

**City of Cupertino Parks and Recreation System Master Plan
Initial Study/Mitigated Negative Declaration, October 2019
State Clearinghouse # 2019109066**

Text Revisions, February 2020

Introduction

This text revisions supplement to the October 2019 Initial Study/Mitigated Negative Declaration (IS/MND) contains changes to the text of the IS/MND subsequent to the close of the public comment period, which ended on November 22, 2019. The following revisions to the text of the IS/MND clarify, amplify, or make insignificant modifications to the IS/MND, which was circulated for public review from October 23, 2019 to November 22, 2019. These text changes do not require substantial revisions to the IS/MND due to new or substantially more severe significant effects on the environment or change any of the conclusions of the IS/MND. Therefore, recirculation of the IS/MND is not required.

The following text revisions are organized by IS/MND chapter. Additions to the IS/MND text are shown with underlining and text removed from the IS/MND is shown with ~~strikethrough~~.

The comments received on the IS/MND during the public comment period did not result in any changes to the IS/MND. At the December 5, 2019 Environmental Review Committee (ERC) meeting, however, the ERC recommended minor changes to the Project Description. Therefore, the Project Description and other relevant sections of the IS/MND have been revised as shown in the following text revisions.

Text Revisions to the IS/MND

Project Description Section 2.7, pages 38-39

2.7 SCOPE OF CEQA REVIEW

The Master Plan identifies opportunities for park improvements and development and is intended to guide the City in allocating resources for future enhancement, renovation, and management of City park and recreation facilities through the year 2040. The key components of the Master Plan are vision and goals, systemwide objectives and actions, opportunities for improving the parks and recreation system (including acquisition of new parks and potential major new facilities as well as smaller enhancements), and associated implementation actions. The Master Plan establishes a policy framework to support decision-making that concerns the physical development of the City's parks. The Master Plan contains a number of goals and actions that do not have the potential to affect the environment as analyzed under CEQA and are not considered in detail in this document (see Chapter 3 of the Master Plan for a complete list of goals, objectives, and actions).

This IS/MND focuses on Master Plan goals, objectives, actions, and enhancement opportunities that have the potential to cause environmental impacts when implemented (see Table 2-2 and Table 2-3). While the Master Plan identifies types and potential locations of park improvements contemplated, it does not present project-level design plans for any specific improvement or project. In the absence of project-level information, this IS/MND identifies general areas of potential environmental impacts that could occur from implementation of the Master Plan, and

identifies how existing City policies, programs, and procedures, as well as regulatory standards and programmatic procedures, would reduce or avoid environmental impacts. Where a potentially significant impact is identified, the impact analysis identifies programmatic mitigation measures that would be applied to future projects to reduce or prevent environmental impacts.

Adoption of the Master Plan would not authorize any specific development, or the construction of park improvements contemplated in the Master Plan. Once project-level information is developed for improvements proposed to be implemented under the opportunities identified in the Master Plan, the City would review the project under CEQA and determine the appropriate level of environmental review. In the absence of even conceptual-level design and implementation information at this time, this IS/MND cannot evaluate the potential environmental impacts of some of the actions contemplated in the Master Plan. Future review of these projects would focus on site-specific environmental issues that could not be examined in sufficient detail as part of this IS/MND. When a specific, proposed project is pursued on school district-owned property, the City and the school district would determine which entity would be the CEQA lead agency, and what the appropriate CEQA determination for the project would be.

Certain types of improvements or modifications identified in the Master Plan are considered small in scale and, subject to the applicable regulations, may not be projects under CEQA (CEQA Guidelines Section 15378 Project), may qualify for exemptions, or may be covered by this IS/MND. ~~These types of small scale projects/improvements may include, but are not limited to, the following:~~

- Improving walking trails within parks;
- Adding shade to existing parks;
- Replacing/Improving play equipment;
- Removal/replacement of existing picnic tables;
- Construction of new restrooms or other small structures in parks;
- Incorporation of sustainable practices in the maintenance and management of parks;
- Improvement of landscaping with sustainable plantings or native planting providing wildlife habitat;
- Improvements that may assist the City in meeting or exceeding Americans with Disabilities Act (ADA) requirements;
- Improvement of trail connections and access;
- Development of fitness areas in parks;
- Integration of nature into parks;
- Enhancement of seating areas in parks;
- Enhancement of existing sports fields (excluding field lighting, additional evening events, or increase in spectators);
- Creation of wayfinding signage or safe routes to parks;
- Replacing, renovating, or repurposing buildings within the parks and recreation system.

