a  
12 visual that the gentleman would like to speak to.

13 MR. SZYMANSKI: You can go to -- there. Yeah.  
14 This one is good. So I think it's really important to  
15 understand also where I come from, the perspective where  
16 I live. I have a very unique perspective being backing  
17 up against S-2, that house is just up on the northeast  
18 side of that. So I back up to the bleachers that are in  
19 the Stadium.

20 So the other thing you should know is I'm also  
21 a little bit elevated. Maybe 50 feet upwards. We can  
22 do the measurements. I'm not perfect at that. There's  
23 going to be some definite implications being backed up  
24 against the bleachers and at the level of the lights I'm  
25 living at.

C7-1

1           What I'd like to consider is really more  
2 important aspect that, one, I am a parent. And I have  
3 an eight year old and a 11 year old. I have a kid  
4 that's in San Hills United. He loves to play sports. I  
5 have messy shirts around the house, actually five of  
6 them, because he wears them all the time. It's really a  
7 sports-driven family. Both kids play soccer. He plays  
8 softball. So they love sports, and I also enjoy sports.  
9 So don't -- sounds like we don't play sports. We play a  
10 lot of it, including soccer.

11           I'd like to reach a point where it really works  
12 for both sides. And I think there are a couple things  
13 that really bother me when I look at what's written in  
14 there. Specifically what I care about is the change in  
15 the times of the use of the field. So the 5:00 p.m. to  
16 the 10:00 p.m. And honestly, everything else around the  
17 report is not really valuable, because it shouldn't  
18 really change before and after. You still have the  
19 amount of games. Same amount of days. Probably same  
20 amount of parents, if it's similar usage. But what  
21 really changes is at 5:00 p.m. to that 10:00 p.m.

22           What's really interesting is when you start  
23 thinking about it, right, we're talking about here a  
24 straight nine months, right? If you take nine months  
25 30 days, five hours each, we're talking about a total of

C7-2

1 1,350 hours of continuous use throughout the year  
2 behind, basically, my backyard.

3           What does that mean? That means I have,  
4 basically, a sports game on all the time for nine months  
5 until 10:00 p.m. So there is no time I come home, and I  
6 get rest. Because by the time the game is over, I'm  
7 sleeping. So I never have the rest. So that's one  
8 aspect to consider.

9           The other is there are some measurements.  
10 Unfortunately, once again, because the report is not  
11 five to ten it doesn't consider it's actually pretty  
12 quiet out in the hills between five and ten. Now there  
13 is a measurement during the day. And what's really  
14 interesting is the measurement is 87.7 max decibels at  
15 S-2 which is basically where I live.

16           How is that described in the reports? It  
17 describe something between -- something between 50 feet  
18 from a diesel truck and being in a New York subway  
19 inside of that. And I don't know if you have been to  
20 New York, but those things are pretty loud.

21           Now I can tell you, during the day, it really  
22 does get that loud. But as I bought the house, coming  
23 in, I knew that during the day until five o'clock I  
24 would have that. And I made peace with that, and said,  
25 okay. I can put up with that. Once you get past five

C7-2  
cont.

C7-3

1 o'clock and you continue being in a subway car for  
2 another five hours for nine months straight Monday  
3 through Sunday, that's a totally different perspective.

4           So I want everybody to really think about it.  
5 Would you want to live in a subway car for these many  
6 hours. And there's no rest. Not even a day of rest  
7 that I would have, right, with these type of noises.  
8 That's one aspect.

9           Please consider everything you look and  
10 including the traffic reports. Everything, five to ten.  
11 How many cars do you have between five and ten coming in  
12 and out. How many you would have after the game. And  
13 consider also these measurements of sound are at the  
14 current levels of usage. We talked about also  
15 increasing the spectators. So probably would even get  
16 louder.

17           The other thing to consider is really the cost  
18 effectiveness on this project. So I was thinking and  
19 looked online, when is sunset? And so when is really  
20 the usable hours?

21           When you look at it from a perspective of March  
22 through September, you'll find that because of DSD and  
23 the way it works that 7:00 p.m. you can use the fields.  
24 So effectively, for seven months out of the nine, you  
25 can add two hours of usage at cost simply by changing

C7-3  
cont.

C7-4

C7-5



1 around how the hours are used on the field.

2           Just consider that. This is very significant  
3 here. We're talking about adding five hours yet.  
4 Saturday nine months already have two, three hours out  
5 of the five. There is an ability to reach compromise.  
6 There is a point in time you want these people living  
7 around the park to get a rest. There is no rest until  
8 ten.

9           The other thing is I do have these kids, and I  
10 think when do they do homework, these kids, right? Do  
11 they do homework 10:00 p.m.? After some soccer game?  
12 Or do they do it at seven or 8:00 p.m.

13           So in reality, practicality for San Carlos  
14 residents is not for games between even eight and nine  
15 o'clock. It's just not going to happen. What you are  
16 going to see happening is probably something else than  
17 for our residents that have to move in here to actually  
18 maximize something at 9:00 p.m., because it's not going  
19 to be our kids playing there. It's going to be someone  
20 else.

21           So I really question who is it for. San Carlos  
22 residents or something else. I want you to consider  
23 that and really think about, is that something we'd want  
24 in the City and encourage that.

25           I wanted to thank you, once again, for giving

C7-5  
cont.

C7-6

1 me this opportunity to speak. But please give us an  
2 opportunity to dialogue and really talk about can we  
3 find something in the middle that really can work for  
4 all of us to achieve some of the things we want, but not  
5 really go to the extreme in talking about continuous  
6 nine months until 10:00 p.m. of basically loud soccer  
7 games in my backyard. Thank you.

8 MR. LANGFORD: Thank you, Filip.  
9 Gus Dedo.

10 MR. DEDO: Good evening. As you said, my name  
11 is Gus Dedo. So far, I lived in San Carlos the longest.  
12 I lived in my house since 1974. I live in Coleman  
13 Court, which is right above Highlands Park. I thought I  
14 only had two minutes. So it's very short.

15 Before I go into it, I want you to know I agree  
16 with what everyone else said ahead of me. I think that  
17 having lights and making it into a sports stadium is not  
18 the right thing to do. What I want to talk about is the  
19 proposal of having lights on until ten o'clock, which  
20 means it could be as late as 10:30. Because if  
21 activities ended close to ten o'clock, that means they  
22 can last until 10:30. I think this is way too late for  
23 any residential -- or especially up in the hills of  
24 Highlands Park.

25 One thing I wonder about is when the games are

C7-6  
cont.

C8

C8-1

C8-2

1 over and people are getting the things done, how long  
2 it's going to take them to do all that. I know it says  
3 you can go to 10:30, but we'll go longer. The reason I  
4 say that is where I live, on Saturday mornings -- and I  
5 found out by reading the report that by 7:40 you cannot  
6 start any activities until 7:45 in the park. I can tell  
7 you from real life experience, by 7:45, everything is  
8 completely ready to go because everything is started by  
9 7:15 or 7:30. So just warning you, since I live up  
10 there, one mechanism, as I said, if the lights go on,  
11 which I'm not in favor of. If the lights go on, how are  
12 you going to stop it.

13 In talking with -- about the noise and whatnot,  
14 in page 107 in the EIR, and I'll read what it says,  
15 because I can't memorize it. Relaxation hours are  
16 defined as being between 7:00 p.m. to 10:00 p.m., and  
17 sleeping hours are defined as being between 10:00 p.m.  
18 to 7:00 a.m.

19 So when I come home and it's seven o'clock and  
20 I'm supposed to relax and I have all this noise and  
21 these lights, my ability to relax is not going to be  
22 quite so good as my neighbors. It says sleeping hours  
23 start at ten, and people can be on the park until 10:30,  
24 maybe quarter to 11. Now you are impacting my sleeping  
25 hours.

C8-2  
cont.

C8-3

1 Now in various places in the EIR, it states  
2 that the proposed project involve changes in use of the  
3 field around the park to make the field use consistent  
4 with the rules governing all of the city fields. But  
5 when you look at the hours that the parks -- the  
6 activities are supposed to be, there's going to be a  
7 difference.

C8-4

8 For example, weekend soccer games and practice  
9 end at eight o'clock at Burton, but ten o'clock at  
10 Highlands Park. I'm just curious why one ends earlier  
11 than the other. If lights go on, and I'll say it's my  
12 first choice, I would prefer eight o'clock to ten  
13 o'clock.

14 Lastly -- and it may be in the report. But I  
15 didn't see what time the lights are supposed to be  
16 turned off. Are they turned off at a particular time?  
17 Are they turned off when the sports activities are done?  
18 Are they turned off after a high hour? To me, it's  
19 pretty important to know what schedule the lighting is.

C8-5

20 Thank you very much.

21 MR. LANGFORD: Thank you, Gus. Jeff Klein.

C9

22 MR. KLEIN: My name is Jeff Klein. I have been  
23 a San Carlos resident for 15 years. I live on Dendee.  
24 And I don't think I'm going to directly be impacted by  
25 the lighting or the noise. I have a street lamp already

1 out in front of my house.

2           And but I think I will be impacted by the value  
3 of the neighborhood. I was a professional appraiser for  
4 15 years, and I have been involved in litigation over a  
5 Bart facility over at San Jose arena and over at high  
6 school.

7           And it's a pretty common concept that when you  
8 are next to external obsolescence, you are going to  
9 impact each house by ten to 20 percent. And looking at  
10 the values today and looking at how many homes are  
11 around, it's going to be an impact of five million easy.

12           And when you look at that, and you look at the  
13 homeowners, potentially losing that kind of value, you  
14 know that's why we got into litigation over the turf.  
15 So the first thing I want to mention is just the impact  
16 to property values. It will severely impact the  
17 neighborhood in terms of property values.

18           Next with the -- with respect to the settlement  
19 agreement, the reason -- one of the main reasons I think  
20 that the City settled previously is the inadequate  
21 parking. I have the parking ordinance for the City of  
22 San Carlos, and looking at Section 18.140.040, it talks  
23 about public assembly. And how many -- how many parking  
24 spots, off-street parking spots are required per seat  
25 for public assembly. And the calculations that we put

C9-1

C9-2

1 together before the settlement agreement showed that  
2 we're already deficient.

3           If you look at the San Mateo County ordinance,  
4 we're deficient about 42 off-street parking spots. And  
5 if you look at the San Carlos parking ordinance, we're  
6 deficient about 77 off-street parking spots. I think  
7 that that was one of the reasons why the City said,  
8 okay. We're already deficient. And we should come up  
9 with some sort of settlement agreement. And the EIR  
10 really doesn't address any additional new parking.

11           So and then the third thing I wanted to bring  
12 up is the settlement agreement that we have already the  
13 City hasn't been complying with. As previous gentlemen  
14 noted, we're not supposed to have any activity in the  
15 park until 7:45. We're not supposed to have any  
16 activity in the park after ten. And it's very very  
17 common that right at seven o'clock kids show up.

18           They start setting up. I actually don't hear  
19 it from my house, but I'm usually up. I get up at  
20 6:00 a.m. And I'm usually walking the dogs, and there's  
21 lots of activity in the park already long before the  
22 City agreed that there would be no activity.

23           So those are the three things I wanted to bring  
24 up. In terms of the parking ordinance, I'll just leave  
25 this with you. These were the calculations that we had

C9-2  
cont.

C9-3

1 previously.

2 (Document handed.)

3 MR. LANGFORD: Thank you, Jeff.

4 We have our last speaker, Karen Inolinari.

5 MS. INOLINARI: Hello. My name is Karen  
6 Inolinari. While I'm new to the four of you, I'm not  
7 new to city staff or the residents here. I'm raising  
8 the fourth generation of San Carlans in my family. I  
9 want you to just think of that, okay? My family has  
10 been committed to this town for four generations, okay?

11 I grew up here. My parents grew up here  
12 playing on these sports fields, okay? Playing for our  
13 school teams, okay? We are incredibly active, sports  
14 family. Adults and kids. We play year round. We serve  
15 on the boards. We coach. We referee. Okay. We are  
16 huge sports enthusiasts in my family.

17 I participated on the City's sports field task  
18 force back in 2000 when 20 plus of us tried to figure  
19 out how to make sense of the deficiencies of park and  
20 field space in our town. We went around and around.  
21 Didn't really come up with many conclusions except that  
22 we all agreed we're still deficient. And at that time,  
23 we didn't really see land use changes or options to  
24 secure additional field space.

25 But today is a totally different day. And

C9-3  
cont.

C10

C10-1

1 while I'm happy and thrilled to see that the City is  
2 looking for ways to increase playing time, I'm also  
3 really saddened that as a city and as a community 20  
4 plus years later, we're still looking for increased park  
5 space and field space. Come on. We should be able to  
6 have figured this out and solved it by now.

7 I think the priority needs to be creating a new  
8 park space, okay? Where we're going to get real true  
9 benefits, okay? We are heavily investing in the  
10 economic business and residential development of our  
11 town. Yet we weren't keeping pace with our amenities.  
12 Our parks and our community centers.

13 This influx of new residents and employees will  
14 only further tap our already overused fields. We need  
15 to focus on new parks. I take issue with the EIR  
16 statement that there isn't any opportunity for new  
17 parks. That's just inaccurate. It's lacking forward  
18 thinking or creative planning.

19 As a public citizen, I'd been lobbying city  
20 counsel for two years to pursue the large parcels in  
21 East San Carlos. East side is park deficient. The City  
22 has money set aside for parks there. Kelly Moore on  
23 level three would have been great places to put a sports  
24 complex. A community pool. A community center. A  
25 theater. A garden. A maker space. You name it.

C10-1  
cont.

C10-2



1           As I mentioned at the previous meeting, I would  
2 love for us to be similar to Burgess Recreation Center  
3 and the Belmont Sports Complex and these towns that are  
4 neighbors. And yet we continue to lack the forward  
5 thinking across all city departments. We have been  
6 siloed, and we need to stop that.

7           I think that our priority should be -- should  
8 be that. Over eking out a few more hours, over a few  
9 days, over a few months each year on an already overused  
10 field and park space. That increase in play on the  
11 grass field is only going to further hasten its demise.  
12 While I respect our maintenance crew is doing the best  
13 they can with the budget and resources they have, it's  
14 not enough, okay?

15           We are the people. We are the neighbors. And  
16 we are the people that show up early to eke out the  
17 right space for practice so our players don't twist  
18 their ankles. My husband wore a boot for four months  
19 because he twisted his ankle on Stadium Field playing  
20 soccer. Come on.

21           It is not a welding tank field now, and here  
22 you are going to increase the level of play? It's going  
23 to get worse. Lights at Highland allowed for increased  
24 usage. That unfortunately led to decline in the type of  
25 grass field that was there. Artificial turf needed to

C10-2  
cont.

C10-3

1 be installed to maintain the existing level of play with  
2 those lights, right?

3           So how is it that now this EIR says that adding  
4 lights to Stadium and increasing the play is not going  
5 to degrade that field. The proof is in the pudding.  
6 You already did it on the previous field, and see what  
7 happened. How could you now be saying it's not going to  
8 happen. It's Stadium. Trust us. It won't. You have  
9 already proven that that's exactly what's going to  
10 happen, and that's why we got artificial turf on  
11 Highlands.

12           That alone disappoints me in that document,  
13 amongst other things. Your 2008 Parks Master Plan  
14 states the City's desire is for all playing fields  
15 except for Burton to be replaced with artificial turf.  
16 The city planning document, and the installation of  
17 lights and Stadium clearly lead to a reasonable and  
18 foreseeable future project on the installation on turf  
19 on Stadium.

20           Therefore, the prudent move would be to analyze  
21 turf installation on Stadium in this EIR. Don't have to  
22 incur the cost, the time, and the limited resources by  
23 segmenting this project. If not, you risk future legal  
24 actions. Lots of wasted time and resources. The  
25 logical, economic, and prudent step is to add the

C10-3  
cont.

C10-4

C10-5

1 consideration of synthetic along with the lights,  
2 because that is what's going to happen.

3           And then the other thing is I just implore you  
4 to work with your counterparts and city government and  
5 to make park and field space just as high a priority as  
6 new buildings for residents and businesses. When these  
7 new companies are coming into town and building six to  
8 ten story buildings and residences, they can surely plan  
9 their development to include a new field space instead  
10 of walk up, open little parklets here and parklets there  
11 that the residents aren't going to use, neither will  
12 their employees.

13           But I sure know that the employees of those  
14 businesses would love to be able to walk two blocks down  
15 and be able to play ultimate at lunch time, go swim a  
16 few laps, and in the evenings and afternoons have those  
17 fields be used by community members.

18           To me, that's the best use of the resources  
19 that we have in this town. And I will continue to work  
20 as hard as I can to make that happen and lobby as best  
21 as I can and work with all the boards that I sit on to  
22 encourage collaboration to make sure that that's really  
23 our highest priority. Thank you.

24           MR. LANGFORD: Thank you. That concludes all  
25 the public comments.

C10-5  
cont.

C10-6

REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 MS. NEWBY: Why don't we let the commission  
2 weigh in -- it's just accepting the public comments on  
3 the document that the consultant is going to then take  
4 back.

5 MS. SELWOOD: I understood you to say at the  
6 last meeting if we had comments, please make sure to  
7 review them. Because I do have comments.

