

MORGAN HILL BUSINESS PARK

PROPERTY OF:
City of Morgan Hill
CITY OF MORGAN HILL
COMMUNITY DEVELOPMENT DEPT.
17555 PEAK AVENUE
MORGAN HILL, CA 95037

Environmental Impact Report

Addendum

For
City of Morgan Hill
and
Wiltron Company

June 1980

Environmental Impact Report

By

Creegan & D'Angelo

San Jose, CA.

MORGAN HILL BUSINESS PARK
ADDENDUM FOR
FINAL ENVIRONMENTAL IMPACT REPORT

This Addendum to the Draft Environmental Impact Report for the Morgan Hill Business Park has been prepared to fulfill the requirements for the Final Environmental Impact Report and to specifically respond to comments on the Draft Report. These responses have been prepared for each Section and subject which have been commented on in each of the letters received. It is divided into six sections:

	<u>Pages</u>
... Summary of Impacts and Mitigation Measures	S-1 to S-11
... Revisions to the DEIR	DEIR Page No.
... List of Persons and Agencies Commenting on the DEIR	L-1
... Letters Received Commenting on the DEIR	L-2 to L-48
... Responses to the Comments in Each Letter	R-1 to R-30
... Summary of the Public Hearing	R-31 to R-33

The responses to each letter have been referenced to the applicable section of the DEIR. Therefore, each section is composed of the content in the DEIR, revisions herein, and responses to comments.

MORGAN HILL BUSINESS PARK

SUMMARY: IMPACTS AND MITIGATION MEASURES

IMPACT

MITIGATION

EMPLOYMENT AND HOUSING

1. Creation of 16,263 jobs; 9,270 jobs within the project and 6,993 service jobs outside the project, with the effect of reducing the imbalance of employment and housing by providing jobs locally. This project, along with other activities within the City, will continue to create pressure for housing in the Morgan Hill area.

1a) Phase construction of Morgan Hill Business Park in a minimum 15 year build-out schedule.

Study of Morgan Hill "Zone of Influence" area (see p. 3.30 EIR) shows a severe lack of jobs in the Morgan Hill area. With a 15 year build-out schedule, a balance of jobs and housing within the "Zone of Influence" does not occur until the 15th year.

1b) City of Morgan Hill in cooperation with Wiltron Company perform annual monitoring of job growth in the City and "Zone of Influence." Acceleration of the "15 year occupancy period" schedule will be permitted if housing supply exceeds job growth.

1c) The City of Morgan Hill should phase all industrial growth in the community to insure job/housing balance occurs. Use of the 5 Year Urban Service Area and the proposed monitoring program (see 1b above) to insure that the ratio of jobs to housing approaches a balance.

SCHOOLS:

1. The proposed project will have no direct impact on the K-12 schools.

1a) Population and housing growth over the next 15 years in the Morgan Hill "Zone of Influence" (nearly all of which is within the Morgan Hill Unified School District) will not experience added housing pressure if the Morgan Hill Business Park adheres to a 15 year buildout schedule (see mitigation: Employment and Housing #'s 1a and 1b).

IMPACT

MITIGATION

2. Gavilan Junior College job training classes will receive an increasing demand for electronics and high technology training as well as office and clerical skill training.
- 1b) Morgan Hill (Measure E), Santa Clara County, and City of San Jose must continue to follow present residential growth policies in order to prevent housing and population growth to expand beyond school's capabilities to serve.
2. Wiltron Company and other businesses which locate in the Business Park in the future could:
 - a. Cooperate with Gavilan College in designing curriculum which meets the Park's employment needs.
 - b. Cooperate to provide teaching staff and specially designed training programs as a part of the Gavilan College and adult education classes in the Morgan Hill Unified School District (MHUSD).
 - c. Provide on-the-job-training experiences for persons attending employee training classes at Gavilan College and the adult education program at Morgan Hill Unified School District.
 - d. Provide flexible hours for student/employees to enable continuing education and work experience.

TRAFFIC AND TRANSPORTATION

1. Impact on Cochrane Road prior to completion of freeway (1983) with 500 employees expected on the site will be minimal.
1. Present design of intersection at Monterey Road and Cochrane Road can operate efficiently with increased traffic from project.
2. Increased traffic to downtown Morgan Hill.
- 2a) The present roadway system provides adequate access to the downtown area via Monterey Road and via the freeway to Dunne Avenue.



IMPACT

MITIGATION

3. Increased traffic to and from the project site from employee commutes (see text Section 5 for trip distribution analysis).
- 2b) Sutter Blvd. is to be installed as part of the project. The City is proceeding with the plan line adoption and formation of an assessment district to install the remainder of Sutter Blvd.
- 3a) Cooperate with County Transportation Agency in providing appropriate bus service within the Park, including bus routes, pullouts, and shelters.
- 3b) If the County Transportation Agency plans commuter rail service to the Morgan Hill area, cooperate with the appropriate agencies to provide commuter service to the Park.
- 3c) CalTrans and County Transit Agency to provide special freeway lanes and on-ramps for buses, carpools, and vanpool vehicles.
- 3d) Promote flexible and staggered hours for all businesses within the Park to reduce peak traffic hour impacts.
- 3e) Provide bus shuttle to any future rail transit stops.
- 3f) Provide company outlets for the sale of transit passes and promoting the use of transit by purchasing tickets in bulk and selling them to employees at a discount.
- 3g) Provide preferential parking for carpool and vanpool vehicles.
- 3h) Encourage the use of vanpooling by organizing vanpool ride services, providing company vans, and other company-initiated incentives.

IMPACT

MITIGATION

- 3i) Encourage hiring of employees from local areas.

WASTEWATER:

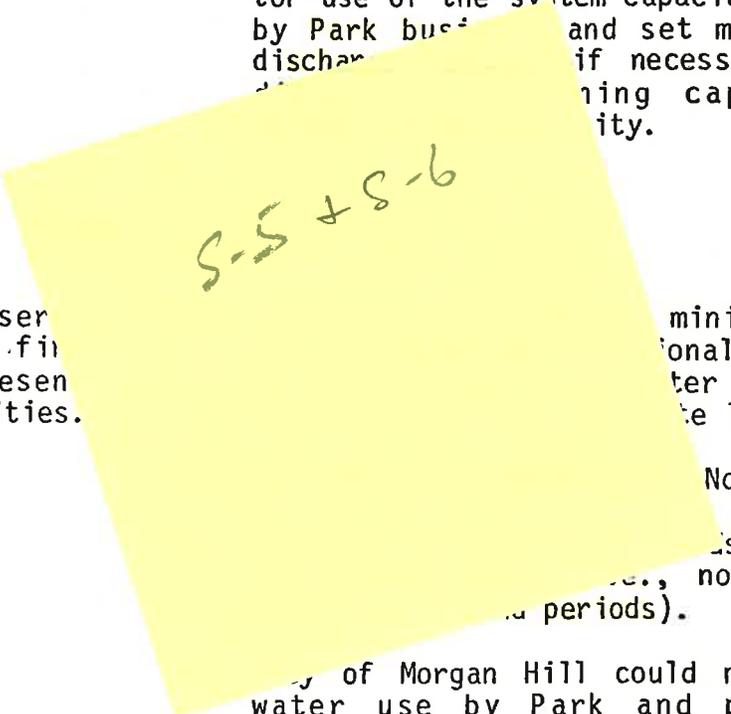
- 1. Increasing demand on the Morgan Hill/Gilroy regional wastewater treatment plant resulting in need to increase plant capacity by 1988.

- 1a) Implement 15 year build-out schedule.
- 1b) Cities of Morgan Hill and Gilroy must begin studies and applications for industrial treatment program mandated by State Water Quality Control Board by July 1, 1982.
- 1c) Where appropriate investigate and implement water conservation and recycling programs within the Park with specific design standards (available from the State Water Quality Control Board and EPA regional office).
- 1d) The cities of Morgan Hill and Gilroy should begin immediate applications to the State Regional Water Quality Control Board (RWQCB) to increase the regional wastewater plant capacity in accordance with the region's needs.
- 1e) The City of Morgan Hill should prepare a Master Wastewater Plan to upgrade the City's offsite trunk sewer line facilities and providing adequate capacity to meet the needs of the new General Plan.
- 1f) Morgan Hill should negotiate with the City of Gilroy to obtain additional capacity in the interceptor line from California Avenue to Farrell Avenue.

IMPACT

MITIGATION

- 1g) The City and Developer will cooperate to expand the plant to meet the projected wastewater processing requirements. The cost of that expansion could be paid through grants, assessment district financing or other sources of funds.
- 1h) The City of Morgan Hill should monitor use of the system capacity used by Park business and set maximum discharge if necessary to maintain existing capacity.



WATER SERVICE:

- 1. Water demand necessary to serve industrial, commercial, and fire protection needs exceeds present water delivery system capabilities.

minimum of industrial sites water supply levels.

No. 1C).

Escaping (i.e., non peak periods).

City of Morgan Hill could monitor water use by Park and permit use of quantities which do not tax the system's capacities, regulating growth in the Park accordingly.

STORM DRAINAGE:

- 1. Stormwater runoff resulting from construction at the Park will reduce impacts on Fisher Creek and Little Llagas Creek.

(See Section 7 of EIR)

- 1a) The ultimate drainage plan provides storm water retention capacity for a 100 year storm, allowing discharge of water offsite at a flow rate not exceeding the 10 year undeveloped peak flow. Discharge will be into both Fisher Creek and Little Llagas Creek.

IMPACT

MITIGATION

- 1b) During construction, grading should not be permitted during the months of October-March unless onsite sedimentation and erosion control measures acceptable to the City Engineer and Santa Clara Valley Water District are provided.
- 1c) To control runoff of oils from roadways, the Public Works Dept. should consider whether the City's standard stormwater catch basins could be modified to act as an oil trap.
- 1d) On an individual basis, each industry shall be evaluated for the need to provide for chemical spills. Where a chemical hazard might exist, the individual industry shall be required to provide a means of intercepting and collecting any chemicals before entering the storm drainage system. This could be with slide gates or valves which would be closed as necessary to retain industrial spills.
- 1e) A routine program of sweeping should be planned and implemented for the public streets and private parking areas. This will remove particulate matters and chemicals from the paved surfaces and reduce and/or eliminate pollutants from the storm drainage system. Frequency of sweeping should be adjusted to weather conditions and the area being maintained.

LAND USE/AGRICULTURE:

- 1. Conversion of the existing Morgan Hill Airport and grain feed crop uses to commercial and industrial uses may result in:
 - a. Loss of air facility impacting other airports in the Valley.
 - b. Loss of agricultural industry.
 - c. Growth inducement to surrounding undeveloped properties.
- 1a) Vacant land could continue to produce crops until land is necessary for construction.

IMPACT

MITIGATION

- 1b) Morgan Hill Airport will eventually be encroached upon by urban development which has been planned for many years. This urbanization would not be compatible with the airport use considered an interim use as evidenced by a short term lease rather than land owned by the Airport Association. This is an unavoidable impact that is overridden by economic necessity.
- 1c) Growth inducement can be controlled by policy of City of Morgan Hill in the form of Five Year Urban Service Area readjustment and implementation, along with annual readjustments of the USA in accordance with the City's monitoring systems for job/housing balance and wastewater capacity use.
- 1d) Use of Williamson Act, County agricultural large lot zoning, and urban growth management by the City of San Jose are public agency and private landowner measures to insure control of development in the Coyote Valley and South County Agricultural Preserve.

AIR QUALITY:

- 1. Increased motor vehicle traffic resulting from commuter traffic to the Park will increase the level of carbon monoxide and total suspended particulates and impact ozone, adding to the present South Santa Clara Valley critical air basin.
 - 1a) (See Traffic and Transportation mitigation 2a, 2b, 3a, 3b, 3c, 3e, 3f, 3g, 3h, 3i, and 3j)
 - 1b) Provide convenient and safe bicycling lanes and storage facilities onsite, and participate in improvements to bike routes for typical commute routes as appropriate.
 - 1c) Provide varied lunch facilities at the Park, with convenient pedestrian access to avoid necessity for vehicular lunch trips.

IMPACT

MITIGATION

FIRE PROTECTION

1. There will be increasing demands on the Fire Department for specialized fire protection, along with the need for a fire flow volume of 3,500 GPM at 20 psi.

- 1a) Incorporate into the water system a combination of pumping and storage capacity to deliver the required 3,500 GPM fire flow for a period of three hours.
- 1b) Business Park employees should be encouraged to join the Morgan Hill Volunteer Fire Department to provide backup personnel to supplement the fire department staff.
- 1c) The water distribution system will be adequate to minimize pressure losses. A system of looped 12" mains is planned for the project.
- 1d) Access will be available to each building with adequate fire hydrants.
- 1e) Structures shall be designed to conform with building codes so that the requirement for 3,500 GPM fire flow is not exceeded.

RECREATION

1. There will be increased demand for recreational facilities by the employees of the Business Park and future residents of the City.

- 1a) Each company should provide onsite recreational facilities compatible with the size of the company. (See page 6.28 of the DEIR).
- 1b) A par course is planned with the Phase I improvements.
- 1c) The circulation system should provide bike paths that interface with the City's bike trail plan.
- 1d) The 9.3 acre drainage detention basin could be utilized for recreational activities which are compatible with the intended drainage control use. This could provide an area for industrial sports activities and for industrial league games.

IMPACT

MITIGATION

FISCAL

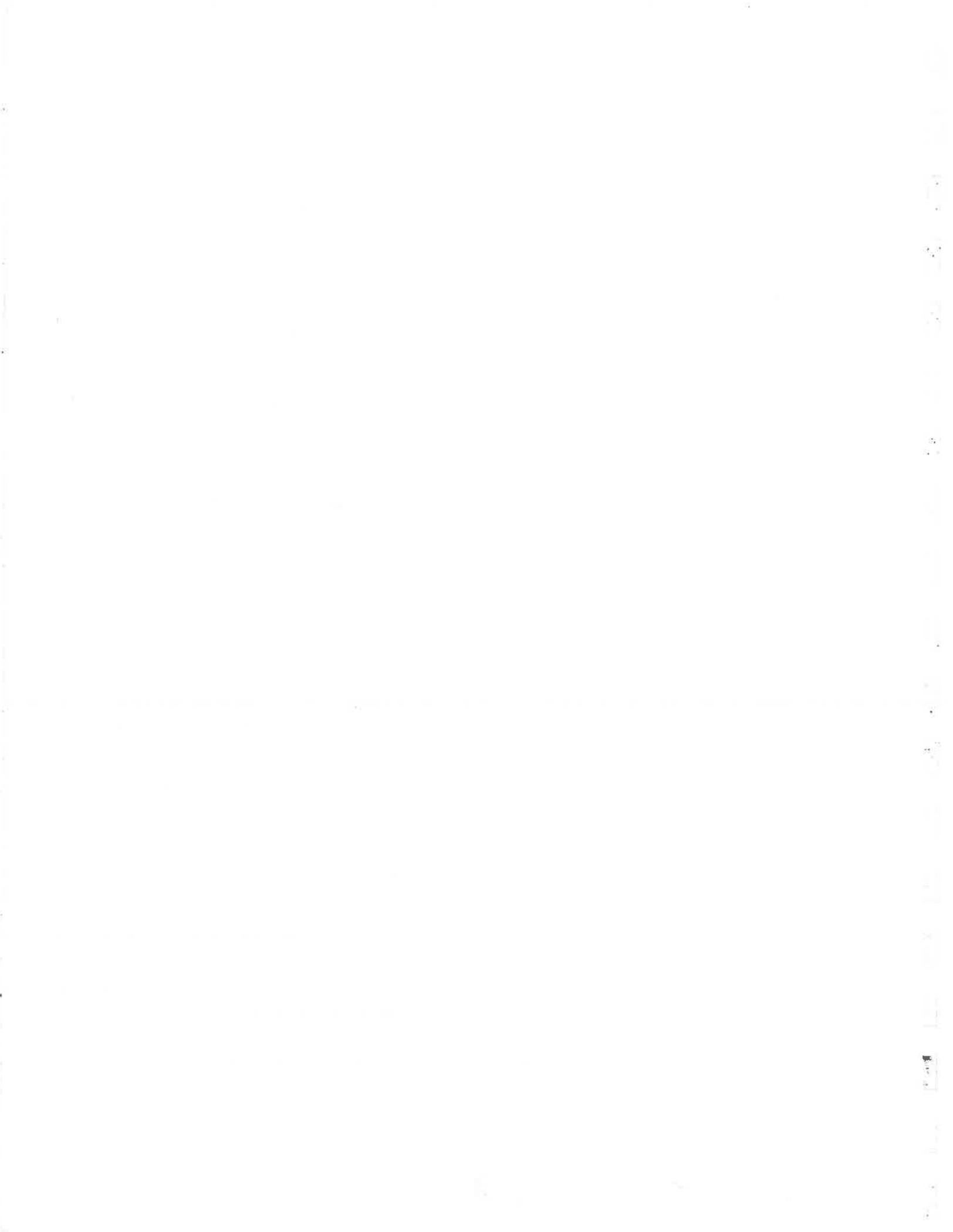
1. Over a period of time, the Morgan Hill Business Park will generate revenues in excess of the City's expenses for providing municipal services. In the short term, there may be a deficit in revenues.

- 1a) The provisions of A.B. 618 could allow the City Council to establish a special standby charge for police protection and fire prevention and suppression services.
- 1b) Municipal improvements for Phase I are to be constructed and financed by formation of an Assessment District under the Municipal Improvement Act of 1913 and the Municipal Bond Act of 1915.
- 1c) Consideration should be made for including the Business Park in the Redevelopment District which will also include the downtown area of Morgan Hill.

VISUAL

1. The existing open space will be replaced by landscaping and structures.

- 1a) The applicant should prepare a Master Landscaping Plan for the perimeter of the Park and the interim streets to be reviewed by the City.
- 1b) A uniform sign program and building design standards should be designed for the Business Park prior to issuance of building permits for the first buildings to be constructed. These building and sign design standards should be incorporated into CC&R's and lease agreement for the project.
- 1c) A low density commercial and industrial development pattern should be insured by minimum lot area coverage (buildings and pavement) standards for all structures as shown in the Development Plan.



IMPACT

MITIGATION

ARCHAEOLOGICAL

1. Although investigation has resulted in no evidence of archaeological significance, Santa Clara County Planning Dept has identified the Project site as partially within an archaeologically sensitive area.

1a In the unlikely event any archaeological artifacts are uncovered during grading or utility installation, the work should be curtailed and an archaeological observer called to review the evidence and direct removal.

SUMMARY OF ENVIRONMENTAL IMPACTS
CONSIDERED NOT TO BE SIGNIFICANT

Solid Waste - There is adequate capacity for disposal of solid waste. Any toxic or chemical wastes should be disposed of at a designated Class I disposal site.

Noise - Noise impacts are minimal and have been mitigated with the berming and set back distance included in the proposed plan.

Utilities - Gas, electricity, telephone - Service facilities are adequate or capable of expansion.

Police Services - There will only be a minor increase in patrol requirements.

Geotechnical Conditions - The site is suitable for the proposed development, and construction will be in accordance with the recommendations of the geotechnical engineers.

Wildlife Habitat - There is no significant wild life habitat within the project site.

Flood Zone - The site is completely outside of designated flood zone, and there is an adequate storm drainage system planned for the project which will reduce offsite impacts.

SECTION 3

EMPLOYMENT AND HOUSING

This Addendum to Section 3 is directed specifically to the jobs-housing imbalance in Santa Clara County and relates this question to the proposed Morgan Hill Business Park. Letters received from the Santa Clara County Planning Department, City of San Jose Planning Department, and the City of Gilroy have raised questions relating to the jobs-housing imbalance. This section is intended to respond to the questions in each of the letters. Where additional clarification is required, each of the letters have been addressed individually.

EXISTING CONDITIONS

The balance of housing and employment has become one of the primary concerns of planners in Santa Clara County. This is reflected in several recent publications such as:

- ... "Living Within Our Limits" by the Santa Clara County Industry and Housing Management Task Force published in November 1979.
- ... "Economic Well-Being" draft of the Santa Clara County General Plan Advisory Committee April 1980 (draft).

Both of these reports reflect the policies and opinions developed by the Santa Clara County Planning Department.

An example of the extent of the jobs-housing balance is shown on the following table for selected cities in Santa Clara County.

	<u>1979 Housing Units Needed</u> (1)	<u>1979 Housing Available</u> (1)	<u>1979 Housing Balance</u> (1)	<u>Ratio of Need to Availability</u> (2)
Palo Alto	47,221	19,084	- 28,137	2.47
Sunnyvale	61,068	36,695	- 24,373	1.66
Santa Clara	44,052	26,704	- 17,348	1.65
Los Altos	4,885	8,059	+ 3,174	0.61
San Jose	140,741	182,086	+ 41,345	0.77
Gilroy	4,258	5,200	+ 942	0.81
Morgan Hill	1,392	5,049	+ 3,657	0.27
Monte Sereno	--	903	903	--

Source: (1) Santa Clara County Planning Department, Table H-1 of the Housing Section, General Plan Advisory Committee.

(2) Creegan & D'Angelo Calculations



A number of conclusions can be drawn from the foregoing table.

- ... The North County jobs-housing imbalance is evident.
- ... The Cities of San Jose and Gilroy are much closer to a jobs-housing balance than Morgan Hill by a factor of 2.85 and 3.0.
- ... Except for the City of Monte Sereno, which is a 100% high value bedroom community, the City of Morgan Hill has the greatest job shortage with relation to existing housing of any of the Santa Clara cities surveyed.