Air Quality Section 3.3.3, page 75, 2nd paragraph

In general, the potential park enhancements, improvements, and other development actions identified in the Master Plan that are ~~within the scope of this IS/MND (see Section 2.7)~~ are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development

of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, small neighborhood park). Such projects could include, but are not limited to, improving walking trails within parks, adding shade to parks, replacing/improving play equipment, removal/replacement of picnic tables, enhancement of seating areas, replacement of landscaping, or creation of wayfinding signage. The potential air quality impacts of these small-scale projects listed in Section 2.7 are considered and evaluated below.

Air Quality Section 3.3.3, page 75, 4th paragraph

Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. As described below, the Master Plan would not conflict with an applicable air quality plan, including the BAAQMD 2017 Clean Air Plan.

BAAQMD 2017 Clean Air Plan

Consistent with BAAQMD's CEQA Air Quality Guidelines, the proposed Master Plan would result in a significant impact if it would be inconsistent with the 2017 Clean Air Plan control measures or result in a projected increase in vehicle trips or vehicle miles travelled (VMT) that exceeds a projected population increase. As discussed in more detail below, the proposed Master Plan is consistent with the 2017 Clean Air Plan and many of the enhancement opportunities are small in size and scale and (see Section 2.7) would not result in an increase in vehicle trips or VMT. None of the Master Plan enhancement opportunities would result in a change in population in the City. The proposed Master Plan, therefore, would be consistent with the BAAQMD's 2017 Clean Air Plan.

Air Quality Section 3.3.3, page 80, 1st paragraph

Increases in Vehicle Trips/Vehicle Miles Travelled that Exceeds Population Growth

The proposed Master Plan provides guidance and priorities for the continued development of a park and recreation system that meets the needs of the Cupertino community; it does not authorize or approve any change in any land use designation or otherwise alter population in the City of Cupertino. In addition, because the Master Plan focuses on serving the needs of the local community, it is not likely to result in substantial new vehicle trips or increases in VMT because the enhancement opportunities are scaled to the type of park in which they are proposed and most enhancement opportunities do not introduce new uses or activities but rather recommend improvements to existing uses or enhancements in the infrastructure (walkways, buildings, landscaping). Therefore, it is reasonable to assume that the projects identified in the Master Plan would allow the City's park and recreation system to better serve Cupertino residents and thereby reduce or avoid the need for residents to travel outside the City for certain park and recreation facilities. The Master Plan would support a reduction in recreation-related vehicle trips and associated VMT through the Master Plan overarching goals of connectivity (MP2), equitable access (MP3), and creation of high quality, inclusive recreation experiences that support and reflect Cupertino's unique character (MP4, MP5, and MP6). The potential park enhancements, improvements, and other development actions identified in the

Master Plan that are small in size and scale (see description of examples of these small-scale projects on page 75) ~~within the scope of this IS (see Section 2.7.1)~~ are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, small neighborhood park) and would not induce population growth or result in appreciable changes to local traffic conditions or recreational-related vehicle trips and VMT.

Air Quality Section 3.3.3, page 80, Question b)

- 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?**

Less Than Significant Impact. As described in Section 3.3.1, the City of Cupertino is located in the SFBAAB, an area of non-attainment for national and state ozone standards, national and state PM2.5 standards, and state PM10 standards. The future development of potential park enhancements, improvements, and other development actions identified in the Master Plan ~~that are within the scope of this IS/MND (see Section 2.7)~~ would generate emissions of regulated air quality pollutants from the following activities, which could contribute to violations of standards for SFBAAB nonattainment pollutants (ozone, PM2.5, and PM10):