8 MS. NEWBY: Sure. Comments regarding the  
9 document. Yes.

10 MS. SELWOOD: The first comment I had -- and  
11 it's already been said. I want to say it again  
12 independently, because I haven't spoken to anyone else  
13 here. The first thing that did jump out at me and the  
14 thing that I'm most concerned about is that the city  
15 counsel has made the decision to specifically exclude  
16 consideration of turf.

17 It's as apparent to me as it is to many of the  
18 people that have spoken that if we extend the hours on  
19 that grass field, we'll put the money into the lights.  
20 And the next thing I will be hearing is, oh, but who  
21 could have known now the field has degraded. And we're  
22 going to have to put turf in, because we spent this  
23 money.

24 I think it's very important that the EIR -- and  
25 I realize I'm after the fact on this, and counsel has

C11

C11-1

1 made the decision. But frankly, the counsel did not  
2 come to the Parks and Rec Commission for input on the  
3 EIR for this park. And the city counsel has -- just  
4 now, we have just declined to take input from Parks and  
5 Recreation members.

6 And I see the planning commission is going to  
7 be asked to vote to recommend one way or the other on  
8 this project, but the Parks and Recreation is not being  
9 asked to give a recommendation on the parks. So that's  
10 basically my input on the EIR. I think it absolutely  
11 has to consider turf, because turf is holding the ball  
12 game. And those lights are going to have a direct  
13 impact on the quality of that field.

14 So the other thing I want to say is that I'll  
15 go back again to something I have said before. We have  
16 city parks, and we have neighborhood parks in town. And  
17 Highlands is a neighborhood park. And I think we need  
18 to look much more closely at the sound impacts there,  
19 and I think the threshold needs to be lower there than  
20 it does in a city park. So that is also a concern I  
21 have with the way the EIR is set up. That's it, since  
22 I'm not commenting.

23 MR. LANGFORD: Okay. I'll make a brief  
24 comment. I'd like to echo what Sherry said in terms of  
25 the disconnect between this commission and city counsel.

C11-1  
cont.

C11-2

C12

C12-1

1 I think we have talked about this multiple times over  
2 the years in different -- with different members. It's  
3 just another band aid. I have seen band aid stuff for  
4 years and there's been no active attempt to define  
5 actual separate space.

6           So I agree with our last and first speaker that  
7 the focus needs to be there. So I want to challenge  
8 counsel to actually, you know, work to do something  
9 about that. We have talked about that multiple times  
10 through different directors and everything, and it  
11 hasn't -- that connection hasn't quite been made.

12           So I would like to publicly state I can see EIR  
13 stuff is just a band aid and doesn't really do anything.  
14 We should go for, you know, try to leverage it. I know  
15 space is short. I know that's hard to find. But it's  
16 at least worth exploring, and it's been helpful getting  
17 some of this background, which I wasn't around for, you  
18 know, back in 2000 and so forth.

19           But yeah. This is just band aid stuff to me.  
20 And I think shouldn't move forward, just for the record.

21           MS. TURNER: I agree with the fact we're not  
22 allowed to weigh in or everything else, and it's  
23 bypassing us. That's the whole purpose of this  
24 commission.

25           And also, you know, in my review of the EIR,

C12-1  
cont.

C13

C13-1

1 there's lots of inaccurate information in there. You  
2 know, even tonight, people mentioned practice until  
3 five. Practice doesn't end at five. We're out there  
4 until eight. So I mean, it's not giving people a  
5 realistic view of what's actually going on.

6           So if they're not getting the accurate  
7 information, you know, I saw when they were talking  
8 about the numbers that we currently only have one soccer  
9 tournament in August. That's not true. You know, there  
10 was another one about baseball. They had two listed  
11 there.

12           So I mean, there's a lot of stuff that's not  
13 correct in the EIR. So I don't think it's good to  
14 consider stuff that's not accurate when we're weighing  
15 in on this.

16           Those are my comments. I think the accuracy  
17 needs to be looked at, and I think we need to say.

18           MR. LANGFORD: Anything else or should we move  
19 on to the next agenda item?

20           MS. NEWBY: That's all.

21           MR. DEDO: Gus Dedo. One of the things that I  
22 remember is that the sound calculations -- and I may be  
23 off a little bit because, like I say, I wasn't prepared  
24 to talk about this because I thought we had a short  
25 period of time. The sound calculations were made in the

C13-1  
cont.

C8-6

1 afternoon, and I live in that area. In the afternoon,  
2 to be honest, who cares about the sound. Sound is not  
3 very much. Most people aren't home.

4           And there was no sound calculation at night.  
5 Night is when everyone is concerned who lives up there  
6 about the noise. And the other thing I found quite  
7 interesting is that it is average over 24 hours. So  
8 what this tells me if the park is hellaciously long and  
9 loud due to from seven to nine, they don't care.  
10 Because they average it over 24 hours.

11           Well, I am concerned about these short period  
12 of times. And I remember, from the best of my memory,  
13 they were talking about the parking lot. They were  
14 saying, well, yeah. There's going to be noise in the  
15 parking lot. People are going to be talking. They're  
16 going to be slamming doors, but we're going to average  
17 that sound over 24 hours. So over 24 hours is not a bad  
18 deal.

19           So I wanted to say that I really think  
20 calculations based on the 24-hour period and  
21 calculations that were done for this test in the  
22 afternoon are crazy.

23           Anyway, thank you again.

24           MR. LANGFORD: So I'll hand this back over to  
25 Sherry, starting with item number nine. If everybody

C8-6  
cont.



REPORTER'S TRANSCRIPT OF PROCEEDINGS 12-06-2017

1 else here, we're done with EIR stuff, the EIR topic for  
2 the night.

3 MS. SELWOOD: But you are absolutely welcome to  
4 stay.

5 (Whereupon, the hearing concluded at 8:36 p.m.)  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

R E P O R T E R ' S C E R T I F I C A T E

I, TAMMY MOON, CSR No. 13184, do hereby certify:

That I am a disinterested person herein; that the foregoing meeting was reported in shorthand by me, Tammy Moon, a Certified Shorthand Reporter, in the State of California, and thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for any of the parties in the meeting, or in any way interested in the outcome of the meeting.

IN WITNESS WHEREOF, I have hereunto set my hand  
December 21, 2017.



Tammy Moon, CSR No. 13184

## **Draft EIR Public Hearing**

December 6, 2017

### **C1 Peter McMahon**

- Response C1-1: In regards to the posting of the Draft EIR, see Response B1d-6.
- Response C1-2: In regards to the extension of time for Draft EIR review, see Response B26-1.
- Response C1-3: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response C1-4: Traffic and parking effects associated with the proposed project are evaluated in the Draft EIR in Section IV.B, Transportation and Circulation. See also Master Response 5, Master Response 6 and Response B23-1.
- Response C1-5: See Master Response 6 in regards to parking.
- Response C1-6: See Master Response 3 in regards to the Settlement Agreement.
- Response C1-7: See Response B17-2 in regards to a new community center.
- Response C1-8: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

### **C2 Anne Tang**

- Response C2-1: See Master Response 3 in regards to the Settlement Agreement. See Master Response 5 and Master Response 6 in regards to traffic and parking.
- Response C2-2: See Master Response 5 and Master Response 6 in regards to traffic and parking.
- Response C2-3: See Master Response 1 in regards to definition of the project evaluated in the Draft EIR and how the City uses the Mahady Report and in regards to installation of artificial turf. See Master Response 2 in regards to field usage associated with the project and City maintenance practices, see also Response B21-7.
- Response C2-4: See Responses C2-2 and C2-3.
- Response C2-5: Noise effects associated with the proposed project are evaluated in the Draft EIR in Section IV.C, Noise.
- Response C2-6: See Response C2-3.

### **C3 Bob Dehner**

- Response C3-1: See Response B21-1 and B21-2.
- Response C3-2: Alternatives to the project were identified and considered in Chapter V, Alternatives in the Draft EIR, see also Response B21-3.
- Response C3-3: See Response B21-4.
- Response C3-4: See Response B21-6.
- Response C3-5: See Response B21-7.
- Response C3-6: The comment is noted. See also Response B21-6.

### **C4 Jean Dehner**

- Response C4-1: See Response B17-2.
- Response C4-2: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

### **C5 Heidi Liebenguth**

- Response C5-1: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.
- Response C5-2: See Response B1f-2 regarding existing and projected use of the parks.
- Response C5-3: See Master Responses 5 and 6 regarding traffic and parking.
- Response C5-4: See Master Response 6 regarding parking and emergency access.
- Response C5-5: Traffic and parking effects associated with the proposed project at both parks are evaluated in the Draft EIR in Section IV.B, Transportation and Circulation. See also Master Response 5, Master Response 6.
- Response C5-6: See Response B1f-2 regarding existing and projected use of the parks. See Master Responses 5 and 6 regarding traffic and parking and safety.
- Response C5-7: The suburban character of the land uses surrounding the project sites are described in Chapter III, Project Description in the Draft EIR. As noted the undeveloped portion of Highlands Park is characterized by trees and shrubs. While the park is considered an open space there are no wild lands adjacent to or connected to either park. Both parks are surrounded by urban uses.

Response C5-8: See Response B20-1 regarding the projects effects on biological resources.

**C6 Richard Crone**

Response C6-1: See Master Response 1 in regards to definition and purpose of the project.

Response C6-2: See Response B20-1 1 regarding the projects effects on biological resources. The existing turf at Highlands Field at Highlands Park is part of the existing conditions of the project.

Response C6-3: See Response C6-1.

**C7 Filip Szymanski**

Response C7-1: The effects of the project on visual resources and the potential for light spillover and glare were evaluated in Section IV.A Visual Resources in the Draft EIR. The proposed project would have a less-than-significant impact associated with spillover light and glare from the new and improved LED lights.

Response C7-2: As discussed in the Draft EIR, the proposed project sites are located adjacent to residential neighborhoods where the primary sound sources in the area are the traffic on the local streets and the recreationalists at the parks. The potential noise impacts discussed in the Draft EIR determined that the proposed project would not have a significant increase in noise levels in the area at the same sensitive receptors. Additionally the proposed project would not exceed thresholds established by the General Plan for noise at nearby residential property lines for either project site. Therefore, implementation of the project would not result in significant increases in ambient noise levels. Please see Master Response 4 for a supplemental analysis of the Lmax and hourly Leq noise level impacts.

In addition, Tables 1 and 2 in Master Response 4 identify the existing evening (5:00 p.m. to 10:00 p.m.) hourly noise levels on weekdays and weekends at both project sites. As shown in Table 1, existing evening hourly noise levels at the closest receptor to Burton Park range from approximately 54.3 to 59.8 dBA Leq on weekdays and approximately 54.3 to 65.0 dBA Leq on weekends. As shown in Table 2, existing evening hourly noise levels at the closest receptor to Highlands Park range from approximately 46.6 to 60.8 dBA Leq on weekdays and approximately 44.8 to 47.9 dBA Leq on weekends. In addition, Appendix F of the Draft EIR contains the noise monitoring data, which includes the measured hourly noise levels collected during the 24-hour measurements.

Response C7-3: In regards to noise measurements, see Master Response 4.

Response C7-4: Traffic and parking effects associated with the proposed project are evaluated in the Draft EIR in Section IV.B, Transportation and Circulation. The noise evaluation considered noise associated with vehicles and spectators. See also Master Response 4.

Response C7-5: See Response B25-6.

Response C7-6: See Response B25-3 and Response B25-6.

### **C8 Gus Dedo**

Response C8-1: See Responses B1e-3 and B1e-4.

Response C8-2: B1d-4 and C8-1.

Response C8-3: Noise effects associated with the proposed project are evaluated in the Draft EIR in Section IV.C, Noise. See also Master Response 4.

Response C8-4: See Master Response 1 regarding the definition of the project, see also Master Response 3 regarding the Settlement Agreement restrictions at Highlands Park.

Response C8-5: See Response B22-6.

Response C8-6: See Master Response 4 regarding supplemental information for the noise analysis.

### **C9 Jeff Klein**

Response C9-1: This comment concerns the effects of the project on property values. CEQA does not require the review of economic effects related to a project or project alternatives, and that information does not need to be included in the EIR. No additional response is required.

Response C9-2: See Master Response 3 regarding the Settlement Agreement. See Master Response 6 regarding the parking analysis prepared for the project.

Response C9-3: See Master Response 3 regarding the Settlement Agreement.

### **C10 Karen Inolinari**

Response C10-1: See Responses B24-3 and B24-4.

Response C10-2: See Responses B24-3 and B24-4.

Response C10-3: See Response B24-1.

Response C10-4: See Response B24-2.

Response C10-5: See Master Response 1 in regards to definition of the project and the installation of artificial turf on grass fields.

Response C10-6: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

### **C11 Sherry Selwood**

Response C11-1: See Master Response 1 in regards to definition of the project and the installation of artificial turf on grass fields.

Response C11-2: As discussed in the Draft EIR, the proposed project sites are located adjacent to residential neighborhoods where the primary sound sources in the area are the traffic on the local streets and users and visitors at the parks. The potential noise impacts discussed in the Draft EIR determined that the proposed project would not have a significant increase in noise levels in the area. Additionally the proposed project would not exceed thresholds established by the General Plan for noise at nearby residential property lines for either project site. Therefore, implementation of the project would not result in significant increases in ambient noise levels. In addition, please see Master Response 4 for a supplemental analysis of the Lmax and hourly Leq noise level impacts based on the standards presented in Table 9-1, Non-Transportation Noise Standards of the City's General Plan Noise Element (Table IV.C-6 of the Draft EIR).

### **C12 Brad Langford**

Response C12-1: The comment is noted. The commenter does not question the contents or adequacy of the analysis contained in the Draft EIR. No additional response is required.

### **C13 Wendy Turner**

Response C13-1: See Response B1f-2 regarding the existing and project use of the fields.

## **D. ORGANIZATIONS**



Letter

D1

From: "Jason R. Flanders" <jrf@atalawgroup.com<mailto:jrf@atalawgroup.com>>  
Date: February 28, 2018 at 2:41:57 PM PST  
To: "KForouhi@cityofsancarlos.org<mailto:KForouhi@cityofsancarlos.org>"  
<KForouhi@cityofsancarlos.org<mailto:KForouhi@cityofsancarlos.org>>  
Subject: Comments to Burton/Highlands Park DEIR

Dear Mr. Forouhi, please find the attached comment letter being submitted today on behalf of Save San Carlos Parks.

Thank you for your assistance in this matter.

Regards,

Jason R. Flanders  
Aqua Terra Aeris Law Group  
(ATA Law Group)  
916-202-3018

www.atalawgroup.com<https://urldefense.proofpoint.com/v2/url?u=http-  
3A\_\_www.atalawgroup.com&d=DwMFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A\_CdpgnVfiiMM&r=fY2A-  
6GcSCyL\_iEhMyqvN19Pz2S4gaDBN0DSYCBcMxY&m=PU9UUoBz9jMzcEu-  
kZ5ALOin3RZ0J\_h6OguYcVuJl0I&s=pU5rdtGhcrBvLBOorLDWp7t4oAG1OkuIU06cSCXo6CjE&e=>

CONFIDENTIALITY NOTICE: This email and any attachments are privileged, including but not limited to attorney-client or attorney work-product privileged. The information is intended only for the use of the intended individual or entity, whether named properly above or not. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, distribution, or the taking of any action in reliance on the contents of this emailed information is strictly prohibited. If you have received this email in error, please immediately notify the sender by telephone or email to arrange for destruction of information and the return of the documents.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal

Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click here<[https://us2.proofpointessentials.com/index01.php?mod\\_id=11&mod\\_option=logitem&mail\\_id=1519857722-N3uYRbCW%2Bjms&r\\_address=kforouhi%40cityofsancarlos.org&report=1](https://us2.proofpointessentials.com/index01.php?mod_id=11&mod_option=logitem&mail_id=1519857722-N3uYRbCW%2Bjms&r_address=kforouhi%40cityofsancarlos.org&report=1)> to report this email as spam.



City of San Carlos  
Public Works Department  
Kaveh Forouhi, Senior Engineer  
600 Elm Street  
San Carlos, California 94070  
[KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org)  
*sent via electronic mail*

February 28, 2018

Re: Opposition to Highlands and Burton Park Project and EIR

Dear Mr. Forouhi:

Please accept these comments on behalf of our client, Save San Carlos Parks, in opposition to the proposed Project and inadequate Draft EIR. As the City is aware, Save San Carlos Parks is comprised of active and concerned members of the City of San Carlos, including residents in the vicinity of Highlands and Burton Parks, with an abiding commitment to the livability and shared use of the City’s common resources. While many members of Save San Carlos Parks will provide independent comments upon this DEIR, continuing through each planning and public review stage of this proposed Project, we provide this letter now to highlight a handful of key, initial concerns.

