

DRAFT

**BURTON AND HIGHLANDS PARKS PROJECT
CEQA FINDINGS**

STATE CLEARING HOUSE NO. 2017052066

**PURSUANT TO SECTION 15091 AND 15093 OF THE STATE CEQA
GUIDELINES AND SECTION 21081 OF THE PUBLIC RESOURCES CODE**

LSA

August 2018

This page intentionally left blank

TABLE OF CONTENTS

1.0 INTRODUCTION.....	1
1.1 STATUTORY REQUIREMENTS FOR FINDINGS	1
1.2 RECORD OF PROCEEDINGS.....	2
1.3 ORGANIZATION/FORMAT OF FINDINGS	3
2.0 BURTON AND HIGHLANDS PARKS PROJECT	3
2.1 PROJECT OBJECTIVES	3
2.2 PROJECT DESCRIPTION.....	4
2.2.1 BURTON PARK.....	4
2.2.2 Highlands Park.....	5
2.3 ALTERNATIVES.....	6
3.0 EFFECTS DETERMINED TO BE MITIGATED TO LESS-THAN-SIGNIFICANT LEVELS	7
3.1 AIR QUALITY	7
3.2 TRANSPORTATION AND CIRCULATION	8
3.3 NOISE AND VIBRATION	10
4.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT OR NOT SIGNIFICANT.....	11
4.1 AESTHETICS/VISUAL RESOURCES	11
4.2 AGRICULTURAL AND FORESTRY RESOURCES.....	11
4.3 AIR QUALITY	11
4.4 BIOLOGICAL RESOURCES.....	12
4.5 CULTURAL RESOURCES.....	12
4.6 GEOLOGY AND SOILS.....	12
4.7 GREENHOUSE GAS EMISSIONS.....	13
4.8 HAZARDS AND HAZARDOUS MATERIALS	13
4.9 HYDROLOGY AND WATER QUALITY	13
4.10 LAND USE AND PLANNING	13
4.11 MINERAL RESOURCES	13
4.12 POPULATION AND HOUSING	14
4.13 PUBLIC SERVICES	14
4.14 RECREATION.....	14
4.15 TRIBAL CULTURAL RESOURCES	14
4.16 UTILITIES AND SERVICE SYSTEMS.....	14
5.0 FEASIBILITY OF PROJECT ALTERNATIVES	14
5.1 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER STUDY	14
5.1.1 Off-Site Alternative.....	14
5.1.2 Addition of Artificial Turf to Existing Fields Alternative.....	15
5.2 PROJECT ALTERNATIVES.....	15
5.2.1 No Project Alternative	15
5.2.2 Reduced Project Alternative.....	16
5.2.3 Only Field Lighting Alternative.....	17
6.0 SIGNIFICANT EFFECTS THAT CANNOT BE MITIGATED TO A LESS-THAN-SIGNIFICANT LEVEL	17
7.0 CONCLUSION	17

This page intentionally left blank

1.0 INTRODUCTION

1.1 STATUTORY REQUIREMENTS FOR FINDINGS

The California Environmental Quality Act (CEQA), (Cal. Pub. Res. Code, §21080) and the CEQA Guidelines (Cal. Code Regs., Title 14, §15063) state that if it has been determined that a project may or will have significant impacts on the environment then an Environmental Impact Report (EIR) must be prepared. Accordingly, an EIR has been prepared by the City of San Carlos (hereafter referred to as "the City") to evaluate potential environmental effects that may result from implementation of the proposed Burton and Highlands Parks Project (hereafter referred to as the proposed project). The EIR has been prepared in accordance with the California Environmental Quality Act of 1970, as amended (Cal. Pub. Res. Code, §21000 et seq.), and implementing State CEQA Guidelines (Cal. Code Regs., Title 14, §15000 et seq.).

In accordance with CEQA Guidelines Section 15090, the City, as Lead Agency for the project, certifies that:

- a. The Final EIR for the proposed project has been completed and processed in compliance with the requirements of CEQA;
- b. The Final EIR was presented to the City Council, as the decision-making body for the proposed project, and the City Council reviewed and considered the information contained in the Final EIR prior to approving the proposed project; and
- c. The Final EIR reflects the City's independent judgment and analysis. The District has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c) in retaining its own environmental consultant and directing the consultant in the preparation of the EIR as well as reviewing, analyzing, and revising material prepared by the consultant.