- **Short-term construction activities:** Park enhancements, improvements, and other development or construction-related activities would generate emissions from the following sources:
 - Gasoline and diesel fuel combustion in the construction equipment necessary to complete a project (e.g., material lifts, fork lifts, trenchers, backhoes, etc.), as well as in motor vehicles travelling to and from the park project site, such as city worker vehicle trips, vendor vehicle trips (e.g., material deliveries to the project area), and soil or debris hauling truck trips, would generate emissions of ROG, NO_x, CO, exhaust PM, and other pollutants. The age, type, amount, size, and hours of construction equipment use, as well as the associated number of workers, vendors, and haul trucks needed to construct a project, all influence the amount of exhaust emissions produced by construction equipment and construction-related motor vehicle trips.
 - Demolition and ground disturbance activities associated with equipment or structure removal, land clearing and grubbing, excavation, grading, and other earth moving activities necessary to complete a project generate fugitive dust and PM emissions. These emissions are generated during active demolition and earth moving operations, as well as when earth/materials are dropped or loaded into haul trucks and transported to their final destinations. The silt content, soil moisture level, wind speed, and volume of material moved affect potential fugitive dust emissions from demolition and earth moving activities.
 - Motor vehicle travel on paved and unpaved roads used to access park projects also generates fugitive dust and PM emissions. The silt content, moisture level, vehicle weight, and vehicle speed are factors that affect fugitive dust emissions from vehicle travel on paved and unpaved roads.

- **Long-term operational activities:** Once constructed, park enhancements, improvements, and/or other development activities would generate emissions from the following sources:
 - Small “area” sources including landscaping equipment that combust fuel and the use of consumer products such as paints, cleaners, and fertilizers that result in the evaporation of ROG into the atmosphere during product use¹.
 - Energy use in the form of the combustion of natural gas in water and space heating equipment, which produces emissions of ROG, NOx, CO, and PM.
 - Mobile sources, specifically visitor vehicles and City maintenance vehicles travelling to and from parks, which generate ROG, NOX, CO and PM from fuel combustion as well as fugitive dust and PM from road travel and tire and break wear.

Air Quality Section 3.3.3, page 83, 1st paragraph

The future development of potential park enhancements, improvements, and other development actions identified in the Master Plan that are small in size and scale within the scope of this IS/MND (see Section 2.7) would be unlikely to generate significant short- or long-term emissions. The City would use the BAAQMD’s construction and operational screening criteria for park land uses presented in Table 3-3 to evaluate future park projects or improvements identified in the Master Plan. Consistent with the BAAQMD’s CEQA Air Guidelines, if the project satisfies all of the screening criteria, it would not result in a significant air quality impact. As shown in Table 3-3, the BAAQMD recommends all projects implement certain identified basic construction measures to reduce and avoid fugitive dust emissions. The implementation of these measures during future construction projects would ensure that Master Plan projects do not result in significant fugitive dust impacts. As shown in Table 2-5, the City has incorporated standard design and construction measures into the planning, design, and implementation of the Master Plan projects that are within the scope of this IS/MND to control and reduce short-term, construction related emissions, including the BAAQMD’s recommended basic construction measures.

Cultural Resource Section 3.5.3, page 113, 4th paragraph

In general, some of the potential park enhancements, improvements, and other development actions identified in the Master Plan that are within the scope of this IS/MND (see Section 2.7) are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, small neighborhood park, etc.). The potential cultural and historic resource impacts of these projects are considered and evaluated below. Examples of the types of projects that are within the scope of this IS/MND generally include but are not limited to improving walking trails within parks, adding shade to parks, replacing/improving play equipment, removal/replacement of picnic tables, enhancement of seating areas, replacement of landscaping, or creation of wayfinding signage, the opportunities listed in Section 2.7.

1 Area sources are sources that are individually small but numerous in operation throughout an area.

Cultural Resource Section 3.5.3, page 115, 2nd paragraph

In general terms, many of the improvements proposed by the Master Plan as presented in Table 2-2 Master Plan Goals, and Table 2-3 Site Opportunities, ~~and described in Section 2.7~~ would be projects with minimal ground disturbing components and, thus, have a minimal chance for uncovering unknown archaeological resources. However, any ground disturbing work has the potential for archaeological discovery. New park and recreation facilities presented in Table 2-4 would have a greater likelihood of discovering unknown archaeological resources because the extent of earthmoving activities is assumed to be relatively large. Once project-level information is developed for improvements proposed to implement under the opportunities identified in the Master Plan, the City would review the project under CEQA and determine the appropriate level of environmental review. In the absence of conceptual-level design and implementation information at this time, this IS/MND cannot evaluate the potential environmental impacts of some of the actions contemplated in the Master Plan. Future review of these projects would focus on site-specific environmental issues that could not be examined in sufficient detail as part of this IS/MND.