More precise data available from the Morgan Hill Community Development Department and the Santa Clara County Planning Department, which will be used in the analysis of the Morgan Hill Business Park, is not completely in agreement with data shown on the foregoing table. However, the table is valid in illustrating the relative impact of the present jobs-housing imbalance in Santa Clara County.

Type of Employment

The analysis of employment impacts generally groups employment in two categories - basic and local service. Included in these two categories are the following types of jobs:

Basic

Manufacturing (R&D)

Wholesale Trade

Local Service

Service - doctors, lawyers, dentists, etc.

Retail Trade - stores, restaurants;
Finance - Banking, Real Estate, Insurance;
Transportation, Communications and Utilities;
Construction;
Governmental Services, and Recreation.

Typically, the local service employment is located in three types of locations:

- ... Within the existing central business district areas by greater utilization of available space;
- ... as population changes are made and new housing areas develop by providing new services; and
- ... immediately within the vicinity of areas where basic employment locates.

Within the City of Morgan Hill, many of the existing businesses are operating at less than full capacity. Therefore, a portion of the local service needs can be provided by some of the existing employment. The present growth in Morgan Hill has resulted in a number of new commercial centers. These are listed on Table 6.3, pages 6.9 to 6.11 of the DEIR. The local service employment from these projects provide for future basic employment growth in Morgan

Hill. As new residential projects are developed within the parameters of Measure E, new local service employment can be expected. Future development should be consistent with the Updated General Plan after it is adopted.

The Morgan Hill Business Park Plan which includes the proposed Garden Hotel and 39 acres of non-manufacturing business is projected to provide over 1,400 local service employment jobs.

Local Zone Influence

To assess the present situation and future impacts of the Proposed Project, we have defined a zone of influence. Because of the close proximity of San Jose on the north and the expanding plans for residential and industrial development in South County, this zone of influence was confined to the Morgan Hill Urban Services Area and adjacent rural residential area. This is shown on Figure 3.2. Included are the corporate limits and urban services area and three adjacent County Areas - East of Morgan Hill, West of Morgan Hill and half of the San Martin area.

The recent San Martin Area Study by the County Planning Department shows 1,270 existing dwelling units and between 345 and 1,655 future lots or units depending upon the size of the parcel. The average of these future units is 1,000 units. Because San Martin is adjacent to both Morgan Hill and Gilroy, it is reasonable to allocate half of the present and future residences in the area to each City for purposes of analyzing housing/employment impacts.

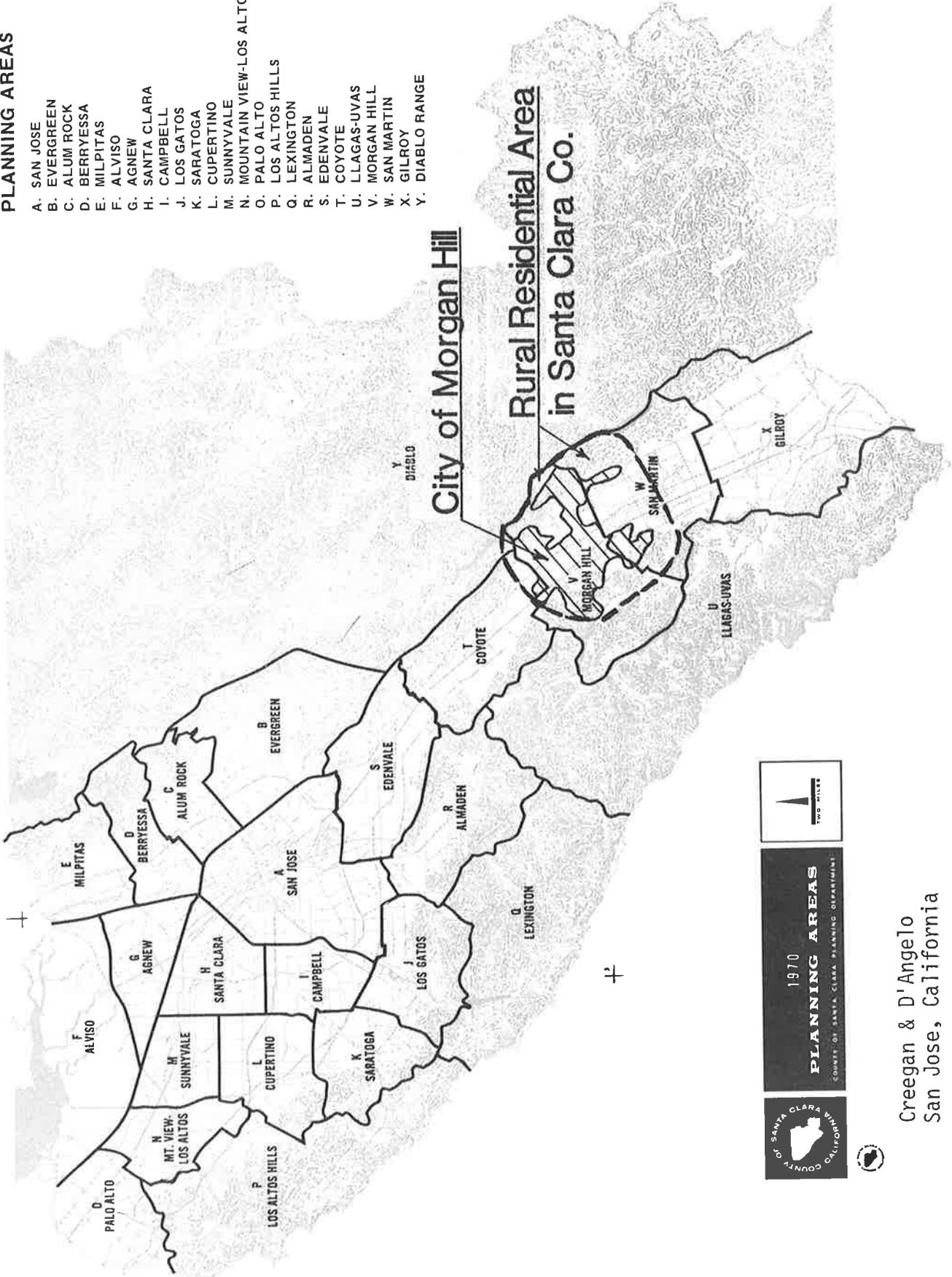
The rural residential area immediately west of Morgan Hill is now being studied by the Rural Committee of the County General Plan Advisory Committee. County staff analysis of this area shows 470 existing residences and 295 vacant parcels for future development.

East of Morgan Hill and within the Morgan Hill transition zone, there are 450 existing dwelling units and 300 vacant lots for future development. This information is from studies by the Morgan Hill Department of Community Development.

The vacant rural residential lots adjacent to Morgan Hill will probably be developed during the next ten years. The following table summarizes existing and future development of these County areas and the employment potential.

PLANNING AREAS

- A. SAN JOSE
- B. EVERGREEN
- C. ALUM ROCK
- D. BERRYESSA
- E. MILPITAS
- F. ALVISO
- G. AGNEW
- H. SANTA CLARA
- I. CAMPBELL
- J. LOS GATOS
- K. SARATOGA
- L. CUPERTINO
- M. SUNNYVALE
- N. MOUNTAIN VIEW-LOS ALTOS
- O. PALO ALTO
- P. LOS ALTOS HILLS
- Q. LEXINGTON
- R. ALMADEN
- S. EDENVALE
- T. COYOTE
- U. LLAGAS-JUVAS
- V. MORGAN HILL
- W. SAN MARTIN
- X. GILROY
- Y. DIABLO RANGE



Creegan & D'Angelo
San Jose, California

Logos for the County of Santa Clara and the Planning Areas 1970. The County of Santa Clara logo features a map of the county within a circular border. The Planning Areas 1970 logo includes the text "PLANNING AREAS 1970" and "COUNTY OF SANTA CLARA PLANNING DEPARTMENT".

Local Zone of Influence

Figure 3.2

	<u>Housing</u>	<u>Employee Potential</u>
1980		
North San Martin	635 (1)	825 (3)
West Morgan Hill	470 (1)	610 (3)
East Morgan Hill	<u>450 (2)</u>	<u>585 (3)</u>
Total	1,555	2,020
1990		
North San Martin	1,135 (1)	1,590 (4)
West Morgan Hill	765 (1)	1,070 (4)
East Morgan Hill	<u>750 (2)</u>	<u>1,050 (4)</u>
Total	2,650	3,710

- Sources:
- (1) County Planning Department Studies
 - (2) Morgan Hill Department of Community Development
 - (3) Creegan & D'Angelo (1.3 employees/residence)
 - (4) County Planning Department Letter dated April 4, 1980, (1.4 employees/residence).

Studies for the General Plan Update by the Morgan Hill Community Development Department shows the housing and employee potential for the City to be:

	<u>Housing</u>	<u>Employee Potential</u>
1980	5,885	7,650 (1)
1990	8,705	12,190 (2)
1995	10,115	14,160 (2)
2000	11,525	16,135 (2)

- Source:
- (1) Creegan & D'Angelo - 1.3 Employees/Housing Unit
 - (2) Santa Clara County - 1.4 Employees/Housing Unit

These housing projections are based on the planned growth control as specified under Measure E.

The combined employee potential within the Local Zone of Influence for both Morgan Hill and the adjacent rural residential areas is:

	<u>Housing</u>	<u>Employee Potential</u>
1980		
Morgan Hill	5,885	7,650
County	<u>1,555</u>	<u>2,020</u>
Total	7,440	9,670
1990		
Morgan Hill	8,705	12,190
County	<u>2,650</u>	<u>3,710</u>
Total	11,355	15,900
1995		
Morgan Hill	10,115	14,160
County	<u>2,650</u>	<u>3,710</u>
Total	12,765	17,870
2000		
Morgan Hill	11,525	16,135
County	<u>2,650</u>	<u>3,710</u>
Total	14,175	19,845

Employment within the Local Zone of Influence is primarily concentrated in the City of Morgan Hill. Statistics published in November 1979 by the City of Morgan Hill Community Development Department as part of the General Plan Update shows there are a total of 1,550 employees within the City of Morgan Hill. Basic employment including agricultural, manufacturing and recreational vehicle manufacturing is estimated to be 600. The local service employment is 1,150 for a total of 1,750 employees within the City. A portion of the agricultural jobs are seasonal and could reduce the basic employment during part of the year by up to 300 employees. Also included in this total are 100 employees for recreational vehicle manufacturing. Recently, this company announced it was closing, thus eliminating these jobs. The total of 1,750 employees in Morgan Hill may be optimistic, and, in fact, this amount is affected by seasonal employment and the declining recreational vehicle industry.

There is a minor amount of employment in the San Martin Area. Although statistics are not available, the employment for San Martin is probably less than 100. This is less than the annual fluctuation of employment in Morgan Hill.

Impacts

The proposed Morgan Hill Business Park is projected to produce a total of 9,270 jobs. This includes 7,813 basic jobs and 1,457 local service jobs. (See Table 3.13, page 3.20 in the DEIR). Along with the basic employment, there will be local service employees. Based on the ABAG local service employee multiplier of 1.08, there could be a total of 8,450 local service jobs of which 1,457 are part of the project. Therefore, an additional 6,993 local service jobs could be anticipated. The total employment related to the Morgan Hill Business Park at 100% buildout is estimated to be:

Basic Employment	7,813	
Local Service	1,457	within the Project
Local Service	<u>6,993</u>	Other locations
Total	16,263	

Morgan Hill presently has an excess of local service employees based on the existing basic employment and the ABAG service multiplier. With 600 basic employment jobs, the equivalent local service employment is 650 jobs. Present local service employment is 1,150 or an excess of 500. This reflects the fact that there is a shortage of basic employment within the City in relation to present population and planned future growth within the limitations of Measure E. The local service jobs are primarily related to providing service to the residential population.

The following tables have been prepared to relate the employment projections for the Morgan Hill Business Park to the present employment in Morgan Hill and the housing and employment projected for Morgan Hill and its Local Zone of Influence as shown on Figure 3.2. Analyses have been prepared for 10 year and 15 year development and occupancy periods.



TABLE 3.19

PROJECTED EMPLOYMENT
MORGAN HILL BUSINESS PARK - CITY OF MORGAN HILL
BASIC AND SERVICE EMPLOYMENT

PROJECT YEAR	CALENDAR YEAR	MHBP EMPLOYMENT		OTHER SERVICE	TOTAL ANNUAL EMPLOYMENT		COMBINED TOTAL
		Basic	Service		Basic	Service	
10 YEAR OCCUPANCY PERIOD							
	1980	--	--	--	650	1,100	1,750*
1	1981	165	0	180	165	180	345
2	1982	165	0	180	165	180	345
3	1983	165	0	180	165	180	345
4	1984	510	110	440	510	550	1,060
5	1985	1,135	225	1,000	1,135	1,225	2,360
6	1986	1,135	225	1,000	1,135	1,225	2,360
7	1987	1,135	225	1,000	1,135	1,225	2,360
8	1988	1,135	225	1,000	1,135	1,225	2,360
9	1989	1,135	225	1,000	1,135	1,225	2,360
10	1990	1,135	225	1,000	1,135	1,225	2,360
TOTAL		7,815	1,460	6,980	8,465	9,540	18,005
15 YEAR OCCUPANCY PERIOD							
	1980			--	650	1,100	1,750*
1	1981	165	0	180	165	180	345
2	1982	165	0	180	165	180	345
3	1983	165	0	180	165	180	345
4	1984	500	30	510	500	540	1,040
5	1985	620	130	540	620	670	1,290
6	1986	620	130	540	620	670	1,290
7	1987	620	130	540	620	670	1,290
8	1988	620	130	540	620	670	1,290
9	1989	620	130	540	620	670	1,290
10	1990	620	130	540	620	670	1,290
11	1991	620	130	540	620	670	1,290
12	1992	620	130	540	620	670	1,290
13	1993	620	130	540	620	670	1,290
14	1994	620	130	540	620	670	1,290
15	1995	620	130	540	620	670	1,290
TOTAL		7,815	1,460	6,980	8,465	9,540	18,005

*All existing jobs in Morgan Hill (Basic and Service)

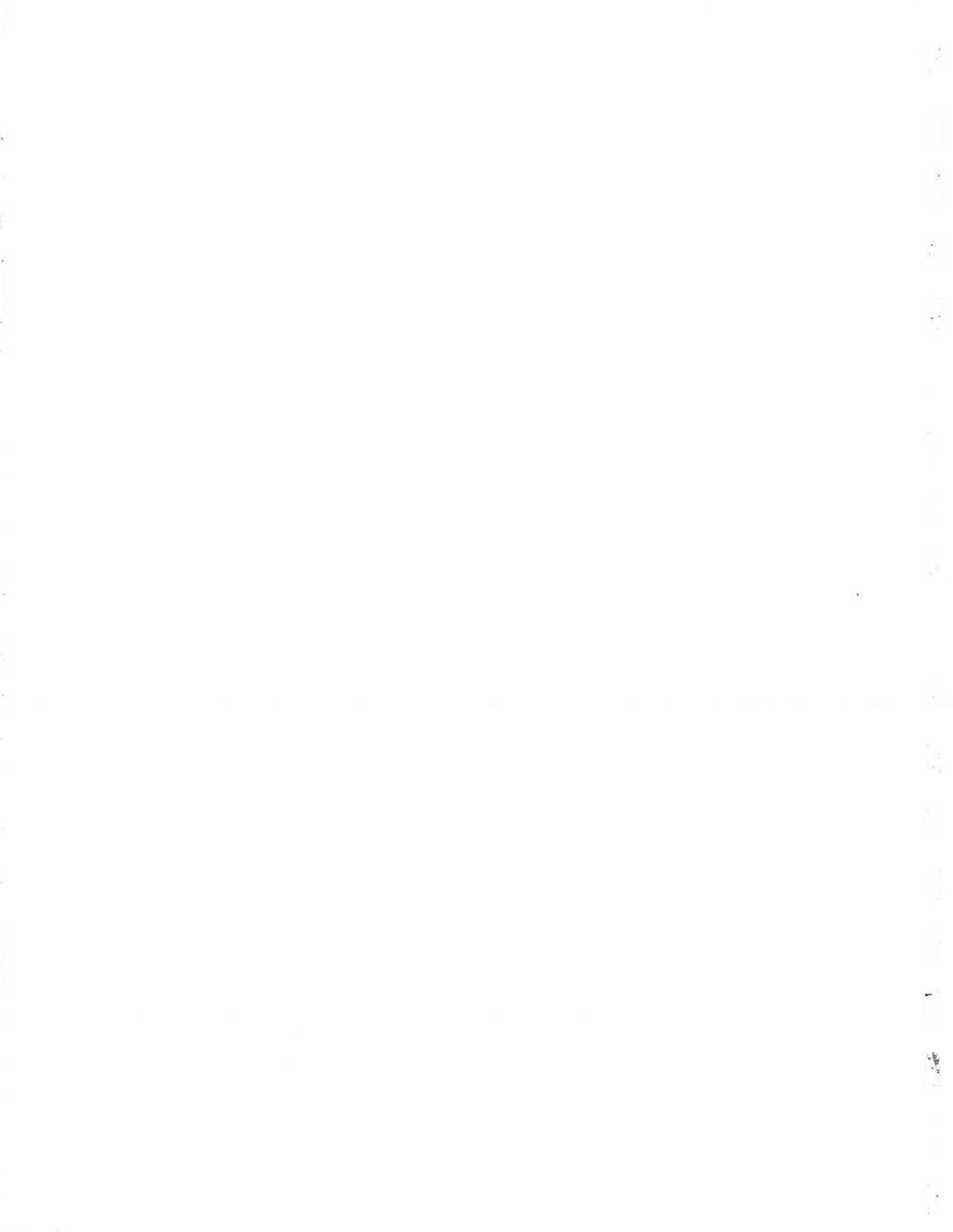


TABLE 3.19 (Continued)

PROJECTED EMPLOYMENT
MORGAN HILL BUSINESS PARK - CITY OF MORGAN HILL
BASIC AND SERVICE EMPLOYMENT

PROJECT YEAR	CALENDAR YEAR	MHBP EMPLOYMENT		OTHER SERVICE	TOTAL ANNUAL EMPLOYMENT		COMBINED TOTAL
		Basic	Service		Basic	Service	
20 YEAR OCCUPANCY PERIOD							
	1980			--	650	1,100	1,750*
1	1981	165	0	180	165	180	345
2	1982	165	0	180	165	180	345
3	1983	165	0	180	165	180	345
4	1984	300	30	310	300	320	620
5	1985	440	90	385	440	480	920
6	1986	440	90	385	440	480	920
7	1987	440	90	385	440	480	920
8	1988	440	90	385	440	480	920
9	1989	440	90	385	440	480	920
10	1990	440	90	385	440	480	920
11	1991	440	90	385	440	480	920
12	1992	440	90	385	440	480	920
13	1993	440	90	385	440	480	920
14	1994	440	90	385	440	480	920
15	1995	440	90	385	440	480	920
16	1996	440	90	385	440	480	920
17	1997	440	90	385	440	480	920
18	1998	440	90	385	440	480	920
19	1999	440	90	370	440	480	920
20	2000	420	80	370	420	380	800
TOTAL		7,815	1,460	6,980	8,465	9,540	18,005

*All existing jobs in Morgan Hill (Basic and Service)

TABLE 3.20

HOUSING AND EMPLOYEE POTENTIAL
MORGAN HILL AND ADJACENT COUNTY ZONE OF INFLUENCE

PROJECT YEAR	CALENDAR YEAR	RESIDENTIAL UNITS			EMPLOYEE POTENTIAL		
		MORGAN HILL	ADJACENT COUNTY AREA	TOTAL	MORGAN HILL	ADJACENT COUNTY AREA	TOTAL
10 YEAR OCCUPANCY PERIOD							
	1980	5,885	1,555	7,440	7,650	2,020	9,670
1	1981	6,167	1,665	7,832	8,105	2,190	10,295
2	1982	6,449	1,775	8,224	8,560	2,360	10,920
3	1983	6,731	1,885	8,616	9,010	2,525	11,535
4	1984	7,013	1,995	9,008	9,465	2,695	12,160
5	1985	7,295	2,105	9,400	9,920	2,865	12,785
6	1986	7,577	2,215	9,792	10,375	3,035	13,410
7	1987	7,859	2,325	10,184	10,825	3,200	14,025
8	1988	8,141	2,435	10,486	11,280	3,375	14,655
9	1989	8,423	2,545	10,968	11,735	3,540	15,275
10	1990	8,705	2,650	11,355	12,190	3,710	15,900

TOTAL

15 YEAR OCCUPANCY PERIOD

	1980	5,885	1,555	7,440	7,650	2,020	9,670
1	1981	6,167	1,665	7,832	8,105	2,190	10,295
2	1982	6,449	1,775	8,224	8,560	2,360	10,920
3	1983	6,731	1,885	8,616	9,010	2,525	11,535
4	1984	7,013	1,995	9,008	9,465	2,695	12,160
5	1985	7,295	2,105	9,400	9,920	2,865	12,785
6	1986	7,577	2,215	9,792	10,375	3,035	13,410
7	1987	7,859	2,325	10,184	10,825	3,200	14,025
8	1988	8,141	2,435	10,486	11,280	3,375	14,655
9	1989	8,423	2,545	10,968	11,735	3,540	15,275
10	1990	8,705	2,650	11,355	12,190	3,710	15,900
11	1991	8,987	2,650	11,637	12,580	3,710	16,290
12	1992	9,269	2,650	11,919	12,975	3,710	16,685
13	1993	9,551	2,650	12,201	13,370	3,710	17,080
14	1994	9,833	2,650	12,483	13,765	3,710	17,475
15	1995	10,115	2,650	12,765	14,160	3,710	17,870