These CEQA findings of fact (hereafter referred to as "Findings") and mitigation monitoring and reporting program (MMRP) have been prepared in accordance with CEQA and the CEQA Guidelines. The purpose of these Findings is to satisfy the requirements of Public Resources Code Section 21081 and Sections 15090, 15091, 15092, and 15097 of the CEQA Guidelines, in connection with the approval of the proposed project. Before approving a project, an EIR must be certified pursuant to Section 15090 of the CEQA Guidelines. Prior to approving a project for which an EIR has been certified, and for which the EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following Findings, accompanied by a brief explanation of the rationale, pursuant to Public Resources Code Section 21081 Section 15091 of the CEQA Guidelines, for each identified significant impact:

1. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

It is recommended that one or more of the specific written Findings above be adopted regarding each significant impact associated with the proposed project. Those Findings are presented here, along with a presentation of facts in support of the Findings. Concurrent with the adoption of these Findings, the City Council will adopt the MMRP, presented as a separate document. Section 15092 of the CEQA Guidelines states that after consideration of an EIR, and in conjunction with the Section 15091 findings identified above, the lead agency may decide whether or how to approve or carry out the project. Per Section 15093, the lead agency may approve a project with unavoidable adverse environmental effects only when it finds that specific economic legal, social, technological, or other benefits of the proposed project outweigh those effects. Section 15093 requires the lead agency to document and substantiate any such determination in a "statement of overriding considerations" as a part of the record. Because no unavoidable adverse environmental effects associated with the proposed project were identified in the EIR, a Statement of Overriding Considerations is not required to be prepared as part of the Findings.

It is recommended that the City Council expressly finds the Final EIR for the proposed project reflects the City's independent review and judgment, as required by CEQA. In accordance with the provisions of CEQA and the CEQA Guidelines, it is recommended that the City Council adopt these Findings as part of its certification of the Final EIR.

1.2 RECORD OF PROCEEDINGS

For purposes of CEQA and the Findings set forth herein, the record of proceedings for the City's decision on the project consists of: a) matters of common knowledge to the City, including, but not limited to, federal, State and local laws and regulations; and b) the following documents which are in the custody of the City:

- Notice of Preparation and other public notices issued by the City in conjunction with the project (see Appendix A of the Draft EIR for the Notice of Preparation);
- The Public Review Draft EIR and supporting documentation prepared for the proposed project (Appendix A through D and the Draft EIR), dated November 2017;
- All written and verbal comments submitted by agencies, organizations and members of the public during the public comment period and responses to those comments (see Response to Comments Document, dated July 2018);
- The Mitigation Monitoring and Reporting Program;
- The Staff Report for the City Council;
- All Findings and resolutions adopted by the City in connection with the project, and all documents cited or referred therein;

- All final reports, studies, memoranda, maps, correspondence, and all planning documents prepared by the City or the consultants to each, or responsible or trustee agencies with respect to: a) the District's compliance with CEQA; b) development of the project; or c) the District's action on the project; and
- All documents submitted to the City by agencies or members of the public in connection with development of the project.

1.3 ORGANIZATION/FORMAT OF FINDINGS

Section 2 of these Findings contains a summary description of the project, sets forth the objectives of the project, and briefly describes alternatives evaluated in the Draft EIR. Section 3 identifies the potentially significant effects of the project which were determined to be mitigated to a less-than-significant level. All numbered references identifying specific mitigation measures refer to numbered mitigation measures found in the Draft EIR and Initial Study Checklist (Appendix B of the Draft EIR). Section 4 identifies the project's potential environmental effects that were determined not to be significant, and do not require mitigation. Section 5 discusses the feasibility of project alternatives.

2.0 BURTON AND HIGHLANDS PARKS PROJECT

This section lists the objectives of the proposed project, provides a brief description of the project, and lists the project alternatives evaluated in the Draft EIR.

2.1 PROJECT OBJECTIVES

The following are the primary objectives of the proposed project:

- 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.
- Provide improved LED lighting systems at Madsen Field at Burton Park and Highlands Field at Highlands Park to improve field playing conditions and reduce energy use and existing levels of light spillover and glare.
- Improve safety and increase nighttime use of Flanagan Field at Burton Park and Stadium Field at Highlands Park by installing new LED lighting.
- Provide opportunities to maximize the use of Burton and Highlands Parks to help meet the existing unmet community demand for field space.
- Ensure that City parks and fields are managed consistently per the Field Use Policy and general City practices for all fields.

2.2 PROJECT DESCRIPTION

The proposed project analyzed in the Draft EIR is the Burton and Highlands Park Project as described below. First lighting improvements at Burton Park are described then lighting improvements at Highlands Park are described.

2.2.1 BURTON PARK

The proposed project involves the replacement of existing lighting at Madsen Field and installation of new lighting on Flanagan Field at Burton Park.

