

Addendum Butterfield Park

prepared by



CITY OF MORGAN HILL

In Consultation with



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Section 1.0 Introduction and Purpose

1.1 Purpose of the Addendum and Background

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is completed and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusion in the environmental document.

The City in 2019 prepared and adopted an Initial Study/Mitigated Negative Declaration (IS/MND) that analyzed the construction of a new public park containing BMX pump tracks, adult exercise area, baseball field/turf field for sports activities, picnic areas, building with a public meeting room, concessions and restrooms, grass lawns, a walking path, a paved surface parking lot, and a biofiltration system below the parking lot.

Since the adoption of the 2019 IS/MND (which is on file with the City), the project has not yet been implemented and the City is considering several changes to the design of the project (described in Section 3.0 Project Description).

The City of Morgan Hill, as the Lead Agency, has prepared this Addendum for the proposed development in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (Title 14, California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of Morgan Hill, California. This Addendum analyzes the changes made to the 2019 project design. The purpose of this Addendum is to inform decision makers and the general public of the environmental impacts that might reasonably be anticipated to result from development of the proposed modified project, if different from what was disclosed in the 2019 IS/MND.

1.2 Notice of Determination

If the project is approved, the City of Morgan Hill will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

Section 2.0 Project Information

2.1 Project Title

Butterfield Park Design Modifications Project

2.2 Lead Agency Contact

Jennifer Carman
Community Development Director
Community Development Department
17575 Peak Avenue
Morgan Hill, CA 95037
Phone: (408) 778-6480

2.3 Project Applicant

Chris Ghione
Public Services Director
Community Services, Engineering and Utilities Department
City of Morgan Hill
17575 Peak Avenue
Morgan Hill, CA 95037

2.4 Project Location

Butterfield Boulevard between Monterey Road and the Union Pacific Railroad (UPRR) tracks

2.5 Assessor's Parcel Number

APNs 817-06-002 and 817-06-064

2.6 General Plan Designation and Zoning District

General Plan: Industrial
Zoning: Light Industrial (IL)

2.7 Habitat Plan Designation

Land Cover: Grain, Row-crop, Hay and Pasture, Disked/Short-term Fallowed
Land Cover Fee Zones: Fee Zone B (Agricultural and Valley Floor Lands)

2.8 Project-Related Approvals, Agreements, and Permits

- Site and Architectural Review
- Grading Permit

Section 3.0 Project Description

3.1 Existing Setting

The proposed 9.5-acre site is predominantly vacant and undeveloped land containing a stormwater detention basin on the western end of the site. The site is surrounded by the Little Llagas Creek culvert and channel, Butterfield Boulevard, UPRR railroad tracks, and vacant land. A mix of residential and light industrial uses are in the project vicinity. The site context and setting within which the project would occur is the same as was described in the 2019 Initial Study. Regional, vicinity, and aerial maps are shown on Figures 3.2-1 through 3.2-3, respectively.

3.2 Project Overview and Proposed Development

The City of Morgan Hill's Bikeways, Trails, Parks and Recreation Master Plan (Master Plan) guides the improvement and future development of the City's bikeways, trail, parks and recreation system in Morgan Hill.¹ The Master Plan identifies and prioritizes improvements and investments within the City and includes goals and programs to improve connectivity and recreation options.

The City in 2019 prepared and adopted an IS/MND that analyzed the construction of a new public park containing BMX pump tracks, adult exercise area, baseball field/turf field for sports activities, picnic areas, building with a public meeting room, concessions and restrooms, grass lawns, a walking path, a paved surface parking lot, and a biofiltration system below the parking lot. The 2019 park design is shown on Figure 3.2-4.

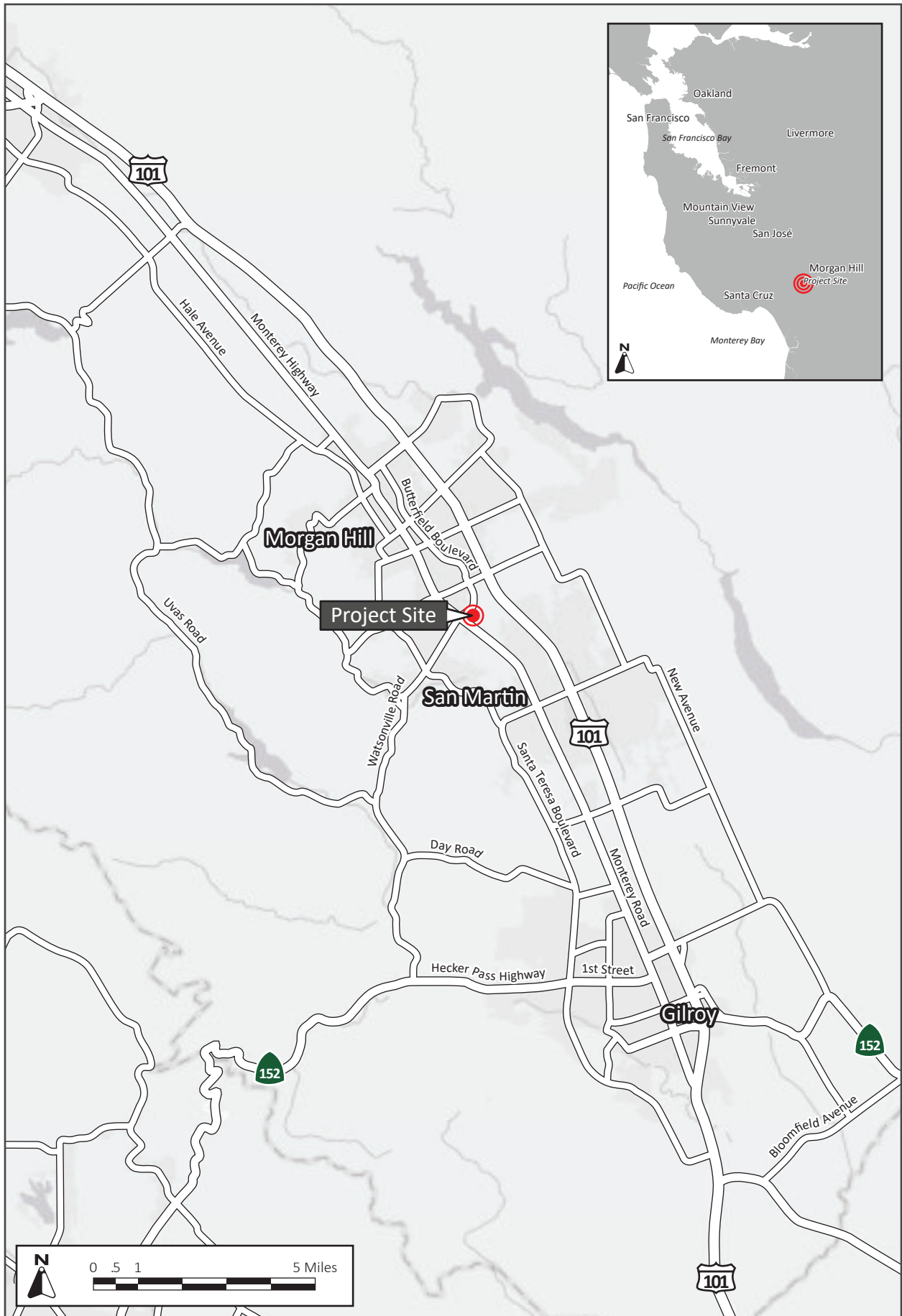
Since the adoption of the 2019 IS/MND, the project has not yet been implemented and the City has considered several changes to the design of the project, as described below.

3.2.1 Park Design

A conceptual site plan of the 2023 park design is shown on Figure 3.2-5. The 2023 project design retains the 2.5-acre turf field for sports activities, 2,000 square foot building to be used for future park amenities (e.g., a concession stand), picnic area, adult exercise area, and landscape/planting area along the northern perimeter of the site that were included in the 2019 concept. Similar to the 2019 concept, the sports field would include 30-foot-tall netting along the left and right sidelines. The 2019 concept assumed the sports field would use synthetic turf, whereas the 2023 project design proposes either synthetic turf or natural grass.

