### City Manager's Office



July 26, 2018

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

### RE: Flood County Park Landscape Plan, Final Environmental Impact Report Comments

Dear Ms. Schoof.

Thank you for agreeing to postpone the meeting of the San Mateo County Parks & Recreation Commission from June 7 until August 2, 2018 to allow more time for public comment on the Final EIR.

Please find attached the City of Menlo Park's comments on the Flood Park Landscape Plan Final Environmental Impact Report (EIR). The attached comments highlight several deficiencies in the Final. This response has not be approved by the City Council due to their not having a City Council meeting during the extended comment period.

In addition, thank you for meeting with us to discuss concerns raised by residents immediately adjacent to the Park. We appreciate your efforts to minimize potential impacts related to the proposed new sports field in particular. We strongly encourage you to continue to work closely with the impacted residents on the specifics of the design as the project progress through future stages.

The City appreciates the opportunity to comment on the proposed project and the Final EIR and looks forward to these issues being addressed prior to certification of the environmental document. Please contact us at 650.330,2200 with any questions.

Sincerely,

Alex D. McIntyre City Manager

### City of Menlo Park Flood County Park Landscape Plan, Comments on the Final EIR

### 1. Response to 44.1

The result of the County wanting to mitigate traffic congestion and trips to the park by prohibiting sports field use between 4-6 p.m. will significantly reduce sports field availability and benefit since peak usage of such fields is between 4-7 p.m. Any such restriction also will result in unsanctioned use by groups still resulting in vehicle trips. The City continues to request that the reduction of athletic programming during peak hours be removed from consideration.

### 2. Response to 44.3

The County acknowledges the potential for increased drop-off and pick-up activities to occur on Iris Lane in Topical Response 2. Currently, existing parking restrictions are provided from 8:00am to 8:00pm, Friday through Sunday and holidays from April 1 to October 31:

- Both sides of Iris Lane between Flood Park and Van Buren Drive
- Both sides of Del Norte Avenue between Iris Lane and Bay Road
- Both sides of Oakwood Avenue between Del Norte Avenue and Sonoma Avenue
- Sonoma Avenue, north side from 1001 to 1011

However, no concrete proposals are incorporated to reduce the existing activities or ensure that these impacts will not be exacerbated under the proposed project. The response indicates that athletic participants will be allowed to enter the park with no fee to drop off or pick up. However, it is not clear how this would discourage access by drop off, pick up or parking near the Iris Lane gate. In lieu of the proposed language, the City requests the County impose a condition of approval on the project that would require before/after access study be prepared that quantifies the number of vehicles accessing the Iris Lane gate and recommends strategies to reduce or eliminate any drop off, pick up or parking in the vicinity, including expanded parking restrictions, no u-turn signs, etc. The City recently incorporated a similar condition for a new development project on El Camino Real that had the potential for parking spillover into an adjacent neighborhood:

Condition 3.i.xii. Within six months after opening of the Middle Avenue pedestrian and bicycle railroad crossing, the Applicant shall conduct a parking duration study to determine whether overflow parking from the project is occurring on Alma Street, in Burgess Park, or in the Linfield Oaks Neighborhood subject to City review and approval. The dates of the survey shall be reviewed and approved by Transportation Division prior to data collection to ensure typical operating conditions and weather. If overflow is observed, the Applicant shall have no more than six months to take steps to eliminate any overflow parking. If after six months, parking overflow is not rectified, the Applicant shall fund the establishment of time restricted parking or a residential parking permit program to eliminate parking overflow.

### 3. Response to 44.9

The County's response disputes that no proposal to eliminate walking or bicycling facilities on Ringwood Area were proposed as part of the project. However, the Draft EIR identified a mitigation measure at Bay Road/Ringwood Avenue, including a proposal to add a left-turn lane on Ringwood Avenue at Bay Road. Given limited right-of-way at this intersection, it is unclear how this measure

### City of Menlo Park Flood County Park Landscape Plan, Comments on the Final EIR

could be constructed without narrowing or elimination of areas currently used for walking or bicycling.

In addition, the County describes that a meeting was held between City staff and County about potential improvements to Bay Road/Ringwood Avenue as requested by the City. No such meeting was held. As described in the City's original comment on the Draft EIR, the City believes that there may be feasible mitigation measures that the City and County should partner on to reduce or eliminate the impact of the project, especially because one leg of the intersection is unincorporated and under the County's jurisdiction. The City requests that a meeting be scheduled between Public Works Departments to discuss such partnership opportunities.