2.2.1.1 Madsen Field

Replacement lighting at Madsen Field would utilize the existing light poles and replace the existing metal halide light fixtures with new LED light fixtures. Madsen Field currently contains a total of five light poles that range in height from 60 feet to 80 feet. The five existing poles at Madsen Field would hold a total of 30 new LED light fixtures and four up-light LED light fixtures for a total of 35 luminaires or light fixtures. The new LED lighting system would have a total connected load of 34.5 kW. Each of the light fixtures at Madsen Field would be equipped with lights ranging from 2.30 kW maximum at the two poles behind home plate and at the pole in the outfield (C2) to 5.75 kW maximum at the poles in the outfield along the first base and third base lines to allow for player safety on the field. While most of the fixtures would be pointed down at the field, the new lighting would also contain fixtures mounted at heights of 25 feet on some poles that point up towards the sky. The purpose of these fixtures is to allow players on the field to safely see balls that reach higher than 50 feet in height.

2.2.1.2 Flanagan Field

New lighting at Flanagan Field would include the placement of a total of six new light poles. Two poles would be placed along the first base line, two poles would be placed along the third base line, and two poles would be placed at the edge of the outfield. The light poles will range in height from 70 feet to 80 feet. The new poles will be constructed of galvanized steel and mounted on 10 to 20 square foot concrete bases. Minor excavation would be required to construct the foundations for each pole and underground trenching would be required to install electrical connections. The six new poles at Flanagan Field would hold a total of 43 new LED light fixtures including two up-light LED light fixtures. The new LED lighting system would have a total connected load of 49.45 kW. The two new poles on northern end of the field would each hold five light fixtures; all of which would be directed at the Flanagan Field softball diamond. The two new poles located along the first base line and third base line would each hold eight light fixtures. The two new poles located in the outfield would contain five light fixtures each and would light up the Flanagan Field softball diamond and the eastern soccer field.

The proposed project would involve a change in use of Flanagan Field on weekdays from events currently ending by 6:30 p.m. to events ending at 10:00 p.m. for soccer and softball games and practices. On weekends, soccer and softball practices and games that currently end by 5:00 p.m. could also end at 10:00 p.m. Additionally and for all uses on an annual basis, the approximate number of participants is expected to increase from a maximum of 220 to a maximum of 411 (a

difference of 191 participants), and the approximate number of spectators is expected to increase from a maximum of 97 to a maximum of 301 (a difference of 204 spectators).

2.2.2 Highlands Park

The proposed project at Highlands Park involves the replacement of the existing metal halide sports lighting system with an LED lighting system at Highlands Field, the installation of a new LED lighting system and safety lighting at Stadium Field and changes in use of both fields.

2.2.2.1 Highlands Field

Highlands Field is currently lit by metal halide lighting on 12 light poles. Due to their age, upgrades to the lighting system would require the replacement of the poles to support the new lighting technology. The proposed light poles would range from 60 feet in height to 80 feet in height. The new lighting system at Highlands Field would replace the existing metal halide lighting system with a new LED lighting system to ensure more even lighting on the field and reduce energy use and light spillover and glare on surrounding uses. The proposed new lighting system would consist of galvanized steel poles and powder-coated aluminum light fixtures and cut-off visors and mounted on 10 to 20 foot concrete bases. The visors would reduce light spillover and glare to the surrounding area to the greatest extent possible. A total of 12 replacement light poles would be installed at Highlands Field. The replacement light poles at Highlands Field would be aimed at the south baseball diamond (Kiwani Field), north baseball diamond (Rotary Field), and soccer field. A total of six light poles with 31 light fixtures with a total load of 35.65 kW would illuminate the southern baseball diamond. Four light poles would illuminate the soccer field. Five poles with a total of 28 light fixtures and a total load of 32.2 kW would be aimed at the north baseball diamond. Lighting at Highlands Field would also include fixtures mounted at 25 feet in height that are pointed up towards the sky so that players on the field can safely see balls that reach higher than 50 feet in height.

In addition to the installation of new and upgraded lights on sports fields at Burton and Highlands Parks, a component of the proposed project includes alterations to operational restrictions at Highlands Park (e.g., regarding field operations, parking, traffic facilities and signage).

2.2.2.2 Stadium Field

New lighting at Stadium Field would include the placement of eight new light poles at the field. Each of the new poles would be 70 feet in height. One pole would be located along the first base line on the diamond, two poles would be placed along the third base line, one pole would be placed at the edge of right field, two poles would be placed on either side of the center field line of the soccer field, and two poles would be placed at the northern end of the soccer field. Minor excavation would be required to construct the 10 to 20 square foot concrete bases for each pole and underground trenching would be necessary to allow for electrical connections. Two of the new poles at Stadium Field would be aimed at the baseball diamond while the other six poles would illuminate both the soccer field and baseball diamond. A total of 10 light fixtures with an average and maximum load of 8.26 kW would light up the baseball diamond exclusively and 25 light fixtures with an average and maximum load of 28.75 kW would light up both the soccer field and baseball diamond.