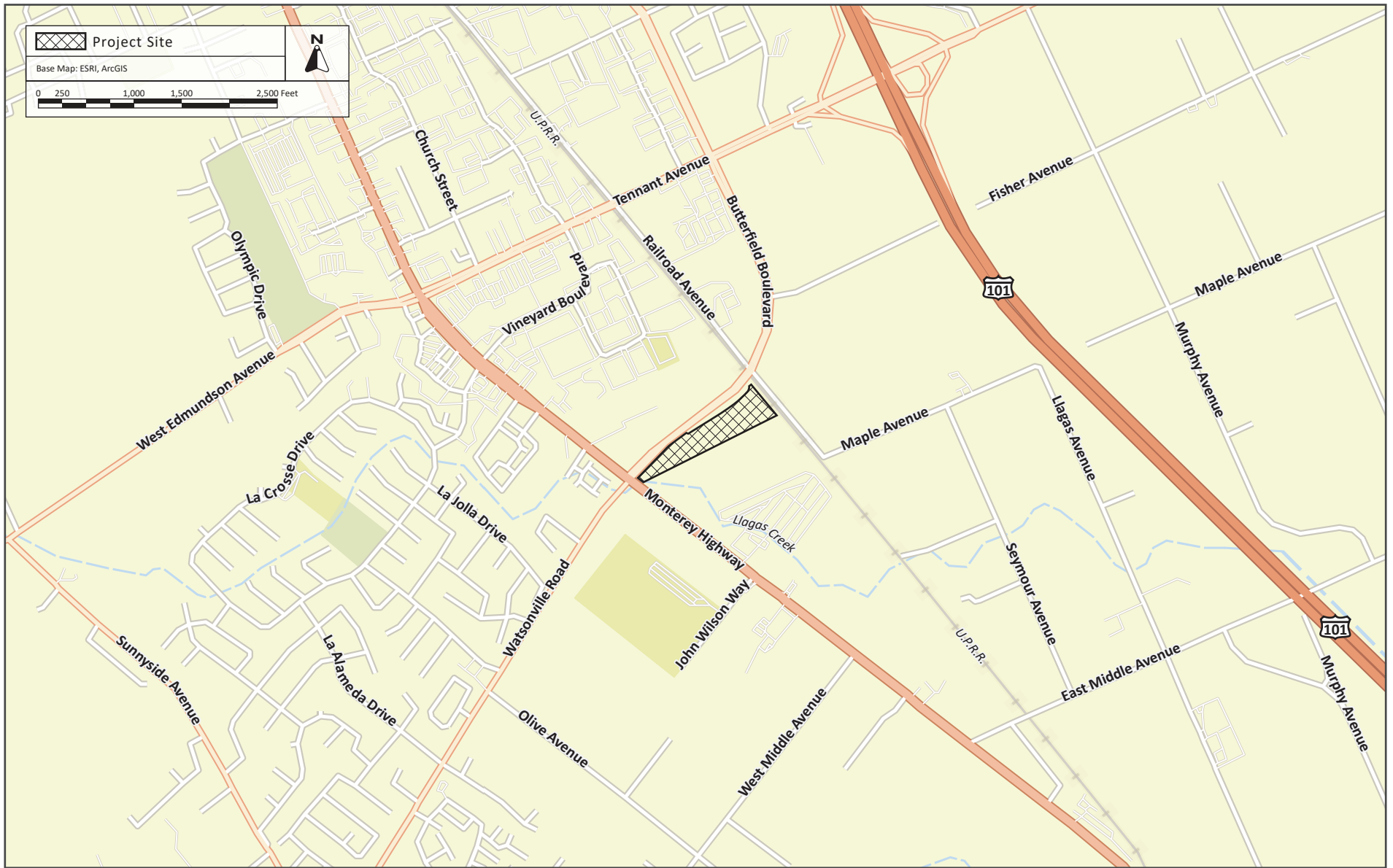
The primary change to the project is the upgrade of the BMX pump tracks to a BMX racetrack. BMX pump tracks are small, looped tracks that allow riders to ride the circuit by pumping only, with no need for pedaling. BMX racetracks are larger, wider tracks that require pedaling. Unlike pump

¹ City of Morgan Hill. *Bikeways, Trails, Parks and Recreation Master Plan*. Adopted July 20, 2017.



REGIONAL MAP

FIGURE 3.2-1



VICINITY MAP

FIGURE 3.2-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3.2-3

tracks, racetracks have separate start/finish lines and do not loop around. Both pump tracks and racetracks are designed with soil and provide a pervious surface area. The 2019 concept included an approximately 26,000 square foot BMX pump track and the 2023 concept introduces an approximately 100,000 square foot BMX racetrack. Minor changes are also proposed related to sidewalks, restroom facilities, and locations of amenities. The project proposes to include a separate restroom building unlike the 2019 concept that proposed a restroom within the concession building. The new project design includes a playground with rubberized surface. The proposed project would also be modified to retain the existing stormwater detention basin instead of the underground biofiltration system that was included in the 2019 IS/MND concept.

3.2.2 Construction

Consistent with what was analyzed in the 2019 IS/MND, construction of the project would take approximately 12 months and construction activities would include excavation, grading, building construction, and paving. Construction equipment would be staged on-site.

3.2.3 Operation

Regular park hours would be 6 AM to 10 PM daily. Consistent with the 2019 concept, the lit turf field would be available for use until 10 PM and would automatically shut off at 11 PM.

The primary change to park operation is associated with the inclusion of the proposed BMX racetrack. The BMX racetrack would be a sanctioned USA BMX track that runs race events, drop-in track days for open use, and rider clinics/classes. Compared to the 2019 IS/MND, the addition of a BMX racetrack would increase park use on a local and regional scale (as is described below and analyzed in this this Addendum).

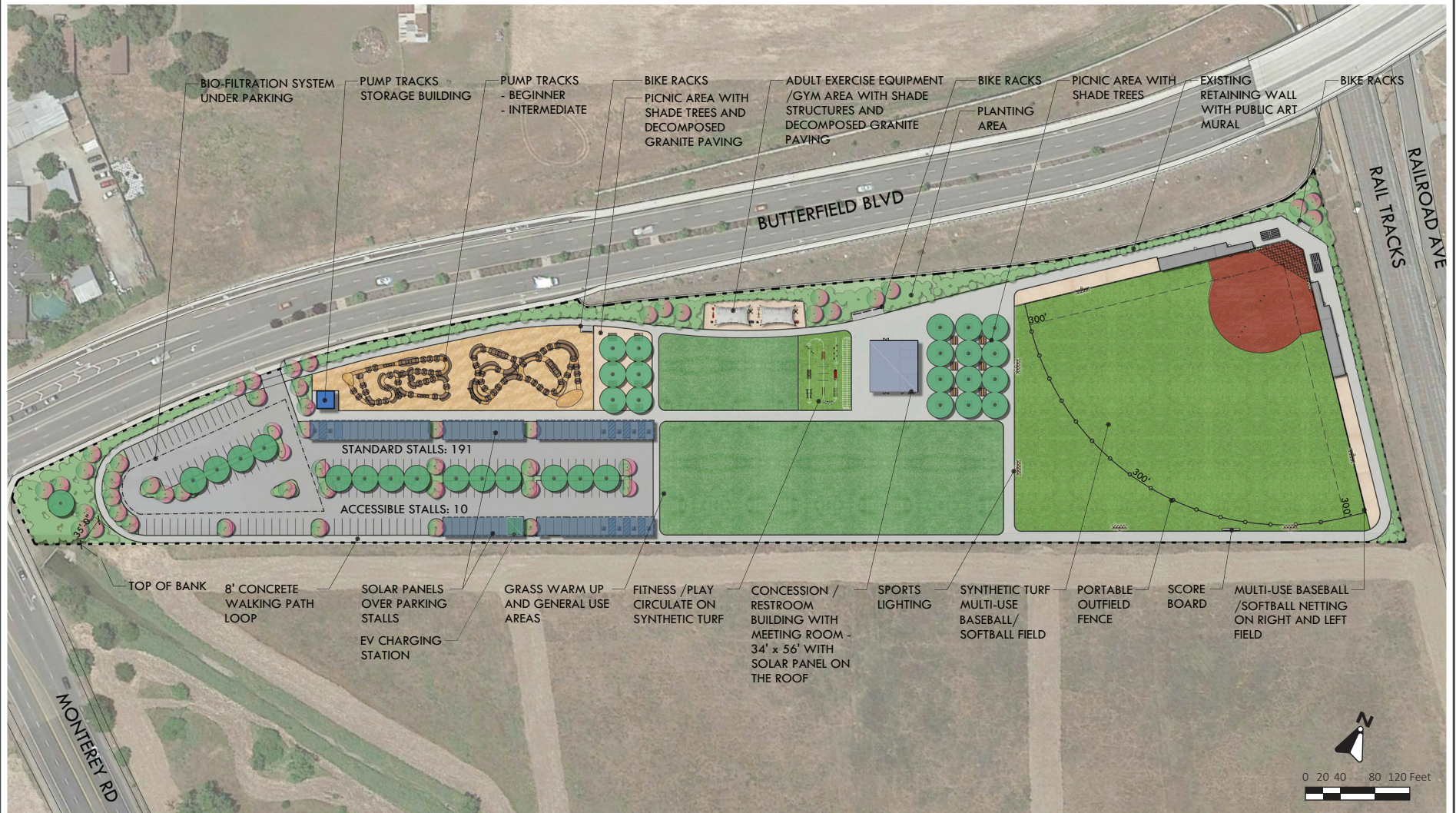
3.2.3.1 *Local and Regional Use of the BMX Racetrack*