TABLE 3.20 (Continued)

HOUSING AND EMPLOYEE POTENTIAL
MORGAN HILL AND ADJACENT COUNTY ZONE OF INFLUENCE

PROJECT YEAR	CALENDAR YEAR	RESIDENTIAL UNITS			EMPLOYEE POTENTIAL		
		MORGAN HILL	ADJACENT COUNTY AREA	TOTAL	MORGAN HILL	ADJACENT COUNTY AREA	TOTAL
20 YEAR OCCUPANCY PERIOD							
	1980	5,885	1,555	7,440	7,650	2,020	9,670
1	1981	6,167	1,665	7,832	8,105	2,190	10,295
2	1982	6,449	1,775	8,224	8,560	2,360	10,920
3	1983	6,731	1,885	8,616	9,010	2,525	11,535
4	1984	7,013	1,995	9,008	9,465	2,695	12,160
5	1985	7,295	2,105	9,400	9,920	2,865	12,785
6	1986	7,577	2,215	9,792	10,375	3,035	13,410
7	1987	7,859	2,325	10,184	10,825	3,200	14,025
8	1988	8,141	2,435	10,486	11,280	3,375	14,655
9	1989	8,423	2,545	10,968	11,735	3,540	15,275
10	1990	8,705	2,650	11,355	12,190	3,710	15,900
11	1991	8,987	2,650	11,637	12,580	3,710	16,290
12	1992	9,269	2,650	11,919	12,975	3,710	16,685
13	1993	9,551	2,650	12,201	13,370	3,710	17,080
14	1994	9,833	2,650	12,483	13,765	3,710	17,475
15	1995	10,115	2,650	12,765	14,160	3,710	17,870
16	1996	10,397	2,650	13,047	14,560	3,710	18,270
17	1997	10,679	2,650	13,329	14,950	3,710	18,660
18	1998	10,961	2,650	13,611	15,345	3,710	19,055
19	1999	11,243	2,650	13,893	15,740	3,710	19,450
20	2000	11,525	2,650	14,175	16,145	3,710	19,855

TABLE 3.21

EMPLOYMENT-HOUSING BALANCE
MORGAN HILL AND LOCAL ZONE OF INFLUENCE

PROJECT YEAR	CALENDAR YEAR	EMPLOYMENT		ANNUAL TOTAL	CUM. TOTAL	POTENTIAL EMPLOYEES(1)			DEFICIT OR EXCESS	RATIO: EMPLOY TO HOUSING
		MHBP	OTHER			MORGAN HILL	ADJACENT COUNTY AREA	TOTAL		
10 YEAR OCCUPANCY PERIOD										
	1980		1,750	1,750	1,750	7,650	2,020	9,670	-7,920	.18
1	1981	165	180	345	2,095	8,105	2,190	10,295	-8,200	.20
2	1982	165	180	345	2,440	8,560	2,360	10,920	-8,480	.22
3	1983	165	180	345	2,785	9,010	2,525	11,535	-8,750	.24
4	1984	620	440	1,060	3,845	9,465	2,695	12,160	-8,315	.32
5	1985	1,360	1,000	2,360	6,205	9,920	2,865	12,785	-6,580	.48
6	1986	1,360	1,000	2,360	8,565	10,375	3,035	13,410	-4,845	.64
7	1987	1,360	1,000	2,360	10,925	10,825	3,200	14,025	-3,100	.78
8	1988	1,360	1,000	2,360	13,285	11,280	3,375	14,655	-1,370	.91
9	1989	1,360	1,000	2,360	15,645	11,735	3,540	15,275	+ 370	1.02
10	1990	1,360	1,000	2,360	18,005	12,190	3,710	15,900	+2,105	1.13

15 YEAR OCCUPANCY PERIOD

	1980		1,750	1,750	1,750	7,560	2,020	9,670	-7,920	.18
1	1981	165	180	345	2,095	8,105	2,190	10,295	-8,200	.20
2	1982	165	180	345	2,440	8,560	2,360	10,920	-8,480	.22
3	1983	165	180	345	2,785	9,010	2,525	11,535	-8,750	.24
4	1984	530	500	1,030	3,815	9,465	2,695	12,160	-8,345	.31
5	1985	750	540	1,290	5,105	9,920	2,865	12,785	-7,680	.40
6	1986	750	540	1,290	6,395	10,375	3,035	13,410	-7,015	.48
7	1987	750	540	1,290	7,685	10,825	3,200	14,025	-6,340	.55
8	1988	750	540	1,290	8,975	11,280	3,375	14,655	-5,680	.61
9	1989	750	540	1,290	10,265	11,735	3,540	15,275	-5,010	.67
10	1990	750	540	1,290	11,555	12,190	3,710	15,900	-4,345	.73
11	1991	750	540	1,290	12,845	12,580	3,710	16,290	-3,445	.79
12	1992	750	540	1,290	14,135	12,975	3,710	16,685	-2,550	.85
13	1993	750	540	1,290	15,425	13,370	3,710	17,080	-1,655	.90
14	1994	750	540	1,290	16,715	13,765	3,710	17,475	- 760	.96
15	1995	750	540	1,290	18,005	14,160	3,710	17,870	+ 135	1.01

(1) Potential employee estimates are based on existing and future housing projections for the City of Morgan Hill and Local Zone Influence (adjacent County area) at the rate of 1.3 employees/household in 1980 and 1.4 employees/household in 1990.

TABLE 3.21 (Continued)

EMPLOYMENT-HOUSING BALANCE
MORGAN HILL AND LOCAL ZONE OF INFLUENCE

PROJECT YEAR	CALENDAR YEAR	EMPLOYMENT			POTENTIAL EMPLOYEES(1)			DEFICIT OR EXCESS	RATIO: EMPLOY TO HOUSING	
		MHBP	OTHER	ANNUAL TOTAL	CUM. TOTAL	MORGAN HILL	ADJACENT COUNTY AREA			TOTAL
20 YEAR OCCUPANCY PERIOD										
	1980		1,750	1,750	1,750	7,560	2,020	9,670	-7,920	.18
1	1981	165	180	345	2,095	8,105	2,190	10,295	-8,200	.20
2	1982	165	180	345	2,440	8,560	2,360	10,920	-8,480	.22
3	1983	165	180	345	2,785	9,010	2,525	11,535	-8,750	.24
4	1984	330	310	640	3,425	9,465	2,695	12,160	-8,735	.28
5	1985	530	385	915	4,340	9,920	2,865	12,785	-8,445	.34
6	1986	530	385	915	5,255	10,375	3,035	13,410	-8,155	.39
7	1987	530	385	915	6,170	10,825	3,200	14,025	-7,855	.44
8	1988	530	385	915	7,085	11,280	3,375	14,655	-7,570	.48
9	1989	530	385	915	8,000	11,735	3,540	15,275	-7,275	.52
10	1990	530	385	915	8,915	12,190	3,710	15,900	-6,985	.56
11	1991	530	385	915	9,830	12,580	3,710	16,290	-6,460	.60
12	1992	530	385	915	10,745	12,975	3,710	16,685	-5,940	.64
13	1993	530	385	915	11,660	13,370	3,710	17,080	-5,420	.68
14	1994	530	385	915	12,575	13,765	3,710	17,475	-4,900	.72
15	1995	530	385	915	13,490	14,160	3,710	17,870	-4,380	.75
16	1996	530	385	915	14,405	14,560	3,710	18,270	-3,865	.79
17	1997	530	385	915	15,320	14,950	3,710	18,660	-3,340	.82
18	1998	530	385	915	16,235	15,345	3,710	19,055	-2,820	.85
19	1999	530	370	900	17,135	15,740	3,710	19,450	-2,315	.88
20	2000	500	370	870	18,005	16,145	3,710	19,855	-1,850	0.91

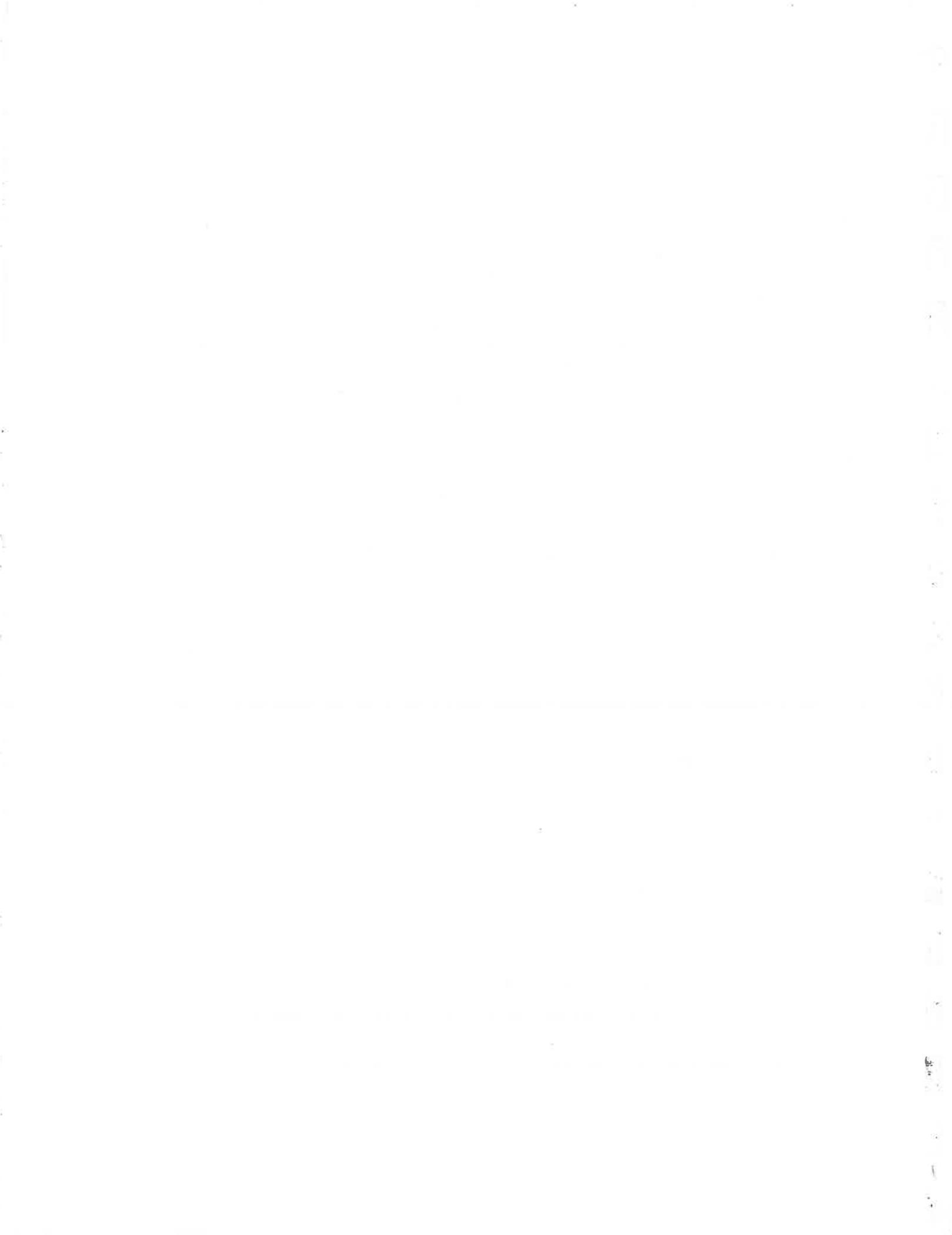
The present employment housing ratio on Table 3.21 is 18% for Morgan Hill and the adjacent County areas (Local Zone of Influence) as compared with 23% for the City of Morgan Hill. This is because there is no employment in the adjacent county areas.

Tables 3.19, 3.20 and 3.21 illustrate the present employment shortage in Morgan Hill and vicinity. If the Morgan Hill Business Park was developed and fully occupied in a 10 year period, the jobs-housing balance would not be reached until the ninth year. A more likely time period for occupancy is fifteen years or more. The fifteen year occupancy schedule shows that the balance is not reached until the last year. If occupancy extended longer than fifteen years, there would continue to be an imbalance (shortage of jobs).

Local service employment resulting from the Basic Employment in the Morgan Hill Business Park is estimated to total 8,450 of which 1,450 is part of the Business Park Plan. The other 7,000, if located in the Morgan Hill area, are likely to be in the downtown area, in new shopping centers (several of which are now being planned or under construction), in new business and commercial areas which are now zoned for those purposes, or in areas designated on the General Plan Revision. Many of the local service jobs could also be located in industrial designated areas. This could include warehousing and service industries ancillary to the R&D and manufacturing industries expected to locate in the Business Park.

As to where future employees will live is purely speculation; however, there are a number of possibilities.

- ... Presently over 7,900 persons in Morgan Hill and the adjacent County areas commute to other locations for their employment. As companies locate in the Business Park, there will be an opportunity for some of these employees to obtain jobs closer to home. Electronic companies (including Wiltron), which are now located in the North County and choose to expand in the Morgan Hill area, will probably allow their present employees who live in or near Morgan Hill to transfer.
- ... As new housing is constructed in Morgan Hill and the adjacent County areas, new employees will purchase some of these homes.
- ... People living in Gilroy and Hollister and now commuting to San Jose or the North County for employment would have the opportunity to obtain jobs in the Morgan Hill Business Park and reduce their commute distance.
- ... Employees now living in South San Jose could also change jobs and obtain employment in the Business Park. This would result in a reverse commute pattern and probably a shorter commute.
- ... Present unemployed persons living in the area could obtain employment either through on-the-job training or in the service-type jobs.
- ... Locate in the A&B Commute Zones discussed in the DEIR.



It is more than likely that some future employees of the Morgan Hill Business Park will locate in each of the areas described. There are no present governmental controls, nor are any expected in the future, which specify where an employee in private industry should live and work.

This analysis indicates that if the project is occupied over a fifteen period or longer, housing projected for Morgan Hill by the Community Development Department for the Morgan Hill General Plan revision and housing in adjacent County areas (described as the Zone of Influence) can meet the needs projected for this project. In addition, commercial and industrial activities which provide service jobs can be accomodated within the housing and growth control objectives of the City.

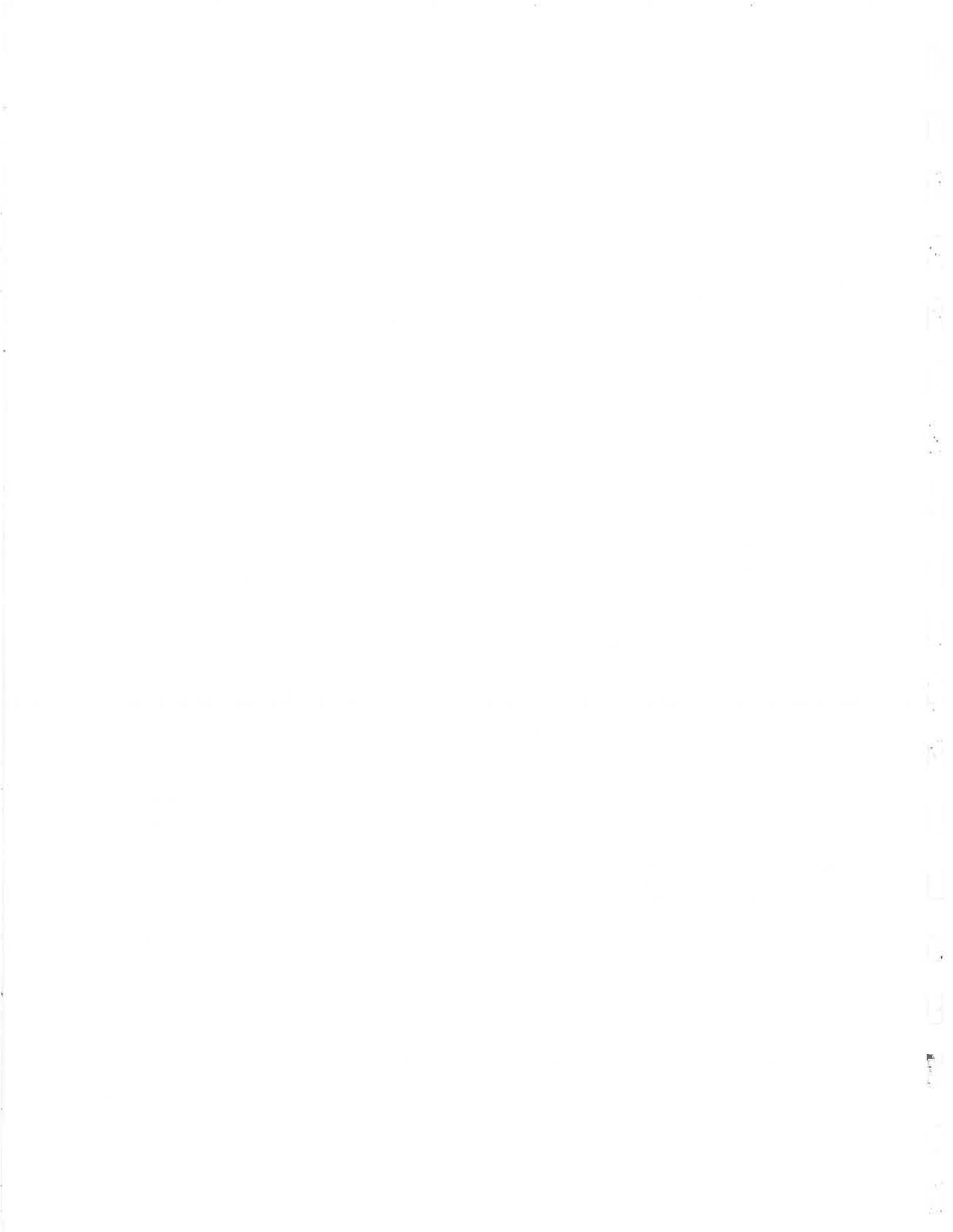
It is apparent that prior to 1995, under the limitations of Measure E, Morgan Hill cannot support any additional basic employment beyond that proposed for the Morgan Hill Business Park.

MITIGATION MEASURES

A buildout-occupancy period of 15 years for the Project would be compatible with the planned residential growth of the City. In conjunction with this build-out period, a program for periodic monitoring of the balance of housing and development should be initiated. As the ratio of employment to housing (potential employees) approaches a balance, the Morgan Hill General Plan should be reviewed to assure that remaining industrial zoned properties in the City are of an appropriate size. This monitoring would include annual build-out and occupancy, type of employment (basic and/or service) and other related factors.

Employment and housing needs for the Morgan Hill area should also include the needs of the adjacent County area. To accomplish this, a liaison should be established with the County Planning Department to monitor housing growth in the County.

Employees now living in Morgan Hill and those who will move to Morgan Hill in the future should be encouraged to obtain local jobs. Possibly, a program could be worked out with the local real estate board to assist employees of Morgan Hill industries to obtain local housing as it becomes available. This could include both new and resale homes. A program of this type is being considered in Sunnyvale but has not been implemented to date.



SECTION 4

SCHOOLS

EXISTING SETTING

There are six unified school districts in Santa Clara County, 22 elementary school districts, five union high school districts, and four junior college districts. Because Measure E limits the amount of new housing in Morgan Hill, it is assumed that a large portion of employees for the Morgan Hill Business Park will come from surrounding areas, which could result in impacting of schools in neighboring districts. In 1980, 53% of the property tax revenues will go for schools in Santa Clara County. The various school districts in the County get different levels of funding, based on their requirements to operate the schools, and the value of property in the district. Information about the exact percentages for each district will be available by the end of December, 1979(4-1)

Morgan Hill Unified School District

Morgan Hill Unified has seven elementary schools, K-6; two middle school, grades 7-9; and one high school, grades 10-12. The population of Morgan Hill has grown fourfold since 1966, from a total of 4,588 in 1966 to 15,950 in 1979. The City of San Jose's Revised General Plan does not include expansion of their Urban Service Area before 1990. No additional students would be added in the Coyote section of the Morgan Hill Unified School District. Because of lack of wastewater treatment facilities for the San Martin area, growth in that area can be expected to be minimal.

The Morgan Hill Unified School District serves the area of Morgan Hill, San Martin area from Church Avenue on the South to Bernal Road in San Jose on the North. There are substantial areas for future residential growth within the District boundaries. Demands for residential growth will be governed by governmental growth control measures. It can be expected there will be continuing demands for growth particularly in the northern part of the District, beyond the Morgan Hill City limits.

In 1974 Morgan Hill adopted a comprehensive master plan for the schools, calling for a continuous planning process and annual update. The Master Plan Update of January, 1977, recommended site acquisition and construction of four elementary schools with a completion date of 1979: one in the western part of the district; one in the south; and two in the east. It also called for completion by 1979 of two full middle schools, one in the north and one in the south, and site acquisition and construction of one comprehensive high school in the northern part of the district to be completed by 1980. However, only one intermediate school (which was completed in the spring of 1980) has been added to the district. In addition, two and one half elementary school and one continuation high school was completed during this period. Morgan Hill Unified School District completed its Master Plan Update in January, 1980.

Because of the impacted school situation, Morgan Hill requires that residential developers wishing to get buiding permits pay \$640 per single family dwelling to provide for temporary classroom space. The City has applications for over 1,200 building permits this year, of which some 217 will be granted under the provisions of Measure E. Developers in the City of Morgan Hill can get more allocation points by paying more than the \$640 required. However, persons who apply for building permits for less than four units are not subject to the point competition as are large developers.(4-1)

At the current ratio for 1980 which is .81 students per family dwelling, the 217 units which will be constructed in 1980-81 will produce approximately 176 school children. If 10% of these units will be occupied by workers from the Morgan Hill Business Park, some 18 students would be added to the schools because of this development. However, the demand for housing in Morgan Hill is such that this number of children would probably be added whether the Project were constructed or not.(4-2) The School District's January 1980 Master Plan Update projects that the future ratio of students per dwelling unit will reduce to 0.71 within the next five years.