The proposed new lighting system would consist of galvanized steel poles and powder-coated aluminum light fixtures and cut-off visors. The visors would reduce light spillover and glare to the surrounding neighborhood to the greatest extent possible. Light fixtures at Stadium Field would be equipped with LED lights ranging from 3.45 kW maximum at the poles behind home plate and the poles at midfield to 6.90 kW maximum at the pole in the outfield.

The proposed project would involve a change in use of Stadium Field on weekdays from events currently ending by 5:00 p.m. (for soccer and baseball practices and games) to events ending at 10:00 p.m. (soccer practices and games). On weekends, soccer practices and games that currently end by 5:00 p.m. would end at 10:00 p.m. and baseball practices and games that currently end by 5:00 p.m. would end by 10:00 p.m. Other uses at the field include soccer tournaments and camp uses during the summer months which would not require field lighting. Additionally and for all uses, the approximate number of participants on an annual basis is expected to increase from a maximum of 242 to a maximum of 368 (a difference of 126 participants), and the approximate number of spectators is expected to increase from a maximum of 190 to a maximum of 310 (a difference of 120 spectators).

Additionally low level safety lighting will need to be installed in the vicinity of Stadium Field to allow field users to leave the fields after the lights are turned off and to access the parking areas. To address safety and security issues and light spillover concerns, the safety lighting shall be designed to include smart controls and shielding to achieve appropriate lighting levels, no off-site spillover or glare, and maximum energy savings. For pedestrian traffic, a design to achieve these goals could include a combination of lighting bollards and low level lighting poles (typically mounted at 12 feet in height) or a similar design.

2.3 ALTERNATIVES

The following three alternatives were evaluated within the EIR:

- The CEQA-required **No Project** alternative assumes that the project sites at Burton and Highlands Parks would remain in their existing conditions. The existing metal-halide lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park would remain, no new lighting would be installed at the currently unlit fields at the two parks, and management and use of Highlands Park would remain inconsistent with the City's policies and management of other City fields.
- In order to reduce the significant traffic impacts associated with lighting improvements at Burton Park, the **Reduced Project** alternative assumes that no new lights would be installed at Flanagan Field at Burton Park; however the existing lights at Madsen field would be upgraded to LED lights. All of the proposed project changes to Highlands Park fields (improved lights, new field and safety lights, changes in use of the fields and parking and signage) would continue to occur under this alternative.
- The **Only Field Lighting** alternative assumes that the proposed project changes to the Settlement Agreement restrictions would not occur and the stated restrictions and requirements of the Settlement Agreement would continue. Under this alternative, new LED

field lights would be installed 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 alternative also includes upgrading the existing metal-halide lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights.

A more detailed description of these alternatives and required Findings are set forth in Section 5: Feasibility of Project Alternatives.

3.0 EFFECTS DETERMINED TO BE MITIGATED TO LESS-THAN-SIGNIFICANT LEVELS

The Draft EIR and Initial Study Checklist identified certain potentially significant effects that could result from the project. However, the City finds for each of the significant or potentially significant impacts identified in this section that based upon substantial evidence in the record, changes or alterations have been required or incorporated into the project which avoid or substantially lessen the significant effects as identified in the Final EIR and, thus, that adoption of the mitigation measures set forth below will reduce these significant or potentially significant effects to less-than-significant levels. Adoption of the recommended mitigation measures will effectively make the mitigation measures part of the project.

3.1 AIR QUALITY

The proposed project may violate air quality standards or contribute substantially to an existing or projected air quality violation.

Mitigation Measure AIR-1: Consistent with the Basic Construction Mitigation Measures required by the BAAQMD, the following actions shall be incorporated into construction contracts and specifications for the project:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.

- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City of San Carlos regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Finding for Impact AIR-1: Mitigation Measure AIR-1 requires the contractor to comply with BAAQMD guidance for construction dust suppression measures. The purpose of these measures is to reduce the amount of dust and particulate matter in the ambient air as a result of any construction or construction related activities by requiring actions to prevent, reduce, or mitigate dust and particulate emissions. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level. Pursuant to CEQA Guidelines Section 15091(a)(1), the City finds that Mitigation Measure AIR-1 will be incorporated into the project via conditions of approval, and will reduce construction dust impacts to a less-than-significant level.

3.2 TRANSPORTATION AND CIRCULATION

During the weekday PM peak period, the addition of project-generated traffic at Burton Park in the Near-Term Condition would result in a significant impact at the intersection of Cedar Street/Brittan Avenue. All other study intersections would continue operating at acceptable levels of service with project-generated traffic.