Local use of the BMX racetrack is expected to occur three days a week, with 200 people (65 vehicles) attending per day. Vehicles are assumed to arrive between 3 to 6 PM and leaving between 7 to 10 PM.

The BMX racetrack is expected to generate regional use one weekend day per week, with 400 people (120 vehicles) attending. Vehicles are assumed to arrive between 4 to 7 PM and leaving between 7 to 10 PM.

3.2.3.2 *Special Event Use of the BMX Racetrack*

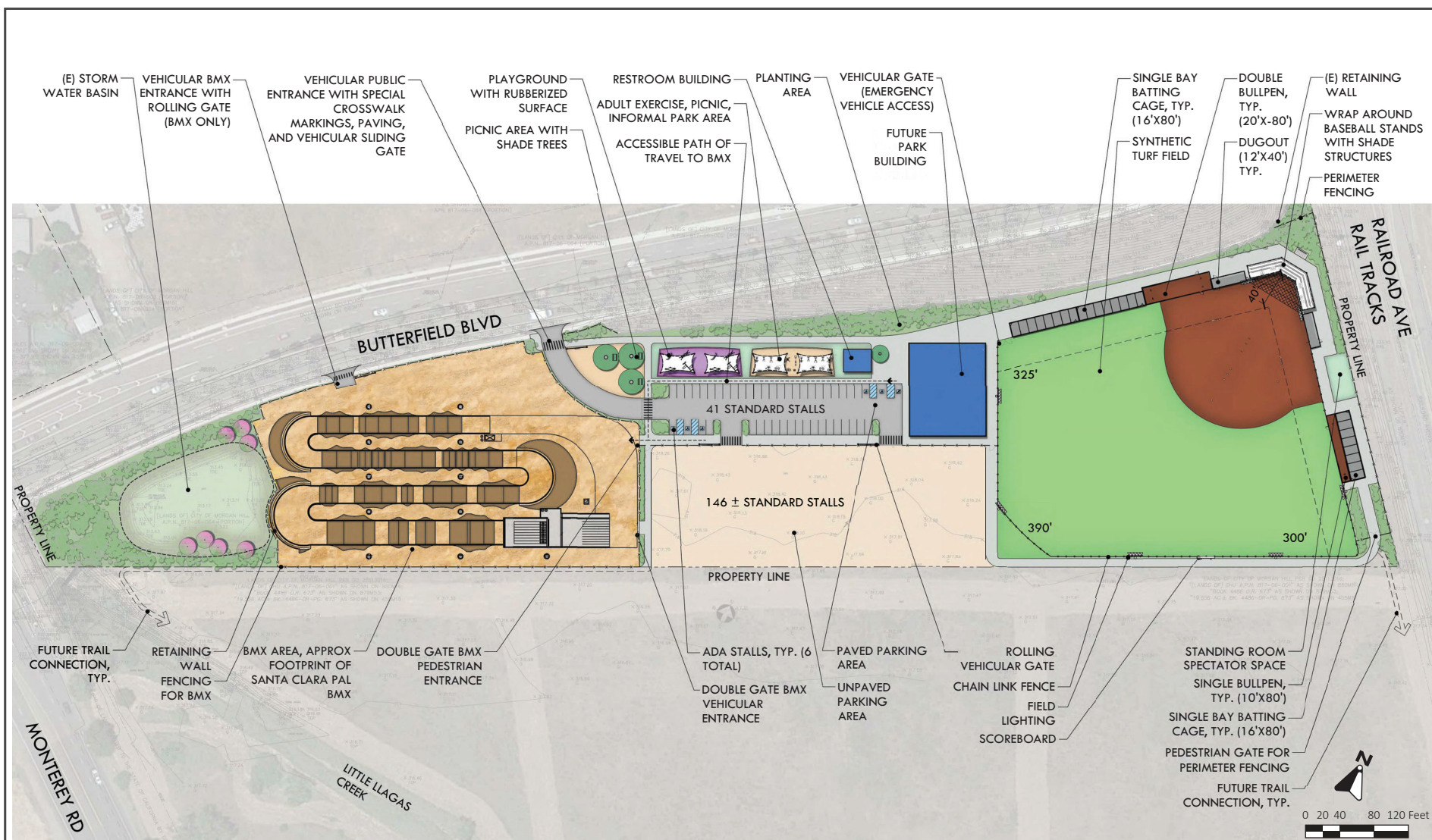
The park is expected to host regional or statewide BMX events one to two times per year. Each event would take place over the course of a weekend, with approximately 750 BMX riders and 3,000 total attendees. It is assumed a maximum of 750 vehicles would be generated by the events. The park is not anticipated to host large-scale special events in the first five years of operation.



Source: Verde Design, Inc., July 16, 2019.

CONCEPTUAL 2019 SITE PLAN

FIGURE 3.2-4



Source: Verde Design, Inc., November 23, 2022.

CONCEPTUAL 2023 SITE PLAN

FIGURE 3.2-5

3.2.4 Site Access and Parking

Consistent with the 2019 concept, vehicle access to and from the project site would be provided via a new driveway along Butterfield Boulevard and pedestrian access would be provided at the entrance at the corner of Monterey Road and Butterfield Boulevard and at the Butterfield Boulevard driveway entrance.

The project would include a paved surface parking lot with 41 standard parking stalls and six ADA stalls, and an unpaved parking area with 146 standard parking stalls, for a total of 193 parking stalls (24 fewer spaces than the 2019 design). During regional or statewide special events, the project would implement a parking mitigation plan to accommodate the expected 750 vehicles. The parking mitigation plan would consist of offsite parking, shuttles, and the use of adjacent temporary parking on nearby properties. As noted previously, the park is not anticipated to host large-scale special events in the first five years of operation, and the City will develop the parking plan based on the availability of offsite parking options in the vicinity at that time, and would conduct supplemental environmental review, as needed, based on the location and setting for the properties being utilized for offsite parking.