### 4. Response to 44.10

The County's response indicates that County and proposed project are "not responsible for pre-existing unacceptable traffic conditions at Bay Road and Willow Road and would not substantially exacerbate traffic congestion at the intersection". CEQA requires that all feasible mitigation measures be incorporated for impacts of the proposed project. The Draft EIR identifies that Bay Road/Willow Road is impacted by the proposed project during the evening peak hour, which by definition means the project would exacerbate traffic congestion at the intersection beyond the adopted standard of significance. The City's comment on the Draft EIR did not request that the County mitigate existing deficiencies, but requested that County incorporate adequate mitigation for the project's impact to this intersection, as required by CEQA. Feasible mitigation at this intersection was identified by the City in past environmental studies (as part of the City's El Camino Real/Downtown Specific Plan), and these improvements could reduce the Plan's impact. The City requests that the County participate in these improvements with a fair share contribution towards their cost. Further, Phases II and III of the Landscape Plan should be analyzed in full and not deferred, even if the County believes these later phases may not have as great an impact on traffic.

### 5. Response to 44.11

The County's response to comment 44.11 includes replacing the proposal to add warning signs along Bay Road indicating pedestrians may be walking on the shoulder with a proposal to add signs within the Park identifying alternative pedestrian routes to the Park that avoid Bay Road, including Iris Lane, Del Norte Avenue, Oakwood Place, and Sonoma Avenue. The City requests that the County coordinate with the City to provide pedestrian wayfinding signs along this route, and also to continue to collaborate to pursue sidewalks on Bay Road to provide direct Park access, especially in light of other unmitigated transportation impacts.

### 6. Response to 44.12

The County's response to comment 44.12 does not address the comment. Flood Park is served by the Menlo Park Municipal Water system. The proposed changes at Flood Park will result in new facilities and added use, which will increase the potable water and fire protection demand. The EIR does not assess whether the Menlo Park Municipal Water distribution system has the adequate capacity to meet the increase demand at this location with service from Iris Lane. The City requests that the County prepare a hydraulic analysis of the system that serves the Park in order to assess

### City of Menlo Park Flood County Park Landscape Plan, Comments on the Final EIR

whether the water demand and pipe size is adequate in order to support the conclusion off-site improvements are not required and impacts are less than significant.

Furthermore, the applicable threshold relevant to water supply is as follows:

"The Landscape Plan would have a significant impact related to utilities and service systems if it would...have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed."

The response lacks any supportable evidence about water usage and is conclusory in nature. The City continues to request that the County provide data regarding historical and projected uses to ensure that there are adequate supplies for all customers served by Menlo Park Municipal Water, especially in multiple dry years (i.e., drought conditions).

### 6/1/18

### To San Mateo County Parks Commissioners

With this email I am submitting names and signatures from 54 addresses on the 4 streets closest to the eastern boundary of Flood Park (Del Norte Ave., Iris Lane, Sonoma, Oakwood Place) with over 90% of neighbors reached in support of alternative #3, multi-use field but with use restriction Mondays – Fridays 3-7 pm. This plan is neighborhood friendly in terms of reduced noise, less traffic and therefore fewer parking problems.

- It keeps the sports activities near the parking lot and restrooms. This is good for players and spectators. Some spectators might be elderly or disabled where walking across the park to get to the restrooms or fields might be difficult.
- I know the ball field group says a multi-use field cannot work, yet there are numerous multiuse fields all over the place.
- At the Nov 1 EIR meeting, a representative from the Menlo Park Legends and a coach from Hoover fields in Redwood City were arguing opposite opinions regarding a multiuse field, stating, "It doesn't work." And "It is crazy to have one field for only one sport."

I am also submitting a diagram proposing a second field location on the other side of the park next to the baseball field and parking lot. This field size could be very similar to what can fit in the current new field location. Although this would entail redesigning the park, it would keep the sports fields by the parking lot.

I know our numbers of names are probably few in comparison to the number of people who want the separate sport fields in the planned location, yet we are the neighbors living next to the side of the park where the fields are currently planned to be located. While the players and spectators will come and then return to their homes,

we will experience the noise, parking, and traffic problems every weekday afternoon and every Saturday and Sunday all year long and likely daily during the summer. We believe the Parks Dept. can improve the proposed design to better protect our neighborhood from negative impacts as well as to provide a better situation for the sports groups.