Mitigation Measure TRA-1: To achieve acceptable intersection operation under Near-Term plus Project Conditions, the City shall implement one of the following measures:

- Convert the Cedar Street/Brittan Avenue intersection from an all-way-stop controlled intersection to a traffic signal controlled intersection, or

- Convert the Cedar Street/Brittan Avenue intersection from an all-way-stop controlled intersection to a mini-roundabout.

Finding for Impact TRA-1: Mitigation Measure TRA-1 requires the City to implement one of two options for the Cedar Street/Brittan Avenue intersection in order to reduce the level of service (LOS) under Near-Term plus Project Conditions from E to A or B, depending on the option selected. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level. Pursuant to CEQA Guidelines Section 15091(a)(1), the City finds that Mitigation Measure TRA-1 will be incorporated into the project via conditions of approval, and will reduce operational impacts at the Cedar Street/Brittan Avenue intersection to a less-than-significant level.

During the weekday PM peak period under Cumulative Plus Project Conditions, the addition of project-generated traffic at Burton Park would result in a significant impact at the intersection of Cedar Street/Brittan Avenue. The project's incremental effect would be cumulatively considerable.

Mitigation Measure TRA-2: Implement Mitigation Measure TRA-1.

Finding for Impact TRA-2: Mitigation Measure TRA-1 requires the City to implement one of two options for the Cedar Street/Brittan Avenue intersection in order to reduce the level of service (LOS) under Cumulative Plus Project Conditions from F to A or B, depending on the option selected. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level. Pursuant to CEQA Guidelines Section 15091(a)(1), the City finds that Mitigation Measure TRA-1 will be incorporated into the project via conditions of approval, and will reduce operational impacts at the Cedar Street/Brittan Avenue intersection to a less-than-significant level.

The addition of project-generated vehicular traffic could increase the potential for conflicts with pedestrians crossing streets or parking lots to access the parks which would be a significant impact.

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.

Finding for Impact TRA-3: Mitigation Measure TRA-3 requires the City to construct pedestrian sidewalks and crosswalks along Baytree Road between Chestnut Street and Woodland Avenue, and enhance pedestrian crossing opportunities along Aberdeen Drive. The purpose of this measure is to reduce the potential for automobile conflicts with pedestrians trying to access the project sites. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level as the additional pedestrian crossings would increase visibility and safety. Pursuant to CEQA Guidelines Section 15091(a)(1), the City finds that Mitigation Measure TRA-3 will be incorporated into the project via conditions of approval, and will reduce impacts to pedestrians to a less-than-significant level.

3.3 NOISE AND VIBRATION

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.

- Mitigation Measure NOI-1:** The project contractor shall implement the following measures during construction of the project:
- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
 - Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.
 - Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.
 - Ensure that all general construction related activities are restricted to 8:00 a.m. and 6:00 p.m. Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays and Sundays. No construction shall be permitted on certain holidays.
 - Designate a "disturbance coordinator" at the City of San Carlos who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem.

Finding for Impact NOI-1: Mitigation Measure NOI-1 requires the project contractor to implement a variety of measures to ensure that noise levels associated with project construction are minimal. The purpose of these measures is to reduce the amount of noise as a result of any construction or construction-related activities by requiring actions to prevent, reduce or mitigate construction noise. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level. Pursuant to CEQA Guidelines Section 15091(a)(1), the City finds that Mitigation Measure NOI-1 will be incorporated into the project via conditions of approval, and will reduce construction noise impacts to a less-than-significant level.

4.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT OR NOT SIGNIFICANT

The City finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the project identified in the EIR and Initial Study Checklist are not significant or are less than significant, and do not require mitigation. Chapter VI, Other CEQA Considerations, of the Draft EIR also provides a detailed analysis of the less-than-significant impacts of the proposed project.

4.1 AESTHETICS/VISUAL RESOURCES

The project sites are not within any scenic vista designated by the City of San Carlos, or within a State Scenic Highway. Additionally, the proposed project would not block public views of a scenic vista. Installation of the new and replacement lighting would introduce new sources of light and glare at the project sites but not at levels that exceed the identified impact thresholds. Therefore, the City finds that impacts associated with aesthetics would be less than significant.

4.2 AGRICULTURAL AND FORESTRY RESOURCES

The project sites are located within existing parks and are surrounded by residential uses. There are no agricultural resources located on or near the project sites. The sites are classified as "Urban and Built-Up Land" by the State Department of Conservation. Therefore, the City finds that impacts to agricultural and forestry resources would be less than significant.

4.3 AIR QUALITY

The proposed project supports the goals of the Clean Air Plan and would not conflict with any of the control measures identified in the Plan or designed to bring the region into attainment. The proposed project does not include a change in land use, and would not substantially increase regional VMT or vehicle trips. The proposed project would not hinder the region from attaining the goals outlined in the Clean Air Plan.

The Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines contain screening criteria that provide a conservative indication of whether the project would exceed the criteria pollutant construction thresholds. According to the BAAQMD, if the screening criteria are met, construction of a proposed project would result in a less-than-significant construction emission impact. As described in the Initial Study, the proposed project meets the screening criteria and therefore would not have the potential to result in significant construction-related emissions.

Construction emissions from the proposed project would be well below the BAAQMD significance criteria and would not result in the generation of substantial emissions. The project would not exceed the BAAQMD construction emission thresholds; however, the BAAQMD requires that all projects implement best management practices to reduce construction fugitive dust impacts to a less-than-significant level. With implementation of Mitigation Measure AIR-1, construction of the proposed project would not substantially contribute to an air quality violation.

The temporary effects of construction activities could cause airborne dust during construction of the project which could pose a nuisance to areas immediately surrounding the sites. However, these impacts would be of a temporary duration and would not affect a substantial number of people.

The proposed project would not conflict with any applicable congestion management program for designated roads or highways, the San Mateo County Transportation Authority, or other agency plans. The proposed project would not have a significant cumulative air quality impact. Implementation of the proposed project would not create objectionable odors affecting a substantial number of people or subject persons to objectionable odors. Therefore, the City finds that impacts to air quality would be less than significant.

4.4 BIOLOGICAL RESOURCES

The project sites are both entirely covered with urban land uses including natural grass and artificial turf. While night lighting may have adverse consequences on wildlife, the wildlife species occurring in the vicinity of the project sites are relatively common urban species that have adapted to artificial night lighting and would therefore not be substantially affected. No State or federally protected plant or animal species are known to occur within the project sites. The project would not remove any trees. Therefore, the City finds that impacts to biological resources would be less than significant.

4.5 CULTURAL RESOURCES

The proposed project would include the installation of new field lighting and replacement of field lighting at Burton and Highlands Parks. Minor excavation would occur associated with the installation of new light poles. In addition, the sites were previously disturbed when developing the sports fields. There is no documentation that suggests archaeological, paleontological, or human remains are present within the project sites. However, it is possible that currently unknown cultural resources, paleontological resources, or human remains may be uncovered beneath the surface. However, implementation of standard conditions of approval would ensure that potential impacts associated with the disturbance of previously undiscovered subsurface archaeological resources and paleontological resources as well as to human remains would be reduced to less-than-significant levels. Therefore, the City finds that impacts to cultural resources would be less than significant.

4.6 GEOLOGY AND SOILS

The San Francisco Bay Area region is a seismically active region that is subject to large earthquakes. The proposed project would expose additional structures to regional seismic risks. The project site has the potential to experience moderate to strong shaking. However, compliance with existing building codes would ensure that potential impacts associated with ground shaking would be less

than significant. Additionally, the project site has low potential to experience impacts related to fault rupture, ground failure, and landslides. Therefore, the City finds that impacts related to geology and soils would be less than significant.

4.7 GREENHOUSE GAS EMISSIONS

The proposed project would generate greenhouse gas emissions during both the construction and operation periods. Implementation of Mitigation Measure AIR-1 would reduce construction period GHG emissions to a less-than-significant level by reducing the amount of construction vehicle idling and by requiring the use of properly maintained equipment. Therefore, the City finds that impacts related to greenhouse gas emissions would be less than significant.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Small quantities of commercially available hazardous material could be used during project construction activities (e.g., diesel fuels, oils, and lubricants) and for field maintenance within the project sites, these materials would not be used in sufficient quantities to pose a threat to human or environmental health. The amount of these hazardous materials present during construction would be limited, would be in compliance with existing federal, State, and local regulations, and would not be considered a significant hazard. In addition, the project sites do not include any active storage sites listed by the Regional Water Quality Control Board, nor are they located within the vicinity of a public or private airstrip. Therefore, the City finds that impacts related to hazards and hazardous materials would be less than significant.

4.9 HYDROLOGY AND WATER QUALITY

The proposed project consists of installation of new and replacement field lighting at Burton and Highlands Parks. The proposed project involves minimal excavation on existing grass and artificial turf fields and would not substantially alter the existing hydrologic conditions on the site. The proposed project would not violate any water quality standards, deplete groundwater supplies, substantially alter the existing drainage pattern of the sites, or substantially degrade water quality because the site is currently developed. Therefore, the City finds that impacts related to hydrology and water quality would be less than significant.

4.10 LAND USE AND PLANNING

The proposed project would not physically divide an established community. In addition, the project would not conflict with General Plan policies adopted for the purpose of avoiding or mitigating an environmental effect. There are no habitat conservation or natural community conservation plans adopted for the sites. Therefore, the City finds that impacts related to land use and planning would be less than significant.