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

This section describes any changes that have occurred in existing environmental conditions on and near the project site, as well as environmental impacts associated with the proposed project or the changed conditions and compares those impacts to the impacts identified in the 2019 IS/MND. The existing analysis contained in the 2019 IS/MND continues to adequately address **aesthetic, agricultural and forestry, biological, cultural, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, mineral, population and housing, public services, recreation, tribal cultural, utilities and service systems, and wildfire resources**, in that:

- 1) the nature and scale of the proposed project has not substantially changed, and
- 2) there has not been a substantial change in the circumstances involving these issues on the subject site nor in the local environment surrounding the site.

Resource Topics that Do Not Require Further Evaluation

Aesthetics: The 2019 IS/MND found that development of a park on the site would have less than significant aesthetic impacts because the project would develop low structures, including now in the current design a small standalone restroom structure, that would not block views of hillsides or scenic vistas, and would not impact scenic resources. Additionally, the park, building, landscaping, and lighting design would be subject to review by the City of Morgan Hill Design Permit process for conformance with City standards. The proposed park would continue to be consistent with the development standards established in the zoning district for the site, and the proposed improvements would be consistent with the Park and Recreation Master Plan and General Plan policies related to scenic resources. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis and would be consistent with the findings of the 2019 IS/MND.

Agriculture and Forestry: There are no agriculture and forestry resources present on site, there are no mitigation measures related to this topic area from the 2019 IS/MND, and therefore, the project changes would not require further analysis of impacts to agriculture and forestry resources and would be consistent with the findings of the 2019 IS/MND.

Biological Resources: The project site is not located within a burrowing owl survey or fee zone. The Biological Resources Assessment prepared for the 2019 IS/MND found that no special-status plant species are located on the project site, but that two special-status animal species have the potential to occur on the site. The project site contains two ordinance-sized trees. In addition, the project site is located within the 35-foot setback of Little Llagas Creek. The 2019 IS/MND identified a less than significant impact with mitigation incorporated to reduce impacts to nesting bird raptors, nesting migratory birds, riparian habitat, and trees. Mitigation measures MM BIO-1.1, MM BIO-2.1, MM BIO-2.2, MM BIO-5.1, MM BIO-5.2, and MM BIO-6.1 remain applicable to the project. The project

changes would not require further analysis of biological resources because the project would remove proposed surface parking and retain the detention basin adjacent to Little Llagas Creek, thereby increasing the proposed creek setback, and would be consistent with the findings of the 2019 IS/MND.

Cultural/Tribal Cultural Resources: The 2019 IS/MND found that the project would have no impact on historic resources because the nearest historic property is approximately 0.25 miles away from the project site. The 2019 IS/MND identified the project site as potentially archaeologically sensitive due to its proximity to Little Llagas Creek, though there are no known resources located onsite. The 2019 IS/MND identified Standard Conditions CUL-1.1, which would reduce any potential impacts to archaeological or tribal cultural resources to less than significant levels by requiring work to cease, development of a buffer zone, and proper coordination with applicable oversight agencies in the event of the unintentional discovery of human remains or archaeological resources. The standard conditions remain applicable to the project. The project changes would not require further analysis of cultural/tribal cultural resources and would be consistent with the findings of the 2019 IS/MND.

Energy: The 2019 IS/MND found that the project would have less than significant impacts related to energy use because the project includes construction waste management methods and design features (e.g., bicycle parking, parking for clean air vehicles, and water conserving water fixtures) that would increase energy efficiency during construction and operation. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of energy resources because the primary proposed change in the project design (replacing BMX pump track with a BMX racetrack) would not entail building construction or otherwise involve substantial, wasteful or inefficient energy consumption, and would be consistent with the findings of the 2019 IS/MND.

Geology and Soils: The site geologic conditions have not changed since preparation of the 2019 IS/MND, as the site remains in a stable, flat conditions on the valley floor, and is not subject to unusual geologic conditions such as faults, landslides, or lateral spreading. The 2019 IS/MND identified Standard Conditions GEO-1.1, GEO-2.1, and GEO-2.2 which require seismic safety design in coordination with the California Building Code, sediment and erosion control measures, and conformance with the National Pollutant Discharge Elimination System (NPDES). The standard conditions remain applicable to the revised project design. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of geology and soils resources and would be consistent with the findings of the 2019 IS/MND.

Greenhouse Gas Emissions: The 2019 IS/MND found that the project would have less than significant greenhouse gas emissions impacts because the project was well below the 600-acre screening threshold for public parks identified by the Bay Area Air Quality Management District (BAAQMD). There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of greenhouse gas emissions because the project would remain below the screening levels and would be consistent with the findings of the 2019 IS/MND.

Hazards and Hazardous Materials: The 2019 IS/MND found that the project would have less than significant hazards and hazardous materials impacts. The project does not propose the use of any hazardous materials on-site and the project site does not have any recorded on-site contamination that would create a hazard to the public. The project site is not listed as a hazardous material site pursuant to Government Code Section 65962.6 or located within an airport land use plan or wildlife hazard area. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of hazards and hazardous materials because the modified design and replacement of the BMX pump track with BMX racetrack would not involve the use, storage, or transport of hazardous materials and would be consistent with the findings of the 2019 IS/MND.

Land Use and Planning: The site has a General Plan land use designation of Light Industrial. The 2019 IS/MND determined that the City would amend the site's land use designation to Public Park to maintain consistency with the General Plan, but that this would not create a conflict with any plan, policy, or regulations for the purpose of avoiding or mitigating an environmental effect. The project would not physically divide the existing community nor would the project conflict with the applicable land use requirements adopted to protect or mitigate impacts to the environment. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of land use and planning resources, given the nature of the park project would not change with the primary design change involving replacing a BMX pump track with a BMX racetrack, and would be consistent with the findings of the 2019 IS/MND.

Mineral Resources: There are no mineral resources present on site. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not impact mineral resources or require further analysis and would be consistent with the findings of the 2019 IS/MND.

Population and Housing: The 2019 IS/MND found that the project would have no population and housing impacts because it would not include residential uses and would, therefore, not induce unplanned population growth or displace residents. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of population and housing resources and would be consistent with the findings of the 2019 IS/MND.

Public Services: The 2019 IS/MND found that the project would have a less than significant public services impact because it would not include residential uses that would increase the demand for fire or police protection, increase the student population and require construction of school facilities, or generate demand for other public facilities. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of public services resources and would be consistent with the findings of the 2019 IS/MND.

Recreation: The 2019 IS/MND found that the project, which is itself a recreational use, would have no recreation impacts because it would not include residential uses, which create the predominant demand for recreational facilities. There are no mitigation measures related to this topic area from

the 2019 IS/MND. The project changes would not require further analysis of recreation resources and would be consistent with the findings of the 2019 IS/MND.

Utilities and Service Systems: The 2019 IS/MND found that the project would have less than significant utilities and service systems impacts because the project would not require relocation or alteration of existing or construction of new facilities, have insufficient water supplies available to service it, result in inadequate wastewater treatment capacity, or generate solid waste in excess of state or local standards. Additionally, the project would comply with federal, state, and local regulations related to solid waste management and reduction. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not require further analysis of utilities and service systems resources given the proposed replacement of the BMX pump track with a BMX racetrack would not require additional water or generate substantial wastewater or solid waste. Similarly, the 2019 IS/MND conservatively assumed all five acres of turf and landscaped areas would require irrigation, whereas the new concept would require irrigation for approximately 3.5 acres. Thus, the assumption that the sports field could use either synthetic turf or natural grass would not require additional water or require further analysis, as this was previously accounted for and the project changes result in less landscaping that requires irrigation. Therefore, the project changes would be consistent with the findings of the 2019 IS/MND.

Wildfire: The project site is not within a wildfire hazard area. There are no mitigation measures related to this topic area from the 2019 IS/MND. The project changes would not impact wildfire resources or require further analysis and would be consistent with the findings of the 2019 IS/MND.