Schools in Surrounding Districts

Because Measure E limits the amount of new housing in Morgan Hill, it is assumed that a large portion of employees for the Morgan Hill Business Park will come from surrounding areas, which may result in impacting schools in neighboring districts. Santa Clara County is one of the larger districts in California, with six unified school districts, twenty-two County elementary school districts, five union high school districts, and four junior college districts.

School districts in the closest proximity to Morgan Hill are Gilroy Unified School District, San Jose Unified School District, Oak Grove School District, and East Side Union High School District. All of these districts have requirements for developers to defray the costs of providing temporary school facilities for students coming from new housing. In each case, the developer enters into an agreement with the school district involved. Generally, the developer agrees to pay for temporary classroom facilities for two years (i.e., the cost of renting a portable facility for a two year period), but the school district may decide the manner in which students can best be accommodated.

The Gilroy Unified School District, with nine schools, is at capacity with 6,602 students, a 4.2 percent increase from last year. The General Plan Citizens Advisory Committee (GPCAC) in Gilroy has recommended that developers be assessed fees equivalent to the cost of permanent classroom and campus facilities, to offset the loss of revenue due to Proposition 13.(4-3)

In San Jose Unified, further growth in the Almaden Valley area would impact Steinbeck Junior High School and Leland High School. The newest high school in the district, Gunderson, is not yet up to capacity. In Oak Grove, one of the three junior high schools is already impacted, while in East Side Union High School District, Santa Teresa, Silver Creek and Oak Grove High Schools are already impacted. While enrollment for Santa Clara County as a whole is declining, these areas are expanding. Further housing development here would cause serious overcrowding of existing facilities.

SB-90 and Proposition 4

The school districts have, for several years, been operating under the requirements of Senate Bill 90 (SB-90) which requires that schools within the State receive equal revenues for school operating expenses. The recently passed Proposition 4 will also have some future influences on school district revenues. This Proposition is based on growth and generally limits revenue appropriations. The California legislature will determine the specifics of how Proposition 4 will function during their 1980 session.(4-4)

Under the provisions of SB-90, the Morgan Hill Unified School District receives \$1,600 per pupil per year. This is from property tax revenues, supplemented by State revenues. Therefore, as the assessed valuation within the District increases, and the portion of the allowance per pupil increases from property tax revenues, the State portion of the school expenses decreases.

PROJECT REQUIREMENTS AND IMPACTS

It is expected that employees working in the Morgan Hill Business Park could live in the adjacent area of Morgan Hill and in the South County. The work force in Zone A is projected to increase by 30,000 employees by 1984 (Table 3.6). It is also projected that the number of new housing units in Zone A will exceed 20,000 (Table 3.3). Zone B, which is completely outside of the Morgan Hill Unified School District, but within a reasonable commute distance, is projected to have 26,800 new housing units within the same time period.

TABLE 4.1

PROJECTED NEW HOUSING EMPLOYEES AND STUDENTS WITHIN MORGAN HILL UNIFIED SCHOOL DISTRICT (1979-1984)

<u>Zone A</u>	<u>New Housing</u> ^{1/}	<u>Employees</u>	<u>Students</u> ^{2/}
Edenvale (30%)	1,400	1,820	994
Coyote, Uvas, Morgan Hill	2,200	2,860	1,562
San Martin	<u>900</u>	<u>1,170</u>	<u>639</u>
TOTAL	4,500	5,850	3,195
Projections by Morgan Hill Unified School District	2,433-3,176	--	1,727-2,255

^{1/}Table 3.3 and Economics Research Associates(4-5)

^{2/}0.71 Students/Dwelling Unit

Table 4.1 shows the projected number of new housing units, employees and students within the Morgan Hill Unified School District during the 1979-1984 period. This table indicates the school district can expect a growth of over 4,000 pupils based on projected new housing whether or not the Morgan Hill Business Park is constructed.

By comparison, the Morgan Hill Unified School District projects the number of housing units in their District by 1984 will be in the range of 2,433 to 3,176 units, which generate 1,727 to 2,255 students. This is based on the 0.71 students/dwelling units in the January 1980 Master Plan Update (Morgan Hill Unified School District).

Because of convenience, it is likely that employees in the Morgan Hill Business Park will attempt to locate in Zone A and particularly in the areas shown on Table 4.1. Therefore, there will be some impact on the school district directly from the students within households of project employees and from local service employees. However, because of the continuing housing demands within Santa Clara County, it can be expected that the housing within Zone A will be constructed in any case, and there will be new student impacts on the School District.

Within the City limits of Morgan Hill, Measure E will limit the number of housing units and student population growth. Because of Measure E, the effects on those schools serving the City of Morgan Hill will probably be no greater with the Morgan Hill Business Park.

Although the proposed Morgan Hill Business Park will substantially increase the assessed valuation of the area under provisions of SB-90, the funds available for operation of the School District will not be increased. The new effect will be that an increasing portion of the funds allowed for each student (\$1,600) will come from property taxes and a lesser amount from direct State Tax revenues.

MITIGATION MEASURES

As previously described, the increase in assessed valuation cannot benefit the school districts because of SB-90. However, there is the potential for more financial benefits to the school district. This could be in the form of cooperative educational programs between the industries locating in the Morgan Hill Business Park and the School District. Because of the types of industries expected to locate in the project, there will be a wide variety of on-the-job educational opportunities.

TABLE 5.3
 PEAK HOUR TRIP DISTRIBUTION ALTERNATIVES
 PHASE I COMPLETE

PEAK-HOUR TRIPS - ESTIMATED PEAK HOUR TRIPS			
	<u>Inbound Trips</u>	<u>Outbound Trips</u>	<u>Total</u>
(a) Majority of trips to the north:			
Northbound	470	1,405	1,875
Southbound	30	95	125
Morgan Hill	95	280	375
East of 101	30	95	125
Total	625	1,875	2,500
(b) Majority of trips to the south:			
Northbound	155	470	625
Southbound	125	375	500
Morgan Hill	315	935	1,250
East of 101	30	95	125
Total	625	1,875	2,500
(c) Majority of trips evenly distributed:			
Northbound	220	655	875
Southbound	155	470	625
Morgan Hill	220	655	875
East of 101	30	95	125
Total	625	1,875	2,500

NOTE:

These concepts are illustrated in Figure 5.1 and 5.2 which gives the percentage estimates of directional distribution, and the peak-hour directional volumes.

TABLE 5.4
PEAK HOUR TRIP DISTRIBUTION ALTERNATIVES
PROJECT COMPLETE

PEAK-HOUR TRIPS - 5,800 ESTIMATED PEAK HOUR TRIPS

	<u>Inbound Trips</u>	<u>Outbound Trips</u>	<u>Total</u>
(a) Majority of trips to the north:			
Northbound	1,090	3,260	4,350
Southbound	75	215	290
Morgan Hill	210	660	870
East of 101	75	215	290
Total	1,450	4,350	5,800
(b) Majority of trips to the south:			
Northbound	365	1,085	1,450
Southbound	285	875	1,160
Morgan Hill	725	2,175	2,900
East of 101	75	215	290
Total	1,450	4,350	5,800
(c) Majority of trips evenly distributed:			
Northbound	505	1,525	2,030
Southbound	365	1,085	1,450
Morgan Hill	505	1,525	2,030
East of 101	75	215	290
Total	1,450	4,350	5,800

NOTE:

These concepts are illustrated in Figure 5.3 which gives the percentage estimates of directional distribution and the peak-hour directional volumes.

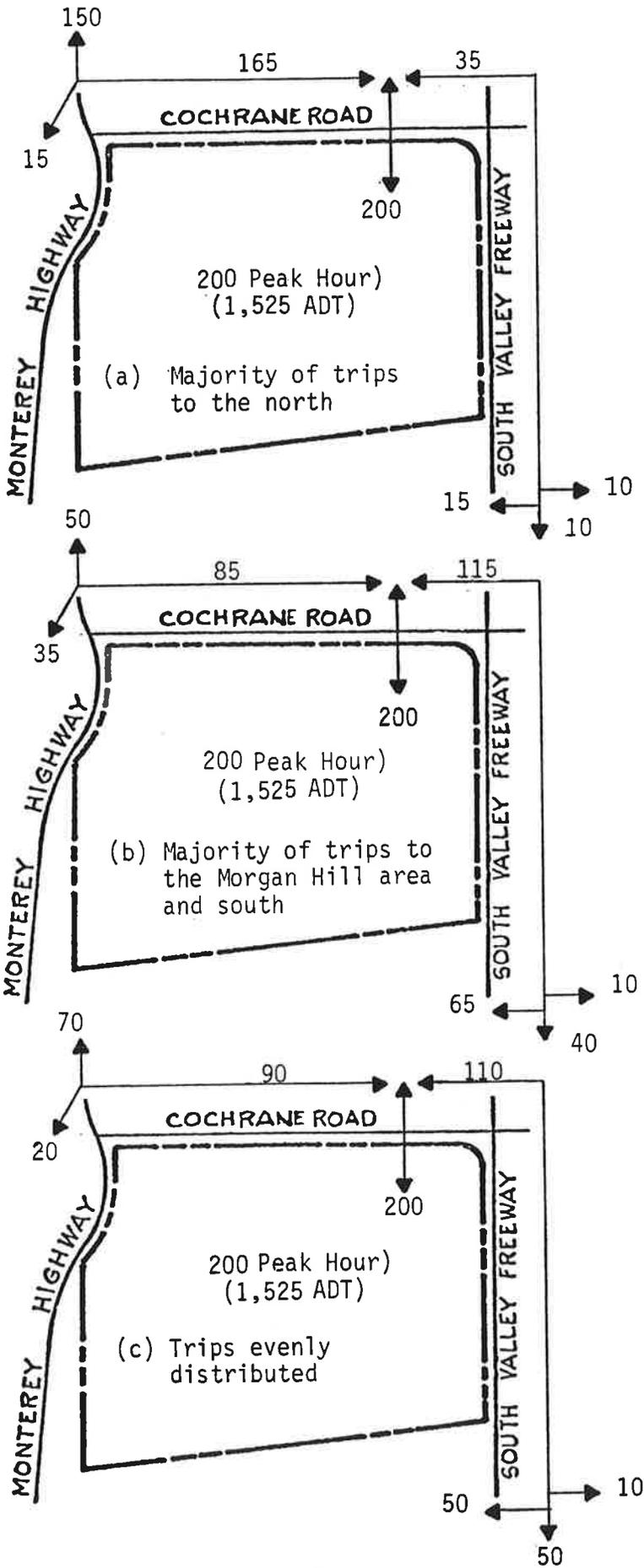


FIGURE 5.1
 PEAK HOUR TRIP DISTRIBUTION
 1983 Before Freeway is Completed
 1,525 ADT
 200 Peak Hr.*

*Peak hour trips could be reduced in the range of 10-30% depending upon the use of public transportation and ride sharing, such as van pooling. Flex time working hours will also reduce the peak hour volumes.

Note: The Morgan Hill traffic is expected to use both Monterey Road and the Freeway with the Freeway traffic exiting at East Dunne Avenue and going west into downtown Morgan Hill.



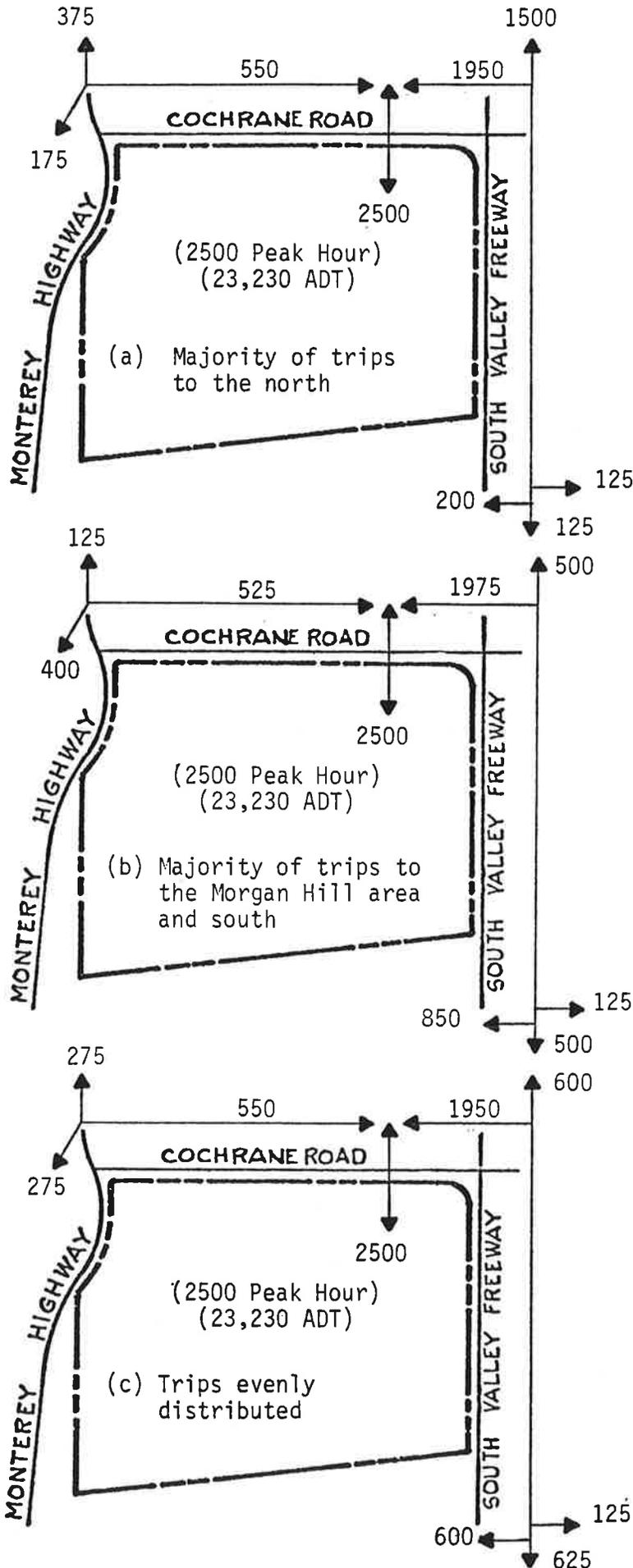


FIGURE 5.2

PEAK HOUR TRIP DISTRIBUTION
 PHASE I COMPLETED
 FREEWAY COMPLETED *

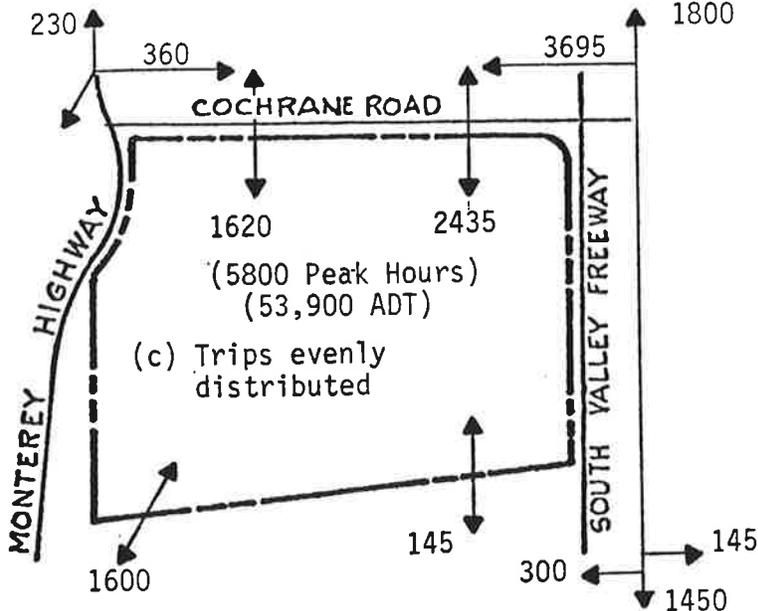
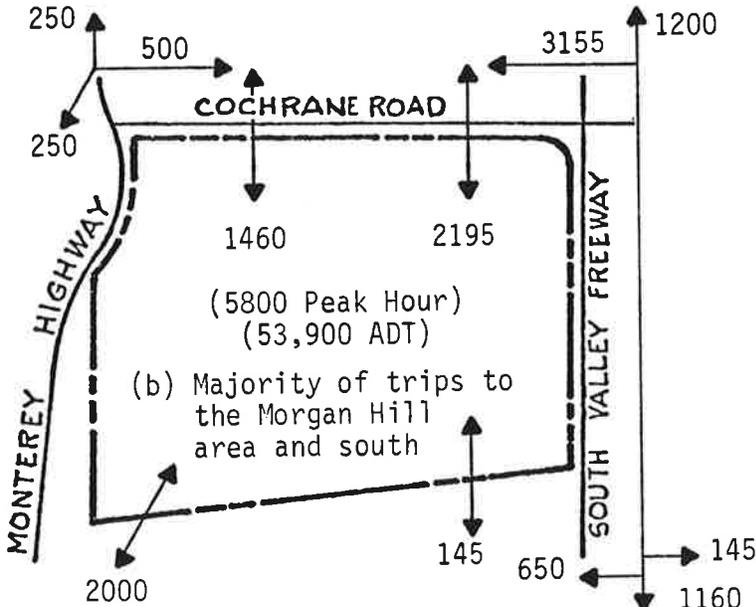
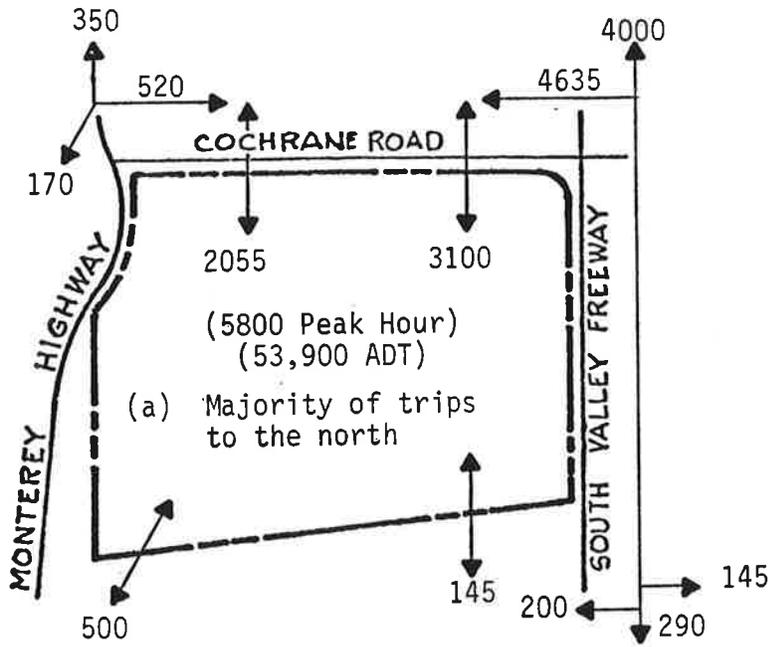
*Peak hour trips could be reduced in the range of 10-30% depending upon the use of public transportation and ride sharing, such as van pooling. Flex time working hours will also reduce the peak hour volumes.

Note: The Morgan Hill traffic is expected to use both Monterey Road and the Freeway with the Freeway traffic exiting at East Dunne Avenue and going west into downtown Morgan Hill.



FIGURE 5.3

PEAK HOUR TRIP DISTRIBUTION
 PHASE II & PROJECT COMPLETED
 ALL TRAFFIC ROUTES COMPLETED *



*Peak hour trips could be reduced in the range of 10-30% depending upon the use of public transportation and ride sharing, such as van pooling. Flex time working hours will also reduce the peak hour volumes.

Note: The Morgan Hill traffic is expected to use both Monterey Road and the Freeway with the Freeway traffic exiting at East Dunne Avenue and going west into downtown Morgan Hill.



Internal Traffic Design

Sutter Boulevard is the main arterial running from north to south through the Business Park, following a curvilinear route. It will be a four-lane road, with left-turn lanes at intersections, and will be designed with trees and landscaped median to mark it as a route of major importance.

The curvilinear pattern chosen for Sutter Boulevard allows for a smoother traffic flow than the right-angle turns required in a grid system. It also allows for less braking and acceleration, cutting down on noise and air pollution.(5-6)

A peripheral loop intersects Sutter near its northern and southern extremes, and two secondary streets connect with Sutter, one at Cochrane Road on the north, and the other at East Lane on the southern boundary. These streets provide an added access to the Park, making four entry points, and are designed to be extensions of the loop, both in width and landscape treatment.

The location of a Garden Hotel at the northeast corner of the Park provides easy access from both Cochrane Road and the South Valley Freeway. A commercial area is planned along Cochrane Road between Sutter Boulevard and the secondary entrance on Cochrane, which will also provide easy traffic access from the two major roadways as well as from within the Park itself.

A total of 42.1 acres of public roads are planned, with 40 feet of landscaping on both sides of all internal roads to be done concurrently with road improvements. Fifty feet of landscaping will be installed along the Monterey Road and Cochrane Road frontages. An existing line of trees defines the site's southern boundary.

Phase I will provide cul-de-sac turn arounds at the end of each street. When Phase II is constructed, the cul-de-sacs will be removed on the streets extending to the west. When Sutter Boulevard and East Lane are completed offsite, the cul-de-sac turn arounds can be removed.

Based on the preliminary traffic analysis included on the foregoing pages, the circulation plan for the Morgan Hill Business Park can efficiently operate without the offsite extension of Sutter Boulevard and East Lane to East Main Street. However, the offsite street extension would be beneficial.