1

I. The Project and DEIR Impermissibly Piecemeal the Whole of the City’s Master Plan Project and Field Use Policy.

The DEIR is quite clear that the proposed Project is intended to implement the goals, policies, and practices set forth in the Master Plan and Field Use Policy. By and through the Master Plan, “[t]he City has documented that there is an insufficient number of fields to meet current demand, and that each year the Parks & Recreation Department sees an increase in field time requests from both traditional sports (e.g., soccer, baseball and softball) and non-traditional sports (e.g., lacrosse, field hockey and Pop Warner football teams).” (DEIR at 16.) In turn, the DEIR states that the primary Project objective is to “Allow for additional hours of play at Burton Park on Flanagan Field and Highlands Park on Stadium Field and Highlands Field to assist in meeting the unmet demand for field space.” (DEIR at 23 [emphasis added].) This Project, therefore, is admittedly only one piece of a larger overall effort by the City to manage its recreational spaces. This Project should not be segmented from consideration of the whole of the overarching City project to manage its parks to meet its City’s recreational demands. Without considering the effects of the discretionary planning decisions the City seeks to implement by and through the Master Plan and Field Use Policy, this DEIR illegally segments and piecemeals implementation of the City’s overarching Master Plan and Field Use Policy. (See, e.g., *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 370 [“The requirements of CEQA cannot be avoided by piecemeal review which results from ‘chopping a large project into many little ones — each with a minimal potential impact on the environment — which cumulatively may have disastrous consequences.’”]) Master plans and city policies are well-documented to require CEQA review. (See, e.g., *Vineyard Area Citizens for Responsible Growth*

2

Save San Carlos Parks  
 Highland/Burton Park DEIR  
 February 28, 2018  
 Page 2 of 5



*v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 440-441 (requiring development project to include CEQA review of master plan from which it was born, or await full master plan CEQA review); *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 792 (considering airport master plan EIR, and addenda thereto); *California Native Plant Society v. City of Santa Cruz*, (2009) 177 Cal. App. 4th 957, 967 (challenge to City's trail system master plan EIR). Thus, the case law makes clear that implementation of a master plan and overarching city policy should be deemed an overarching project under CEQA, and the City may not now piecemeal review of the whole of that project by and through this DEIR.

In addition to the proposed Project's stated purpose, the DEIR includes numerous indications that the proposed Project unquestionably implements the overarching Master Plan and Field Use Policy. For example, the DEIR's impact assessment states that the "Master Plan for Parks, Open Space, Buildings and Other Recreational Facilities; Field Use and Agronomic Specifications Report; and Field Use Policy contain requirements" for the proposed Project. (DEIR at 57[emphasis added].) Of course, as a matter of law, these various reports and plans do not impose *legal* requirements upon the proposed Project. Instead, these plans, reports, and policies only impose requirements on the proposed Project to the extent that the City's overarching project purpose requires it to implement these plans, policies, and reports, by and through the proposed Project. Again, however, these things may not be implemented on a piecemealed basis, lacking any overarching CEQA review.

As one example, and as discussed further, below, conversion of Flanagan, Madsen or Stadium Fields to artificial turf is a reasonably foreseeable consequence of increasing usage on these fields by adding night lighting. Indeed, the DEIR states that such is the recommendation of the City's Master Plan:

"The City does not currently have and is unlikely to purchase in the future, available suitable land on which to build new fields, and therefore continues to look for ways to increase the use of existing fields. The Mahady report recommended converting natural turf sports fields to artificial turf to improve the wear tolerance of existing sports fields, and that has been done at Highlands Field. The reader should note that the project evaluated in this Draft EIR and as defined by the City of San Carlos as Lead Agency, does not include the conversion of Flanagan, Madsen or Stadium Fields to artificial turf.

The Master Plan noted the recommendation of the Mahady Report regarding artificial turf, and also recommended the addition of night lighting to unlit fields to provide for an increased number of hours of play per year to maximize the utility of existing fields. The proposed project (providing new lights at Flanagan Field and Stadium Field and upgrading existing lights at Madsen Field and Highlands Field to improve field conditions and reduce energy use and light spillover and glare) evaluated in this Draft EIR addresses the Master Plan recommendation to provide night lighting at unlit fields." (DEIR at 21.)

2  
 cont.

3



“To meet the project objectives of allowing additional hours of field use and maximize use of existing City fields, this alternative assumes that the City would convert natural grass fields to artificial turf at Burton Park and Stadium Field at Highlands Park and/or other City fields. While this alternative would allow more time that the fields were available for use, as stated in Chapter III, Project Description, the City has determined that there is no funding for implementation of this alternative.” (DEIR at 133.)

3  
cont.

These passages make perfectly clear that adding night lights now is but once piece of the Master Plan being implemented now, and that the City fully intends, and, according to its Master Plan, needs to convert these fields to artificial turf to meet City recreational demands, as soon as funding becomes available. The proposed Project therefore impermissibly piecemeals implementation and CEQA review of the City’s Master Plan project.

As another example, the DEIR states that the Project must adhere to the “City’s Field Use Policy,” which, among other things, “prioritizes” groups and event types for recreational park usage. (DEIR at 16.) No CEQA document has evaluated whether such usage prioritization has direct or indirect consequences. For instance, is the City prioritizing uses more likely to result in the need to install artificial turf? Do some uses have different noise or traffic profiles than others? Such are the effects of the Use Policy that have gone unanalyzed under CEQA, but which are being implemented in a piecemeal fashion by and through this proposed Project, and any other separately proposed projects.

4

The failure of the DEIR to even include among its appendices the Master Plan render it impossible to evaluate the whole of the proposed Project. To enable a complete review of the whole of the Project at issue, the DEIR must be revised and recirculated to consider the effects of the Master Plan and Field Use Policy that the proposed Project begins to implement.

5

II. The DEIR Impermissibly Conflates the Proposed Projects at Burton and Highlands Parks.

As discussed, above, the only logical rationale for the City to have included these independent projects into the same environmental review document as though they were a single project is because, in fact, the projects should be taken together along with all other plans for implementing the City’s Master Plan and Use Policy. Unfortunately, this muddles the DEIR’s consideration of the proposed project at Burton Park separately from consideration of the proposed project at Highlands Park. For instance, it is unclear the extent to which either of these project components independently meets the project objectives. If decoupled, how could the funding for project alternatives change?

6

III. The Use of Artificial Turf is a Reasonably Foreseeable Effect of the Project that Must be Evaluated in the EIR.

Members of the City’s Parks, Recreation and Culture Commission have been quoted as saying that lighting may lead to the need for artificial turf and past precedent exists for lighting

7



resulting in a maintenance need for artificial turf on lighted fields. As such, the conversion of Burton and Highlands Park fields to lighted fields has the reasonably foreseeable consequence of resulting in a conversion to artificial turf. (*See, El Dorado Union High Sch. Dist. v. City of Placerville*, (1983) 144 Cal.App.3d 123 [increased school enrollment foreseeably effects need for new school, which must be considered in EIR].) The DEIR simply fails to discuss, at all, the City’s maintenance program, including any natural field turf specifications, or tested hours of use intensity, to enable an understanding of how and whether the natural grass fields may withstand the increased usage as a result of the proposed Project. Given the City’s decisions to convert other high use fields to artificial turf in the past, this information should be readily available. How does the City presently determine whether a field’s conditions are suitable for continued or increased use? How often does the City make repairs to existing natural grass fields, or replace portions of sod? What is the present and expected budget for these activities under the proposed Project? The City has a reasonable duty to investigate such effects and fully disclose the scope of impacts of its proposed Project. (*See, Sierra Club v. Bd. of Forestry*, (1992) 20 Cal.App.4th 1162, 1177 [“impacts on wildlife will trigger a duty to investigate further when a fair argument may be made on the basis of substantial evidence that a potentially substantial, adverse change in the environment may occur as a result of a proposed activity.”]; CEQA Guidelines §§ 15142, 15148, 15150(a),(e), 15169.))

7  
 cont.

The reasonably foreseeable conversion of these newly lighted fields to artificial turf should be discussed in this EIR. (CEQA Guidelines § 15064(d)(2)-(3), 15358(a)(2), 15126.2(a), Concerningly, the San Mateo Civil Grand Jury has issued a report raising concerns about the City’s use of synthetic materials at public parks that may contain known carcinogens and toxicants. “An EIR is an environmental alarm bell whose purpose it is to alert the public and its responsible officials to environmental changes . . . .” (*Laurel Heights Improv. Assn. v. Regents of the Univ. of Cal.* (1998) 47 Cal.3d 376, 392 [quotes omitted].) The DEIR’s failure to disclose these potentially significant environmental and public health effects thus fails to fulfill CEQA’s essential purpose.

#### IV. Mitigation Measures Designed to Reduce Noise Impacts Appear to be Ineffective.

DEIR mitigation measure NOI-1 fails to demonstrate that noise impacts will be reduced to a less than significant level. The DEIR states that, “[b]ased on General Plan Action-I-1.4, a significant impact would occur if the proposed project would: cause the Ldn at noise-sensitive uses to increase by 3 dB or more and exceed the “normally acceptable” level; cause the Ldn at noise-sensitive uses to increase 5 dB or more and remain “normally acceptable”; or cause noise levels to exceed the limits in Table IV.C-5.” (DEIR at 119.) Following these thresholds of significance, the DEIR concludes that “Noise from construction activities at the Burton Park project site would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.” (DEIR at 127.) In turn, NOI-1 proposes several common sense and simple operational measures to help reduce construction noise impacts upon neighborhood receptors. However, the DEIR never demonstrates how or whether these measures will actually reduce decibel levels to the point that they would no longer be significant pursuant to the thresholds, above. The DEIR therefore fails to support its

8

Save San Carlos Parks  
Highland/Burton Park DEIR  
February 28, 2018  
Page 5 of 5



conclusion that MM NOI-1 would reduce construction noise impacts to a less than significant level.

8  
cont.

V. The DEIR's Analysis of Noise Effects at Stadium Fails to Account for Existing Conditions.

The DEIR should account for the unique shape and resulting acoustic dynamics at Stadium Field. As the DEIR aesthetics discussion reveals, hillsides partially encircle Stadium Field (DEIR Figure IV.A-4d), yet these contours are not disclosed as pertains to the baseline environmental conditions used to assess noise impacts; nor is there any evidence that the DEIR accounted for the specific and amplified trajectories that additional noise at Stadium Field would have as a result of the proposed Project. (See DEIR at 120-130.) Testimony from local residents indicates a more dynamic noise profile than the generic levels provided by the DEIR. As a result, the DEIR fails to accurately describe the existing conditions of the proposed Project, and fails to incorporate those conditions into its assessment of potentially significant noise effects.

9

VI. Conclusion.

Thank you for your careful consideration of these comments. As will be made clear by additional comments submitted by Save San Carlos Parks and its supporters, the community opposition to this proposed Project is significant. The City should not proceed to approve the proposed Project based on the deficient DEIR presently provided.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Flanders', written over a horizontal line.

Jason Flanders  
ATA Law Group  
Counsel for Save San Carlos Parks

## COMMENTER D1

Save San Carlos Parks  
Aqua Terra Aeris Law Group  
February 28, 2018

- Response D1-1: This comment is introductory in nature. See Responses D1-2 through D1-9.
- Response D1-2: See Master Response 1 in regards to definition of the proposed project and the inclusion and evaluation of the Master Plan and Field Use Policy as part of the project in the Draft EIR.
- Response D1-3: See Master Response 1 in regards to definition of the proposed project and installation of turf.
- Response D1-4: The comment suggests that the project should include an analysis of the City's Field Use Policy and the City's process for prioritizing use of the City's sports fields, as described on page 16 of the Draft EIR. This comment concerns ongoing City policies and processes and does not related to the adequacy of the information or analysis within the Draft EIR. No further response is required. See also Master Response 1.
- Response D1-5: The Master Plan was included in the Administrative Record for the EIR and is available on the City's website.
- Response D1-6: As stated in Master Response 1, the City decided to evaluate the proposed lighting projects at both parks in one EIR because there were cost savings to do both at the same time and economies of scale in the CEQA evaluation and design of the projects. Additionally, if there were separate impacts associated with each park, they were identified and mitigated in the Draft EIR (e.g., Impact TRA-1 which only relates to project-generated traffic at Burton Park.)
- Response D1-7: See Master Response 1 regarding the installation of turf and Master Response 2 regarding ongoing City maintenance practices for grass fields.
- Response D1-8: As discussed on pages 125 through 128 of the Draft EIR, construction of the proposed project would temporarily raise ambient noise levels in the vicinity of the project during the construction period. As discussed on pages 112 and 113 of the Draft EIR, construction noise is exempt when activities occur between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday and between the hours of 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays. Construction activity is not allowed on the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day. In addition, the Municipal Code requires that all gasoline-powered construction equipment shall be equipped with an operating muffler or baffling system as

originally provided by the manufacturer, and no modification to these systems is permitted. In addition, as identified in the Draft EIR, Mitigation Measure NOI-1 would limit construction activities to the less noise-sensitive periods of the day and would reduce potential construction period noise impacts at nearby sensitive receptors to less-than-significant levels.

In addition, as discussed on page 127 of the Draft EIR, the closest sensitive receptors to Burton Park include the single-family residences located approximately 95 feet north of the project site along Woodland Avenue. As identified in the Draft EIR, at 95 feet, the closest off-site sensitive receptors may be subject to short-term construction noise reaching 80 dBA Lmax when construction is occurring at the project site boundary. Based on this maximum noise level and assuming a crane and a truck would be operating simultaneously, construction of the proposed Burton Park project would result in noise levels of approximately 73 dBA Leq at the nearest sensitive receptor. Construction noise is exempt from the City's noise performance standards. In addition, construction noise would be temporary and construction equipment would operate at various locations within the Burton Park project site and would only generate this maximum noise level when operations occur at the boundary of the project site closest to the receptor.

As discussed on page 128 of the Draft EIR, the closest sensitive receptors to Highlands Park include the single-family residences located approximately 70 feet north of the project site along Elston Court. As identified in the Draft EIR, at 70 feet, the closest off-site sensitive receptors may be subject to short-term construction noise reaching 83 dBA Lmax when construction is occurring at the project site boundary. Based on this maximum noise level and assuming a crane and truck would be operating simultaneously, construction of the proposed Highlands Park project would result in noise levels of approximately 76 dBA Leq at the nearest sensitive receptor. Construction noise exempt from the City's noise performance standards. In addition, construction noise would be temporary and construction equipment would operate at various locations within the Highlands Park project site and would only generate this maximum noise level when operations occur at the boundary of the project site closest to the receptor.

The mitigation measures outlined in NOI-1 of the Draft EIR would require the project construction activities comply with City noise ordinance standards, and minimize noise levels to surrounding residents. The designated noise disturbance coordinator would ensure any noise complaints associated with construction are addressed.

Response D1-9: In regards to the potential for an amphitheater effect from noise associated with the proposed project, see Master Response 4.



Letter

D2

---

**From:** Peter McMahon [mailto:peter@mllp.com]  
**Sent:** Wednesday, February 28, 2018 2:56 PM  
**To:** Kaveh Forouhi <KForouhi@cityofsancarlos.org>  
**Cc:** Amy Newby <ANewby@cityofsancarlos.org>  
**Subject:** Comments On Draft EIR Re: Highlands Stadium Field  
**Importance:** High

Dear Mr. Forouhi,

Attached please find a Second Letter prepared and submitted by Matthew Jones, who is a 15-year CEQA professional. Through me, he is submitting his comprehensive letter on behalf of Save San Carlos Parks.

If you have any questions or comments, please do not hesitate to contact me.

Regards,

Peter McMahon  
16 Elston Court

Matthew Jones  
Shenton Park, Western Australia  
6008

January 23, 2018

Save San Carlos Parks

**Subject: Third Party Review of Burton and Highlands Parks Project Environmental Impact Report (State Clearinghouse No. 2017052066)**

As the request of the community group "Save San Carlos Parks" (SSCP), I have conducted a third-party review of the "Burton and Highlands Parks Project Environmental Impact Report" (State Clearinghouse No. 2017052066) prepared by the consultancy LSA Associates.

I am a 15-year CEQA professional who has worked for ICF International (formerly Jones & Stokes Associates), ERM, WSP, and TRC as a Principal and senior Project Director. I now reside in Perth, Western Australia, where I continue to work as a consultant in Environmental Impact Assessment and environmental compliance. My professional resume follows the technical attachments to this memorandum.

This review follows the general structure of the Draft EIR to identify areas of concern where additional work may be required for the City of San Carlos to fully meet its obligations under CEQA and provide a Final EIR that allows for both the City and the community to understand the impacts of the project fully before making an approval decision on the Project. Overall, the document is of high quality and LSA Associates (and the Principal in Charge, Judith Malamut) are highly regarded, experienced CEQA professionals with extensive experience in municipal projects and community project EIRs. The firm and Ms. Malamut are eminently qualified to prepare an EIR. There are, however, some deficiencies and omissions from the Draft EIR that should be remedied.

1

## PROPOSED PROJECT

The Proposed Project and scope of the EIR has been focused from an earlier Initial Study prepared for the Proposed Project and contains two areas of note and potential concern for SSCP. Both comments discussed below are noted as "Potential Areas of Controversy", but are not meaningfully addressed by the Draft EIR.