Resource Areas Evaluated in this Initial Study

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections which have the potential to be affected by the proposed changes in the project:

4.1 Air Quality

4.3 Noise and Vibration

4.2 Hydrology and Water Quality

4.5 Transportation

Initial Study Components

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant, as they existed at the time of the 2019 Initial Study and as they currently exist, if different.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact

on the environmental subject as related to the checklist questions as disclosed in the 2019 Initial Study for the 2019 project design and as expected now for the 2023 modified park design. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 Air Quality

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

Provided below is an update to the regulations and policies listed in the 2019 IS/MND.

Regional

CEQA Air Quality Guidelines

Published in 2012 and revised in 2017 and 2022, the BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area.² Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

4.1.1.2 *Existing Conditions*

The existing conditions remain the same as described in the 2019 IS/MND.

4.1.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

² Bay Area Air Quality Management District. "CEQA Thresholds and Guidelines Update." Accessed May 25, 2023. <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

- a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The BAAQMD CEQA Air Quality Guidelines establish screening thresholds for the sizes of land use projects that could result in significant air pollutant emissions. The 2019 IS/MND identified no impact because the 9.5-acre park would be below the construction and operation thresholds (67 acres and 2,613 acres, respectively) for a city park set forth by the 2017 BAAQMD CEQA Air Quality Guidelines.

The 2022 BAAQMD CEQA Air Quality Guidelines established new construction and operation thresholds of 10 and 175 acres, respectively, for a city park. The project site has not changed in size since the adoption of the 2019 IS/MND. Since the project proposes to develop a city park on 9.5 acres, emissions would continue to be below the BAAQMD significant thresholds for both construction and operational criteria air pollutants. Thus, the project is not required to incorporate project-specific control measures listed in the 2017 CAP. Further, implementation of the project would not inhibit BAAQMD or partner agencies from continuing progress toward attaining state and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP.

The project would not conflict with or obstruct implementation of the CAP and would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [No Impact])**

- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As discussed above, the proposed modified project with a BMX racetrack and other refinements would generate operational and criteria pollutants below the BAAQMD thresholds based on the size of the project continuing to be smaller than the screening thresholds noted above in question a), above. The modified project would host a limited number of larger events; however, those would

be infrequent and not a regular source of substantial vehicle-related operational criteria pollutant emissions. Because the project would have less than significant criteria pollutant impacts, the project would not result in a cumulatively considerable contribution to any criteria pollutants for which the region is in non-attainment. The project would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The 2019 IS/MND identified a less than significant impact to sensitive receptors because the community and cumulative health risk impacts from project construction and operation (calculated in the 2019 Air Quality Assessment prepared by Illingworth & Rodkin, Inc.) did not exceed BAAQMD single-source thresholds for cancer risk, particulate matter concentrations, or hazard index. Because the construction timeframe and activity would remain the same, i.e., the proposed changes do not involve substantial new construction nor any new uses that in operation would involve the use of diesel-powered equipment or other sources of toxic air contaminants, the proposed modified project would continue to have a less than significant impact and would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The 2019 IS/MND identified a less than significant impact for odors. No new stationary odor sources are proposed as part of the proposed project and the project would not expose existing nearby sensitive receptors to new odor sources. The modified project would continue to generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors; however, the odors would be localized and temporary and would not affect people off-site. For these reasons, implementation of the proposed modified project would not generate odors that would affect a substantial number of people. The project would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

4.2 Hydrology and Water Quality

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

Provided below is an update to the regulations and policies listed in the 2019 IS/MND.

Regional

2021 Groundwater Management Plan

The 2021 Groundwater Management Plan (GWMP) describes Valley Water's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management. The GWMP covers the Santa Clara and Llagas subbasins, which are located entirely in Santa Clara County. Valley Water manages a diverse water supply portfolio, with sources including groundwater, local surface water, imported water, and recycled water. About half of the county's water supply comes from local sources and the other half comes from imported sources. Imported water includes the District's State Water Project and Central Valley contract supplies and supplies delivered by the San Francisco Public Utilities Commission (SFPUC) to cities in northern Santa Clara County. Local sources include natural groundwater recharge and surface water supplies. A small portion of the county's water supply is recycled water.

Local groundwater resources make up the foundation of the county's water supply, but they need to be augmented by the District's comprehensive water supply management activities to reliably meet the county's needs. These include the managed recharge of imported and local surface water and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.

Local

City of Gilroy, City of Morgan Hill, and County of Santa Clara Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements

The cities of Gilroy and Morgan Hill and the County of Santa Clara jointly developed the Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements in 2015, consistent with the Central Coast Post-Construction Requirements described above. The manual requires projects that create or replace 22,500 square feet or more of impervious surface area to incorporate post-construction controls into the design of the project and to manage post-development peak flows discharged from the site. Performance Requirements (PRs) include PR-1 Site Design and Runoff Reduction, PR-2 Water Quality Treatment, PR-3 Runoff Retention, and PR-4 Peak Management. The following post-construction requirements are required.

Project Type	Post-Construction Requirements
Tier 1 – Projects that create or replace 2,500 square feet or more of impervious surfaces	PR-1 – Implement Low Impact Development (LID) Measures: <ul style="list-style-type: none"> • Limit disturbance of natural drainage features; • Limit clearing, grading, and soil compaction; • Minimize impervious surfaces; • Minimize runoff by dispersing runoff to landscape or using permeable pavements.
Tier 2 – Projects that create or replace 5,000 square feet or more of impervious surfaces	PR-2 – Implement PR-1 Measures Plus: <ul style="list-style-type: none"> • Treat runoff with an approved and appropriately sized LID treatment system prior to discharge from the site.
Tier 3 – Projects that create or replace 15,000 square feet or more of impervious surfaces	PR-3 – Implement PR-2 Measures Plus: <ul style="list-style-type: none"> • Prevent offsite discharge from events up to the 95th percentile rainfall event using stormwater control measures.
Tier 4 – Projects that create or replace 22,500 square feet or more of impervious surfaces	PR-4 – Implement PR-3 Measures Plus: <ul style="list-style-type: none"> • Control post-project peak flows to not exceed pre-project peak flows for the two- through ten-year storm events.

4.2.1.2 Existing Conditions

The 2019 IS/MND analyzed a project site containing a total of 456,509 square feet of pervious surfaces, consisting of non-native grasses. The 2023 project design includes a total of 411,195 square feet of pervious surfaces. All other existing conditions remain the same as described in the 2019 IS/MND.

4.2.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
– impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

-
- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
-

Construction Water Quality Impacts

The 2019 IS/MND found that the project would have a less than significant construction-related water quality impact because it would comply with City of Morgan Hill Standard Conditions and with the NPDES General Permit for Construction Activities. The conditions are listed below and have been updated accordingly to reflect any changes made to City standard conditions since adoption of the 2019 IS/MND.

Standard Condition HYD-1: In accordance with the City of Morgan Hill Standard Conditions of Approval and the Construction General Permit, the following condition shall be included in the project to reduce construction-related water quality impacts to a less than significant level:

The following BMPs shall be implemented during project construction:

- Burlap bags filled with drain rock will be installed around storm drains to route sediment and other debris away from the drains.
- Earthmoving or other dust-producing activities will be suspended during periods of high winds.
- All exposed or disturbed soil surfaces will be watered at least twice daily to control dust.
- Stockpiles of soil or other materials that can be blown by the wind will be watered or covered.
- All trucks hauling soil, sand, and other loose materials will be covered and all trucks will be required to maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas and residential streets adjacent to the construction site will be swept daily (with water sweepers).
- Vegetation in disturbed areas will be replanted as quickly as possible.