MITIGATION MEASURES

Although the South Valley Freeway will alleviate the congestion which presently exists on Monterey Road, this freeway is not scheduled for completion until 1983, by which time the Business Park will be in partial operation with an estimated 500 employees. During 1981 and 1982, and up until late 1983, Monterey Road will continue as the primary access route and will receive the impact of the Morgan Hill Business Park.

Perhaps the greatest effect of the Business Park will be to divert some of the traffic on Monterey Road from an A.M. northbound commute to a southbound



Morgan Hill's wastewater treatment capacity will increase from 1.40 MGD to 2.05 MGD as soon as the new treatment plant goes into operation. There is an additional amount of 0.51 MGD that can be used as soon as the NPDES Permit for the plant is expanded from 4.88 MGD to 6.10 MGD. This reserve capacity is being constructed, but must receive approval prior to being utilized. This reserve capacity was constructed because there had been some disagreement between the Cities and the CWRCB, ABAG and EPA on the design capacity and how it should be utilized. Hence, the 1.22 MGD capacity was constructed with City funds and did not receive any of the State or Federal grant application. The various regulating agencies permitted this construction on the proviso that approval be obtained before utilization of this capacity for commercial and industrial use. The conditions for this use are stipulated in the State Grant Agreement for the Step 2 Facility Improvements.

The difference in volume between dry weather flows and peak wet weather flows is built into hydraulic capacity of the treatment plant and does not affect the overall quality of treatment, especially for primary treatment. All flows are retained in the 40 acres of percolation ponds. This increased volume usually only occurs for short periods of time and has the net effect of reducing the retention time period in the percolation basins. Because of freeboard, which is the height of the levee above the design maximum treated wastewater level, and the other design provisions for the percolation, it is unlikely that the ponds would overflow, even in extreme flood conditions.

The CWRCB required a high factor of safety in the design of the treatment plant because of certain operational procedures. After the plant is in use, it is possible the safety factor allowance could be modified and allowed to operate at a higher capacity.(6-7)

The EIR prepared for the new treatment plant allows for expansions and operations up to 9.0 MGD. Additional expansion above the 6.1 MGD design capacity could be accomplished in the following manner:

- . Proof of operation and modification of factor of safety;
- . Increasing aeration methods; and
- . Increasing depth of storage ponds.

Any expansion will probably require the acquisition of additional land for percolation.

There are a number of active projects in the City of Morgan Hill which either have site approval or are in the process of receiving site review. These are tabulated on Table 6.3 along with the projected wastewater flows for each use. Based on the wastewater volumes shown on Table 6.3 and employment projections on Tables 3.19, 3.20 and 3.21, we have estimated future flows from new commercial and industrial projects other than the Morgan Hill Business Park at 0.050 MGD each year. This takes into account realistic build-out periods based on actual experience in the City, and equates to a range of 20-30 acres per year.

based on a 10 year development program. The estimated net developable acreage is 328.0 acres. Wastewater volumes are projected at 2,000 gallons per acre which totals 656,000 gallons for the project.

TABLE 6.4

MORGAN HILL BUSINESS PARK
PROJECTED WASTEWATER VOLUMES
(15 Year Occupancy Period)

Development Year	Year Ending	Cumulative Net Developed Acreage	CUMULATIVE WASTEWATER VOLUMES (3)	
			ADF (1)	Infiltration Allowance (2)
3	1983	16.4	33,000	5,000
4	1984	34.2	68,000	21,000
5	1985	60.9	122,000	37,000
6	1986	87.6	175,000	53,000
7	1987	114.3	229,000	69,000
8	1988	141.0	282,000	84,000
9	1989	167.7	335,000	101,000
10	1990	194.4	389,000	117,000
11	1991	221.1	442,000	133,000
12	1992	247.8	496,000	149,000
13	1993	274.5	549,000	165,000
14	1994	301.2	602,000	181,000
15	1995	328.0	656,000	197,000

Total Dry Weather Flow 656,000 gallons
Total Combined Wet Weather Flow 853,000 gallons(3)

NOTES:

1. Average Daily Flow at 2,000 gallons per net acre
2. Infiltration at 500 gallons/acre + 20% for street area = 600 gal/AC.
3. All wastewater volumes are rounded to the nearest 1,000's.

Combined wastewater projections for the Morgan Hill Business Park, future residential growth along with other projects in the City of Morgan Hill can be projected based on the following assumptions:

1. Measure E will limit residential growth in future years. This amount can be expected to vary from year to year. In 1980 a total of 217 building permits will be issued.
2. Morgan Hill Business Park growth as shown on Table 6.5.
3. Other commercial and industrial growth assuming the same pattern as the 1979 growth tabulated on Table 6.3.

These amounts are combined and compared with the available wastewater treatment capacity in the new treatment plant on Table 6.5.

TABLE 6.5
 PROJECTED WASTEWATER TREATMENT FACILITY VOLUMES
 AVERAGE DAILY DRY WEATHER FLOW IN MGD
 (15 Year Occupancy Period)

TIME	RESIDENTIAL USE		COMMERCIAL AND INDUSTRIAL USE		ANNUAL TOTAL MGD	CUMULATIVE TOTAL MGD	AVAILABLE CAPACITY MGD
	PERMITS	TOTAL MGD	MORGAN HILL BUSINESS PARK MGD	OTHER PROJECTS MGD			
Existing Treatment Plant - Total Morgan Hill Capacity							1.400
October 1979 - Measured Flow to Plant		1.10				1.10	0.300
December 1979							
December 1980	943	0.208	0	0.271	0.479	1.579	(0.179) (1)
January 1981							0.471 (2)
December 1981	235	0.052	0.011	0.050	0.113	1.692	0.358
December 1982	235	0.052	0.011	0.050	0.113	1.805	0.245
December 1983	235	0.052	0.011	0.050	0.113	1.918	0.132
December 1984	235	0.052	0.035	0.050	0.137	2.055	0.505 (3)
December 1985	235	0.052	0.053	0.050	0.155	2.210	0.350
December 1986	235	0.052	0.053	0.050	0.155	2.365	0.195
December 1987	235	0.052	0.053	0.050	0.155	2.520	0.040
December 1988	235	0.052	0.053	0.050	0.155	2.675	(0.115) (1)
December 1989	235	0.052	0.053 (4)	0.050	0.155	2.830	(0.270)
December 1990	235	0.052	0.053	0.050	0.155	2.985	(0.425)
December 1991	235	0.052	0.053	0.050	0.155	3.140	(0.580)
December 1992	235	0.052	0.053	0.050	0.155	3.295	(0.735)
December 1993	235	0.052	0.053	0.050	0.155	3.450	(0.890)
December 1994	235	0.052	0.055	0.050	0.157	3.607	(1.047)
December 1995	235	0.052	0.056 (5)	0.050	0.158	3.765	(1.205)

NOTES:

1. () Indicates deficiency in capacity.
2. New Plant of 2.05 MGD Capacity for Morgan Hill replaces existing plant.
3. Utilize available reserve capacity. Morgan Hill's allotment 0.51 MGD.
4. 50% Occupancy
5. 100% Occupancy
6. Permits based on General Plan Update and Measure E Target population.
7. December 1980 total includes projects approved or being considered from Table 6.3 and the 1980 Measure E allotment. The new treatment plant is expected to be available by November 1980.



Table 6.5 shows that a number of actions are required to meet the projected growth of Morgan Hill for the Morgan Hill Business Park, orderly residential growth within the provision of Measure E, and other commercial and industrial growth. A number of conclusions are evident from the foregoing Table.

1. In 1980, if present growth continues, the capacity of the existing plant will be exceeded and some of the connections will have to be delayed until 1981.
2. With the new plant in operation in November 1980, Morgan Hill could continue the same growth pattern until 1988 when there will be a deficiency.
3. In 1988, Morgan Hill's portion of the treatment plant capacity will be committed and exceeded. At this point, the Morgan Hill Business Park is approximately 43% occupied. This could be extended to a later time if build-out in the Business Park is slower and if there is less commercial and industrial development in the City than projected.
4. Expansion of the treatment facilities are required to meet future growth. Over the next seven years, when the Morgan Hill Business Park Project would be 100% occupied, an additional capacity of 1.205 MGD is estimated to be needed to meet the total growth requirements of the City through 1995.
5. There is adequate space available to extend the treatment plant in its same operating configuration from 6 MGD to 10.4 MGD or 4.4 MGD. Additional land will be required for percolation areas. Assuming a sharing of this expansion with Gilroy on the same 58-42 split, Morgan Hill would receive 1.81 MGD which exceeds the 1990 projection by 0.74 MGD.
6. If residential growth continues as projected by the General Plan Revision and Measure E to a total of about 30,000 residents in the year 2,000, an additional, 0.260 MGD would be required beyond the year 1995.

The projections shown on Tables 6.3 and 6.5 are based on the best information available at this time. However, they should be reviewed annually and updated to reflect current approvals and new projects coming on line. Also, the Morgan Hill flow meter which is read monthly will also provide data for refining these projections.

MITIGATING MEASURES

All possible means should be investigated and implemented to conserve water and recycle water to reduce the impact on the wastewater treatment facilities and to reduce water use. This applies to industries locating within the Morgan Hill Business Park as well as the residential and other commercial and industrial growth in the City.

Experience has demonstrated that it takes many years to obtain State and Federal approvals for any treatment plant expansion, therefore, action should be scheduled with sufficient time to obtain the approvals to expand the treatment plant from 6 to 10.4 MGD. With the capacity available in the new treatment plant, the reserve capacity could be needed by about 1984 and new treatment and disposal capacity by 1988.

Presuming that all approvals can be obtained for the expansion to 10.4 MGD, funding of this construction could be accomplished by selling the expansion capacity to specific users. For example, the Morgan Hill Business Park Assessment District could participate in the expansion of the wastewater treatment facilities and thereby acquire a guaranteed volume of capacity. The sewer connection fees are partially reserved for future improvements. Hence, if the Assessment District were to purchase plant capacity, it would be appropriate to adjust the connection fees accordingly.

The City of Morgan Hill should consider preparation of a Master Wastewater Plan to organize a program for upgrading the City's offsite trunk sewer line facilities and providing adequate capacity for future development in accordance with the General Plan. Infiltration into the system has been a problem which requires evaluation as part of the Master Wastewater Plan. This Master Plan will provide orderly direction for expansion of the treatment facilities as well as resolving the need for additional trunk line capacity. Action should also be started to contracting with the City of Gilroy for additional capacity, as it is required, in the section of line from California Avenue to Farrell Avenue.

ADDENDUM TO SECTION 13

Redevelopment Agency District

The City of Morgan Hill is now considering creation of a Redevelopment Agency and District to include the downtown portion of Morgan Hill and a portion (west half), if not all, of the Morgan Hill Business Park. This type of agency would have authority through its Executive Director and the City Council to construct public improvements, major maintenance projects and purchase equipment and structures. Funds generated by the District could be used for administrative and planning expenses including a reasonable portion of the City Staff expenses. Public Works projects within the boundaries or benefiting the District, that would otherwise be funded through the City's General Fund, can be included as work funded by the Agency. To a limited extent, redevelopment funds can be used for the site improvements and construction of buildings on private property.

A Redevelopment Agency can provide several sources of financing:

- ... tax exempt financing in the form of bonds, usually 30% below the market rate.

- ... tax increment financing.

The tax exempt financing could also utilize Municipal Improvement Bonds and provide a guarantee for these bonds. Structures and lands outside of public rights of way can be improved and financed through lease-revenue bonds which are tax exempt.

Tax increment financing is based on freezing the assessed value (tax base) at the time the District is formed. All taxes generated by the existing tax base are distributed by the County to the City, School Districts, Special Districts and County which share the property tax revenues. The additional tax revenues generated by the increased value of the property above the tax base are available for use by the Redevelopment Agency to meet its expenses including administration, operation and repayment of debt. All Redevelopment Agency funds generated by the property tax increment must be used the same year. If there is an excess of funds in any one year, this excess is returned to the general property tax fund for distribution by the County to each of Public Agencies receiving property tax revenues from property within the District.

While the Redevelopment District is being formed, and after formation prior to the time revenues are received, the District can borrow funds from the City. These would be repaid at a later date when bonds are sold and/or when tax increment funds become available.

The net effect of the tax increment funding procedure is to utilize all revenues from taxes on increased property values within the District for the benefit of the Redevelopment District. Tax revenues to the City's general fund would be reduced only in the portion returned as the City's share of



total tax distribution. School Districts are limited by the funding requirements of SB-90 and are funded primarily by the State.

Property taxes generated by the Morgan Hill Business Park and available to the City of Morgan Hill will remain at their present level when the tax base is frozen. Additional property taxes generated by increased values will be available to the Redevelopment Agency for operation and debt service.

Whether the Redevelopment District includes all of the Morgan Hill Business Park or only the westerly half, would be decided at the time the District is formed. If all of the project is included, the Phase I municipal improvement bonds could be guaranteed by the Redevelopment Agency and tax exempt financing could be available for private improvements.

Revised Revenue Projections

The annual revenue projections shown on the various tables in this section are expected to vary depending upon the total build-out period, 10-15-20 years. Also, revenues from property taxes to the City's General Fund would be reduced by the Redevelopment Agency. This reduction will be partially offset by sharing of certain City Administrative expenses between the City and the Agency. Sales tax revenues and revenues for special service fees would not be affected by the Redevelopment Agency.





MARK THOMAS & CO. INC.
CONSULTING CIVIL ENGINEERS & MUNICIPAL PLANNERS
18 N. SAN PEDRO STREET, SAN JOSE, CALIF. 95110 • (408) 295-2425
OFFICES IN SAN JOSE AND CUPERTINO

HARRY F. AUMACK, JR.
JOHN E. FLEMING
SAM J. ZULLO
RICHARD K. TANAKA
MARK E. THOMAS
ALDO P. SAVIO

June 4, 1980
File No. 79085

Mr. Stan Kulakow
Creegan & D'Angelo
P.O. Box 26220
San Jose, California 95159

Re: Morgan Hill Business
Park EIR - City Council
Consideration Time to
Drain Storm Water
Detention Basin

Dear Stan:

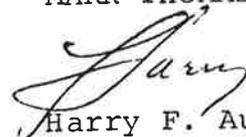
At the Morgan Hill City Council work shop meeting held on May 29, 1980, Councilman Steve Pearson inquired as to the length of time storm waters would be pumped from the detention facility under the ultimate project development.

Assuming a 100 year storm event, 78 acre feet of run-off will ultimately be stored in the detention basin. It will take 27 hours of continuous pumping at 35 cfs to empty the detention basin. However, we recommend that the pumping facility be flexible with a capability to pump at lower discharge rates in the event that there is a definite reason to reduce the discharge rate to less than 35 cfs. If the discharge rate were cut in half to say 17.5 cfs, it would take 54 hours of continuous pumping to totally draw down the detention basin. These hours of pumping would be reduced if the detention basin were to be used as a percolation to ground water facility. The 35 cfs discharge rate represents a run-off equivalent to 75% of the peak flow that would be expected from the property in its present undeveloped state during a 1 and 10 year storm event.

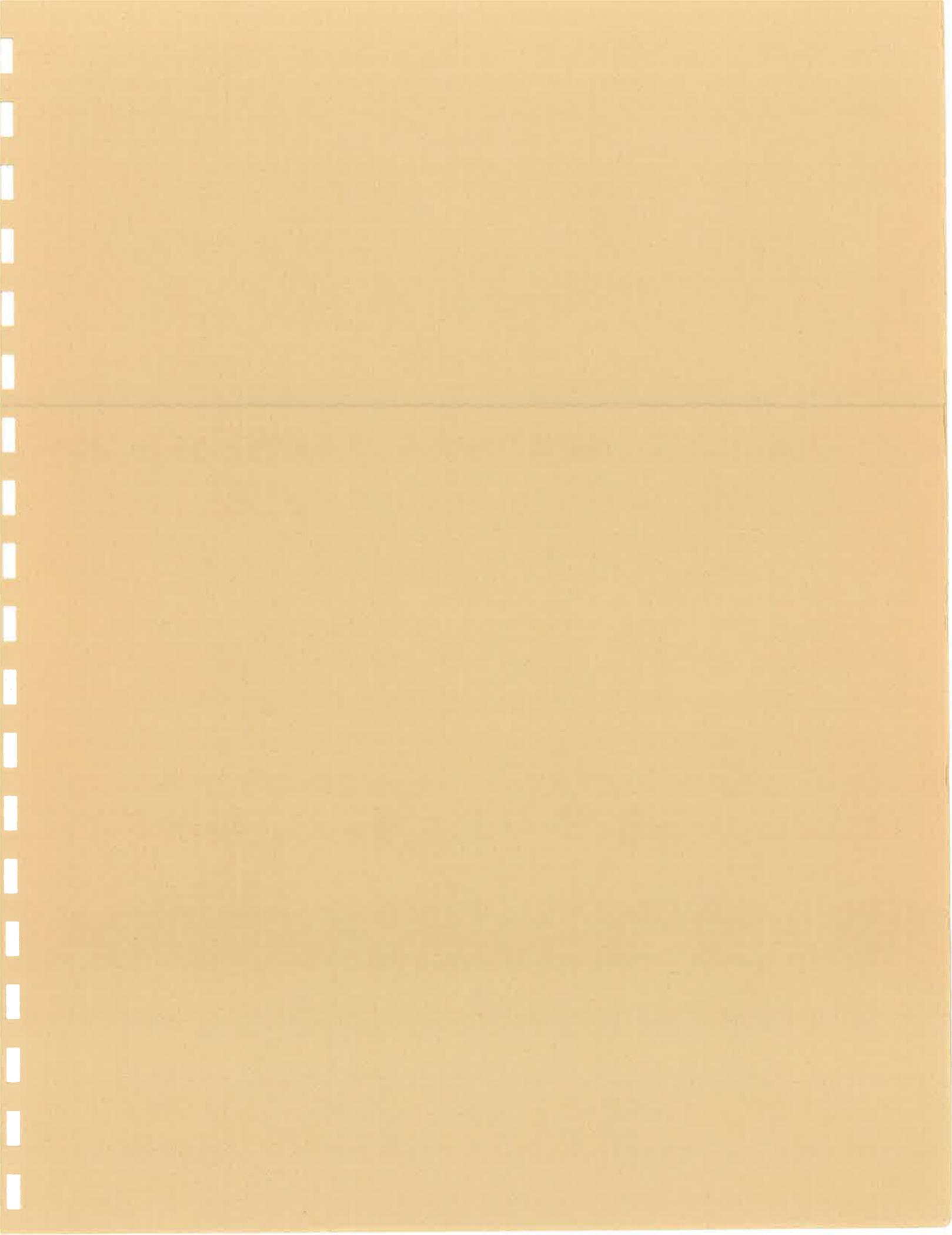
I believe this answers Councilman Pearson's inquiry. However, kindly contact me if you have any further questions.

Yours very truly,

MARK THOMAS & CO. INC.


Harry F. Aumack, Jr.

HFA:si
Copy: Sam Cox



LIST OF PERSONS AND AGENCIES COMMENTING ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

- Sullivan's Last Stand - R. W. Sullivan
- Morgan Hill Unified School District - Robert Stannard, District Superintendent
- Gavilan College - R. J. Melone, Superintendent/President
- Association of Bay Area Governments - Charles Q. Forester, Director of Planning
- Loma Prieta Resource Conservation District - Doris Leverton, Director
- California Regional Water Quality Control Board - Central Coast Region - Kenneth R. Jones, Executive Officer
- California Regional Water Quality Control Board - San Francisco Bay Region - W. L. Bruhns, Water Quality Engineer
- City of Gilroy - Michael Dorn, Director of Planning
- County of Santa Clara, Planning Department - Roy S. Cameron, Director
- City of San Jose, Planning Department - Gary J. Schoennauer, Director of Planning
- State of California, Office of Planning and Research - Anna Polvos, State Clearing House
- State of California, Department of Transportation, Division of Transportation Planning - Ann Barkley, Chief
- State of California, Air Resources Board - William C. Lockett, Chief Regional Programs Division
- State of California, State Solid Waste Management Board - Douglas L. Strauch, Chief Enforcement Division



**Sullivan's
Last
Stand**



CITY OF MORGAN HILL

APR 22 1980

RECEIVED

April 21, 1980

785 Cochrane Rd.
Morgan Hill, CA. 95037
(408) 779-7177

City of Morgan Hill
Planning Commission and City Council
17555 Peak Ave.
Morgan Hill, California 95037

Re: Draft EIR Morgan Hill Business Park

Dear Commission and Council:

In the process of reviewing the draft EIR for Morgan Hill Business Park, we discovered the following:

The draft EIR, as written, is not completely accurate, and therefor legally unacceptable, because of errors of omission and impacts therefrom.

The report must speak to the fact that twenty six acres of Thoroughfare Commercial already exists at the intersection of Hwy. 101 and Cochran Rd.

While mentioning the Commercial to the south on 101 (Walnut Park) and the downtown Commercial, the actual closest Commercial, across the street to the north, was inadvertently omitted from the report.

The property to the north across the street consists of two parcels; one of nine acres directly across Cochran Rd. from the airport (parcel 727-15-038 and seventeen acres (parcel 727-15-037) kitty corner across the street from the airport, namely the NW and NE corners of the intersection of Hwy. 101 and Cochran Rd.

These twenty six acres of Commercial were zoned over twelve years ago in compliance with the City General Plan. Since then, we have expended over \$155,000 in planning, engineering, and improvements to these properties, and our legal, financial, and development commitments are irreversible. These expenditures and commitments relied upon and were based upon the City's commitment and obligation to us in zoning these properties Commercial.