The EIR says most users will be coming from Menlo Park. This is a County Park. Who are the local teams going to be playing? Will Menlo Park be given preference over other cities in SM County?

Although historic use from the 1983 Master Plan is old, the Master Plan says "when Saturday or Sunday attendance reaches about 1,800 people and a baseball double header is being played, room for picnic activity is limited." Is this plan going to squeeze out many of the current users who are mostly from East Palo Alto, East Meno Park and North Fair Oaks where they have many family, church, and community celebrations and limited spaces to host these?

### What is the "true" approximate field size for the new field?

- At the December 16, 2015 meeting, lead architect David Gates stated the edge of the new field was approximately 30 feet from neighbors' property lines. I asked the question then.
- The EIR states that "noise from the proposed soccer/lacrosse field would occur as close as approximately 100 feet from the backyards of single family residences on Del Norte Ave to the southeast, based on the proposed Landscape Plan shown in Figure 4 in Section 2. It is assumed that this distance is representative of the nearest activity on the proposed field with respect to these residences, as well as of spectators lining the southeastern side of the field. Pg 136 137 draft EIR.
- Distance from PUC hatch to neighbors' property lines is approx. 260 feet
   A full-size lacrosse field is 180 feet plus 6 yards limit line/side. Adding 10 15 feet of
   space for spectators leaves you with "about 30 feet" to neighbors' yards as was stated
   by lead architect David Gates. Allowing 100 feet plus 15 feet for spectators, leaves
   approximately 145 feet for field space inclusive of limit lines. If you approve the
   Landscape Plan, please hold the Parks Department to the 100 feet plus room for
   spectators (approximately 15 feet)!

### Traffic

- There is an unmitigable traffic impact at Bay Rd. and Ringwood.
- This intersection is currently at a grade "C", almost a "D" and only 25 more vehicle trips during the peak traffic hours will put it at an unacceptable "D."
- By the time this project is to go into effect, this intersection will be at a grade 'D" or higher.

- There has been <u>no analysis</u> of traffic impacts with games and other activities. The EIR states adult soccer games would typically occur in the evenings during the week.
- This alone shows why this project should not proceed as outlined and there should not be any encouraged use during the weekday peak traffic hours.
- The only way to access Flood Park is by using Bay Rd. You cannot snake your way to the park on back streets.

Because there has been no analysis of traffic or parking during games and with other activities such as picnic users and gathering meadow use, it is questionable whether there will be more of a traffic impact on the weekends with cuing getting into the parking lot.

### There is cuing now.

- People stop to drop off supplies/people at the Bay Rd. gate.
- Even if sports participants don't have to stop to pay at the entrance gate, it will be slow to move through the parking lot as it is one lane in and one lane out with parking along the sides. The drop off turn-around is deep within the parking lot.
- As the park is used now, people come in and stay for hours for their weekend picnics.
- With games or practices changing nearly every hour for soccer/lacrosse, there will be a much worse cuing problem getting into and out of the park. This is known as the collision factor. This was never addressed in the EIR.
- It will be very inconvenient to try to drop off or pick up your kid. Because of this, many people will use the Iris Ln. gate resulting in increased traffic in our neighborhood. No doubt some parents will park on neighborhood streets despite parking restrictions while waiting for their kids. We who live here know that random enforcement by the Menio Park Police Dept. means rare or no enforcement which won't be changed by encouraging enforcement as stated in the EIR. The MPPD has more important duties.

### Noise

- Obviously, the current location of the soccer/lacrosse field is where the concern for noise comes in.
- Even if there is a minimum of 100 feet including spectators' area to neighbors' yards, whistles are designed to carry at least 330 feet, the length of a field. They are extremely loud.
- Although parks may be exempt from the quantitative noise standards, they are not exempt from the qualitative noise standards.
- Whistles and loud shouts are impulse noises and would be very bothersome to neighbors nearby. And with games being all-day from 9 AM to 8 PM during the summer months, this would be very disturbing.
- The EIR says sound amplification is not allowed without a special permit, and that the County "typically doesn't allow amplified sound." We who live next to the park know

that amplified sound is present in the park on a frequent basis. Saturday 5/26 at 6:30PM, someone stated talking through a microphone followed by amplified music.

Just because there is a piece of land that can accommodate a field, does not mean that is the best place to put it. Flood park used to be very respectful of its neighbors that share its borders, but that seems to have changed in the last few years. I noted a number of people made comments regarding this in letters concerning the park development.