Standard Condition HYD-2: In accordance with the City of Morgan Hill Standard Conditions of Approval and the Construction General Permit, the following condition shall be included in the project to reduce construction-related water quality impacts to a less than significant level:

- As required by the SWRCB Order No. 2009-0009-DWQ, construction activity resulting in a land disturbance of one acre or more of soil, or whose projects are part of a larger common plan of development that in total disturbs more than one acre, are required to obtain coverage under the NPDES General Permit No. CAS000002 for Discharges of Storm Water Associated with Construction Activity (General Permit). To be permitted with the SWRCB under the General Permit, owners must file a complete Notice of Intent (NOI) package and develop a Storm Water Pollution Prevention Plan (SWPPP) Manual in accordance with Section A, B, and C of the General Permit prior to the commencement of soil disturbing activities. A NOI Receipt Letter assigning a Waste Discharger Identification number to the construction site will be issued after the SWRCB receives a complete NOI package (original signed NOI application, vicinity map, and permit fee); copies of the NOI Receipt Letter and SWPPP shall be forwarded to the Building and Land Development Engineering Divisions review. The SWPPP shall be made a part of the improvement plans. (SWRCB NPDES General Permit CA000002).

With compliance with the standard conditions listed above, the project would not violate any water quality standards during construction, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

Post-Construction Water Quality

The 2019 IS/MND found that the project would have a less than significant post-construction water quality impact because the project would conform to the City's Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements.

Redevelopment and new projects that create or replace 2,500 square feet or more of impervious surface area are required to implement site design and runoff reduction measures where feasible. According to the City's Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements, projects that create or replace 22,500 square feet or more of impervious surface area are required to incorporate post-construction controls into the design of the project and to manage post-development peak flows discharged from the site. Post-construction controls are permanent features designed to reduce pollutants in stormwater and/or erosive flows during the life of the project. Types of post-construction controls include LID site design, pollutant source control, stormwater treatment, and hydromodification management measures. The LID approach reduces stormwater runoff impacts by minimizing disturbed areas and impervious surfaces, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses).³

The 2019 concept was estimated to add approximately 252,545 square feet of impervious surfaces. The 2023 concept would result in 193,127 square feet of impervious surfaces, resulting in a 59,418 square foot decrease compared to what was analyzed in the 2019 IS/MND. Whereas the 2019 concept proposed to replace the existing stormwater basin with an underground treatment facility, the 2023 project proposes to maintain the existing detention basin. The detention basin would be designed to handle the existing runoff as well as the additional runoff from the added impervious surface areas. In addition, the 2023 concept includes an unpaved parking area and a BMX racetrack that is larger than the 2019 BMX pump track. These changes contribute to the addition of pervious surface area and allow for stormwater infiltration during regular rainfall events.

Because the project would result in more pervious surfaces than previously analyzed and comply with the City's Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements, project impacts to post-construction water quality would be less than significant, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

-
- b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
-

As discussed in the 2019 IS/MND, the project site is not an aquifer recharge facility (i.e., streams or ponds). Therefore, development of the project would not substantially interfere with aquifer

³ City of Gilroy, City of Morgan Hill and County of Santa Clara. *Stormwater Management Guidance Manual for Low Impact Development & Post-Construction Requirements*. June 2015.

recharge, and impacts would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?
-

The 2019 IS/MND identified a less than significant impact because the project would comply with the City's Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements. The proposed project would continue to comply with the City's requirements. Additionally, as described under checklist question b) above, the proposed project would result in 193,127 square feet of impervious surface area, a 59,418 square foot decrease compared to what was analyzed in the 2019 IS/MND. Because the project would continue to comply with the City's requirements and result in less impervious surfaces than previously analyzed, the project would have a less than significant impact, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

- d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?
-

As discussed in Section 4.2.1.2 Existing Conditions, the project site is within FEMA flood zones AE and X. However, the project site is a flat parcel on the valley floor and is not proximate to a large body of water. Additionally, the project site is not located within a designated tsunami inundation zone. The project would not involve the use or storage of pollutants. Therefore, the proposed project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones, and would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [No Impact])**

- e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
-

The modified project would comply with the City's Stormwater Management Guidance Manual for Low Impact Development and Post-Construction Requirements. The modified project would not impact groundwater recharge and would not conflict with Valley Water's 2021 Groundwater Management Plan. Thus, the modified project would not conflict with implementation of a water quality or groundwater management plan, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [No Impact])**

4.3 Noise and Vibration

4.3.1 Environmental Setting

4.3.1.1 *Regulatory Framework*

Provided below is an update to the regulations and policies listed in the 2019 IS/MND.

City of Morgan Hill Municipal Code

Chapter 12.16 of the Municipal Code requires Special Event Permits for events that are held on any public street, alley, park, dedicated open space, or any other public building grounds when the total anticipated attendance can reasonably be expected to be more than 50 people, a sound amplifying system is being used, or alcohol will be served and/or sold. Special event holders are required to provide a description of primary travel routes, planned street closures, and amplified sound equipment associated with the event.

4.3.1.2 *Existing Conditions*

Existing conditions remain the same as described in the 2019 IS/MND.

4.3.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

-
- a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
-

Construction and Temporary Noise Increases

The 2019 IS/MND identified a less than significant impact with mitigation incorporated. Because the project construction activity assumptions and timeframe (12 months) would remain the same, the project construction impacts remain the same and the project would adhere to the same mitigation measure MM NOI-1.1 disclosed in the 2019 IS/MND. With implementation of mitigation measure MM NOI-1.1, the project construction activity would result in a less than significant impact, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact with Mitigation Incorporated])**

Operational and Permanent Noise Increases

The Trip Generation and Operations Analysis prepared for the 2023 concept (see Appendix A) identified an average daily traffic (ADT) of 30,860 along the Monterey Road and Watsonville Road/Butterfield Boulevard intersection. The 2019 IS/MND assumed the same ADT and found that the project would need to generate an ADT volume of 3,300 trips to increase ambient noise levels by 1 dBA L_{dn} along the intersection. The 2019 IS/MND concluded the project would have a less than significant impact because the project would generate an ADT volume well below 3,300 daily trips based on a review of the site plans and park size in relation to similar projects.

As discussed in detail in Section 4.4 Transportation, the proposed modified project during the busiest Saturday peak hour of use would generate approximately 624 daily trips. Though the project would result in a higher number of trips than the previously approved project, the number of trips would continue to be well below the established threshold of 3,300 trips.

Furthermore, the regional or statewide BMX events held one to two times per year would attract approximately 750 BMX riders and 3,000 total attendees over a weekend. These special events would temporarily increase noise but would qualify as a less than significant impact because the events would occur several times per year and be permitted through the City's Special Event permit process.

Therefore, the project would not result in a substantial temporary or permanent increase in ambient noise levels in excess of local standards, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact with Mitigation Incorporated])**

-
- b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
-

The 2019 IS/MND identified a less than significant impact because the project would not require pile driving, which can cause excessive vibration, and would not exceed the California Department of Transportation's conservative vibration limits of 0.3 in/sec PPV for structurally sound buildings. The 2023 modified project design would also not involve pile driving, and would result in a less than significant vibration impact.

Because the project's construction assumptions remain the same, the proposed project would not result in construction-related vibration exceeding 0.3 in/sec PPV at existing buildings or at future on-site receptors. Therefore, the project would not result in generation of excessive groundborne vibration or groundborne noise levels and would be consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

-
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
-

The San Martin Airport is located about 2.25 miles southeast of the project site. The 2019 IS/MND concluded that according to the Santa Clara County Airport Land Use Commission (ALUC)'s Comprehensive Land Use Plan for San Martin Airport, the project site lies outside of the 2022 55 dBA CNEL noise contour. The proposed project would be compatible with the City's exterior noise standards for aircraft noise. Because the project site has not changed, these conditions remain the same. Therefore, the project would not expose people residing or working in the project area to excessive noise levels, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

4.4 Transportation

The following discussion is based, in part, on a Trip Generation and Operations Analysis and Vehicle Miles Traveled (VMT) Assessment prepared for the project by Hexagon Transportation Consultants, Inc. The reports are attached as Appendices A and B, respectively.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Provided below is an update to the regulations and policies listed in the 2019 IS/MND.