The above referenced corrections to the draft EIR should be addressed in section 10, page 10.1; section 15, page 15.1; section 18, page 2.2; on page 7, and elsewhere in the EIR as necessary to correct the errors of omission.

This letter should be made a part of, and incorporated into, the draft EIR.

Your attention to this matter will be appreciated as well as allow the draft EIR to reflect the true existing facts.

Sincerely,

R. W. Sullivan
Gould, et al
by R. W. Sullivan



MORGAN HILL UNIFIED SCHOOL DISTRICT

P.O. BOX 927 • MORGAN HILL, CA 95037 • (408) 779-5272

May 21, 1980

David Miller
City Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

Dear Dave:

In re Draft EIR of Morgan Hill Business Park School Section

We have reviewed the draft of the school section and find several statistical errors in the "existing site."

We question the projected new housing for Morgan Hill Unified School District during the next five years.

We cannot respond to schools in the surrounding districts as included in this report.

With the errors and/or questions that we have noted, we would like a chance to obtain clarification in the final EIR.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Stannard".

Robert Stannard
District Superintendent

RS:pa

Sanilun College

Board of Trustees
1978-1980

President
1978-1980

President
1978-1980

President
1978-1980

DR. RUDY J. MELONE
Superintendent/President

April 14, 1980

CITY OF MORGAN HILL
APR 17 1980
RECEIVED

Mr. David E. Miller
Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

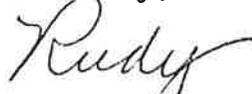
Dear Dave:

It has taken me some while to go through the master plan and draft environmental impact report prepared on behalf of the City of Morgan Hill and the Wiltron Company.

It is a very fine document, full of valuable information, and I do appreciate the fact that you have sent it along and asked for my reactions. I know I am a bit late, but offer these comments for your attention at this time.

The one thing lacking in the impact report has to do with the community college and its ability to provide services in training people of this community to meet the needs of such an industry. We are presently utilizing a chemistry laboratory in order to begin an electronics program. In the very near future, we expect that we will have to return that laboratory to the chemistry program as our enrollment increases in that area. As a result, we are very concerned about the opportunities for developing any other construction in order to have a more complete electronic education program along with a computer science and programming program. Given the impact of Prop 13 on our ability to generate local funds for construction purposes, our only recourse at this moment is to seek private or foundation grant monies or, are we at the stage where suddenly the community colleges must ask for impact fees from businesses and industries as they move into the community in order to generate construction dollars. That is not a happy thought with me because I know that those dollar costs are passed on to the consumer and only contribute to inflation. However, that is the one area of impact that seemed neglected in the study and which I felt you should know about.

Sincerely,



R. J. Melone
Superintendent/President

RJM:ma





Association of Bay Area Governments

Hotel Claremont • Berkeley, California 94705 • (415) 841-9730

RECEIVED
JAN - 7 1980

January 4, 1980

David E. Miller
Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

Subject: Notice of Preparation (NOP) for Wiltron-Morgan Hill
Business Park

Dear Mr. Miller:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Wiltron-Morgan Hill Business Park. Staff has reviewed the NOP along with its scope of work and is forwarding the following comments. The ABAG Executive Board has not taken a position on this document or the proposed project.

We would like the DEIR to discuss the relationship of the project to regional policies. As you know, over the last four years ABAG and the Metropolitan Transportation Commission conducted a study of the Santa Clara Valley Corridor. The study resulted in amendments to ABAG's Regional Plan. We are enclosing a copy of the Santa Clara Valley Corridor Evaluation Summary (March 1979).

Please do not hesitate to contact us if we can be of assistance in analyzing the relationship of these policies to the project.

Sincerely,

Charles Q. Forester
Director of Planning

Enclosure

cc: *Stan Kulakow*

SANTA CLARA VALLEY Corridor Evaluation · summary



Adopted by the Joint Policy Committee of the Association of Bay Area Governments & the Metropolitan Transportation Commission



March 1979

MEMBERS OF THE JOINT POLICY COMMITTEE OF ABAG AND MTC
DURING THE SANTA CLARA VALLEY CORRIDOR EVALUATION

Louise Giersch, Chairman	ABAG Representative to MTC
Jane Baker, Deputy Mayor, City of San Mateo	ABAG Representative
Don Dillon, Councilmember, City of Fremont	ABAG Representative
A.W. Gatov, Marin County	MTC Representative
James E. Jackson, Councilmember, City of Cupertino	ABAG Representative
James Moriarty, Supervisor, Contra Costa County	MTC Representative
Valerie Raymond, Supervisor, Alameda County	ABAG Representative
Robert I Schroder, Supervisor, Contra Costa County	MTC Representative
James E. Self, Vice Mayor, City of San Jose	MTC Representative
Rod Diridon, Supervisor, Santa Clara County	Ex Officio Member

(The aerial photos on the report cover show the change that has taken place in Cupertino between 1959 and 1978.)

April 23, 1979

To: Elected Officials, Citizens, and Staff Santa Clara County

From: Louise Giersch, Chairman, Joint Policy Committee of ABAG
and MTC;
Rod Diridon, President, Association of Bay Area Governments;
James E. Self, Chairman, Metropolitan Transportation
Commission

Subject: Santa Clara Valley Corridor Evaluation Recommendations Adopted
by the Joint Policy Committee, March 21, 1979

On March 21, the Joint Policy Committee of ABAG and MTC unanimously endorsed a set of land use and transportation recommendations for adoption by the Association of Bay Area Governments and the Metropolitan Transportation Commission. The Joint Policy Committee's vote came after nearly three years of technical analysis and review of the findings and conclusions by local elected officials, citizens and staff. The recommendations approved by the Joint Policy Committee are described in the Summary Report.

The land use and transportation recommendations satisfy two key objectives. First, the strong influence that land use and transportation decisions have on each other has been recognized through a complementary set of recommendations. Second, the set of transportation facilities, recommended for development over the next ten to fifteen years, has been established on the basis of a reasonable expectation of revenues.

The next steps leading to implementation of these recommendations will include their adoption by ABAG and MTC and the preparation of updated local Transportation Improvement Programs and General Plans. The ABAG Regional Planning Committee voted to endorse the Joint Policy Committee's recommendations on April 11. The ABAG Executive Board is scheduled to vote on the recommendations in May.

Implementation of the recommendations by MTC has already begun. Route 152 was nominated for discretionary funding as a high priority project. Further, staff from MTC, Santa Clara County, and the City of San Jose will soon complete a scope of work for the Edenvale/Guadalupe alternatives analysis. MTC will begin its plan revision process by distributing the proposed amendments to the Regional Transportation Plan in mid-July. Public hearings will be held on the proposed revisions during August. The Work Program Committee will then vote in early September on revisions they will recommend for adoption by the full MTC Commission. That vote will occur in late October.

It is anticipated that local jurisdictions will also be working concurrently to adopt specific programs and policies supporting the land development and transportation recommendations. Some of these decisions will be made in the course of revising the County's General Plan, which is scheduled to be completed by the end of this year. Other decisions will be made as a result of approving major new developments or modifying elements of local General Plans. Finally the selection of an appropriate transportation mode in the Edenvale/Guadalupe Corridor will be accomplished by the project level alternatives analysis that will begin this summer.

The attached set of land use and transportation recommendations emerged during a thorough public participation effort and resulted in their being endorsed by nearly all the local officials and citizens. Over two hundred public meetings and workshops were held during the course of the study to solicit comments. Invaluable assistance and cooperation were received from local officials, citizens and staff. On behalf of the Joint Policy Committee, we would like to extend our appreciation to these persons.

SUMMARY REPORT

INTRODUCTION

This report has been prepared to assist local officials and citizens of Santa Clara County to determine the County's future course in transportation and land development. The report is also intended to ensure that in the process of making these important decisions, regional, county and local goals and policies remain consistent with each other. The recommendations were reviewed extensively by local officials, citizens and local staff. The ABAG/MTC Joint Policy Committee approved the recommendations as did the Santa Clara County Board of Supervisors and almost all of the fifteen cities.

In the simplest terms, there are two major decisions to be made:

Development patterns: Where will future jobs and homes be located in the County?

Transportation projects: How much and what kind of transportation service can or should be provided?

The selection of the recommended land use and transportation measures followed an analysis of existing conditions, present trends and possible alternatives. Several important findings resulted from this analysis. First, trends to date and the general plans of Santa Clara's 15 cities, when taken together, concentrate new job growth in the northern part of the County. Residential policies, by contrast, concentrate growth in the central and southern sections. Therefore, commute trips from home to work are lengthening because new jobs are not close to new housing. As a result, traffic congestion is increasing, air pollution is getting worse, and there is a great need for new transportation facilities.

Another problem is the severe imbalance between the number of new jobs and the number of new homes being built in the County. New jobs are being added in the county at a rate far exceeding the housing supply. This, in turn, will swell the number of people who work in the County but live outside it. Increased in-commuting will place a heavy demand on existing and proposed regional transportation facilities. Housing prices are also expected to continue rising. The result of this imbalance may be constrained economic growth in Santa Clara County, particularly if cities in adjoining counties limit their housing supply or housing becomes too expensive for most new workers.

Still another issue raised in the analysis was what kind of future transportation facilities should be built in the next fifteen years. Should the County continue to depend primarily on the highway system, particularly when the nation is faced with limited oil supplies, reduced government budgets and declining air quality? If transit were emphasized, where will rail or bus perform best? Finally, and possibly the biggest question of all, how can the citizens of Santa Clara County make the most prudent decision in allocating scarce financial resources? This question took on even higher importance in view of Proposition 13.

In the past 25 years, the nation has spent large sums for transportation. The interstate highway system is the most notable development. But today's problem of inflation combined with limited budgets is making less money available for transportation facilities. Scarce funds have brought fierce competition among communities and have increased political pressure as a practical means of securing transportation projects that need Federal or State approval and money. Lack of money also has brought more Federal requirements to plan for transportation and to do such planning in relation to anticipated population growth and land use development. The key to transit planning, especially new rail lines, is to show how existing or expected land uses will ensure public transit riders. As noted earlier, the intent of the Santa Clara Valley Corridor Evaluation was to define a rational transportation program for the County and to gather local and regional support for the program. A sound plan that has both county and city government support will no doubt be a persuasive tool in competing for Federal transportation money. An agreed-upon plan will not guarantee Federal funds, but financial support from the Federal Urban Mass Transportation Administration (UMTA) is not likely without such a plan.

The Santa Clara Valley Corridor Evaluation, consequently, considered many different ways the County could grow. After lengthy discussion by policy makers and the public, the following two basic concepts for development by 1990 were accepted for future analysis:

Alternative I - Policy Trends: County development would occur in accord with recent trends, meaning most new jobs would go into North County cities, and most new homes would be built at low density in southeast San Jose.

Alternative II - Reduce Commute: The location of new jobs and houses would be changed from current trends so that more housing would be built in the North County, and more jobs would be created near San Jose's residential areas.

These two development patterns were based on the following set of countywide population, housing and job projections for 1990:

Population	1.44 million
Housing Units	570,000
Jobs	715,000

The impacts of a faster rate of employment growth, such as those resulting from an additional 100,000 jobs, were also examined.

The following three transportation alternatives were also analyzed:

Bus Emphasis This option consisted of a transportation system based primarily on bus service improvements and reduced auto reliance.

Rail Emphasis This option consisted of reducing auto reliance by building new rail facilities, and improving bus service.

Highway Emphasis This option tested continuing heavy reliance on the automobile.

All of the land development and transportation alternatives were evaluated for their effects on the environment, the economy, the use of energy and other factors.

KEY FINDINGS

Use of the Land

- o All the land designated by existing local plans for residential development will be used by 1990. Growth beyond 570,000 housing units cannot occur in the County unless local plans are amended to permit higher density development or unless lands now withheld from development in South County are urbanized.
- o Higher density housing in the northern part of the county could result in having an additional 30,000 acres of land in San Jose and Milpitas available for housing compared to current trends.
- o Job growth will be limited to slightly in excess of 700,000 jobs because housing will not be available for added workers unless one or a combination of the following courses of action is adopted:
 1. Counties and cities surrounding Santa Clara County agree to increase their plans for housing growth, and the capacities for transportation links are greatly increased to bring in workers from outside the County.
 2. Plans for South County are amended to permit urban use of agricultural lands.

3. Local plans are amended to provide more housing in North County cities.
 - o Under current trends 84% of the remaining undeveloped industrial land will be in Central and South County.
 - o By 1990, agricultural acreage will be reduced by 35% to 50% from 1975 levels.

Water Supply and Wastewater Facilities

- o There are relatively minor differences in the development alternatives regarding the total demand for water supply. The increased use of water for residential landscaping would be offset by the drop in agricultural use.
- o The size of wastewater plant capacity is nearly the same for both development alternatives, but the cost of serving the added acres of development under the Policy Trends Alternative would be higher than under the Reduce Commute Alternative.

Energy Use

- o The residential, commercial and industrial development of the Reduce Commute Alternative would use slightly less energy by 1990 than the Policy Trends development pattern.

Municipal and School Finance

- o The Policy Trends Alternative is more likely to provide greater municipal revenues than the Reduce Commute Alternative.
- o Countywide costs of education will not be significantly different under either 1990 land-use alternative.

Transportation

- o Continuing the current trends of development of locating most jobs in the north and providing low density housing in the south will further increase dependence on the automobile and place a greater demand on the existing highway system.
- o Transit can help travel conditions but, in general, highway travel times will worsen somewhat by 1990.
- o Total daily transit ridership in 1990 could be two to four times greater than today's level.
- o Transit could carry up to 12% of the work trips during peak travel periods.

- o Transit patronage is greatest where jobs are concentrated, such as in downtown San Jose.
- o None of the transit options recover more than 31% from the farebox.
- o The highest rail patronage, approximately 6000 passengers per hour in the peak direction, was projected for the Peninsula line between San Jose and San Francisco. The next two lines, Fremont and Edenvale, were projected to reach lower patronage figures -- approximately 3000 persons per hour in the peak direction.

Transportation Use of Energy and Air Quality Impacts

- o The lowest levels of operating energy consumption and air pollutant emission levels were recorded for alternatives that reduce auto vehicle miles traveled through shifts in land use and/or increased transit ridership.
- o Carbon monoxide is the most serious transportation related pollutant in Santa Clara County.

Transportation Finances

- o Funds for expanding the highway system are limited under current programs. There is not enough money to build the major projects shown in local plans. Highway resources in existing programs are sufficient to complete currently committed projects such as the South Valley Freeway; the interchange of Routes 101/280/680; and Route 87 from 280 to downtown San Jose. Given current levels of funding, highway revenues in the future will be dedicated almost exclusively to rehabilitation, operational improvements and maintenance.
- o Transit funds are also limited. Assuming current programs will be continued, some expansion of the transit system is possible beyond the County's 516 bus program and the upgrade of Southern Pacific commuter service.

Adding 100,000 More Jobs

- o An additional 100,000 jobs would use up nearly all the remaining commercial and industrial lands shown in local plans.
- o Existing and currently planned water supply could meet the additional demand; however, sewage facilities would most likely need to be expanded.
- o While the jobs/housing balance would be improved in the central/southern parts of the county, the total number of jobs would require one third of the work force to commute

into the county, placing a heavy demand on facilities linking Santa Clara County to adjacent counties.

- o If South County were developed to provide housing for the additional workers, travel demand would greatly exceed currently planned facilities.

RECOMMENDATIONS

Basis For Recommendations

The Santa Clara Valley Corridor Evaluation was conducted to define land development and transportation decisions that would be mutually supportive. The following series of recommendations are based on such a unified approach.

- o The plan must be based on a realistic assessment of resources.

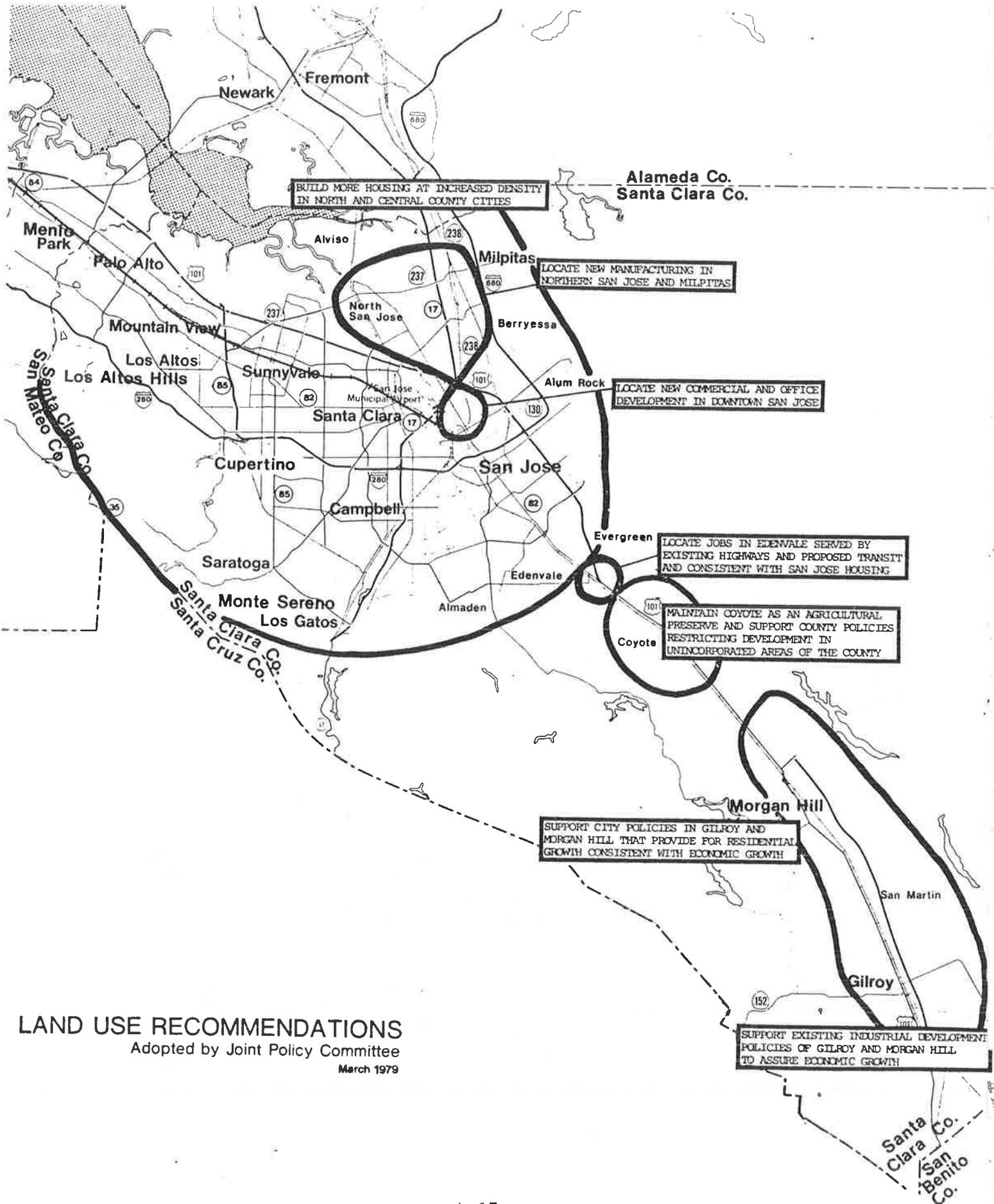
Existing local plans contain transportation projects that cannot be built by 1990 within existing or even modestly expanded resources. Budget constraints, therefore, must be recognized in developing a realistic plan with implementable projects. Many of the proposed projects in the recommended plan will be competing with other projects outside Santa Clara County and the Bay region for federal and state support. Therefore, to achieve even the level of funding anticipated in this report requires a strong consensus on priorities.

- o A better balance between jobs and housing will make the most efficient use of existing facilities and will have the least negative impact on the environment.

The rapid growth of Santa Clara County is continuing into the present. Employment growth appears to be occurring even faster than predicted only two or three years ago, and some persons believe that the projections used as a basis for this report will be exceeded before 1990. However, impediments such as the availability and cost of housing may slow this rate of growth. Development is expected to continue at low densities, with very little focus. Most land currently zoned for residential development will be committed by 1990.

An increase in residential densities would increase the ability of local governments to accommodate residential growth before and after 1990. Continued growth of jobs is dependent on access to the labor force. In turn, the location of jobs and housing strongly affect congestion levels, trip lengths and the effectiveness of transit. Employment growth should be encouraged where it will make the most effective use of existing and proposed transportation facilities.

- o The most effective strategy for improving mobility is to give careful consideration to the location of jobs, to develop an



LAND USE RECOMMENDATIONS
 Adopted by Joint Policy Committee
 March 1979

adequate transit system, and to make investments in the highway system that are aimed at making the existing system work better.

Existing and future development patterns will mean continued use of the automobile for most trips in Santa Clara County. Unless some unforeseen and dramatic change in energy resources occurs, over 90% of all trips in 1990 will be made by auto. This reliance on the automobile will continue to create varying degrees of congestion even if there were enough resources to construct the most extensive highway network examined.

The fact is there are not enough resources to build all the highway facilities desired in Santa Clara County by 1990, even if it were found to be environmentally prudent to do so. At the same time, the analysis showed that coordination between jobs and housing can make better use of existing facilities, and the implementation of convenient transit can serve a significant portion of peak period trips. Therefore, to improve mobility and provide capacity for growth will require a strategy that coordinates decisions on job location, the development of transit, and highway investments.

RECOMMENDATIONS FOR DEVELOPMENT

o Encourage new job formation and commercial development in central San Jose.