### RECOMMENDATIONS

- 1. Consider an alternative plan with a second field on the other side of the park in the area between the adobe house, baseball field and water feature. Please see diagram.
- Placing fields near parking is very important for players as well as elderly or disabled people coming to watch the games who may not be able to walk so far to get to the field or restrooms.
- Many fewer trees would need to be cut down than what is currently planned. I
  measured the tennis courts plus pathways and overlaid the diagram on the existing park
  map
- If you move the second field to the other side of the park, the tennis courts can remain in their current location and volleyball courts can be built in the space of the Petanque court, but close to the baseball field.
- This would allow a second field to be built without impacting neighbors or the park to the degree the current landscape plan will.
- 2. Approve the multi-use plan but restrict field use to the weekends due to the unmitigable traffic impact.
  - This will allow the tennis courts to remain where they are. One set of volleyball courts can be built in the area of the petangue court
  - If the multi-use field is approved for use during the week, use would need to be restricted to no more than one team at a time due to the traffic impact.
- 3. If you do approve the current landscape plan, hold the County to their 100 feet plus spectators (a total of approximately 115) with any field design on the southeast side of the park.
- 4. If you approve the landscape plan, move the volleyball courts farther into the park so not to disturb neighbors. Their current location will involve cutting down many trees. Mr. Gates placed them in their current location to "keep all of the sports together." This was insensitive to neighbors as is the placement of the second field in its current location.

5.	As there is no way to mitigate traffic at Bay Rd and Ringwood, there would need to be
	restriction of no games being played from approximately 3 PM to 6:30 PM during the
	week to not affect the traffic. School school traffic from Laurel elementary and Menlo
	Atherton High School occurs between 3-4PM followed by the PM commute traffic.

6. If you approve the landscape plan without moving a field, consider closing the Iris Ln. gate during field and game times.

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## Petition in Favor of Approving the Multi-Use Field Option for Flood Park

The neighbors of Flood Park feel approval of a multi-use field for Flood Park is the only option that will allow neighbors of Flood Park to have some space between our homes and the new activities being planned for the park as well as allow the project to meet its objectives to:

- Repair and update park features and core infrastructure components
- Meet demand for active recreation facilities in San Mateo County by increasing offerings of sports
- Provide a variety of uses for a range of user groups, including youth
- Optimize preservation of oak woodland

hours of 4-6 PM. Although the EIR did offer an alternative plan to include a multi-use field, it did not recommend the necessary use restrictions of no We, the undersigned, feel approval of alternative #2 in the DEIR which proposes a multi-use field to fit in the location of the existing baseball field is the solution for park development and neighborhood integrity. As stated in the DEIR, increased traffic at the Ringwood/Bay Road intersection is unsustainable with no feasible mitigation possible so organized use of all sports fields and courts must be prohibited during weekday commute scheduled games M-F during peak traffic hours of 4-6 PM.

To further mitigate the effects of the re-development of the park on neighbors, we also request sports activities and pathways be placed at a minimum of 100 feet from neighbor's property lines as was suggested for a potential soccer field in the DEIR. These signatures may be presented to the San Mateo County Parks Department, San Mateo County Parks Commissioners, San Mateo Board of Supervisors or other interested parties.

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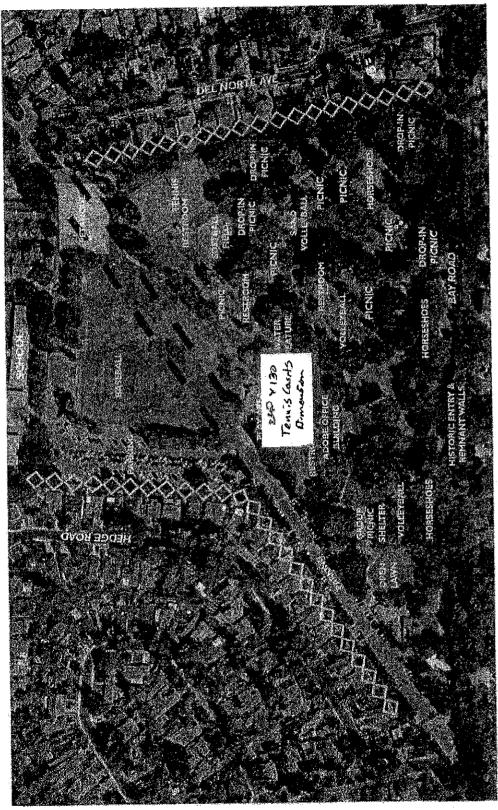
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