State

Regional Transportation Plan

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and the Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by the Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

Regional and Local

City of Morgan Hill Municipal Code

Chapter 12.16 of the Municipal Code requires Special Event Permits for events that are held on any public street, alley, park, dedicated open space, or any other public building grounds when the total anticipated attendance can reasonably be expected to be more than 50 people, a sound amplifying system is being used, or alcohol will be served and/or sold. Special event holders are required to provide a description of primary travel routes, planned street closures, and amplified sound equipment associated with the event.

4.4.1.2 Existing Conditions

The existing conditions remain the same as described in the 2019 IS/MND.

4.4.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?					

The 2019 IS/MND identified a less than significant impact to pedestrian, bicycle, and transit facilities. The 2019 IS/MND included an LOS analysis under this checklist question because the IS/MND was adopted in 2019, prior to the July 2020 deadline for agencies to adopt a VMT-based threshold per CEQA Guidelines Section 15064.3. An analysis of LOS is provided in Section 4.4.3 Non-CEQA Effects. The discussion below focuses on the modified project's impact on the circulation system including transit, roadway, bicycle, and pedestrian facilities.

Transit Facilities

The 2019 IS/MND identified a less than significant impact to transit facilities because bus line LR 68 (which operates on Monterey Road and offers a bus stop 0.25 miles from the project site) would serve the project site. The 2019 project and the modified 2023 project would not conflict with plans related to existing transit facilities.

Roadway Facilities

Site Access

The 2019 IS/MND identified a less than significant impact in relation to site access because the project would be designed in accordance with Municipal Code Section 18.72.060 Parking Design and Development Standards, which require a street entrance driveway width of 35 feet. Similar to the 2019 concept, the 2023 modified concept would provide direct access to the project site via a right-in and right-out access driveway along Butterfield Avenue, approximately 650 feet east of the Monterey Road and Butterfield Boulevard intersection.

Both the 2019 and 2023 transportation analyses recommended that Butterfield Boulevard be widened an additional two to four feet at the project site entrance for 150 feet in order to provide 34 feet of right-of-way. The increased right-of-way would provide two 12-foot through lanes and a 10- to 12-foot bike lane/right-turn lane, which would provide capacity for up to six inbound vehicles, and would avoid site access activity from interfering with eastbound traffic through Butterfield Boulevard. Similar to the 2019 IS/MND, the modified 2023 project would include roadway widening as part of the project design, or alternatively adjust lane widths or reduce median size. This will be finalized as project plans are further advanced and prior to approval of project construction.

The modified 2023 project would not conflict with plans related to roadway facilities and would be consistent with City site access standards.

Sight Distance

The 2019 IS/MND did not include a discussion of sight distance, but identified a less than significant impact to roadway facilities because the project would comply with City site access and design standards, as noted above. Adequate sight distance must be provided at project driveways, i.e., project access points should be free and clear of any obstructions to ensure exiting vehicles can see other pedestrians or vehicles. According to American Association of State Highway Transportation Officials (AASHTO) standards, the stopping sight distance for a facility with a posted speed limit of 45 mph (such as Butterfield Boulevard) is 360 feet. That is, a driver exiting the proposed project must be able to see 360 feet to the west along Butterfield Boulevard in order to stop adequately and avoid a collision. The intersection of Monterey Road/Butterfield Boulevard is located approximately 400 feet west of the proposed BMX racetrack entrance driveway and approximately 650 feet west of the proposed parking lot driveway. The project driveways would meet AASHTO minimum stopping sight distance requirements. The modified 2023 project would not conflict with plans related to roadway facilities and would be consistent with sight distance standards.

Bicycle Facilities

The 2019 IS/MND identified a less than significant impact because the project site is adequately served by Class II bike lanes and a Class I bikeway. Because the 2023 modified project would be

served by the same bike lanes and bikeway, the project would not conflict with plans related to bicycle facilities.

Pedestrian Facilities

The 2019 IS/MND identified a less than significant impact because, although missing sidewalks along Monterey Road and Watsonville Road would result in a discontinuous pedestrian network in the immediate vicinity of the project site, the existing bicycle network would provide an alternate mode of access to park users (besides automobiles). Similar to the 2019 concept, the modified 2023 project includes pedestrian pathways that connect to all areas and amenities within the site. The project would not conflict with existing plans related to pedestrian facilities.

For the reasons described above, the project would have a less than significant impact on transit, bicycle, and pedestrian facilities, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

-
- b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
-

The 2019 IS/MND identified no impact because the IS/MND was adopted in 2019, prior to the July 2020 deadline for agencies to adopt a VMT-based threshold per CEQA Guidelines Section 15064.3.

Vehicle Miles Traveled Methodology

The California Office of Planning and Research (OPR) provides screening threshold recommendations that are intended to identify when a project can be determined to cause a less than significant impact without conducting a detailed VMT evaluation. OPR screening criteria are not directly applicable to park uses. However, the origin and destination of daily trips and VMT generated by the proposed project would be similar to that of local-serving retail. The OPR recommendations include local-serving retail developments less than 50,000 square feet in size. For purposes of this VMT analysis, the proposed project was converted to an equivalent amount of local-serving retail space, based on a comparison of project operations and trip generation to typical retail uses.

Vehicle Miles Traveled Analysis

The proposed park would be used by local Morgan Hill organizations for games (baseball field), by local and regional organizations for race events (BMX racetrack), and by residents for typical park activities. The anticipated racetrack usage is shown in Table 4.4-1 below.

Table 4.4-1: Project Trip Generation Estimates

Type of Usage	Type of Trip Generated	Frequency	Anticipated Attendance (per event)			
			Persons	Vehicles	Arrivals	Departures
Regular Weekday	Local	3 times per week	200	65	3 to 6 PM	7 to 10 PM
Regular Weekend	Local and Regional	1 time per weekend	400	120	7 to 10 AM	4 to 7 PM
Special Event Weekend	Regional or Statewide	2 weekends per year	3,000	750	7 to 10 AM	4 to 7 PM

Source: Morgan Hill City staff.

The project trip generation estimates on a typical weekday and weekend are shown in Table 4.4-2.

Table 4.4-2: Project Trip Generation Estimates

Land Use	Daily (Weekday)				Daily (Weekend)			
	Rate	Trips			Rate	Trips		
		In	Out	Total		In	Out	Total
Baseball Field ¹ (one field)	1 game	39	39	78	4 games	157	157	314
BMX Facilities (one track)	83 vehicles	83	83	166	132 vehicles	132	132	264
Public Park	45	23	23	46	45	23	23	46
Total		145	145	290	-	312	312	624

¹ The ITE Trip Generation Manual does not provide trip generation rates for baseball fields. Thus, the daily trip generation for the baseball field was estimated based on the assumption that one baseball game would be played per weekday and one baseball game would be played per weekend. It is assumed that each game would consist of 12 total players, two officials per game, one spectator vehicle trip generated for every four players.

² Trip generation for the BMX racetrack were estimated based on the anticipated track usage information provided by the City.

³ Trip generation for the remaining park space and supporting amenities was estimated based on the ITE Trip generation rates for public park land use (ITE Land Use Code 411).

Source: Hexagon Transportation Consultants. *Butterfield Park Vehicle Miles Traveled Assessment*. May 30, 2023.