4.11 MINERAL RESOURCES

No known mineral resources are present on or near the project sites. The proposed project would not result in the loss of availability of a known mineral resource. Therefore, the City finds that impacts to mineral resources would be less than significant.

4.12 POPULATION AND HOUSING

The project would not displace any residents necessitating the construction of replacement housing elsewhere. The proposed project would not result in the construction of residential units. The proposed project would not require the extension of new infrastructure or services that could induce additional population growth in the area. Therefore, the City finds that impacts related to population and housing would be less than significant.

4.13 PUBLIC SERVICES

The project sites are located on existing fields at Burton and Highlands Parks where public facilities and services are already in place. As such, no impacts to public facilities or services would result, as detailed in the Initial Study. Therefore, the City finds that impacts related to public services would be less than significant.

4.14 RECREATION

The proposed project includes the installation of new and updated field lighting at Burton and Highlands Parks and revisions to the 2010 Settlement Agreement to make field use at Highlands Park consistent with other City fields. The proposed project would not require the construction or expansion of existing recreational facilities or result in substantial physical deterioration of existing recreational facilities as the City would continue with standard field management and maintenance practices at Burton and Highlands Parks. Therefore, the City finds that impacts related to recreational facilities would be less than significant.

4.15 TRIBAL CULTURAL RESOURCES

The project site is not listed on, and does not appear to be eligible for listing on, the California Register of Historical Places, or a local register. Additionally, consultation requests were sent to Native American tribes traditionally and culturally associated with the area, and none of the tribes contacted requested consultation.

4.16 UTILITIES AND SERVICE SYSTEMS

The proposed project includes the installation of new and updated field lighting at Burton and Highlands Parks, which are currently served by existing utility systems. The proposed project would not increase water demand, or wastewater or solid waste generation.

5.0 FEASIBILITY OF PROJECT ALTERNATIVES

5.1 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER STUDY

The following alternatives to the project were considered by the City as Lead Agency but were rejected from further study for the reasons described below.

5.1.1 Off-Site Alternative

To meet the project objectives of providing more lit fields to allow for additional hours of field use and reduce the operational traffic impacts associated with the proposed project, the Off-Site

alternative assumes that the City would either purchase a site within the City and build new lit fields or would construct lights at an existing field, such as Crestview Field, per suggestions made by the public during the scoping period and comments in the Mahady report. However, purchase of a new site for new lit fields is deemed to be 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. Additionally, no funds are available to construct new lit fields or a sports complex. Additionally, the City has considered the addition of new lighting at all City fields, including Crestview Field, and has determined that Burton and Highlands Parks were the most feasible fields for construction of a lighting project to provide more hours of field use to meet unmet demand for field use. Furthermore, during the approval of the Crestview Park Renovation in 2013-2014, the City Council determined that neither artificial turf nor field lights at Crestview would be part of the renovation project or funded. Therefore, the Off-Site alternative was not further evaluated.

5.1.2 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, the Addition of Artificial Turf to Existing Fields 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. 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, this alternative was not further evaluated.

5.2 PROJECT ALTERNATIVES

The Final EIR included three alternatives: the No Project alternative; the Reduced Project alternative; and the Only Field Lighting alternative. The City hereby concludes that the Final EIR sets forth a reasonable range of alternatives to the proposed project so as to foster informed public participation and informed decision-making. Further, the City finds that the alternatives identified and described in the Draft EIR were considered, and finds them to be infeasible for the specific economic, social, or other considerations set forth below pursuant to CEQA Section 21081.

5.2.1 No Project Alternative

The No Project alternative, as required by CEQA, assumes the project site, the existing fields and lights, the operation and use of the fields, the parking areas and signage would generally remain in their existing condition. The existing lighting would not be upgraded and new lighting would not be installed. Additionally, there would be no changes to existing conditions, no new lights, no lighting upgrades, and no changes to existing conditions in regards to the terms of the Settlement Agreement.

Finding for the No Project Alternative: Development of the No Project alternative would preserve the existing conditions of the project sites. The short-term, construction-related noise and air

quality impacts would not occur with this alternative, and the existing congestion at Cedar Street and Brittan Avenue would not be exacerbated with project-related traffic resulting in a significant impact. The levels of light spillover and glare from the existing lights would continue and would be much higher than under the proposed project. However, this alternative would not achieve any of the objectives of the proposed project as field use would not be increased, existing lighting systems would not be improved at the two parks, and use and management of Highlands Park fields would not be consistent with other City fields.

This alternative would not achieve any of the benefits of the proposed project, and for this reason and given the discussion above, the No Project alternative is determined to be infeasible.

5.2.2 REDUCED PROJECT ALTERNATIVE

The Reduced Project alternative assumes that no new lights would be installed at Flanagan Field at Burton Park; however the existing lights at Madsen field would be upgraded to LED lights. All of the proposed project changes to Highlands Park fields (improved lights, new field and safety lights, changes in use of the fields and parking and signage per the alterations to operational restrictions) would continue to occur under this alternative.