Energy Section 3.6.3, page 120, question a).

Would the project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less than Significant Impact. As described in Section 3.3.3, the potential park enhancements, improvements, and other development actions identified in the Master Plan that are ~~within the scope of this IS (see Section 2.7.1)~~ are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, small neighborhood park, etc.). Although these projects would not be large, the construction of Master Plan projects would require the use of construction equipment and generate construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. The use of this fuel would be necessary to complete the Master Plan project. In addition, as shown in Table 2-5, the City has included BMPs to reduce fuel use in small equipment, idling, and waste hauling activities, ensuring fuel would not be combusted in a wasteful or inefficient manner.

Geology and Soils Section 3.7.3, page 131, 2nd paragraph

A review of the University of California's Museum of Paleontology's (UCMP) fossil locality database was conducted for the entire City and Sphere of Influence (City of Cupertino 2014). No paleontological resources have been identified within the current park locations; however, the presence of Pleistocene deposits that are known to contain fossils indicates that the overall park system sites could contain paleontological resources. Because most of the enhancement opportunities contained in the Master Plan involve minor ground disturbance it is unlikely that implementation of the Master Plan recommendations would result in impacts to paleontological resources. Paleontological features are found in sedimentary bedrock. Most small-scale projects or improvements proposed in the Master Plan are small projects for which excavation would not

extend beneath surficial soils, would not encounter a paleontological horizon and, therefore, would not disturb paleontological resources. ~~A list of minor projects is described in Section 2.7.1.~~ Projects with the potential to impact environmental resources, primarily larger projects, would undergo a separate CEQA process once design plans are available. These projects would be evaluated for the potential to encounter bedrock and thus have a potential impact on paleontological resources for which mitigation measures would be identified as necessary. The City will design, construct, and manage park projects in conformance with adopted City policies and standards and CEQA requirements. This process would ensure impact to paleontological resources from park projects would be less than significant.

Greenhouse Gas Emissions Section 3.8.3, page 136, 2nd paragraph

3.8.3 Discussion

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. As described in Section 3.3.3, the potential park enhancements, improvements, and other development actions identified in the Master Plan that are ~~within the scope of this IS/MND (see Section 2.7)~~ are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, small neighborhood park).

Noise Section 3.13.3, page 175, 3rd paragraph

In general, the potential park enhancements, improvements, and other development actions identified in the Master Plan that are ~~within the scope of this IS/MND (see Section 2.7)~~ are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur (e.g., community park, large neighborhood park, or small neighborhood park). The potential noise and vibration impact of these projects are considered and evaluated below. Examples of the types of potential noise-generating Master Plan projects include, but are not limited to (see "Site Enhancement Opportunities" for large and small neighborhood parks Table 2-3):

- Temporary construction noise from equipment use, traffic, or construction activities during development and construction of future Master Plan projects.
- Permanent park and recreation noise from the following sources:
 - Children's play activities at playgrounds, nature play areas, water play areas, fields, and recreation facilities.
 - Passive recreation activities such as picnicking, wildlife viewing, or gardening (at parks with community gardens).
 - Fitness activities such as walking, jogging, or biking (on park trails or pathways), or use of fitness equipment and fitness stations.

- Sports activities such as but not limited to soccer, basketball, baseball, or ultimate Frisbee at single- or multi-use sports fields and facilities.
- Dogs using dedicated dog parks, off-leash dog areas, or dog exercise spaces and dogs on leash.
- On-site maintenance activities such as invasive species removal, bank stabilization, and equipment and building repair activities (e.g., painting, replacing parts, etc.).
- Off-site vehicle trips on roads used to access City park and recreation facilities.

Transportation Section 3.17.3, page 203, 1st paragraph

The Master Plan identifies enhancement opportunities at each City park, many of which would not result in any changes to existing traffic patterns or volumes and as such, would not significantly affect LOS associated with the park or recreation facility use. ~~(see list of small-scale projects listed in Section 2.7)~~