As previously discussed, the proposed project was converted to an equivalent amount of retail use for the purposes of the VMT assessment since the OPR screening criteria are not directly applicable to park uses. Based on the project operations information and ITE daily trip rate, during regular weekend park usage, the proposed park is estimated to generate a total of 624 daily trips, which are equivalent to the number of trips estimated to be generated by 17,000 square feet of retail space, according to ITE trip generation rates for shopping centers. Since the project's converted retail size would be less than 50,000 square feet, the proposed project for the vast majority of the days per year it is used would function as a local-serving facility, and would therefore have a less than significant impact on VMT. The larger, infrequent events hosting special BMX events would

draw visitors from a larger geographic area, leading to increased VMT for those specific events, however, they would not be a regular occurrence, and VMT is evaluated based on normal, routine facility operations. Because the 2019 IS/MND identified no impact, the project would result in a new less than significant impact. **(New Less than Significant Impact)**

-
- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
-

The 2019 IS/MND identified a less than significant impact because the project would be designed in accordance with City design standards and would not include sharp curves or incompatible uses. The 2023 conceptual site plan (refer to Figure 3.2-5) does not include driveway widths. However, as discussed in the 2019 IS/MND and under checklist question a) above, the project would be designed in accordance with Municipal Code Section 18.72.060 Parking Design and Development Standards, which require a street entrance driveway width of 35 feet. The project does not include sharp curves or incompatible uses and would not increase hazards due to its geometric design. For these reasons, the proposed project would have a less than significant impact, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [Less than Significant Impact])**

-
- d) Would the project result in inadequate emergency access?
-

The 2019 IS/MND identified no impact because the project driveway would provide access to large vehicles and would be designed in accordance with City design guidelines. The 2023 modified project design would continue to provide access to larger vehicles such as emergency vehicles and garbage collector trucks. By adhering to the City of Morgan Hill's standards and requirements for emergency access, the proposed site access points and layout of the surface parking areas would be adequate to accommodate circulation of both passenger and emergency vehicles. Additionally, during special events, the proposed project would implement a parking mitigation plan (which will be established as project plans are further advanced and prior to the approval of project construction) and comply with Chapter 12.16 of the Municipal Code requiring Special Event Permits. Thus, the proposed project would have a less than significant impact, consistent with the findings of the 2019 IS/MND. **(Same Impact as Approved Project [No Impact])**

4.4.3 Non-CEQA Effects

While the evaluation of project CEQA impacts on the transportation system is based on vehicle miles traveled (VMT), the following discussion is included for informational purposes in accordance with the City's Level of Service General Plan Policy TR-3.4 and for comparison with the LOS findings disclosed in the 2019 IS/MND.

4.4.3.1 *Morgan Hill LOS Guidelines and Methodology*

All intersections within the City of Morgan Hill are required to meet the City's LOS standard of LOS D, with the exception of intersections and freeway zones listed in General Plan Policy TR-3.4.

According to the City of Morgan Hill LOS guidelines, a development would create an adverse effect on traffic conditions at a signalized intersection if for either peak hour:

- The level of service at the intersection degrades from an acceptable level (LOS D or LOS E as identified above) under existing conditions to an unacceptable level (LOS E or F) under project conditions, or
- The level of service at the intersection is an unacceptable level (LOS E or F as identified above) under existing conditions and the addition of project trips causes the average critical delay to increase by four (4) or more seconds and the volume-to-capacity ratio (V/C) to increase by 0.01.

An exception to this rule applies when the addition of project traffic reduces the amount of average delay for critical movements (i.e., the change in average delay for critical movements is negative). In this case, the threshold of significance is an increase in the critical V/C value by 0.01 or more.

4.4.3.2 *Intersection Level of Service Analysis*

The 2019 IS/MND analyzed the following study intersections:

- Monterey Road and Watsonville Road/Butterfield Boulevard
- Butterfield Boulevard and Tennant Avenue
- Monterey Road and Tennant Avenue

The 2019 IS/MND evaluated the project's effect during the Saturday peak hour (at the above intersections) because the project was not anticipated to generate a significant amount of traffic during standard weekday AM and PM peak hours. The 2019 IS/MND identified a less than significant impact because the addition of project traffic would not result in a LOS deficiency. The results of the 2019 intersection LOS analysis are summarized in Table 4.4-3 below.

The Trip Generation and Operations Analysis prepared for the modified 2023 project (Appendix A) analyzed the same study intersections, but included an evaluation of weekday PM peak hours in addition to Saturday peak hours. Traffic conditions were evaluated for Existing and Existing Plus Project Conditions. The Existing Conditions represent the existing peak hour traffic volumes on the existing roadway network. Existing PM peak-hour traffic volumes were derived from previously collected traffic counts in 2018, 2019, and 2021, with a 1.5 percent annual growth factor applied to represent existing 2023 conditions. Existing Saturday peak hour traffic volumes were obtained from new manual turning-movement counts conducted on Saturday, April 1, 2023 at the study intersections. The Existing Plus Project Conditions peak hour traffic volumes were estimated by adding to the existing traffic volumes the additional traffic that would be generated by the proposed modified 2023 project. Existing plus project conditions were evaluated relative to existing conditions in order to determine the effects of the proposed project on existing traffic conditions. The project trip generation estimates are shown in Table 4.4-2 above.

Since the special event weekend use is expected to take place no more than twice a year, and because traffic associated with special events would be subject to a parking mitigation plan, the effect of the proposed project on existing traffic conditions was evaluated for regular weekday and weekend activity. The results of the 2023 intersection LOS analysis (summarized in Table 4.4-4 below) show that all study intersections currently operate at acceptable LOS D under existing conditions, and that the addition of project traffic would not result in the degradation of intersection LOS during either PM or Saturday peak hours. Though no longer considered a CEQA impact, this would be consistent with the findings of the 2019 IS/MND.

Table 4.4-3: Intersection Level of Service Summary (2019 Project)

Intersection	Existing Control	LOS Standard	Peak Hour	Existing		Existing + Project			
				Average Delay	LOS	Average Delay	LOS	Increase in Critical Delay	Increase in Critical V/C
Monterey Road and Watsonville Road/Butterfield Boulevard	Signal	D	SAT	43.6	D	43.9	D	0.0	0.002
Butterfield Boulevard and Tennant Avenue	Signal	E	SAT	38.3	D	38.2	D	1.7	0.051
Monterey Road and Tennant Avenue/Edmunson Avenue	Signal	E	SAT	37.8	D	38.6	D	1.2	0.024

Source: Hexagon Transportation Consultants. *Butterfield Park Trip Generation and Operations Analysis*. July 5, 2019.

Table 4.4-4: Intersection Level of Service Summary (2023 Project)

Intersection	Existing Control	LOS Standard	Peak Hour	Existing		Existing + Project			
				Average Delay	LOS	Average Delay	LOS	Increase in Critical Delay	Increase in Critical V/C
Monterey Road and Watsonville Road/Butterfield Boulevard	Signal	D	PM	38.5	D	38.8	D	1.0	-0.014
			SAT	42.5	D	43.7	D	2.4	0.022
Butterfield Boulevard and Tennant Avenue	Signal	E	PM	38.2	D	38.4	D	0.2	0.004
			SAT	35.4	D	35.1	D	-0.6	0.032
Monterey Road and Tennant Avenue/Edmunson Avenue	Signal	E	PM	36.9	D	37.2	D	0.6	0.011
			SAT	39.6	D	39.9	D	0.4	0.013

Source: Hexagon Transportation Consultants. *Butterfield Park Vehicle Miles Traveled Assessment*. May 30, 2023.

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 6.0 Lead Agency and Consultants

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Section 7.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADT	average daily traffic
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
Bay Area	San Francisco Bay Area
CAAQS	California Ambient Air Quality Standard
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalents
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	Diesel Particulate Matter
EO	Executive Order
EPA	Environmental Protection Agency
IS	Initial Study
L _{eq}	Energy-Equivalent Sound/Noise Descriptor
L _{max}	Maximum A-weighted noise level during a measurement period
LOS	Level of Service
LR	Local Route
MND	Mitigated Negative Declaration
mph	miles per hour
MTC	Metropolitan Transportation Commission
N ₂ O	nitrous oxide

NAAQS	National Ambient Air Quality Standard
NO ₂	nitrogen dioxide
NOD	Notice of Determination
NO _x	nitrogen oxides
O ₃	ozone
OPR	Office of Planning and Research
PM	particulate matter
PM ₁₀	particulate matter with a diameter of 10 microns or less
PM _{2.5}	particulate matter with a diameter of 2.5 microns or less
PPV	Peak Particle Velocity
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SB	State Bill
SO _x	sulfur oxides
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
VMT	Vehicle Miles Traveled