First and foremost, in addition to lighting and facility use changes, the EIR evaluates "*changes in use of the fields at Highlands Park to make field use consistent with the rules governing all other City fields. Changes in use would alter some of the operational restrictions within the 2010 Settlement Agreement between the City of San Carlos and Save San Carlos Parks (SSCP) regarding the use of Highlands*". This change is, consistent with the terms of the 2010 Settlement Agreement, intended to resolve issues at Highlands Park and bring into effect a consistent Park Use policy. The action taken by the City though appears to simply draw Highlands back into line with old policy without implementing a new holistic and consistent use policy.

2

More importantly, changes to the Settlement Agreement include language beyond what is necessary. The proposed changes in Appendix C are a significant change to implications of settlement agreement, which the settlement does appear to allow, but may be of concern to SSCP and may not resolve the issues that caused SSCP to file suit. Notably, one of the "project" level revisions to the settlement in appendix c is:

3

"The Agreement specifies that the City may make changes in the restrictions contained in the Agreement in the future, subject to a public process, but without any amendingment to the Agreement."

3<sup>rd</sup> Party Review - Burton and Highlands Parks Project EIR  
(State Clearinghouse No. 2017052066)

This statement is irrelevant to the proposed use changes described in the EIR Project Description and functionally cancels the settlement agreement applicability moving forward. While the City, based on the EIR, appears to see this change as the expected and legal resolution of the settlement agreement, SSCP should be aware of the language and fully understand the loss of rights from the Settlement Agreement if the change is approved.

**3**  
**cont.**

The second notable concern in the Proposed Project is that the potential addition of artificial turf to fields resulting from the expansion of use of the fields due to lighting. While I have not attended Public Meetings during the process, my understanding from SSCP is that several members of the City's Parks, Recreation and Culture Commission have been quoted as saying that lighting may lead to the need for artificial turf and past precedent exists for lighting resulting in a maintenance need for artificial turf on lighted fields. As such, the conversion of Burton and Highlands Park fields to lighted fields has the reasonably foreseeable consequence of resulting in a conversion to artificial turf. At a minimum, past precedent suggests that this reasonably foreseeable Project may be a cumulative impact that needs to be analyzed under CEQA. More likely, the proposed conversion to turf should be looked at as an interrelated action. This would allow the community to understand the whole of the likely action to be taken, but would also ultimately provide the City with CEQA approval for a likely future action without the need for another EIR (which, given historic controversy regarding turf in the City of San Carlos, would likely be necessary).

**4**

**EXISTING VERSUS PROPOSED USE.**

One of the primary metrics outlined in Tables III-1 and III-2 is days per month events occur, which shows no to minimal change and consumes much of the visual space in the tables. However, the number of participants and spectators increase significantly through the addition of events into evenings and the ability to see this comparison is visually demoted within the format of the tables.

The number of days of use is a disingenuous comparison metric showing approximately a 25% increase. A better comparison is participant and spectator usage, which in most cases is a 3x to 5x increase, with overall use more than doubling at Burton. Comparison of net increase in visitors to the site (participants and spectators) using a reasonable worst-case scenario (i.e. the high use number provided in the EIR) creates a different perspective on the use change, with the data presentation being very important. As the visitor use numbers also become the basis for analyzing traffic impacts associated with the Project, these numbers should be better identified in the EIR.

**5**

<b>Burton Park</b>	<b>Existing</b>			<b>Proposed</b>			
	<b>Total # of Days Per Year</b>	<b>Apx. # of Participants</b>	<b>Apx. # of Spectators</b>	<b>Total # of Days Per Year</b>	<b>Total New # of Participants</b>	<b>Total New # of Spectators</b>	<b>% Change of use (Spectators plus Participant)</b>
<b>Type of Use or Event</b>							
Soccer Practices and Games (weekday)	88	24	10	88	48	40	260%
Soccer Practices and Games (weekend)	44	24	20	56	48	40	200%
Soccer Tournament (weekend)	4	24	20	4	48	40	200%
Youth Softball Practices and Games (weekday)	133	24	10	165	48	40	260%

3<sup>rd</sup> Party Review - Burton and Highlands Parks Project EIR  
(State Clearinghouse No. 2017052066)

Youth Softball Practices and Games (weekend)	32	24	10	32	48	40	260%
Youth Softball Tournament (weekend)	2	30	20	2	120	80	400%
Adult Softball (weekday)	0	25	7	44	75	21	300%
Camp Uses (weekday)	45	45	0	45	0	0	0%
<b>Total</b>	<b>348</b>	<b>220</b>	<b>97</b>	<b>436</b>	<b>435</b>	<b>301</b>	<b>230%</b>

Highlands Park presents similar comparison showing no increase in days of use, but a significant increase in usage. Ultimate translation of this data in the impact analysis shows a lack of significance related to temporal nature of impacts, but potentially significant change in intensity of impacts associated with events days.

Highlands Park	Existing			Proposed			
	Total # of Days Per Year Events Occur	Apx. # of Participants Per Event	Apx. # of Spectators Per Event	Total # of Days Per Year Events Occur	Total New # of Participants	Total New # of Spectators Per Event	% Change of use (Spectators plus Participant)
<b>Type of Use or Event</b>							
Soccer Practices and Games (weekday)	170	24	10	170	72	30	300%
Soccer Practices and Games (weekend)	46	24	20	46	48	40	200%
Soccer Tournament (weekend)	4	24	40	4	48	80	200%
Youth Softball Practices and Games (weekday)	112	25	15	112	50	30	200%
Youth Softball Practices and Games (weekend)	38	25	25	38	50	50	200%
Youth Softball Tournament (weekend)	6	50	40	6	50	40	100%
Adult Softball (weekday)	2	50	40	2	50	40	100%
Camp Uses (weekday)	45	45	0	45	0	0	0%
<b>Total</b>	<b>423</b>	<b>267</b>	<b>190</b>	<b>423</b>	<b>368</b>	<b>310</b>	<b>150%</b>

5  
cont.

For both facilities, the intensity of perceived impact related to sensitive receptors would increase across the whole of the week, effecting both weekdays and weekends. Importantly, light noise that is introduced translates into impacts on sensitive residential receptors that now extends into evenings at both locations and brings potential traffic impacts into residential areas during evening peak hour.

3<sup>rd</sup> Party Review - Burton and Highlands Parks Project EIR  
(State Clearinghouse No. 2017052066)

## ANALYSIS

### VISUAL RESOURCES

The visual resource analysis provides a good setting of appropriate thresholds where none existed previously for the City. Overall, the metrics are well described and while receptors perception of impacts, especially those in close proximity are likely to perceive significance, impacts are well described from a CEQA viewpoint and conclusions are legally defensible.

6

### TRANSPORTATION

The ability to compare existing conditions to the proposed project is difficult for lay reader given the distinct separation of tables between existing conditions and the impact analysis. While legally sufficient, data could be better presented for the community and a non-technical readership.

Trip generation numbers for the proposed users is consistent and appropriate for described actual increase in users. Parking, while not required under CEQA, is well described and a functionally informative disclosure. SSCP has expressed concerns regarding safety and access of emergency vehicles to Highlands Park via the north entrance at Elston Court, which was screened out by the Initial Study. From a CEQA analysis perspective, this impact would be hard to define and is unlikely to reduce emergency response times such that significant impacts would occur, but is a valid community concern that should be addressed meaningfully by the City through better parking controls and functional enforcement of those controls on parking on Elston Court.

7

### NOISE

At Highlands Park, an increase in noise levels of 2.6 dBA L<sub>dn</sub> on weekdays and 2.4 dBA L<sub>dn</sub> on weekends, versus City's criteria for noise-level increases of 3 dBA for residential receptors was observed (Threshold to require noise technical review and measures). L<sub>dn</sub> is averaged across 24-hour period, which is standard practice, but does not do a sufficient job of appropriately measuring the impact consistent with the change in use. L<sub>max</sub>, also used by the City as a noise threshold, is presented for existing conditions and construction, but is not modeled for the project operation and would be informative. Weighted L<sub>dn</sub> at Burton appears to be well within normal range, but Highlands is close enough to the L<sub>dn</sub> threshold that additional discussion and disclosure would have been beneficial and should have been included, particularly related to night time conditions.

The residential L<sub>max</sub> threshold for the City of San Carlos at nighttime is 60 dba exterior and 45 dba interior, excluding traffic noise, as per the General Plan Noise Element and the City's Noise Ordinance, included in Attachment A. This threshold is not addressed at all for operations and would be a valid and useful disclosure to the community. The project creates nighttime uses in a residential area where none existed previously.

8

The use of L<sub>dn</sub> is appropriate, but no baseline night time measurements are taken, no review of anticipated operation L<sub>max</sub> at the nearest receptor has been included, and the operational analysis is cursory at best. However, proximate construction noise impacts are better analyzed and measures are proposed. The lack of night time analysis, baseline measurements, and comparison to existing City thresholds for noise are glaringly missing. L<sub>max</sub> thresholds are supposed to be used to guide "development decisions" per the general plan and are missing here.

The noise analysis would appear to be fundamentally incomplete and needs further review under CEQA. While the L<sub>dn</sub> threshold for a noise study has not been exceeded for the proposal, no analysis of residential noise limits for the project has been undertaken against Table 18.21.050-A in the zoning code. This is a concerning and fundamental gap in the analysis. L<sub>dn</sub> is more appropriate for a commercial development project with new impacts spread across the day, but L<sub>max</sub> provides an important perspective for a distinct event driven program with defined peaks. As this project adds only night time use to an existing day use facility, the impact analysis should better address the temporal nexus to the potential impact.

3<sup>rd</sup> Party Review - Burton and Highlands Parks Project EIR  
(State Clearinghouse No. 2017052066)

## CONCLUSION

Based on my review of the document, there remain gaps in the analysis that would be beneficial for SSCP and community decision makers to have before rendering a decision on the project. The lack of better night time analysis of noise and comparison to existing City night time noise limits for sensitive receptors is a notable omission that should be remedied. Additionally, SSCP should endeavor to fully understand the resolution of the settlement agreement and confirm that the resolution meets SSCP's needs before forgoing future rights under the settlement.

9

Please do not hesitate to contact me if you have additional questions or needs regarding this review

Yours sincerely,



Matthew Jones

<https://www.linkedin.com/in/matthew-steven-jones/>

**ATTACHMENT A**

NOISE ELEMENT

9





# 9 NOISE ELEMENT



The purpose of the Noise Element is to identify sources of noise in San Carlos and to define strategies for reducing the negative impact of noise to the community. Noise is an environmental pollutant that can threaten the quality of life and human health by causing annoyance or disrupting sleep and everyday activities. With the presence of significant noise sources in San Carlos, including Highway 101, El Camino Real, the Caltrain corridor and the San Carlos Airport, reducing the negative impact of unwanted and excessive noise is an important aspect of maintaining the city's high quality of life and community character.

<b>Contents</b>
226 Introduction
227 Background Information
Noise Terminology
Noise Control Ordinance 1086
Land Use Compatibility
Existing Noise
Future Noise
239 Goals, Policies and Actions

A photograph of an airport tarmac with several aircraft parked at gates.

## Introduction

State law requires that the General Plan include a Noise Element, which is to be prepared according to guidelines adopted by the California Office of Noise Control (ONC). In accordance with State law requirements, this Noise Element provides a systematic approach to limiting community exposure to noise, including the following components:

- Quantitative analysis, based on noise measurements and modeling of major existing and future noise sources in the community, including both mobile and stationary sources;
- Mapping of generalized noise level contours to be used as a basis for land use decision-making; and



contours for current and projected levels of activity within the community. The noise exposure information developed for the Noise Element is incorporated into the General Plan to serve as a basis for achieving land use compatibility with respect to noise. Noise exposure information is also used to provide baseline levels and noise source identification for use in the development and enforcement of a local noise control ordinance and for ensuring compliance with the State's noise insulation standards, which are discussed in more detail below.

### Noise Terminology

The discussion of noise requires the use of a number of technical terms. Some of the key noise-related terms used in this Element include:

- **Decibel (dB).** A decibel is a unit of measurement which indicates the relative amplitude of a sound. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. Each 10 decibel increase in sound level is per-

ceived as approximately a doubling of loudness over a fairly wide range of intensities.

- **A-weighted sound level (dBA).** The A-weighted sound level is the most common method to characterize sound in California. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. All sound levels in this chapter are A-weighted, unless reported otherwise.
- **Energy-equivalent sound/noise level ( $L_{eq}$ ).**  $L_{eq}$  describes the average level that has the same acoustical energy as the summation of all the time-varying events. This descriptor is useful because sound levels can vary markedly over a short period of time. The most common averaging period for  $L_{eq}$  is hourly, but it can be of any duration.
- **Day/night average sound level ( $L_{dn}$ ).** Since the sensitivity to noise increases during the evening and at night, 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events.  $L_{dn}$  is a measure of the cumulative noise exposure in a community, with a 10 dB addition to nocturnal (10:00



contours for current and projected levels of activity within the community. The noise exposure information developed for the Noise Element is incorporated into the General Plan to serve as a basis for achieving land use compatibility with respect to noise. Noise exposure information is also used to provide baseline levels and noise source identification for use in the development and enforcement of a local noise control ordinance and for ensuring compliance with the State's noise insulation standards, which are discussed in more detail below.

### Noise Terminology

The discussion of noise requires the use of a number of technical terms. Some of the key noise-related terms used in this Element include:

- **Decibel (dB).** A decibel is a unit of measurement which indicates the relative amplitude of a sound. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. Each 10 decibel increase in sound level is per-

ceived as approximately a doubling of loudness over a fairly wide range of intensities.

- **A-weighted sound level (dBA).** The A-weighted sound level is the most common method to characterize sound in California. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. All sound levels in this chapter are A-weighted, unless reported otherwise.
- **Energy-equivalent sound/noise level ( $L_{eq}$ ).**  $L_{eq}$  describes the average level that has the same acoustical energy as the summation of all the time-varying events. This descriptor is useful because sound levels can vary markedly over a short period of time. The most common averaging period for  $L_{eq}$  is hourly, but it can be of any duration.
- **Day/night average sound level ( $L_{dn}$ ).** Since the sensitivity to noise increases during the evening and at night, 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events.  $L_{dn}$  is a measure of the cumulative noise exposure in a community, with a 10 dB addition to nocturnal (10:00



p.m. to 7:00 a.m.) noise levels. This is the measurement that the City of San Carlos normally uses in noise evaluations and analysis.

- **Community Noise Equivalent Level (CNEL).** CNEL is the energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. and 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m.

**Noise Control Ordinance 1086**

The City of San Carlos’ noise ordinance is intended to protect residents and visitors to San Carlos from unreasonable noise associated with machines, persons, or devices. It specifies that unreasonable noise is that which exceeds 10 dBA above local ambient noise levels. Noise levels are measured at a distance of 49 feet from the property lines of either public or private property. Some noise sources are exempt from these regulations, including transportation, construction, home workshops or gardening tools and solid waste pick-up. Violations of the specified noise levels are monitored by the San Carlos Police Department and are considered misdemeanors.

**Land Use Compatibility**

Land uses deemed as noise sensitive by the State of California include schools, hospitals, rest homes, long-term care and mental care facilities. Many jurisdictions consider residential uses particularly noise sensitive because families and individuals expect to use time in the home for rest and relaxation and noise can interfere with these activities. Some variability in standards for noise sensitivity may apply to different densities of residential development; single-family uses are frequently considered the most sensitive. Jurisdictions may identify other uses as noise sensitive such as churches, libraries, day care centers and parks.

Land uses that are relatively insensitive to noise include some office, commercial and retail developments. There is a range of insensitive noise receptors which generate significant noise levels or where human occupancy is typically low. Examples of insensitive uses include industrial and manufacturing uses, utilities, agriculture, vacant land, parking lots and transit terminals.

To assist with evaluating the compatibility of land uses with various noise levels, the California General Plan



Guidelines compare the compatibility of noise levels with various land uses. Figure 9-1 summarizes the Guidelines' recommendations.

Research determined how much noise is acceptable for different land uses. In the mid-1970s, the Environmental Protection Agency concluded that a noise level of 55 dBA  $L_{dn}$  (including a 5 dBA margin of safety) would have "no impact" on a residence. The State of California built upon this information and established guidelines suggesting 60 dBA  $L_{dn}$  as an upper limit for acceptable environmental noise in a residential setting. Certain land uses are sensitive to noise outdoors and exterior noise thresholds are appropriate.

Other land uses are only sensitive to noise indoors (e.g. professional office spaces, high-density housing in a downtown area).

One of the requirements of a Noise Element is to facilitate the noise insulation standards contained in the State Building Code that are applicable to new multi-family housing development. Where the exterior noise exposure level is 60 dBA  $L_{dn}$  or greater, the residential building must attenuate the interior noise level to 45

dBA  $L_{dn}$  or less in residential living areas. The intent of the Noise and Land Use Compatibility Guidelines is to achieve an interior noise level of 45 dBA  $L_{dn}$  or less in all new residential housing. Three acceptability categories are identified: normally acceptable, conditionally acceptable and unacceptable. In the normally acceptable category, a use would be acceptable without additional mitigation measures. In the conditionally acceptable category, the use would be acceptable with the application of mitigation measures. In the unacceptable category, the use may be unacceptable even after the application of available mitigation measures.