San Jose will soon become the most populous city in the region. While downtown redevelopment is now in early stages, increased commercial and office development appears certain - particularly in the area bounded by Civic Center, San Jose State University, and the Guadalupe Parkway. At the present time, development patterns in the cities in north county are largely fixed. While some densification of commercial uses and industrial facilities is anticipated, major redevelopment is not contemplated. At the same time, central San Jose is undergoing major changes. As San Jose plays an increasingly dominant role in the region, it can be expected to take on the character of other major urban centers. Corporate headquarters, banking, insurance, and real estate activities are expected to grow and will require centralized office space accessible to the rest of the County. The workers in these offices will create an expanded market for shopping, entertainment and cultural facilities. San Jose can best serve this function, given its location and historical role as the government center of the County. This growth is not expected to detract but rather to complement existing industrial development and the research and development facilities in North County.

San Jose's central location also makes the most efficient use of transit. Existing commuter rail service and improvements proposed for transit work best where there is a focus of activity, carrying people from several different residential areas into a core work place. Encouraging jobs in downtown San Jose will help reduce the need for auto commuting, and thereby also reduce air pollution and conserve energy.

- o **Encourage manufacturing jobs which depend on highway access to locate in the northern San Jose/Milpitas area.**

Relatively minor expansions to existing transportation system can accommodate new job growth in this area. Truck and rail connections for factories are reasonably accessible at the present time. Job growth in this area would also be located closer to more of the region's labor force.

- o **Encourage job development in the Edenvale area of San Jose that can be served by existing highway and proposed transit improvements and that is consistent with housing development in San Jose.**

People commuting to jobs in Edenvale will be able to make use of existing "reverse" direction highway capacity as well as the proposed transit improvements. Additionally, the San Jose General Plan proposes adding 40-50,000 homes within approximately five miles of the Edenvale industrial sites. This new housing will be located in the Edenvale, Almaden and Evergreen neighborhoods and should reduce home-to-work trip distances by residents in these neighborhood.

In recommending the Edenvale job center, it is important that San Jose continue to provide substantial housing in this area to help relieve housing pressure in Morgan Hill and Gilroy.

- o **Encourage the development of higher density housing in North and Central County Cities.**

Housing is in great demand in North County cities because of the number of jobs already existing in the area. While there are limited opportunities to do this, more residential development of the type compatible with existing development patterns will mean less commuting and related improvements in air quality and energy consumption. In many areas, only relatively small parcels at high cost remain. Such parcels are better suited to higher density development than low density patterns. As these parcels exist within developed areas, costs of public services are also relatively lower than for new, low density projects. Other North County cities like Cupertino, Saratoga and Los Altos Hills still have substantial land planned for residential development and should be encouraged to permit modest increases in the density of housing developments. As an example, if housing density in Saratoga were amended from the present 1 1/2 houses per acre to 2 houses per acre; it would allow for an additional 1,600 new homes while maintaining the rural atmosphere of 1/2 acre lots.

Central County cities already contain large parcels of land available for a variety of housing developments. New residential growth in Central County should be encouraged to match the rate of industrial development. Higher density housing should be developed, where appropriate, in conjunction with the transit recommendations.

- o **Support existing industrial development policies of Gilroy and Morgan Hill, to assure continued economic growth.**

Both cities desire and need a supportive economic base. Such new commercial and/or industrial development should provide opportunities for people to live and work in the same city. In addition, jobs related to agricultural production, as well as new industrial and commercial jobs, should be created at a pace that meets the needs of current and new Morgan Hill and Gilroy residents.

- o **Support city policies in Gilroy and Morgan Hill that provide for residential growth consistent with economic growth.**

Job growth, both in the northern section of the county as well as within Morgan Hill and Gilroy, should not be so expansive as to create pressure for additional housing that cannot be accommodated without straining existing services. The two south county cities are studying, and in some cases have adopted, policies which encourage a moderate rate of residential development consistent with existing industrial growth.

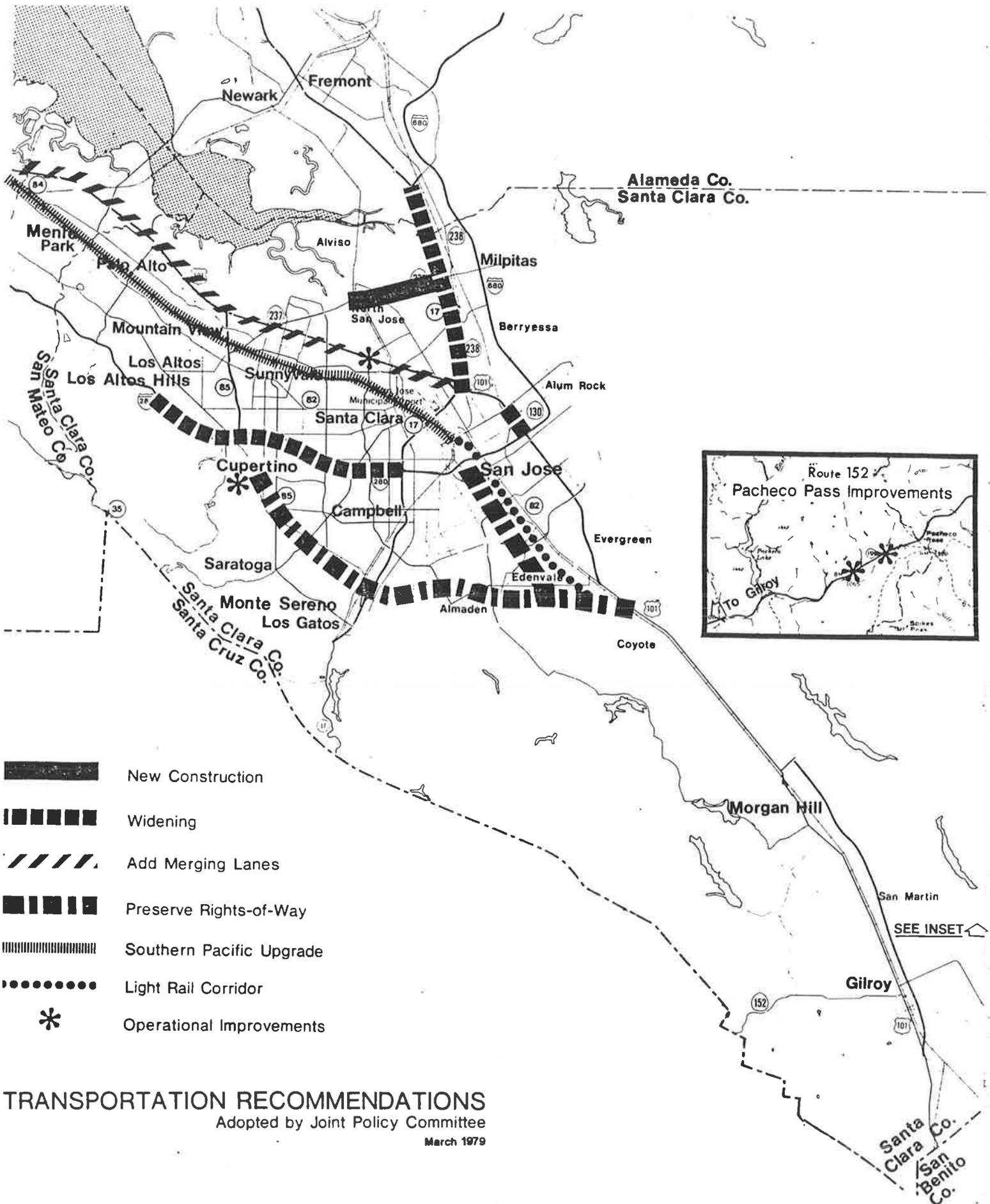
- o **Support the maintenance of Coyote as an agricultural preserve and the strengthening of county policies restricting development in unincorporated areas of the county.**

Development options for Coyote and the rest of unincorporated South county should be preserved beyond 1990, and planning for long-range development of this area should be deferred until more is known about the need to convert this productive agricultural land into urban uses.

- o **Support the construction of new housing at a rate commensurate with new job development in the County. Such construction should be consistent with the above policies.**

From a regional prospective, the countywide imbalance between the large number of jobs and limited new housing continues. Experience in 1978 suggests that the trend is worsening rather than improving. According to County estimates, almost 40,000 new jobs were added in 1978 while roughly 13,000 new housing units were constructed. The need for more housing, especially in areas near job growth, is increasingly apparent. Insufficient residential construction results in higher housing costs, low vacancy rates, and a reliance on areas outside the county to house Santa Clara workers.

The present number of jobs in North county is growing rapidly, putting pressure on Central and South County communities to provide housing. Policies by all cities and the county should be aimed at preventing urban growth from leapfrogging into South county and even further south.



TRANSPORTATION RECOMMENDATIONS
 Adopted by Joint Policy Committee
 March 1979

RECOMMENDATIONS FOR TRANSPORTATION

- o **Transportation projects should be used to reinforce the desired land use patterns.**

The recommended development strategy for Santa Clara County emphasizes additional residential growth within the existing urban limits, concentrating office and commercial development in downtown San Jose, and locating manufacturing jobs in Northern San Jose/Milpitas area. Thus, the transit proposals should emphasize access to downtown San Jose, and increased highway capacity should take place in the north and central parts of the County.

- o **Transportation projects should be selected which maximize the total system's effectiveness.**

To improve the effectiveness of transit the initial emphasis should continue to be placed on implementing existing transit programs. Two important transit programs are underway. These include an expansion of the existing bus system to approximately 500 buses and upgrading the Southern Pacific commuter rail service. These programs represent a major commitment by Santa Clara County and the region to improve transit. The need for these programs was reaffirmed by this study. Building on these programs will be the most effective way for the County to meet its future needs.

With regard to highways, Santa Clara County has an extensive freeway and expressway network. The most effective investments are those that will make existing highways work more efficiently. In contrast, investments in building portions of entirely new highways would be unwise in that such roads would not be finished within the next decade. During the meantime, the current traffic problems could go uncorrected.

- o **Where possible, options for the future should be preserved.**

This study addressed a fairly short period of time -- until 1990. Where possible, the County needs to preserve options where growth past 2000 might create additional travel demands. This is particularly true for the Route 85 and Route 87 corridors where the public already owns a large portion of the rights-of-way required for a transportation facility.

- o **Strategies need to be defined which will support the County in its request for State and Federal discretionary funds.**

The most important strategy, often stated in this report, is to achieve a consensus on the projects to be pursued. The County will need this consensus to compete for both transit and highway funding.

Highway resources are limited and, based on current estimates, very few additional projects are possible. The highway resources for new

construction are becoming increasingly limited because the costs of maintenance and construction are rising with inflation, while the revenues which are tied to fuel consumption are not.

The specific project recommendations are based on the assumption that a local/regional consensus will be successful in sustaining a program that would continue to be able to match current Federal highway programs. This level of funding would be equivalent to a two cents per gallon increase in State or local revenues. Such an increase of two cents per gallon is supported by MTC policy. Many conditions may cause this estimate to change - either up or down - due to changes in cost estimates, inflation rate, matching ratios and fuel consumption.

Recommendations for Highways

The following highway projects are recommended for implementation through the use of highway funding programs. The projects have been arranged by priority within a given fund source. An estimate of the construction funds required for the project is shown in parenthesis in millions of 1977 dollars. These estimates are provided in ranges because of the unknown effects that project design would have on the costs.

Federal Aid Interstate

- o Route 280 - Add two inside lanes between Route 17 and Magdalena Road. The possible use of these additional lanes exclusively by buses and carpools should be considered. Additional analysis should be undertaken to indicate how this type of preferential treatment would work in this location and how the development of the expanded bus fleet would be coordinated with this proposal (\$14-16 million).

Federal Aid Primary

- o Route 152 - Widen to 4 lanes and add a median barrier and truck escape ramps between the Pacheco Creek Bridge and the existing 4 lane section in the vicinity of the summit. This widening is to be consistent with an ultimate four lane facility on Route 152 (\$6 million).
- o Route 237 - Route 237 is currently in the Federal Aid Urban system. The County, the cities and Caltrans should determine the appropriate segment between Milpitas and Mountain View to recommend for conversion to the Federal Aid Primary system and should determine the priority for implementation of specific projects on this route (\$20-25 million).
- o Route 101 - Widen from four to six lanes in the vicinity of the Alum Rock interchange (\$5-10 million).

The Joint Policy Committee voted to indicate that improvements to Route 152, Route 237 and Route 101 at the Alum Rock interchange would have equal priority at this time. Route 152, however, has already been supported as a high priority project by the County Board of Supervisors and MTC.

- o Route 101 - Add auxiliary lanes (weaving lanes between interchanges) north of Route 17 (\$4-6 million).
- o Route 17 - Widen by adding one lane in each direction from Route 101 to Fremont. The exclusive use of these lanes by buses and carpools should be considered in conjunction with the deployment of additional express bus routes that would utilize this facility (\$8-12 million).
- o Develop and implement ramp metering and preferential treatment for buses where appropriate (\$3-5 million). This particular recommendation does not have the project specific nature of the other recommendations included in this section. The position of this proposal is not meant to indicate that it has the lowest priority for the use of Federal Aid Primary funds. Rather, the intent of this recommendation is to insure that in the next ten years this magnitude of funding be allocated for ramp metering and transit and carpool preferential treatment on Federal Aid Primary highways. (Although no specific dollar amount has been developed, similar types of measures should be implemented, as appropriate, on Interstate and Federal Aid Urban freeways and expressways.)

Federal Aid Urban

- o Routes 85 and 87 - Protect rights-of-way and continue purchases as required for these transportation corridors (\$5-10 million).
- o Route 87 - Construct four lane expressway with appropriate grade separations to connect with the Almaden Expressway in the vicinity of Curtner Avenue (\$18-20 million). The remaining corridor right-of-way should be protected for future transportation purposes.
- o Montague/San Tomas Interchange at Route 101 - Widen the existing bridge over Route 101 from two to six lanes to match the roadway widths of the two adjoining expressways.
- o Route 85 - Make operational improvements in Cupertino. The existing Caltrans project, which would cost approximately \$7-10 million to extend a freeway or expressway to Sunnyvale Saratoga Road, will be considered. The project is to be designed to avoid simply shifting traffic from Cupertino to San Jose and Saratoga Streets.

Recommendations for Transit

- o The bus system should be expanded to approximately 750 buses to provide adequate local and express service within the urban limits.

Additional transit is required to assure adequate mobility for citizens and to reduce dependence on the auto. In addition, peak hour transit services can provide significant relief in critical highway corridors.

- o Expansion beyond the basic 500+ bus system should emphasize express service to downtown San Jose, express service from residential terminals to jobs in the industrial parks, and feeders to Southern Pacific and regional bus connections with BART.

These are the areas where encouragement of transit is most likely to be beneficial and the potential demand the highest, such as in the Southern Pacific Corridor. This also begins to use transit to provide a development focus, particularly to the downtown area of San Jose.

- o Southern Pacific rail service between San Jose and San Francisco should be upgraded as recommended in the Peninsula Transit Alternatives Project (PENTAP).

The Southern Pacific corridor is the major rail corridor in the County, and it should be upgraded to provide service that is both more frequent and better oriented to the growth of jobs in the County.

- o Development of a "light rail line" should proceed in the Edenvale Corridor, and the full existing right-of-way for the proposed Route 87 south of Almaden Expressway should be preserved for future transportation development.

The first step in the implementation of this recommendation will be a request to the Urban Mass Transportation Administration for funds to undertake a detailed alternatives analysis in the Edenvale corridor. This analysis will identify the impacts of the following alternative transit technologies: light rail in either the Route 87 corridor or along Monterey Highway, a busway in the Route 87 corridor, or the extension of Southern Pacific service south of downtown San Jose. In addition, the impacts of constructing highway facilities either alone or in conjunction with other modes will be evaluated. Both the northern and southern termini will also be evaluated to determine the extent of the transit corridor. The analysis will indicate if the northern terminus should be extended north of downtown San Jose to the airport or even beyond, to the Santa Clara industrial area. All of this analysis will result in an Environmental Impact Statement. Even if as a result of this detailed analysis, light rail is not recommended or approved by the federal government, the Route 87 corridor should be preserved.

The analysis indicated one other corridor in addition to the SP and Edenvale corridors that had some potential for development of a rail system. The results of the technical analysis alone, however, do not make an absolute case for rail in either the Edenvale or Fremont corridors. The weakness in attempting to project a rail future based on today's conditions in Santa Clara County is that the justification of a rail system must assume changes in land use. Therefore, policy

considerations and the ability to achieve consensus on the conditions that support a rail line are the most important factors in determining its feasibility.

The potential for achieve in a policy consensus is greatest in the Edenvale Corridor. Further, construction of light rail in this corridor supports three important objectives:

- the development of the central area of San Jose, particularly by connecting the different parts of this area;
- the development of clusters of higher density housing and commercial areas on the rail corridor within the existing urban limits;
- the interconnection with an existing regional rail service in the Southern Pacific corridor.

A major federal commitment will be required to build a light rail system. Federal policies require that any light rail proposal should show a convincing need and that policies be adopted to support a rail decision. These policies include:

- 1) Zoning policy and development incentives to stimulate high density development around the transit stations.
- 2) Land use plans to reinforce the development impact of the system.
- 3) Station area improvements in the form of plazas, malls walkways, and other pedestrian amenities to revitalize the station areas.
- 4) Bus transit improvements must be coordinated with the rail system.
- 5) Parking and transfer facilities should be provided as appropriate.
- 6) Highway policies should be aimed at managing peak period use of automobiles in rail corridors.

Light rail transit can be a possibility in Santa Clara County if the following policies are followed:

- 1) Downtown San Jose must have the highest priority for jobs and commercial development with a strong parking management plan.
- 2) The proposed land use plan for San Jose should be consistent with the development of the light rail corridor; that is, higher density housing and commercial development should be located with convenient access to light rail stations. The commitment to any changes in land use required as a result of

rail recommendation plans would be concurrent with the federal commitment for construction.

- 3) Transit system design must emphasize convenient interconnection between busses, Southern Pacific commuter rail service, and light rail service.
- 4) The existing right-of-way for the proposed Route 87 south of the Almaden Expressway must be preserved for rail transit, and major new competing highway projects must be eliminated from the plan. Further analysis will be required to determine the compatibility of the development of the Route 87 corridor for highway purposes.
- 5) The system design must discourage development which would leapfrog the existing urban limits.

The Edenvale Corridor light rail recommendation is based on the condition that local government support for the transportation investment will result in adoption of the five policies listed above.

Recommendations for Supporting Measures

The previous paragraphs have described capital intensive facilities that are being recommended for implementation in the next ten to fifteen years. Since a basic concept of these recommendations is that a more effective use of the existing highway and transit systems must be achieved due to funding limitations and environmental concerns, there are many non-capital intensive measures that local jurisdictions and private groups should be encouraged to implement.

Some of the most effective means of using the capacity of the existing system better include: staggered and flexible work hours; preferential treatment for buses and carpools by using traffic signal preemption, special freeway on-ramps, exclusive lanes, or close-in parking for pool vehicles in employment areas; traffic engineering measures such as signalization of channelization, and special provisions for bicycles and pedestrians. The deployment of express buses as recommended earlier will require the provision of preferential treatment on many of the County's freeways and expressways. These measures should be incorporated into any improvements to facilities such as Route 85 in Mountain View, Route 101 north of Capitol Expressway, Route 17 north of Los Gatos and Interstate 280 between San Jose and Mountain View.

Examples of facilities designed to increase bicycle use include the designation of bike lanes or the construction of bikepaths not only for recreational purposes but also in corridors exhibiting high work trip flows. In addition, the provision of bike storage facilities at major transit transfer locations, such as SP stations and express bus terminals and in office or industrial parks, would increase the use of bicycles as an access mode to and from transit facilities and major employment locations. Allowing bicycles to be transported on selected transit carriers should also be considered.

Finally, the following measures should be supported by private firms to assist public agencies in making the most cost effective use of the proposed highway and transit improvements: providing connecting shuttle buses or vans from offices or industrial parks to Southern Pacific stations or express bus terminals; providing company outlets for the sale of transit passes and the distribution of transit schedules and information; promoting the use of transit by purchasing tickets and passes in bulk and re-selling them to company employees at a discount; and promoting the use of car-, van-, or buspools by providing assistance in the formation of these pools and preferential parking for pool vehicles.



LOMA PRIETA
RESOURCE CONSERVATION DISTRICT
P. O. Box 1627
Gilroy, California 95020

Loma Prieta Resource Conservation District

~~P.O. BOX 636 MORGAN HILL, CALIFORNIA 95037~~

To: *L. Hill*
May 1, 1980

CITY OF MORGAN HILL
MAY - 2 1980
RECEIVED

City of Morgan Hill
Planning Commission
17555 Peak Avenue
Morgan Hill, California 95037

Dear Commissioners:

I have reviewed the draft Environmental Impact Report for the proposed Morgan Hill Business Park owned by Wiltron. There is not an adequate section on soils. The only mention of soils is a paragraph on Page 10.2, which altogether excludes mention of the Cortina soil found at the project site. There is mention of agricultural capability of the soils, but not building limitations, such as suitability for foundations or percolation ponds.

I have enclosed soil characteristics charts and a soil survey map sheet for the project area. The soil suitability of the proposed project should be addressed in the E.I.R.