Finding for the Reduced Project Alternative: Development of the Reduced Project alternative would reduce and avoid the transportation impacts at the Cedar Street/Brittan Avenue intersection (impacts TRA-1 and TRA-2) as there would be fewer project-related trips going through the impacted intersection such that the project's contribution would be less-than-significant in the Near-Term Plus Project and Cumulative Plus Project conditions (for the traffic data related to this alternative see Appendix F of the Draft EIR). The affected intersection is directly adjacent to Burton Park, and therefore traffic associated with an increase in the hours of use of Flanagan Field when lit, directly affects this intersection. Changes in use at Highlands Park do not have a direct effect on this intersection. Mitigation measures TRA-1 and TRA-2 would not be needed under this alternative. The potential pedestrian impacts (impact TRA-3), and short-term, construction-related noise (impact NOI-1) and air quality impacts would continue to occur with this alternative, however the identified mitigation measures (mitigation measures TRA-3, NOI-1, AIR-1) would reduce these impacts to a less-than-significant level similar to the proposed project.

The Reduced Project alternative would partially meet the objectives of the project, as new field lighting would be installed at Stadium Field at Highlands Park and changes in use and management of the Highland Parks fields would allow for an increase in hours of play over existing conditions. Additionally, the existing lighting at both parks would be updated which would significantly increase safety and decrease existing spillover light and glare. However, this alternative would not contribute to additional hours of field use at Burton Park to assist in meeting unmet demand to the degree that the proposed project would.

This alternative would only partially meet the objectives of the project, and for this reason and given the discussion above, the Reduced Project alternative is determined to be infeasible.

5.2.3 ONLY FIELD LIGHTING ALTERNATIVE

The Only Field Lighting alternative assumes that the proposed lifting of restrictions identified in the Settlement Agreement restrictions would not occur and the stated restrictions and requirements of the Settlement Agreement would continue. Under this alternative, new LED field lights would be installed 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 alternative also includes upgrading the existing metal-halide lighting at Madsen Field at Burton Park and Highlands Field at Highlands Park with LED lights.

Finding for the Only Field Lighting Alternative: Development of the Only Field Lighting alternative would not reduce and avoid the transportation impacts at the Cedar Street/Brittan Avenue intersection which would remain significant as there would be no change in the addition of project-related vehicle trips compared to the proposed project. Similar to the project, the identified mitigation measures TRA-1 and TRA-2 could be applied to this alternative to reduce these impacts to a less-than-significant level. The potential pedestrian impact at Highlands Park (TRA-3) would also continue to be significant under this alternative, but could be reduced to a less-than-significant level with implementation of Mitigation Measure TRA-3. Short-term, construction-related noise and air quality impacts would continue to occur with this alternative as the field lights would be constructed.

The Only Field Lighting alternative would partially meet some of the objectives of the project, as new and upgraded field lighting would be implemented at both parks similar to the proposed project. However, this alternative would not meet the objective of ensuring that City parks and fields are managed consistently per the Field Use Policy and general City practices for all fields, and would only partially meet the objective of maximizing the use of Highlands Park to help meet the existing unmet community demand for field space. This alternative would not contribute to additional hours of field use to the degree that the proposed project would.

This alternative would only partially meet the objectives of the project, and for this reason and given the discussion above, the Only Field Lighting alternative is determined to be infeasible.

6.0 Significant Effects That Cannot be Mitigated to a Less-Than-Significant Level

The Final EIR did not identify any significant effects that cannot be mitigated to a less-than-significant level, and therefore a Statement of Overriding Considerations is not required, per CEQA Section 15093.

7.0 Conclusion

The Burton and Highlands Park Project Final EIR has been prepared pursuant to the CEQA Guidelines. The City Council has independently determined that the Final EIR fully and adequately addresses the impacts and mitigations of implementation of the proposed project. The number of project alternatives identified and considered in the Final EIR meets the test of “reasonable” analysis and provides the City Council with important information from which to make an informed decision.

Substantial evidence in the record from technical sources demonstrates various benefits and considerations including economic, legal, social, technological, and other benefits which the District and community would achieve from the implementation of the project. The City Council has balanced these project benefits and considerations against the environmental impacts that would result from the project and has concluded that those impacts are outweighed by the project benefits. Upon balancing the environmental risk and countervailing project benefits, the City Council has concluded that the benefits that the City and community will derive from the implementation of the project outweigh those environmental risks. The City Council hereby finds that any residual or remaining effects on the environment resulting from adoption, implementation, and/or build-out of the proposed project are acceptable due to the benefits associated with implementation of the project.