#### *Existing Noise*

A noise study was completed as part of the General Plan update and included noise measurements along major roadways. The major noise sources in San Carlos are vehicular traffic on major roadways, railroad operations along the Caltrain corridor and the San Carlos Airport. Table 9-2 details the current traffic noise levels for major roadways in San Carlos.

**FIGURE 9-1 LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENT**

Land Use Category	Exterior Noise Exposure ( $L_{dn}$ )					
	55	60	65	70	75	80
Single-Family Residential						
Multi-Family Residential, Hotels and Motels		a				
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds						
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches						
Office Buildings, Business, Commercial and Professional						
Auditoriums, Concert Halls, Amphitheaters						

<sup>a</sup> See Policy NOI-1.5.

-  **NORMALLY ACCEPTABLE.** Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements.
-  **CONDITIONALLY ACCEPTABLE.** Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.
-  **UNACCEPTABLE.** New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

# 9 NOISE ELEMENT



**TABLE 9-1 NON-TRANSPORTATION NOISE STANDARDS**

Land Use Receiving the Noise	Hourly Noise-Level		Exterior Noise-Level Standard In Any Hour (dBA)			Interior Noise-Level Standard In Any Hour (dBA)		
	Descriptor	Noise-Level	Daytime (7am-10pm)	Nighttime (10pm-7am)	Daytime (7am-10pm)	Nighttime (10pm-7am)	Daytime (7am-10pm)	Nighttime (10pm-7am)
Residential	L <sub>90</sub>		55	45	40	30		
	L <sub>max</sub>		70	60	55	45		
Medical, convalescent	L <sub>90</sub>		55	45	45	35		
	L <sub>max</sub>		70	60	55	45		
Theater, auditorium	L <sub>90</sub>		--	--	35	35		
	L <sub>max</sub>		--	--	50	50		
Church, meeting hall	L <sub>90</sub>		55	--	40	40		
	L <sub>max</sub>		--	--	55	55		
School, library, museum	L <sub>90</sub>		55	--	40	--		
	L <sub>max</sub>		--	--	55	--		

**Notes:**

1. The Residential standards apply to all residentially zoned properties.
2. Each of the noise levels specified above shall be lowered by 5 dBA for tonal noises characterized by a whine, screech, or hum, noises consisting primarily of speech or music, or recurring impulsive noises.
3. In situations where the existing noise level exceeds the noise levels indicated in the above table, any new noise source must include mitigation that reduces the noise level of the noise source to the existing level.
4. The exterior noise standards are measured at any point on the receiving property where there is, or could be in the future, frequent human use and quiet would be beneficial.
5. These standards do not apply to temporary sources such as construction activities.

**TABLE 9-2 2009 VEHICULAR TRAFFIC NOISE ON MAJOR ROADWAYS**

Major Roadway	Segment	L <sub>dn</sub> at 75 ft, dBA *	
		2009 Existing	2009 Existing
El Camino Real	North of Holly St	69	63
	San Carlos Ave to Brittan Ave	68	65
	Brittan Ave to Howard Ave	69	62
	South of Howard Ave	69	59
Holly Street	West of El Camino Real	62	61
	Old County Rd to Industrial Way	65	62
	East of Industrial Way	68	64
Old County Road	North of Holly St	63	64
	Holly St to Brittan Ave	64	59
	Brittan Ave to Howard Ave	64	60
	South of Holly St	62	59
Industrial Road	North of Holly St.	61	59
	Holly St to Brittan Ave	66	62
	South of Brittan Ave	66	63

\* Noise levels are given at a distance of 75 feet from the center of the roadway.





### *Vehicular*

Traffic continues to be the most significant source of noise within San Carlos. Highway 101, as the dominant traffic noise source and El Camino Real (State Route 82), a major contributor to the noise environment, exhibit noise levels from 70 to 77 dBA  $L_{dn}$  at land uses immediately joining these roadways. Interstate 280 carries high volumes of traffic but does not affect existing developed areas within the city. Major arterials, including Holly Street, San Carlos Avenue, Alameda de Las Pulgas, Brittan Avenue, Old Country Road and Edgewood Road are significant noise sources and exhibit noise levels from 65 to 70 dBA  $L_{dn}$  at nearby land uses. Neighborhood streets such as Crestview Drive and Devonshire Boulevard exhibit noise levels from 60 to 65 dBA  $L_{dn}$  at nearby receivers. Residential neighborhoods insulated from through traffic have noise levels less than 60 dBA  $L_{dn}$  which is an acceptable level.

### *Railroad*

The Caltrain railway roughly parallels Highway 101 and follows El Camino Real in the northeastern portion of the city. The San Carlos Caltrain station is near the intersection of El Camino Real and San Carlos Avenue.

In 2009, there were 35 scheduled weekday northbound stops per day and 35 scheduled weekday southbound stops per day at the San Carlos Caltrain Station. Day-night average noise levels are estimated to range from 67 to 69 dBA  $L_{dn}$  at a distance of 100 feet from the tracks. Train warning whistles can generate maximum noise levels of approximately 105 dBA at 100 feet and would be audible throughout the community. Trains are required to blow their horns at railroad stations, so  $L_{dn}$  noise levels in the station area will be substantially higher unless the City of San Carlos and Caltrain obtain Quiet Zone designations.

Trains are also a source of perceptible groundborne vibration within approximately 50 to 100 feet of the tracks. Ground-borne vibration occurs in areas adjacent to fixed rail lines when railroad trains pass through San Carlos. Ground vibration levels along the railroad corridors are proportional to the speed and weight of the trains as well as the condition of the tracks, train engine and car wheels. Vibration measurements conducted in San Carlos indicate that the acceptable vibration levels occur about 65 feet from the center of the near railroad track for the maximum measured train vibration level and about 55 feet from



the center of the near railroad track for typical train passbys.

*Airport*

Aircraft using San Carlos Airport intermittently contribute to ambient noise levels in the city. This general aviation airport is located in the northeast portion of the City of San Carlos east of Highway 101. The airport averages about 425 aircraft operations per day. Approximately 49 percent of aircraft operations are local general aviation, 48 percent are transient general aviation, 2 percent are air taxi operations and less than 1 percent are military operations. San Mateo County and the San Carlos Airport Pilot's Association promote noise reduction practices by airport users, including avoiding flying over sensitive areas. Existing noise contours for the San Carlos Airport are shown on Figure 9-2. Noise compatibility is regulated by the City/County Association of Governments of San Mateo County (C/CAG) Airport Land Use Commission for the County's airports. The San Mateo County Comprehensive Airport/Land Use Plan (CLUP), adopted by C/CAG in 1996, is a State-mandated document that promotes airport/land use compatibil-

ity. Table IV-2 of the CLUP includes noise compatibility standards.

Aircraft noise in California is described in terms of the CNEL. The noise levels measured in CNEL are approximately equivalent to noise measured with the day/night average noise level (Ldn) but include an additional 5 dB weighting factor for the evening hours (7:00 p.m. to 10:00 p.m.).

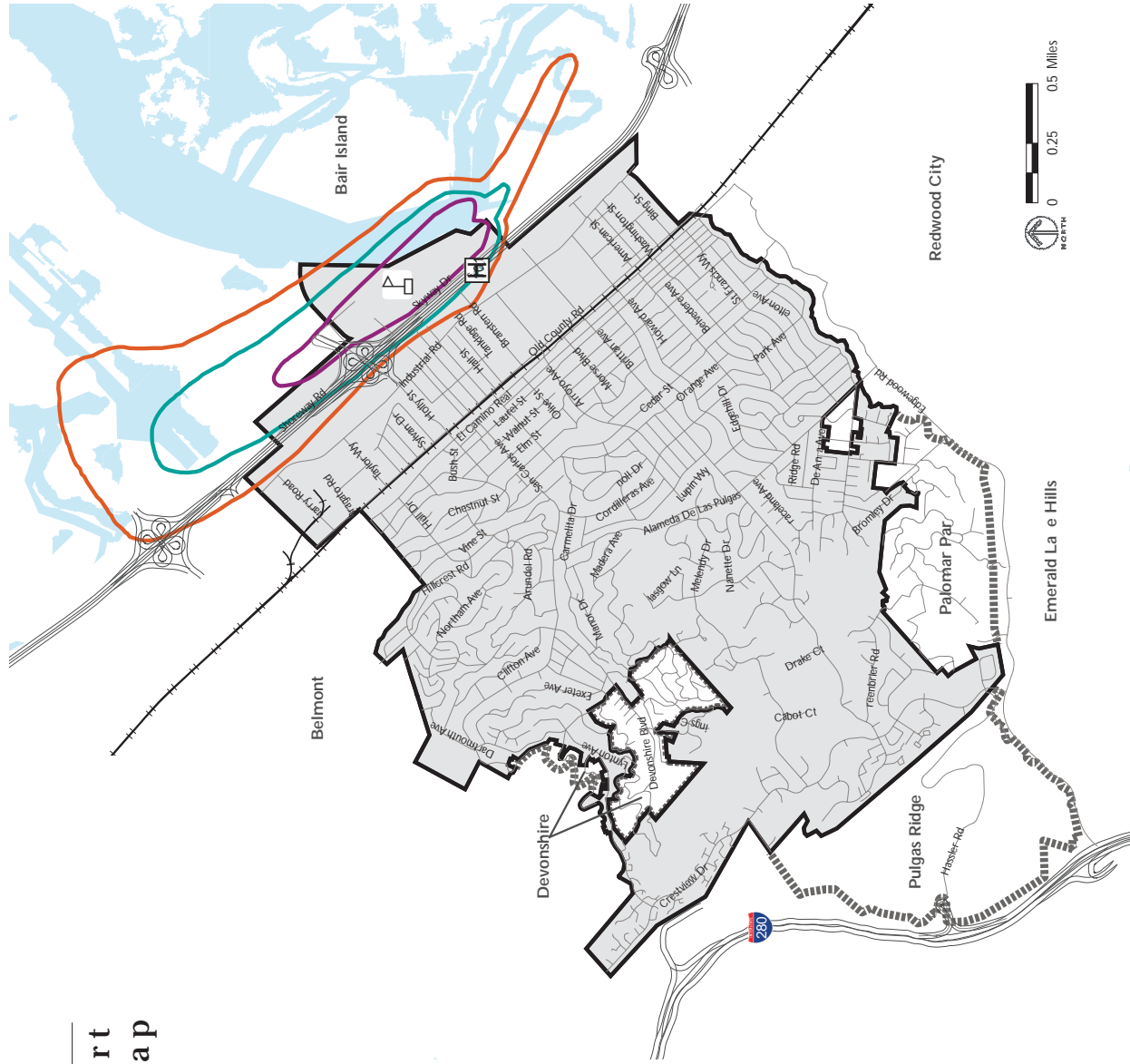
Jet aircraft to and from the Mineta, San José and San Francisco International Airports generate intermittent noise when passing over the City of San Carlos. Noise generated by these over-flights, although audible and noticeable in quiet areas above other ambient noise sources, do not contribute to daily average noise levels in the city.

*Non-Vehicular*

There are no known stationary noise sources that make a significant contribution to the community's noise environment. The majority of commercial and industrial land uses within San Carlos are located east-northeast of El Camino Real and may be minor contributors to

**FIGURE 9-2**  
**San Carlos Airport**  
**Noise Contour Map**

City Limit  
 Sphere of Influence Areas  
 Airport Noise Contours  
 55 CNEL  
 60 CNEL  
 65 CNEL  
 Source: San Carlos Airport Master Plan Update  
 Airport Modernization Draft EIR (June 2002).



the noise environment, while Highway 101, major arterial roadways and the railroad contribute significantly.

### *Future Noise*

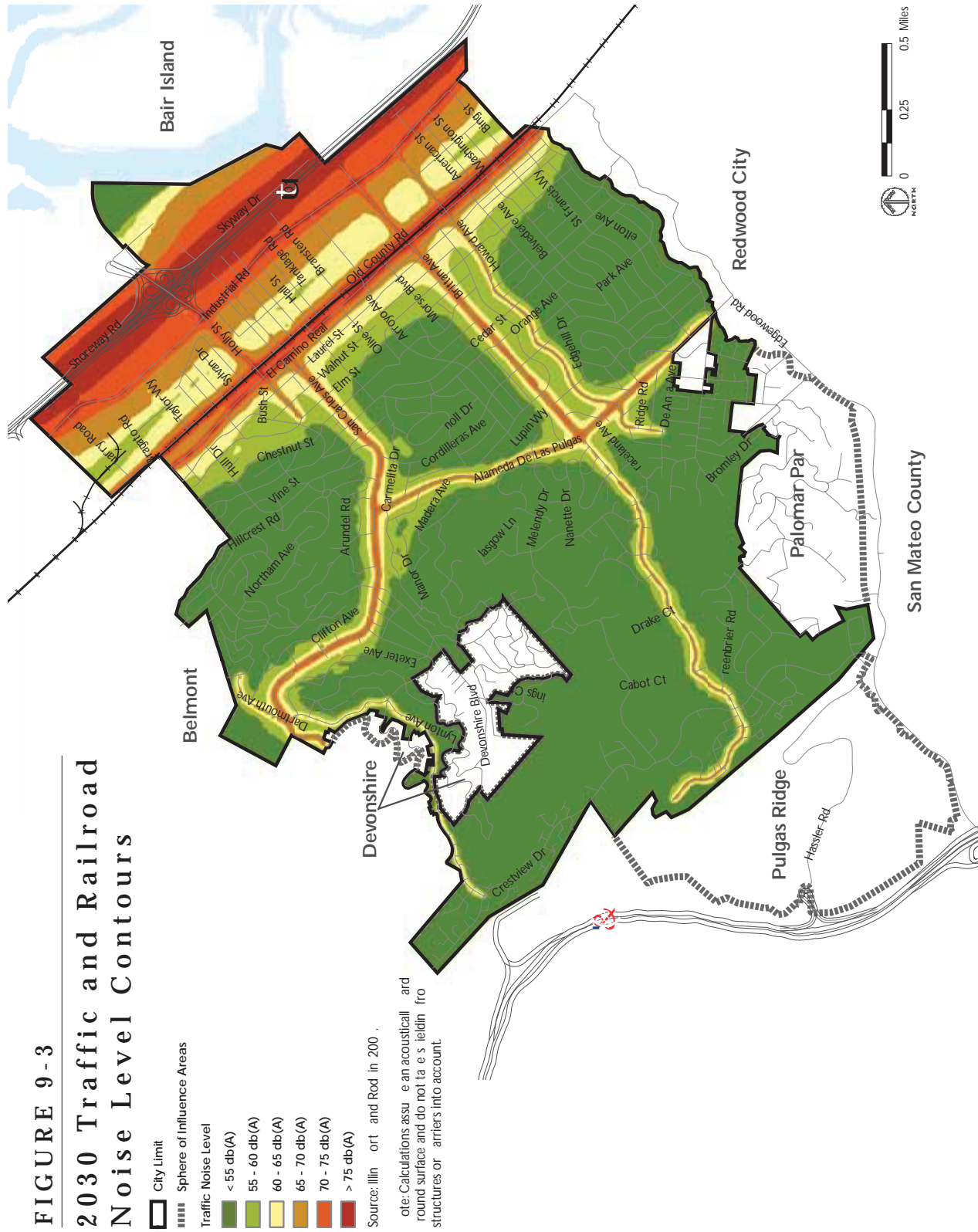
The noise environment in San Carlos is not expected to change as a result of the implementation of the General Plan. Vehicular traffic noise, the dominant source throughout the city, is not anticipated to change substantially along local streets or major through routes, including Highway 101 and El Camino Real. Aircraft noise in the region and sources of non-transportation noise are similarly not anticipated to increase in the community. Figure 9-3 shows the projected noise contours at buildout of the General Plan.


Currently, California is considering construction of a high-speed train system that would link the San Francisco Bay Area and Los Angeles. The plan would be for high-speed trains to operate through San Carlos on or near the existing Caltrain right-of-way. Numerous at-grade crossings along the Caltrain corridor would need to be eliminated in order to facilitate the high-speed trains, which would reduce noise from the sounding of railroad train horns. The high-speed trains would likely use electric power cars, which

would eliminate the low frequency rumble associated with diesel-powered locomotives. However, overall high-speed train noise levels may increase over conventional trains due to the aerodynamic effects. Vibration of the ground caused by the passby of high-speed trains is expected to be similar to that caused by conventional steel wheels/steel rail trains. As information becomes available, it should be incorporated into the Noise Element and utilized accordingly in noise/vibration and land use planning.



View of Downtown from San Carlos train station





### Guiding Principles

The Guiding Principles are a set of key objectives that articulate San Carlos' core values relating to noise. The following Guiding Principle establishes a framework for the basic intent of this Element and is a broad statement of overall community value relating to noise in San Carlos:

- Maintain a community with a noise environment that supports a high quality of life.



Caltrain platform  
GENERAL PLAN

### Goals, Policies and Actions



**GOAL NOI-1**

**Encourage compatible noise environments for new development and control sources of excessive noise citywide.**

**POLICIES**

**POLICY NOI-1.1** Use the Noise and Land Compatibility Standards shown in Figure 9-1, the noise level performance standards in Table 9-1 and the projected future noise contours for the General Plan shown in Figure 9-3 and detailed in Table 9-2, as a guide for future planning and development decisions.

**POLICY NOI-1.2** Minimize noise impacts on noise-sensitive land uses. Noise-sensitive land uses include residential uses, retirement homes, hotel/motels, schools, libraries, community centers, places of



public assembly, daycare facilities, churches and hospitals.

**POLICY NOI-1.3** Limit noise impacts on noise-sensitive uses to noise level standards as indicated in Table 9-1.

**POLICY NOI-1.4** Require a detailed acoustic report in all cases where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 CNEL Ldn or greater. If recommended in the report, mitigation measures shall be required as conditions of project approval.

**POLICY NOI-1.5** New development of noise-sensitive land uses proposed in noise-impacted areas shall incorporate effective mitigation measures into the project design to reduce exterior and interior noise levels to the following acceptable levels:

a. For new single-family residential development, maintain a standard of 60 Ldn (day/night average noise level) for exterior noise in private use areas.

b. For new multi-family residential development maintain a standard of 65 Ldn in community outdoor recreation areas. Noise standards are not applied to private decks and balconies and shall be considered on a case-by-case basis in the downtown core.

c. Interior noise levels shall not exceed 45 Ldn in all new residential units (single- and multi-family). Development sites exposed to noise levels exceeding 60 Ldn shall be analyzed following protocols in Appendix Chapter 12, Section 1208, A, Sound Transmission Control, 2001 Building Code Chapter 12, Appendix Section 1207.11.2 of the 2007 California Building Code (or the latest revision).

d. Where new residential units (single- and multi-family) would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels in-

side homes shall not exceed 50 dBA in bedrooms or 55 dBA in other occupied spaces. These single event limits are only applicable where there are normally four or more train operations per day.

**POLICY NOI-1.6** Where noise mitigation measures are required to achieve the noise level standards, the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered after practical design-related noise mitigation measures have been integrated into the project.

**POLICY NOI-1.7** The City shall seek to reduce impacts from ground-borne vibration associated with rail operations by requiring that vibration-sensitive buildings (e.g. residences) are sited at least 100 feet from the centerline of the railroad tracks whenever feasible. The development of vibration-sensitive buildings within 100 feet from the centerline of

the rail-road tracks would require a study demonstrating that ground borne vibration issues associated with rail operations have been adequately addressed (i.e. through building siting, foundation design and construction techniques).

**POLICY NOI-1.8** During all phases of construction activity, reasonable noise reduction measures shall be utilized to minimize the exposure of neighboring properties to excessive noise levels.

- a. Construction activities shall comply with the City's noise ordinance.

**POLICY NOI-1.9** Minimize potential transportation-related noise through the use of setbacks, street circulation design, coordination of routing and other traffic control measures and the construction of noise barriers and consider use of "quiet" pavement surfaces when resurfacing roadways.





**POLICY NOI-1.10** Ensure that mixed-use development projects are designed to minimize noise impacts on residential units.

**POLICY NOI-1.11** Ensure that proposed noise sensitive land uses include appropriate mitigation to reduce noise impacts from aircraft operations at San Carlos Airport. Work with the San Carlos Airport Pilots Association and San Mateo County to continue to refine and implement the Airport's noise abatement procedures.

**POLICY NOI-1.12** Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan.

**POLICY NOI-1.13** Require a noise analysis for new residential uses located within the 55 CNEL impact area of the San Carlos Airport. If recommended in the report, mitigation measures shall be required as conditions of project approval.

**POLICY NOI-1.14** The Federal Transit Administration vibration impact criteria and assessment methods shall be used to evaluate the compatibility of train vibration with proposed land uses adjoining the UPRR (Caltrain) corridor. Site specific vibration studies shall be completed for vibration-sensitive uses proposed within 100 feet of active railroad tracks.

## ACTIONS

**ACTION NOI-1.1** Establish a noise abatement protocol for existing sensitive land uses located in areas anticipated to experience significant noise increases with the implementation of the General Plan. Cumulative traffic noise impacts on existing noise-sensitive uses could be reduced through the inclusion of exterior and/or interior sound-reduction measures such as set-backs, noise barriers, forced-air mechanical ventilation and sound rated window construction. The

City should research sources of funding for these actions.

c. Cause noise levels to exceed the limits in Table 9-1.

**ACTION NOI-1.2** Revise the City’s Noise Ordinance to be consistent with this Element.

**ACTION NOI-1.5** Enforce Section 27007 of the California Motor Vehicle Code that prohibits amplified sound that can be heard 50 or more feet from a vehicle.

**ACTION NOI-1.3** Require residents of new mixed-use developments to be informed of potential noise from refuse collection and other activities typically associated with commercial activity.

**ACTION NOI-1.6** Enforce Section 27150 of the California Motor Vehicle Code that addresses excessive exhaust noise.

**ACTION NOI-1.4** Require the evaluation of mitigation measures for projects that would cause the following criteria to be exceeded or would cause a significant adverse community response:

**ACTION NOI-1.7** Update and review procedures for dealing with noise complaints in the community.

a. Cause the Ldn at noise-sensitive uses to increase by 3 dB or more and exceed the “normally acceptable” level.

**ACTION NOI-1.8** Evaluate the necessity of requesting Caltrain to establish a Quiet Zone designation for San Carlos.

b. Cause the Ldn at noise-sensitive uses to increase 5 dB or more and remain “normally acceptable.”

# City of San Carlos Noise Ordinance

[[Emphasis in ***bold italic*** and highlights added by author]]

18.21.050 Noise.

A. Noise Limits. ***No use or activity shall create noise levels that exceed the following standards.*** The maximum allowable noise levels specified in Table 18.21.050-A, Noise Limits, ***do not apply to noise generated by automobile traffic or other mobile noise sources in the public right-of-way.***

TABLE 18.21.050-A: NOISE LIMITS

Land Use Receiving the Noise	Noise-Level Descriptor	Exterior Noise Level Standard in Any Hour (dBA)		Interior Noise-Level Standard in Any Hour (dBA)	
		Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
<b>Residential</b>	<b>L50</b>	<b>55</b>	<b>45</b>	<b>40</b>	<b>30</b>
	<b>Lmax</b>	<b>70</b>	<b>60</b>	<b>55</b>	<b>45</b>
Medical, convalescent	L50	55	45	45	35
	Lmax	70	60	55	45
Theater, auditorium	L50	-	-	35	35
	Lmax	-	-	50	50
Church, meeting hall	L50	55	-	40	40
	Lmax	-	-	55	55
School, library, museum	L50	55	-	40	-
	Lmax	-	-	55	-

1. Adjustments to Noise Limits. The maximum allowable noise levels of Table 18.21.050-A, Noise Limits, shall be adjusted according to the following provisions. No more than one increase in the maximum permissible noise level shall be applied to the noise generated on each property.

a. Ambient Noise. If the ambient noise level at a noise-sensitive use is ten dBA or more below the standard, the allowable noise standard shall be decreased by five decibels.

- b. Duration. The maximum allowable noise level (L50) shall be increased as follows to account for the effects of duration:
- i. Noise that is produced for no more than a cumulative period of fifteen minutes in any hour may exceed the noise limit by five decibels; and
  - ii. Noise that is produced for no more than a cumulative period of five minutes in any hour may exceed the noise limits by ten decibels;
  - iii. Noise that is produced for no more than a cumulative period of one minute in any hour may exceed the noise limits by fifteen decibels.
- c. Character of Sound. If a noise contains a steady audible tone or is a repetitive noise (such as hammering or riveting) or contains music or speech conveying informational content, the maximum allowable noise levels shall be reduced by five decibels.
- d. Prohibited Noise. Noise for a cumulative period of thirty minutes or more in any hour which exceeds the noise standard for the receiving land use.
- B. Noise Exposure—Land Use Requirements and Limitations. Table 18.21.050-B, Noise Exposure—Land Requirements and Limitations, describes the requirements and limitations of various land uses within the listed day/night average sound level (Ldn) ranges.

TABLE 18.21.050-B: NOISE EXPOSURE—LAND USE REQUIREMENTS AND LIMITATIONS

Land Use	Day/Night Average Sound Level (Ldn)	Requirements and Limitations
Residential (1) and Other Noise-Sensitive Uses (e.g., Schools, Hospitals, and Churches)	Less than 60	Satisfactory
	60 to 75	Acoustic study and noise attenuation measures required
	Over 75	Acoustic study and noise attenuation measures required
Auditoriums, Concert Halls, Amphitheaters	Less than 70	Acoustic study and noise attenuation measures required
	Over 70	Not allowed
Commercial and Industrial	Less than 70	Satisfactory
	70 to 80	Acoustic study and noise attenuation measures required

TABLE 18.21.050-B: NOISE EXPOSURE—LAND USE REQUIREMENTS AND LIMITATIONS

Land Use	Day/Night Average Sound Level (Ldn)	Requirements and Limitations
	Over 80	Airport-related development only; noise attenuation measures required
Outdoor Sports and Recreation, Parks	Less than 65	Satisfactory
	65 to 80	Acoustic study and noise attenuation measures required; avoid uses involving concentrations of people or animals
	Over 80	Limited to open space; avoid uses involving concentrations of people or animals

Notes:

1. New residential development in noise impacted areas are subject to the following noise levels:
  - a. For new single-unit residential development, maintain a standard of 60 Ldn for exterior noise in private use areas.
  - b. For new multi-unit residential development, maintain a standard of 65 Ldn in community outdoor recreation areas. Noise standards are not applied to private decks and balconies and shall be considered on a case-by-case basis in the MU-DC District.
  - c. Where new residential units (single and multifamily) would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels inside homes shall not exceed forty-five dBA in bedrooms or fifty-five dBA in other occupied spaces. These single-event limits are only applicable where there are normally four or more train operations per day.
  - C. Acoustic Study. The Director may require an acoustic study for any proposed project that could cause any of the following:
    1. Locate new residential uses within the fifty-five CNEL impact area of the San Carlos Airport;
    2. Cause noise levels to exceed the limits in Table 18.21.050-A;
    3. Create a noise exposure that would require an acoustic study and noise attenuation measures listed in Table 18.21.050-B, Noise Exposure—Land Use Requirements and Limitations; or
    4. Cause the Ldn at noise-sensitive uses to increase three dBA or more.
  - D. Establishing Ambient Noise. When the Director has determined that there could be cause to make adjustments to the standards, an acoustical study shall be performed to establish ambient noise levels.

In order to determine if adjustments to the standards should be made either upwards or downwards, a minimum twenty-four-hour-duration noise measurement shall be conducted. The noise measurements shall collect data utilizing noise metrics that are consistent with the noise limits presented in Table 18.21.050-A, e.g., Lmax (zero minutes), L02(one minute), L08 (five minutes), L25 (fifteen minutes) and L50 (thirty minutes). An arithmetic average of these ambient noise levels during the three quietest hours shall be made to demonstrate that the ambient noise levels are regularly ten or more decibels below the respective noise standards. Similarly, an arithmetic average of ambient noise levels during the three loudest hours should be made to demonstrate that ambient noise levels regularly exceed the noise standards.

E. Noise Attenuation Measures. Any project subject to the acoustic study requirements of subsection C of this section may be required as a condition of approval to incorporate noise attenuation measures deemed necessary to ensure that noise standards are not exceeded.

1. New noise-sensitive uses (e.g., schools, hospitals, churches, and residences) shall incorporate noise attenuation measures to achieve and maintain an interior noise level of forty-five dBA.
2. Noise attenuation measures identified in an acoustic study shall be incorporated into the project to reduce noise impacts to satisfactory levels.
3. Emphasis shall be placed upon site planning and project design measures. The use of noise barriers shall be considered and may be required only after all feasible design-related noise measures have been incorporated into the project. (Ord. 1438 § 4 (Exh. A (part)), 2011)

18.21.060 Vibration.

No vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) are exempt from this standard. (Ord. 1438 § 4 (Exh. A (part)), 2011)

# Matthew Jones

## Principal Planner

<https://www.linkedin.com/in/matthew-steven-jones/>

### Summary

Senior Planner and Environmental Regulatory Compliance specialist leading multidisciplinary project teams in the planning, environmental review, statutory approval, permitting, and compliance monitoring of major capital projects/programs in the rail/transit/transportation, water, power, urban development, landfill/waste management, and telecommunications / technology sectors. My greatest strength lies in the ability to assist private and government clients, approving agencies, and outside stakeholders in finding a common understanding and to drive timely consensus and resolution in the project negotiation and approval process.

In business management and development, I have operated at the principal, group, office and staff manager levels since 2006. I have more than 12 years staff management experience and experience managing large project teams utilizing intermediary managers across multiple offices. I have managed profit and loss responsibility at both the client, group, and office level. As a business development lead, I have managed key clients, new market development, long lead capture and maintained workload backlog and staff development responsibility.

### Employment

**2016-2017** TRC

#### Northern California Practice Leader

Managed the environmental consulting practice in Northern California for 20 staff across five offices, responsible for business unit profit and loss, key client management, strategic growth, and internal business unit coordination. Responsible for growing and reinvigorating business unit that had not achieved operating budget for three consecutive years prior to my arrival. Brought costs back in line and achieved a first profitable month within six months of hire. TRC is a US engineering, consulting and construction management firm providing integrated services to the power, oil and gas, environmental and infrastructure markets with 4,000 staff in 120 offices.

**2015-2016** WSP | Parsons Brinckerhoff

#### San Francisco Bay Area Environmental Manager

Managed the environmental consulting practice in Northern California, supporting project delivery, client management, business development, strategic pursuits, and internal business functions. Directed the firm's Northern California environmental team in support of WSP | Parson Brinckerhoff's transportation

### Areas of Expertise

#### Environmental Impact Assessment

- National Environmental Policy Act (NEPA)
- California Environmental Quality Act (CEQA)

#### Environment and Biodiversity Approvals

- Regional Strategic Assessments
- Endangered Species Act (ESA) Permitting & Compliance
- Mitigation/Offset Planning
- Habitat Conservation Planning (HCP)
- Natural Community Conservation Planning (NCCP)
- Clean Water Act (CWA) Permitting & Compliance
- Watershed and Water Resource Planning

#### Planning

clients and was instrumental in expanding client base throughout Northern California.

**2014-2015 Environmental Resources**

**Management (ERM)**

**Principal Consultant**

Hired to expand California services in environmental regulatory compliance and drive commercial growth to support expansion of staff and service lines. My role was focused on new client development and proponent side support of clients in the High Tech and Telecommunications sector while contributing to additive growth with Power sector clients. Generated \$750k in new client sales within 9 months of being hired. Key non-commercial responsibilities included founding of Silicon Valley office and strategic staff recruitment in the Western US.

**2002-2014 Jones & Stokes Associates / ICF**

**International**

**Principal**

In 12 years at Jones & Stokes Associates (acquired by ICF International in February of 2008), I continually grew into increasing roles of responsibility and consulting expertise. My last role at ICF was a Principal both acting as Project Manager or Principal in Charge on CEQA, NEPA, and permitting work for water resource, transportation, and urban development projects. I was engaged in multiple business development roles including existing key client/account management, long lead capture pursuits, and new market capture efforts with local planning departments, transportation agencies, and private urban developers, resulting in 3 consecutive years nets sales in excess of \$1 million USD. I also held internal business management roles as the senior staff manager in the Bay Area, responsible for 30 planning and biological resource staff, utilizing two junior staff supervisors and was the San Jose Office lead from 2011-2014, managing the finances, administration, and staff associated with ICF's San Jose Location.

- Urban Planning
- Transportation and Infrastructure
- Parks and Recreation

**Biology/Ecology**

- Aquatic/Stream Ecology
- Wildlife Biology
- Fisheries Biology
- Survey Protocols
- Large Scale Survey Management and EHS Plans

**Education**

---

**2000**

Middle Tennessee State University

**Bachelor of Science**

Biology.

**Awards**

---

**2007 American Society of**

**Landscape Architects**

**Northern California Chapter**

Merit Award for the Coyote Creek Parkway Integrated Natural Resources Management Plan and Master Plan.



## Representative Projects

---

Matthew manages and prepares Environmental Impact Assessments (EIA) for infrastructure and development projects throughout California, but mainly focused on the San Francisco Bay Area. Matthew is adept at carrying EIAs from start to finish, including scoping, alternatives analysis, project definition, technical resource studies, impact analysis, and stakeholder outreach. Matthew is also a senior aquatic ecologist with more than a decade and a half of experience working with assessment aquatic habitats and the conservation/restoration of aquatic environments.

### Transportation – Rail

#### **Bay Area Rapid Transit Authority, BART Transbay Core Capacity Environmental – San Francisco and Alameda County, California (Project Manager: 2015-2016).**

Provided technical assistance for state and federal environmental compliance. Lead for Federal environmental approval under NEPA with the Federal Transit Authority (FTA) and directed technical studies to support Categorical Exemption. BART's Core Capacity Program included: 1) A modern, expanded fleet of railcars to meet growing ridership demands, improve passenger comfort, and keep service reliable; 2) A new maintenance facility to maximize car availability by providing additional capacity to maintain and store the expanded fleet; and 3) An improved train control system to increase train frequency and put the expanded fleet in service both safely and reliably

#### **Santa Clara Valley Transportation Authority, BART Silicon Valley (Also known as Silicon Valley Rapid Transit Project) – Santa Clara County, California (Project Manager: 2006-2014).**

Project manager and State/Federal environmental approval lead managing documentation and analysis of potential impacts to biological and cultural resources resulting from various transit corridor alternatives. Project involved management and preparation of technical reports, contribution to the Impact Assessment Document (EIR/EIS), and additional development of seven supplemental environmental approval documents in the years following approval of the original Impact Assessment. Also, served as project manager and lead agency contact for state and federal biological and water resource permitting for railroad corridor and utility relocation activities. Technical director for the development of BAs under Section 7 of the Endangered Species Act submitted to both NMFS and USFWS. Over the course of eight years' on the program team, I was also involved in community outreach, internal coordination with design engineers, conducted agency meetings, provided assistance during design-build procurement, and managed compliance training and Environmental Management Audits during project construction. My management work on the program included the preparation and implementation of more than two dozen scopes of work under three separate master service agreements and the financial management of the program and subconsultant work agreements and deliverables

#### **California High-Speed Rail Authority/Parsons Transportation Group, California High-Speed Train from San Jose to Merced – San Jose, California: (Technical Director: 2009-2014).**

Biological resources lead and senior biologist for the biological technical reports, wetland delineation reports, and EIS/EIR documentation for the San Jose to Merced section of the proposed California High-Speed Train Project. Assisted the authority project management team and design team on the EPA/Corps 404(b)1 analysis, including preliminary alternatives analysis work to define the least environmentally damaging practicable alternative (LEDPA) as required under law. The California High-Speed Rail Authority is proposing high-speed train service for travel between major metropolitan areas of California. The service would run from Los Angeles, Orange County and San Diego in the south to the San Francisco Bay Area and Sacramento in the north. This system is forecast

to carry more than 100 million passengers annually by the year 2030.

**Bay Area Rapid Transit Authority, BART Warm Springs Extension Project Permitting and Compliance – Alameda County, California (Project Manager: 2009).**

Provided technical assistance for state and federal permitting. Lead for preconstruction surveys, early construction monitoring and construction worker awareness training. Project required agency consultation and acquisition of permits from the San Francisco Regional Water Quality Control Board, California Department of Fish and Game, and the Corps and included mitigation planning for BART. Contract also included transitional construction monitoring and training during the early Design Build Phase Implementation.

**Haystack Landing Bridge Replacement EA/FONSI, Sonoma Marin Area Rail Transit – Petaluma, California (Technical Director, 2013-2014)**

Served as senior QA/QC reviewer for the environmental permitting processes for replacement of the Haystack Landing Bridge near Petaluma, California in conjunction with the development of the Sonoma Marin Area Rail Transit Program. Additional responsibilities included close coordination with the United States Coast Guard, client's engineering team, and regulatory agency staff.

**Transportation—Roads, Bridges, and Highways**

**Santa Clara Valley Transportation Authority and HDR Engineering, SR-152 Trade Corridor EIR/EIS Biological Resources Studies – San Jose, California (Technical Director: 2011-2013)**

Biological resources lead and senior biologist for the biological technical reports, wetland delineation reports, and environmental documentation. Matthew managed the biological team during corridor surveys and the development of technical documents for State and Federal compliance. Project also involved assistance with regulatory compliance. The purpose of the project is to develop an east-west trade corridor on SR-152 between US 101 and SR-99 so that the roadway facilities meet the goods-movement, commuter, and recreational travel needs for the region. The team looked at the capital upgrades and potential corridor realignments necessary to construct and toll the corridor.

**City of Mountain View Planning Department. Sares Regis Bridge Project for NASA-Ames Google Development (Stevens Creek Crossings) – City of Mountain View, California (Project Manager: 2009-2011)**

Project Manager for the development of environmental and regulatory compliance documentation for two new bridges across Stevens Creek in the City of Mountain View. The bridges will connect new development by Google at the NASA Ames Research Center with Google's existing campus in Mountain View, allowing for local transit service, interoffice bus service, non-motorized transit, and emergency services access to the new development. The project evaluates potential impacts to multiple resources including biological resources, visual resources, recreational facilities, and hydrology.

**City of Palo Alto and Nolte Vertical Five, Newell Road Bridge Replacement Project – Palo Alto, California (Principal in Charge: 2012-2014).**

Managed preparation of technical studies (hydrology, visual, biological resources, cultural/historic resources, hazardous materials/wastes, community impact assessment, etc.) and a draft US Federal and State of California environmental document (anticipated EIR/EA) for a bridge replacement project between the cities of Palo Alto and East Palo Alto. Reviewed and approved technical reports and Federal NEPA document under Caltrans District 4 purview.

**Commercial/Residential Development**

**City of Mountain View Planning Division, 700 East Middlefield Road Office Campus Project EIR – City of Mountain View, California (Project Manager 2012-2014).**

Directed the preparation of the draft EIR and completion of technical sections. The 700 East Middlefield Road Project is an infill project that includes an up to four-building office campus on an approximately 24-acre site currently occupied by four office buildings with associated surface parking. The project includes four, five- to eight-story office buildings, a 5,000 sf retail space, a two-story Commons building, two parking garages, and open space areas. The one-million square foot office campus is seeking LEED Platinum certification. Construction activities would include demolition of the existing two-story office buildings and surface parking lots, as well as removal of trees and vegetation that would be replaced in accordance with the project's landscape plan.

**City of Mountain View Planning Division, The Village at San Antonio Phase II Development EIR – City of Mountain View, California (Principal in Charge 2013-2014).**

The Village at San Antonio Center Phase II would consist of six distinct blocks that would contain office, commercial, retail, hotel, cinema, and parking uses. Directed the consultant team, including subconsultants, in the preparation of a thorough and cohesive environmental impact report with supporting traffic and utility technical studies. Major issues for the project included potential traffic impacts and potential cumulative impacts on the adjacent city of Los Altos.

**City of Mountain View Planning Division, 100 Moffett Boulevard Residential Development Project IS/MND – City of Mountain View, California (Principal in Charge 2012-2014).**

Principal in charge and senior reviewer for preparation of the draft IS/MND. This project is a residential infill project on a 2.89-acre site currently occupied by a county office building, commercial businesses, residential units, associated surface parking, and existing public street right-of-way. The project includes three two- to four-story structures with one- and two-bedroom units, a club room, fitness center, leasing office, three courtyards and two underground parking garages. Where Stierlin Road extends through the middle of the project site, the project includes an option to either convert the roadway to a one-way road or to a public pedestrian/bicycle paseo closed to vehicles.

**Conservation Planning and Habitat Management**

**Multiple Agencies, Santa Clara Valley Habitat Plan, Santa Clara County, California, (Technical Director: 2008-2013).**

Strategic Assessment covering the actions of seven government authorities (Four cities, the county government, plus the regional transportation and water management agencies) in the Silicon Valley Region. Managed agency approval negotiations and authored the riverine and riparian habitat sections of the Habitat Plan including covered fish species accounts, conservation strategies, reserve system design, and suitable habitat models. Moderated stakeholder, internal management and technical discussion groups regarding fish species covered under the plan and the habitats used by covered species.

**Water**

**San Francisquito Creek Joint Powers Authority, San Francisquito Creek Flood Protection, Ecosystem Restoration and Recreational Improvements San Francisco Bay to Highway 101 and Upstream of Highway 101 – Menlo Park, California (Project Manager: 2007-2014).**

Environmental lead for work with the SFCJPA for environmental compliance, outreach assistance, and comprehensive planning assistance in support of the project and the SFCJPA's larger goals for the watershed. Managed the preparation of two major environmental approval documents and permitting in support of the East Bayshore Road to San Francisco Bay Flood Reduction Project to implement conveyance improvements to protect residents and property from flood events along the lower urban section of San Francisquito Creek, from Highway 101 to the San Francisco Bay and Upstream of Highway 101. The SFCJPA is also working as the local sponsor with the United States Army Corps of Engineers (USACE) to initiate a long-term and large-scale, comprehensive flood

management plan for the entire watershed. Completed analyses required under CEQA and coordinated the regulatory compliance required under ESA, Sections 401 and 404 of the federal Clean Water Act (CWA), and Sections 1600–1607 of the California Fish and Game Code. Also assisted with a Comprehensive Plan for the Watershed that describes all of the projects within the framework of SFCJPA's overarching goals within the San Francisquito Creek watershed and associated public outreach to the community and local environmental stakeholders.

**Santa Clara Valley Transportation Authority/Kimley-Horn and Associates, Upper Penitencia Creek Improvement Project – San Jose, California (Project Manager: 2009-2011).**

Managed the mitigation design, mitigation and monitoring plan, including coordination with the hydrology and planting design teams. Also directed The Wrigley Creek Improvement Project includes the relocation, restoration, and revegetation of a portion of Wrigley Creek and adjacent areas upstream of Calaveras Boulevard in the City of Milpitas. The project provides in-kind replacement for permanent impacts to federal and state wetlands and waters due to the Santa Clara Valley Transportation Authority's Freight Railroad Relocation/Lower Berryessa Creek Project.

**Santa Clara Valley Transportation Authority, Wrigley Creek Mitigation and Monitoring Plan – Milpitas, California (Project Manager: 2007-2010).**

Project Manager and technical director for the mitigation and monitoring plan, including coordination with the hydrology and planting design teams. The Wrigley Creek Improvement Project includes the relocation, restoration, and revegetation of a portion of Wrigley Creek and adjacent areas upstream of Calaveras Boulevard in the City of Milpitas. The project provides in-kind replacement for permanent impacts to federal and state wetlands and waters due to the Santa Clara Valley Transportation Authority's Freight Railroad Relocation/Lower Berryessa Creek Project.

**Santa Clara Valley Water District (SCVWD), Lenihan Dam Outlet Modification – Santa Clara County, California: (Technical Director: 2007-2008).**

Prepared a habitat mitigation and monitoring plan to address impacts to riparian and coastal scrub habitats associated with construction of a new outlet structure at Lenihan Dam. The proposed project would involve the construction of a tunnel to carry a new outlet pipe, the construction of a multi-port inclined intake structure, the construction of a terminal energy dissipation structure, and the subsequent abandonment of the existing outlet pipe. New control buildings for operation of the control valves would also be built.

**Santa Clara Valley Water District (SCVWD), San Luis Reservoir Low-Point Improvement Project EIR/EIS – Santa Clara County, California: (Fisheries Analyst: 2004-2007).**

Fisheries biologist for State and Federal compliance and technical outreach lead. Prepared the fisheries resources analyses for the environmental document, analyzing a range of alternatives to address problems with quality and reliability of supply from San Luis Reservoir during summer high-demand months. As the primary author of the fisheries analysis and biological resources team leader, oversaw efforts to identify data gaps, focus the impact analysis, and develop conservation strategies. The large project area covers many jurisdictions and landowners. Conducted outreach to natural resource agencies and stakeholder groups, and coordinated with subconsultants.

**U.S. Army Corps of Engineers, Biological Assessment for Operation and Maintenance of Corps Levees, Seattle District – Seattle, Washington. (Project Manager: 2004-2007)**

Prepared BAs for maintenance of 20 authorized flood control works in eastern and western Washington. Significant issues included assessing the impact of these activities on threatened and endangered salmonid species, determining an appropriate way to characterize the environmental baseline for levees built prior to the listing of these species,

and developing programmatic mitigation for ongoing impacts related to levee maintenance.

#### Technology and Telecommunications

##### **Confidential Client, CEQA compliance for Last Mile Fiber to the Premises Infrastructure – Mountain View, California (Project Manager 2014-2015).**

Project Manager and planning lead for current work with a confidential client to provide environmental compliance, outreach assistance, and comprehensive planning assistance in support of fiber-to-the-premises (FTTP) infrastructure development in five Silicon Valley cities. The project would provide new high-speed fiber optic infrastructure in support of a new residential internet service in each community providing speeds substantially greater than existing infrastructure can support. The program includes State of California environmental compliance under CEQA within all five cities and planning coordination between those cities to provide consistent infrastructure planning documents for the build and maintain equivalent mitigation and management commitments between the five cities.

#### Landfills

##### **City of Livermore Public Works Department. Raymond Road Landfill Initial Site Assessments and Cap Upgrade Initial Study – City of Livermore, California (Project Manager: 2011-2013).**

Project Manager for State environmental approval document and analysis of potential biological and hydrologic constraints that could affect the design of an upgrade to the cap on a landfill in the City of Livermore that closed in the 1960s. Initial work involved technical studies investigating the biological and hydrologic baseline of the project area and surrounding vicinity, which include sensitive alkali wetlands. Project manager and environmental document lead for second phase State of California approval under CEQA and analysis of potential impacts resulting from the upgrade of the landfill cap.

##### **Recology Environmental Solutions, Inc., Pacheco Pass Compost Facility Expansion and Wetland Mitigation Project Biological Monitoring – Gilroy, California (Project Manager: 2010-2013).**

Project Manager and monitoring coordinator for implementation of environmental mitigation measures and monitoring associated with a mitigation site associated with the closure of a landfill and recycling facility. Directed the mitigation and monitoring program as mandated by associated permits.

##### **Z-Best Composting Facility Expansion CEQA Analysis – County of Santa Clara, Santa Clara, California (Project Manager: 2007-2011).**

Project Manager and State environmental approval lead for documentation and analysis of potential impacts resulting from expansion of a green waste and food waste facility in Santa Clara County. Project has involved development of specific technical reports related to hydrology, cultural resources, and odor, development of a rigorous project description, preparation of an IS, and development of additional environmental approval documentation in subsequent years following modifications to the project based on the initial technical studies.

#### Parks, Trails, and Open Space

##### **City of Palo Alto Parks and Recreation Department. Palo Alto Municipal Golf Course Reconfiguration and Baylands Athletic Center Expansion Project EIR – City of Palo Alto, California (Project Manager: 2012-2014).**

Prepared the draft State environmental approval document and directed completion of technical reports. The impetus for this project is the San Francisquito Creek Flood Reduction, Ecosystem Restoration, and Recreation Project San Francisco Bay to Highway

101 (Flood Reduction Project), proposed by the San Francisquito Creek Joint Powers Authority (SFCJPA) (approved in November 2012), which would permanently incorporate 7.4 acres of the Golf Course into the SFCJPA's project. The project would reconfigure all 18 holes of the Golf Course, a portion of the driving range and practice facility, and replace a restroom facility, while retaining a regulation golf course with a par of 71. In addition to reconfiguring the Golf Course, the City proposed to incorporate 10.5 acres of the existing Golf Course into the Baylands Athletic Center to be converted into a maximum of five full-size athletic playing fields and a 24,100 square foot gymnasium with additional parking and lighting.

**Santa Clara County Parks, Coyote Creek Parkway Natural Resources Management Plan, Santa Clara County, California: (Project Manager: 2006-2009).**

Project Manager and technical director for a natural resources management plan incorporated into an integrated management plan for the parkway. Resource planning focused on maintaining and enhancing the natural riparian corridor and wildlife movement within the parkway, including an assessment of potential conflicts between the natural environment and the recreational uses in the park. Also managed the completion of impact assessment required under CEQA for final county approval of the project.

**The Presidio Trust, Quartermaster Reach EA – San Francisco, California (Project Manager: 2010-2013).**

Managed the development of environmental and regulatory compliance documentation for the riverine restoration of the Quartermaster Reach adjacent to Crissy Field Marsh at the Presidio. The restoration project was mitigation for impact associated with the Doyle Drive/Presidio Parkway Project.

**National Park Service, Point Reyes Coastal Watershed Restoration Project BA, Marin County, California (Project Manager: 2006-2008).**

Project Manager and technical director for a BA as part of NPS's ESA consultations for the Point Reyes National Seashore Culvert Replacement and Geomorphic Restoration Projects. The BA included a discussion of potential impacts on steelhead trout, coho salmon, California red-legged frogs, western snowy plover, California brown pelican, Myrtle's silverspot butterfly, and essential fish habitat.

## COMMENTER D2

Save San Carlos Parks

Matthew Jones

February 28, 2018

- Response D2-1: This comment is introductory in nature. See Responses D2-2 through D2-11.
- Response D2-2: This comment describes an objective of the project, i.e., to make changes in the use of the fields at Highlands Park to make field use and operations consistent with the Field Use Policy and City practices at other City fields. The commenter goes on to say that the City should implement “a new holistic and consistent policy.” In response, the City has identified the proposed project (installation of new and improved lights and changes in use and operation of Highlands Park fields) and need not revise the Field Use Policy to approve those changes or the proposed project. See also Master Response 1 regarding definition of the proposed project.
- Response D2-3: This comment is a discussion and opinion regarding the City’s changes to the Settlement Agreement as part of the proposed project. See also Master Response 3 regarding the Settlement Agreement. No further response is required.
- Response D2-4: See Master Response 1 regarding the installation of turf. A transcript of the Draft EIR public hearing before the Parks, Recreation and Culture Commission on December 6, 2018 and responses to CEQA comments is included in Section C of this document.
- Response D2-5: This comment provides a suggestion for a different method for comparing existing and proposed with project participant and spectator usage, rather than the information provided in Tables III-1 and III-2 in the Draft EIR that show existing and proposed field use. Tables III-1 and III-2 estimate new participants and spectators based on additional hours of operation, and were generated by City staff. As experts on the matter, City staff’s best judgement in the determination of additional participants and spectators is appropriate. As noted in the comment, the increase in use (in regards to numbers of users and the increase in evening hours of use with lights) associated with the proposed project provided in Tables III-1 and III-2 was used as the basis for the traffic and noise analysis provided in the Draft EIR.
- Response D2-6: This comment regarding the adequacy of the visual resources analysis contained in the Draft EIR is noted. No additional response is required.
- Response D2-7: This comment regarding the adequacy of the transportation analysis contained in the Draft EIR is noted. This comment is noted, and the commenter does not question the contents or adequacy of the analysis

contained in the Draft EIR. In regards to the parking and emergency access analysis, see Master Response 6.

Response D2-8: In regards to noise measurements and averaging noise levels over a 24-hour period, see Master Response 4.

As discussed on page 120 of the Draft EIR, with implementation of the proposed Highlands Park project, it is estimated that the nearest receptors would be subject to noise levels of 57.1 dBA Ldn on weekdays and 57.6 dBA Ldn on weekends, which would result in an increase in noise levels of 2.6 dBA Ldn on weekdays and 2.4 dBA Ldn on weekends. This noise level increase would be below the City's criteria for noise-level increases of 3 dBA or more and would remain below the City's normally acceptable noise level for single-family residential and recreational and uses. In addition, as discussed above, according to the General Plan, a significant impact would occur if noise levels would cause the Ldn at noise-sensitive uses to increase by 3 dB or more and exceed the "normally acceptable" level or cause the Ldn at noise-sensitive uses to increase 5 dB or more and remain "normally acceptable". Implementation of the proposed project would not cause the Ldn to increase 5 dB and resulting noise levels at the nearest sensitive receptors would remain "normally acceptable." In addition, audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Therefore, noise levels with implementation of the proposed project would be similar to existing conditions and would not result in a perceptible increase in noise levels.

As shown in Table IV.C-6 of the Draft EIR, the interior Lmax standard for residential land uses is 55 dBA Lmax during the daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA Lmax during the nighttime (10:00 p.m. to 7:00 a.m.). As discussed above, implementation of the proposed project would extend the hours that games and events would occur; however events would not occur past 10:00 p.m. Therefore the nighttime noise level performance standards are not applicable to the proposed project.

Based on the EPA's Protective Noise Levels,<sup>3</sup> with a combination of walls, doors, and windows, standard construction for Northern California buildings (STC-24 to STC-28) would provide more than 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open. With windows open, the Burton Park project site would meet the City's interior noise standard of 55 dBA L<sub>max</sub> (i.e., 68.2 dBA – 15 = 53.2 dBA). In addition, with windows open, the Highlands Park project site would also meet the City's interior noise standard of 55 dBA L<sub>max</sub> (i.e., 59.4 dBA –

---

<sup>3</sup> Environmental Protection Agency, 1978. *Protective Noise Levels, Condensed Version of EPA Levels Document*. November.



15 = 44.4 dBA). With windows closed, noise levels for residents would be reduced further below the City's interior noise standard at the Burton Park project site (i.e.,  $68.2 \text{ dBA} - 25 = 43.2 \text{ dBA}$ ) and at the Highlands Park project site (i.e.,  $59.4 \text{ dBA} - 25 = 34.4 \text{ dBA}$ ). Therefore, the proposed project would comply with the City's interior  $L_{\text{max}}$  standards for residential land uses.

- Response D2-9: In regards to noise measurements and averaging noise levels over a 24-hour period, see Master Response 4.
- Response D2-10: The Noise Element of the City of San Carlos General Plan in this comment is associated with comments identified in D2-2 through D2-9.
- Response D2-11: The resume in this comment is associated with comments identified in D2-1.

*This page intentionally left blank*

## IV. DRAFT EIR TEXT REVISIONS

Chapter IV presents specific changes to the text of the Draft EIR that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR in response to comments received during the public review period, or are staff-initiated changes. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Text deleted is shown in ~~strikeout~~.

The following text revision is made to page 88 of the Draft EIR:

### Highlands Park

10. Highlands Park south parking lot near tennis courts
11. Highlands Park north parking lot near North Baseball Diamond
12. Melendy Drive between Aberdeen Drive and Torino Drive
13. Aberdeen Drive between Melendy Drive and Dundee Lane
14. Glasgow Lane between Aberdeen Drive and Dundee Lane
15. Dundee Lane between Aberdeen Drive and the eastern end of Dundee Lane
16. Elston Court between Coleman Court and the end
17. Coleman Court between Elston Court and the end
18. Coronado Avenue from 200 feet west of Coleman Court to 200 feet east of Coleman Court

Mitigation Measure TRA-3 on page 102 in the Draft EIR is revised as follows:

Mitigation Measure TRA-3: The City shall implement the following pedestrian improvements to reduce the impact to a less-than-significant level:

- At Burton Park, the City shall construct pedestrian sidewalks and crosswalks along Baytree Road between Chestnut Street and Woodland Avenue. The crosswalks shall be high-visibility (i.e., zebra or ladder styles).
- At Highlands Park, the City shall enhance pedestrian crossing opportunities along Aberdeen Drive to include a high visibility crosswalk (with curb ramps) at the north side of the intersection of Glasgow Lane. The City shall install a new curb ramp on the west side of Aberdeen Drive across from the existing curb ramp at the northeast corner at Glasgow Lane. Additionally, the City shall initiate a program to prohibit on-street parking adjacent to existing driveways along Aberdeen Drive to improve driver sight lines and enhance safety in the areas nearest each driveway. (LTS)

The following text revision is made to page 103 of the Draft EIR after Table IV.B-12:

The parking utilization survey confirmed that approximately 180 to ~~204~~ 234 parking spaces are typically available during the study periods.

The Draft EIR is revised on pages 7 and 127, as follows:

NOI-1: Noise from construction activities at the ~~Burton Park~~ project sites would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Page 133 of the Draft EIR is revised as follows:

## **2. Addition of Artificial Turf to Existing Fields Alternative**

To meet the project objectives of allowing additional hours of field use and maximize use of existing City fields, this alternative assumes that the proposed project would be implemented as described in the Draft EIR (i.e., existing lights at Madsen Field and Highlands Field would be replaced with improved LED lighting systems, new LED lights would be installed at Flanagan Field and Stadium Field, and proposed project changes in field use, parking and signage at Highlands Park fields would occur). In addition artificial turf would be installed on Flanagan, Madsen, and Stadium fields. Similar to the artificial turf field at Highlands Park on Highlands Field, the artificial turf infill material would be coconut husks. Timing and use of the fields would be the same as under the proposed project (see Tables III-1 and III-2 in Chapter III, Project Description) as all night use of the fields would need to stop at 10:00 p.m. per the City's Field Use Policy. Development of this alternative would not reduce or avoid any of the significant impacts identified for the proposed project (a requirement for the identification of CEQA alternatives). There could be beneficial savings in regards to water conservation with this alternative, as the artificial turf would not need to be regularly watered. However, this alternative would have adverse policy consequences related to curtailing the community's use of the grass fields and range of activities, such as general play, picnicking, and walking and exercising dogs, because food and animals are not allowed on artificial turf fields per City policy. Thus, this option is not feasible due to policy considerations, that the City would convert natural grass fields to artificial turf at Burton Park and Stadium Field at Highlands Park and/or other City fields. While this alternative would meet most of the basic project objectives allow more time that the fields were available for use, as stated in Chapter III, Project Description, the City has determined that there is no funding for implementation of this costly alternative, whereas there is funding for initiation of the proposed lighting improvement project. Additionally, the City has previously determined that conversion to artificial turf was not part of the proposed project being considered in this EIR. Should the City decide to convert any City field from grass to artificial turf in the future, staff will consider and evaluate the conversion as a separate project. Therefore, because it would not reduce or avoid any significant impacts, would reduce community benefits and use associated with existing grass fields, and is not reasonably foreseeable by the City, the Addition of Artificial Turf to Existing Fields alternative is not further evaluated in this EIR.

**APPENDIX G**

**PROJECT CHANGES TO SETTLEMENT  
AGREEMENT RESTRICTIONS**



## PROJECT CHANGES TO SETTLEMENT AGREEMENT RESTRICTIONS

A Settlement Agreement ("Agreement") was entered into in September 2010, by and between the City of San Carlos ("City") and Save San Carlos Parks ("SSCP"), an unincorporated association. The Agreement specifies that the City may make changes in the restrictions contained in the Agreement in the future, subject to a public process, but without any amendment to the Agreement. For clarity and informational purposes, this document sets forth excerpts from the Agreement (using the original paragraph numbering) and shows in strike-through and underlined fashion the changes that would be made to the restrictions in the Agreement by virtue of the proposed project.

2. Traffic & Parking Improvements. In connection with the Project, the City shall undertake the following traffic and parking improvement measures:

a. Restricted Parking on East Side of Aberdeen. A sign or signs shall be installed prohibiting parking on the east side of Aberdeen Drive from Glasgow Lane north to the cul de sac on Aberdeen Drive on Saturdays and Sundays from 8:00 a.m. to 6:00 p.m. In addition, the northeast and southeast corners of Aberdeen Drive and Glasgow Lane extending approximately to the driveways of the houses located on Aberdeen Drive at these corners shall be painted red to prohibit parking in these areas. Similarly, the southeast corner of Aberdeen Drive and Dundee Lane shall be painted red to prohibit parking in this area.

b. Signs Notifying Drivers of Off-Street Parking Lots. A sign shall be placed at the entrance to the lower parking lot adjacent to the tennis courts ("Lot A") reading: "PARKING LOT A/PLEASE RESPECT OUR NEIGHBORS/PARK IN LOTS." A sign shall be placed at the entrance to the upper parking lot ("Lot B") reading: "PARKING LOT B/PLEASE RESPECT OUR NEIGHBORS/PARK IN LOTS." A sign shall also be placed at the exit of Lot B reading "ADDITIONAL PARKING" with a directional arrow pointing to Lot A.

c. Speed Humps on Aberdeen Drive. The City shall install two (2) speed humps on Aberdeen Drive. At least one of the speed humps shall be installed past the driveway leading to Lot B. Although, pursuant to City Council policy, installation of a speed hump would normally require written approval by the homeowners and residents on both sides of the street where the hump is to be installed, since the City is the proponent of the proposal to install the speed humps, the Parties acknowledge and agree that no such written approval is required in this instance.

d. Stop Sign on Glasgow Lane. A stop sign shall be placed on Glasgow Lane at Aberdeen Drive requiring traffic going westbound on Glasgow Lane to stop at Aberdeen Drive.

g. Prohibit Parking on Lot B Driveway. City shall paint the curbs on both sides of the driveway leading to Lot B red and/or install a sign or signs indicating that parking is prohibited on the driveway leading to Lot B. A stop sign shall be placed at the end of the Lot B driveway at Aberdeen Drive.

h. Encourage Parking at Lot A. An additional opening to the Project Field will be installed near Aberdeen Drive so that users may access the Project Field from Lot A. Also, City shall relocate containers with field equipment so as to be closer to Lot A than Lot B.

Except for the lines delineating the baseball/softball fields, no permanent lines or markings shall be installed on the Project Field.



**APPENDIX H**

**EMERGENCY CALLS INFORMATION**



# Incident Summary Query Results

Start Date/Time: 04/20/2016 00:00:00

End Date/Time: 04/20/2018 23:59:00

Class: P

Jurisdiction: SOS

Location: %ELSTON CT%

Incident	Date/Time	Location	Description
<a href="#">SOS161500074</a>	05/29/2016 12:33:46	COLEMAN CT/ELSTON CT ,SNC	PARKING PROBLEM
<a href="#">SOS161650041</a>	06/13/2016 09:13:12	20 ELSTON CT ,SNC	PANIC/DURESS ALARM
<a href="#">SOS161980147</a>	07/16/2016 16:19:40	16 ELSTON CT ,SNC	RESIDENTIAL ALARM
<a href="#">SOS162500090</a>	09/06/2016 10:17:39	20 ELSTON CT ,SNC	RESIDENTIAL ALARM AUDIBLE
<a href="#">SOS162630229</a>	09/19/2016 22:01:15	16 ELSTON CT ,SNC	CARBON MONOXIDE DETECTOR
<a href="#">SOS162860038</a>	10/12/2016 08:01:49	5 ELSTON CT ,SNC	PAST DEFRAUDING / FRAUD
<a href="#">SOS170700221</a>	03/11/2017 15:48:49	20 ELSTON CT ,SNC	RESIDENTIAL ALARM AUDIBLE
<a href="#">SOS171080082</a>	04/18/2017 10:18:36	20 ELSTON CT ,SNC	RESIDENTIAL ALARM AUDIBLE
<a href="#">SOS171210178</a>	05/01/2017 14:57:38	28 ELSTON CT ,SNC	HEART PROB CLAMMY/COLD SWEATS
<a href="#">SOS171210185</a>	05/01/2017 15:15:18	28 ELSTON CT ,SNC	911 WIRELESS HANGUP/OPEN LINE
<a href="#">SOS171460238</a>	05/26/2017 18:17:49	COLEMAN CT/ELSTON CT ,SNC	PARKING PROBLEM
<a href="#">SOS172510242</a>	09/08/2017 18:29:37	COLEMAN CT/ELSTON CT ,SNC	PARKING PROBLEM
<a href="#">SOS180340053</a>	02/03/2018 09:38:22	16 ELSTON CT ,SNC	FIRE ALARM

13 incidents found.



**APPENDIX I**

**NOTICE TO EXTEND COMMENT PERIOD**





**NOTICE OF PUBLIC COMMENT PERIOD EXTENSION  
DRAFT ENVIRONMENTAL IMPACT REPORT  
CITY OF SAN CARLOS**

**DATE:** February 7, 2018

**TO:** State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Interested Organizations

**FROM:** Kaveh Forouhi  
Senior Engineer  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070

**SUBJECT:** Notice of Public Comment Period Extension for Draft Environmental Impact Report (DEIR) of the Burton and Highlands Parks Project

**LEAD AGENCY/SPONSOR:** City of San Carlos Public Works Department

**PROJECT TITLE:** Burton and Highlands Parks Project

**REVIEW PERIOD:** November 20, 2017 through February 28, 2018

By this notice, the City of San Carlos, as California Environmental Quality Act (CEQA) Lead Agency is announcing the extension of the public comment period on the Draft Environmental Impact Report (DEIR) of the Burton and Highlands Parks Project

**PROJECT LOCATION:** Burton Park and Highlands Parks are located in the city of San Carlos in San Mateo County on the San Francisco Peninsula. The DEIR was released on November 20, 2017.

**The Public Review Period is hereby extended from February 15, 2018 to February 28, 2018. Written comments on the Draft EIR are due by 5:00 p.m. on Wednesday, February 28, 2018. Comments should be addressed to:**

Kaveh Forouhi, Senior Engineer, City of San Carlos, Public Works Department, 600 Elm Street, San Carlos, California 94070; or via email to [KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org) with "Burton and Highlands Parks EIR" as the subject.

**PROJECT DESCRIPTION:** The proposed project is intended to provide additional and improved night lighting at fields, also referred to as the "project sites," at Burton Park and Highlands Park to allow for additional hours of play and assist in meeting the unmet demand for field space. The proposed project involves the installation of new light-emitting diode (LED) lights on the currently unlit Flanagan Field at Burton Park and the

unlit Stadium Field at Highlands Park, along with safety lighting as necessary. The project also includes upgrading the existing metal-halide lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights. The project also involves some traffic facility, parking and signage changes. It will include changes in use of the fields at Highlands Park to ensure use is consistent with the rules governing all other City fields through the identification and evaluation of a modified project as contemplated by the terms of a 2010 Settlement Agreement with Save San Carlos Parks (SSCP).

Consistent with Section 15161 of the California Environmental Quality Act (CEQA) Guidelines, a project-level DEIR was prepared to analyze the potential impacts of replacement of existing lighting and increased use at Burton Park and Highlands Park.

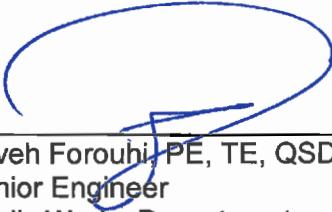
Copies of the DEIR continue to be available for review to interested parties at City Hall at 600 Elm Street; or on the City's website at:

<https://www.cityofsancarlos.org/government/departments/current-parks-recreation-projects>

After all comments have been received, a Final EIR will be prepared, the Planning Commission will consider the information in the Final EIR and make a recommendation to City Council. City Council will then consider certification of the EIR and make a decision on the project at a public hearing, the dates of which are yet to be determined. A separate public notice of these hearings will be provided.

If you decide to challenge the EIR, or other actions of the City pertaining to the Burton and Highlands Parks project in court, you may be limited to raising only those issues raised at the public hearings described above or in written correspondence received by the Public Works Department at or prior to those hearings and during the public comment period.

For further information please contact Kaveh Forouhi, at (650) 802-4202 or via email at [KForouhi@cityofsancarlos.org](mailto:KForouhi@cityofsancarlos.org).



Kaveh Forouhi, PE, TE, QSD/QSP  
Senior Engineer  
Public Works Department