Sincerely,

Doris Leverton

DORIS LEVERTON
Loma Prieta RCD
Director

Enclosures

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD —
CENTRAL COAST REGION**1102 A LAUREL LANE
SAN LUIS OBISPO, CALIFORNIA 93401
(805) 549-3147CITY OF MORGAN HILL
MAR 20 1980
RECEIVED

March 18, 1980

Mr. Dave Miller, Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, California 95037

SUBJECT: Comments on Master Plan and Draft EIR for Morgan Hill
Business Park

Dear Mr. Miller:

The subject document has been reviewed. Since this business park will have electronics industries, the EIR should include an estimate of wastewater constituents which will be conveyed to the Gilroy-Morgan Hill wastewater treatment facility and impacts upon the treatment facility and the groundwater basin. The electronics industry typically discharges metals from plating operations, metals and acids from acid etching operations, exotic solvents, rinse waters containing a variety of pollutants, plus domestic wastewater. The treatment facility which will receive these wastes has been designed to essentially treat domestic wastewater only. Pollutants from the electronics industry would typically pass through this treatment system and find their way into the underlying groundwaters. Mitigation measures in this document should include how these pollutants will be kept out of the treatment system and hence out of the groundwater. Since wastewaters from these industries will be discharged directly to the groundwater basin from the treatment facility, it is recommended the City institute it's own effluent limits upon the industries which would protect the groundwaters under the Treatment Facility.

The City of Morgan Hill should take a close look at the type of wastewater discharged by all types of industries which will be going into this business park. All wastewaters other than domestic sewage must be evaluated in terms of impacts on the treatment given at the wastewater treatment facility, which of these pollutants will pass through the treatment system, the effects of these pollutants upon the groundwater basin, disposal of sludge from the treatment facility (which will contain a portion of these pollutants), and the fate of all the pollutants coming from the business park. This office is currently looking at the Federal Pre-treatment regulations to determine which communities within the Central Coast Region should be subject to their regulations. The City of Morgan Hill's business park certainly has the type of industries which comes under the purview of these regulations. It is possible these pre-treatment regulations will be applied to the Gilroy/Morgan Hill Treatment Facility because of these industries locating in your area. These regulations, in effect, require the City to look at all industrial dischargers, how they affect the City's treatment system, and to impose effluent limitations upon the industries. These regulations also have very specific

SUBJECT: Comments on Master Plan and Draft EIR for
Morgan Hill Business Park

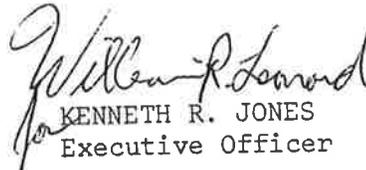
March 18, 1980

limitations for the electronics industry and the City will be mandated to apply these limitations to those industries.

You should also note the subject document states the Cities of Gilroy and Morgan Hill have an NPDES Permit for the existing wastewater treatment facilities. This is an error. An NPDES Permit is issued for discharges to surface waters. The existing treatment facility discharges to the groundwater basin and not to a surface water, hence an NPDES permit has not been issued. This facility is presently subject to Waste Discharge Requirements.

John Goni of my staff is available to give you advice and more detailed comments on this project.

Very truly yours,


KENNETH R. JONES
Executive Officer

KRJ:JWG:cb

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
464-1255



March 19, 1980

File No. 2188.05 (WKB) pet

CITY OF MORGAN HILL
MAR 20 1980
RECEIVED

Mr. David E. Miller
Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill CA 95037

Dear Mr. Miller:

Subject: Draft EIR - Morgan Hill Business Park.

We reviewed the above report and find it totally lacking in any references of how this project will or could potentially affect water quality. The report should discuss at least the following environmental impacts and provide mitigation measures for each:

1. Construction of this type of project usually greatly increases erosion and sedimentation rates. What impact will this have on nearby streams and how will it be mitigated.
2. After completion of the project what will be the impact of runoff on both surface and groundwaters. The report should consider both normal urban runoff pollutants (dirt, oil, etc.) and industrial spills. Methods of preventing these pollutants from entering surface or ground waters should be described.

The Central Coast Regional Board will be commenting on the question of capacity at the Gilroy treatment plant. If you have any questions contact me at (415) 464-0903.

Sincerely,

A handwritten signature in cursive script that reads "Wil Bruhns".

WIL BRUHNS
Water Quality Engineer

cc: RWQCB, Region 3
Attn: John Goni



City of Gilroy

7351 Rosanna Street, P. O. Box 66
GILROY, CALIFORNIA
95020

Lulakow

PLANNING DEPARTMENT

April 10, 1980

CITY OF GILROY
APR 14 1980
RECEIVED

Dave Miller
Community Development Director
17555 Peak Avenue
Morgan Hill, California 95037

Dear Dave:

Thank you for sending a copy of the Morgan Hill Business Park Draft Environmental Impact Report (EIR) for City of Gilroy review. The Gilroy Planning Commission and City Council have reviewed the EIR and have expressed two major concerns regarding potential unmitigated impacts of the Morgan Hill Business Park as it may affect Gilroy.

1. The EIR indicates that Measure E growth controls will limit Morgan Hill from meeting the housing demand from the Business Park. This unmet housing need has the potential of adversely impacting the entire South County and Gilroy. In order to mitigate these impacts, Morgan Hill should provide housing to meet the entire need generated by the Business Park by stretching the phasing of the industrial development and/or raising the measure E limits.
2. The sewage treatment demands of the Business Park will cause Morgan Hill to exceed their 42% allotment of the new sewage treatment plant by 1985. Future expansion of the new plant, now under construction, will require approval of various agencies and is not assured.

Gilroy recognizes that Morgan Hill and Gilroy have a number of mutual problems in regards to growth, development and jobs-housing imbalance. The Gilroy City Council requests that Morgan Hill work with Gilroy in establishing a South County task force to discuss these mutual problems and to work toward mutual solutions.

Sincerely,

Michael Dorn

Michael Dorn
Director of Planning

MD:rp

STAN KULAKOW

Planning Department
County Government Center, East Wing
70 West Hedding Street
San Jose, California 95110
299-2521 Area Code 408

County of Santa Clara
California

EMA / GSA
Environmental Management /
General Services Agency

April 24, 1980

RECEIVED
APR 25 1980
PLANNING DEPARTMENT

Mr. Dave Miller
Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

MASTER PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT--MORGAN HILL BUSINESS PARK

Dear Mr. Miller:

Thank you for submitting this document to our staff for review. We are of the opinion that this project is one of the most significant to come before us in some time. This is the first major industrial proposal by an established County electronics firm for the South Valley. We feel that this project raises many of the tacit issues related to urban growth, jobs and housing, and the future of the County's environment that we have been discussing over the past two years in such groups as the County General Plan Advisory Committee, the Industry and Housing Management Task Force, the County Local Agency Formation Commission, and other public and private organizations. Our comments on those areas which we feel are the most important issues from the County's perspective are included below.

1. Jobs and Housing Implications

a. As the Draft Environmental Impact Report (DEIR) indicates, the full development of the 387-acre business park is expected to result in 9,270 persons employed on site. In addition to this, the DEIR predicts that 7,910 persons will be employed in the service sector as a direct multiplier benefit of the new "basic" jobs, for a total of 17,180 new employees by 1990.

b. The County Planning Department had previously projected that there would be a total of 2600 employees in the City of Morgan Hill in 1990. This estimate is included in Table 3.10 of the DEIR on page 3-18. If this figure (2600 jobs) is added to the 17,180 jobs expected to result from the full buildout of the Morgan Hill Business Park, then a very much higher jobs figure will result for 1990 (19,780 total jobs).

c. The County Planning Department has also projected the total number of housing units expected for Morgan Hill in 1990 to be 8,400 total dwelling

units. This estimate takes into consideration the limitations of the Measure E growth control ordinance.

The imbalance of jobs and housing is already evident here. To refine our estimates, consider the following:

d. The County Planning Department estimates that by 1990 the average number of workers per household will be 1.4. From this number we can estimate that there will be a job-generated housing demand for 14,130 units in Morgan Hill in 1990. This would exceed the projected supply of 8,400 units by some 5,730 units. Thus, Morgan Hill would be a "net exporter" of 5,730 units to other jurisdictions.

e. It should be noted here that our estimates for the net export of housing units are based on the DEIR's assumed buildout of the 387-acre project. If these estimates are true, then the DEIR is projecting approximately 24 employees/acre. This figure may be too low. A report of the Santa Clara County Manufacturing Group's Jobs/Housing Task Force titled "Vacant Land in Santa Clara County - Implications for Job Growth and Housing in the 1980's" estimates the average jobs/acre figure for Morgan Hill to be 35. The DEIR should therefore consider a possible higher range of housing demand in its analysis.

f. The DEIR states on page 3.24, paragraph 5, that "the city is not in a position to provide housing for any sizeable number of Morgan Hill Business Park employees because of the residential limitations imposed by Measure E." However, the DEIR does not define mitigations that the city is able to implement in order to deal with the housing problems created by the project. The suggestion that San Jose will house Morgan Hill's future workers and provide a solution to the South County housing shortage would only be plausible if backed by a communication from that city, or a process defined to make San Jose and South County plans for future urban growth consistent. Such a process would need to be carried out by collective action of San Jose, Gilroy, and Morgan Hill.

g. Without such action, the transfer of the housing problem generated by the Morgan Hill Business Park to the City of San Jose and other jurisdictions is clearly not an adequate mitigation measure to this impact. In fact, the suggestion that other cities will solve the housing problem created by Morgan Hill is no solution. It is no different from the practices that the "job rich" North County cities have followed in the past which have led this County to the stage of housing crisis it is now experiencing.

h. The direct mitigation that we propose is that any industrial development in the Morgan Hill Business Park should be allowed only if a corresponding amount of housing adequate to serve the needs of project-generated employees is also made available. If this is not possible under the Measure E ordinance, then the project should either be reduced in magnitude to a size commensurate with available housing, or Morgan Hill should share a portion of the revenues derived from the project with the

cities (and the County) that provide such housing.

Discussion of interjurisdictional impacts and ways to mitigate them should precede approval of the full scale project. We thus consider the jobs and housing impacts to be unmitigated unless such new measures are proposed.

2. Growth-Inducing Impacts

It is our feeling that the growth-inducing impacts that might be caused by full development of the Morgan Hill Business Park have not been adequately discussed in the DEIR.

The DEIR assumes that there will be a supply of housing available to the north of the project, without discussing the amount of industrial growth that is planned by other jurisdictions to the north. The City of San Jose's planned industrial growth will need all of its available housing supply in order to accommodate its own needs. The San Jose General Plan is based on this premise.

The DEIR also ignores the industrial growth plans of Morgan Hill's neighbor to the south, Gilroy. Since Gilroy also has a residential growth control plan in effect, would employees from Gilroy projects also look to the north for their housing as a mitigation measure?

We feel that the growth inducement section of the DEIR should include a comprehensive overview of potential housing supply and demand for the entire South Valley. Such an analysis should take into consideration the employment growth expected in Southern San Jose, Morgan Hill and Gilroy.

3. Sewage Treatment Plant Capacity

The assumptions made in the DEIR about future expansions of the joint Gilroy-Morgan Hill sewage treatment facility are somewhat disturbing, particularly in light of the fact that full approval has not been granted yet for the current expansion.

We agree with the DEIR's statement on page 6-16 that "experience has demonstrated that it takes many years to obtain State and Federal approvals for any treatment plant expansion...". We feel that the projection of a buildout assuming such expansion after 1983, as indicated in Table 6.5, is not a completely realistic evaluation. The South Valley's designation as a critical air basin, and the expected continuation of adverse air quality in the valley, makes such further approvals at best only a possibility.

If the proposed new treatment plant improvements are intended as the mitigation measures for this problem, an analysis of the growth permitted by such expansions of the treatment plant for the entire South Valley should also be included in the growth-inducing impacts section of the report.

4. Traffic

We are not convinced that there will be substantial benefits in reduced commutes arising from this project. If most of the housing for the project's employees is to be located to the north and since it is not certain where in the "north" these residences will be located, there is no substantial basis by which to determine whether a shorter commute will result. It is still almost 10 miles from the business park to areas where most new housing will be built in the Evergreen and Edenvale portions of San Jose. The fact that this commute will be southward, instead of northward moving does not shorten the distance. A more precise analysis of residential location is needed to document such a statement.

Another traffic-related problem that is not addressed by the DEIR is the potential large increase in trips to downtown Morgan Hill from the site during daytime hours, and particularly at noon. The DEIR should evaluate the ability of the existing street system to absorb such traffic increases and determine whether or not existing levels of service will deteriorate or whether expanded parking facilities will become necessary. If so, the method of financing any necessary improvements should be discussed in the DEIR.

5. Air Quality

The concerns about air quality are related to concerns we have expressed about growth-inducing impacts and traffic. The air quality impacts should be a part of the comprehensive evaluation of the project, with particular regard to consistency with the adopted air quality maintenance plan for the area.

6. Agriculture

The DEIR does not discuss the potential impacts the project might have on the long-term viability of agriculture in this part of the County. This analysis should not only discuss the viability of agriculture in and around Morgan Hill, but take a countywide perspective.

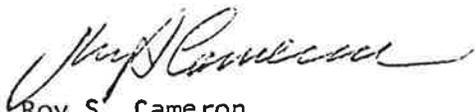
The Coyote Valley would be surrounded by large industrial parks in San Jose and Morgan Hill if the project is approved. The implications of the growth pressures resulting from this juxtaposition should be addressed by the DEIR.

The County has singled out some 17,400 acres east of Gilroy for possible protection as an agricultural preserve. The impact of the project on these efforts and on County zoning should be addressed by the DEIR.

Mr. Dave Miller
City of Morgan Hill
April 24, 1980
Page 5

We appreciate the opportunity to comment on this document and wish to work with the city in future South County planning efforts.

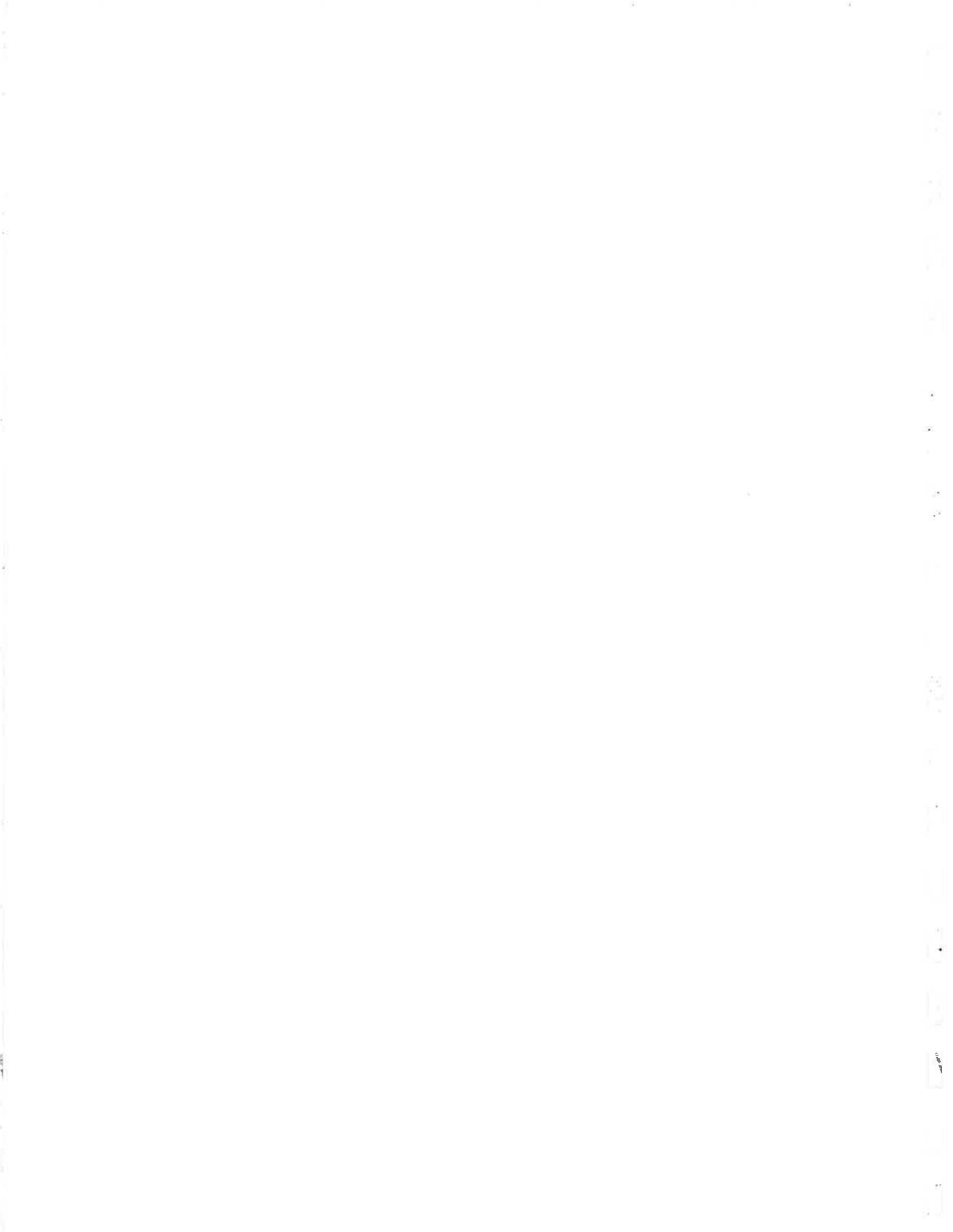
Sincerely,



Roy S. Cameron
Director

RSC:RCH:SM:KV:jl

cc: City of San Jose
LAFCO
IHMTF





CITY OF SAN JOSE, CALIFORNIA

801 N. FIRST
CITY HALL ANNEX
RM. 400

CITY PLANNING

April 8, 1980

Mr. David E. Miller
Community Development Director
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, California 95037

CITY OF MORGAN HILL
APR 11 1980
RECEIVED

Dear Mr. Miller:

We have reviewed the Draft Environmental Impact Report for the Morgan Hill Business Park (Wiltron Project) primarily in the areas of induced housing growth, jobs-housing balance, growth-inducing impacts in other cities, and the like. The Draft EIR is seriously deficient in its discussion of these issues, as follows:

1. Housing Demand. We were unable to find any reference in the EIR to the number of dwelling units required to house workers employed on-site and off-site in both primary and secondary (or basic and non-basic) jobs, both directly and indirectly generated by the project.
2. Jobs/Housing. No quantification is presented in the EIR on how the project will affect the balance between jobs and housing in Morgan Hill. Our preliminary calculations show that the Wiltron project will create a demand for twice the number of housing units that can be built in Morgan Hill under Measure "E" by the year 2000. This excessive demand for housing may not produce any growth inducement in Morgan Hill or other South County/San Benito County cities, but it will certainly have an adverse effect on housing prices there.
3. San Jose Housing Resources. The EIR blithely assumes that existing and planned housing resources in the City of San Jose will be available for prospective employees in the project area. This assumption appears to be based on the housing and employment forecasts generated by the Santa Clara County Planning Department, which show 11,830 acres of residential land being absorbed by 1990 while only 830 acres out of 6,390 vacant industrial acres might be absorbed by 1990 (see last paragraph on page 3.9 of the EIR). By implication, these forecasts would lead to the conclusion that San Jose will continue to produce housing for employment centers elsewhere in the County.



Mr. David E. Miller
Page Two
April 8, 1980

This is definitely not the case. Of the 830 acres of 1975-90 industrial land absorption forecasted by the County, 692 have already been developed, as follows:

	<u>Industrial Acres Developed</u>
7-1-75 to 6-30-76	89
7-1-76 to 6-30-77	156
7-1-77 to 6-30-78	143
7-1-78 to 6-30-79	304
4 YEAR TOTAL	<u>692</u>

It is rather clear that the County Planning Department has significantly underestimated job growth in San Jose. Even if industrial land absorption continues through 1990 at the average rate for the last four years, the fifteen years between 1975 and 1990 will see almost 2,600 acres absorbed. We confidently expect, however, that the total will be at least 3,000 acres and perhaps more.

The EIR must take account of the fact that job creation in San Jose will very likely absorb all new housing built in San Jose.

4. Growth-Inducing Impacts. The section on growth-inducing impacts is inadequate as regards housing impacts. It is abundantly clear that housing demand generated by the proposed project cannot be accommodated in Morgan Hill given the restrictions of Measure "E". Having come to that conclusion, the growth-inducing impacts section of the EIR then states that housing impacts "will be concentrated to the north". CEQA requires that EIRs discuss impacts irrespective of municipal boundaries, such that the subject EIR must include a more definitive discussion of how many housing units will be required by the project, where specifically those housing units will be located, and the public service impacts of that housing.

Secondly, there is virtually no discussion of growth-inducing impacts in the Coyote Valley, the "non-urban separation" between San Jose and Morgan Hill to which you made reference in your letter of June 13, 1979, to LAFCO. The preservation of agricultural uses in the Coyote Valley is the policy of both San Jose and Morgan Hill. The potential effects of the Wiltron project on agricultural preservation should be addressed in some detail in the EIR.

Mr. David E. Miller
Page Three
April 8, 1980

Thank you for the opportunity to comment on this EIR. We would appreciate receiving a copy of the responses to our comments which become included in the Final EIR.

Sincerely,

Gary J. Schoennauer

Gary J. Schoennauer
Director of Planning

GJS:TAM:bn

CC: James A. Alloway, San Jose City Manager
San Jose City Council members





State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

April 24, 1980

CITY OF MORGAN HILL
APR 29 1980
RECEIVED

Mr. David Miller
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

SUBJECT: SCH# 79122502 MORGAN HILL BUSINESS PARK

Dear Mr. Miller,

State agencies have commented on your draft environmental document (see attached). If you would like to discuss the concerns and recommendations in their comments, contact the staff from the agencies whose names and addresses appear on the comments.

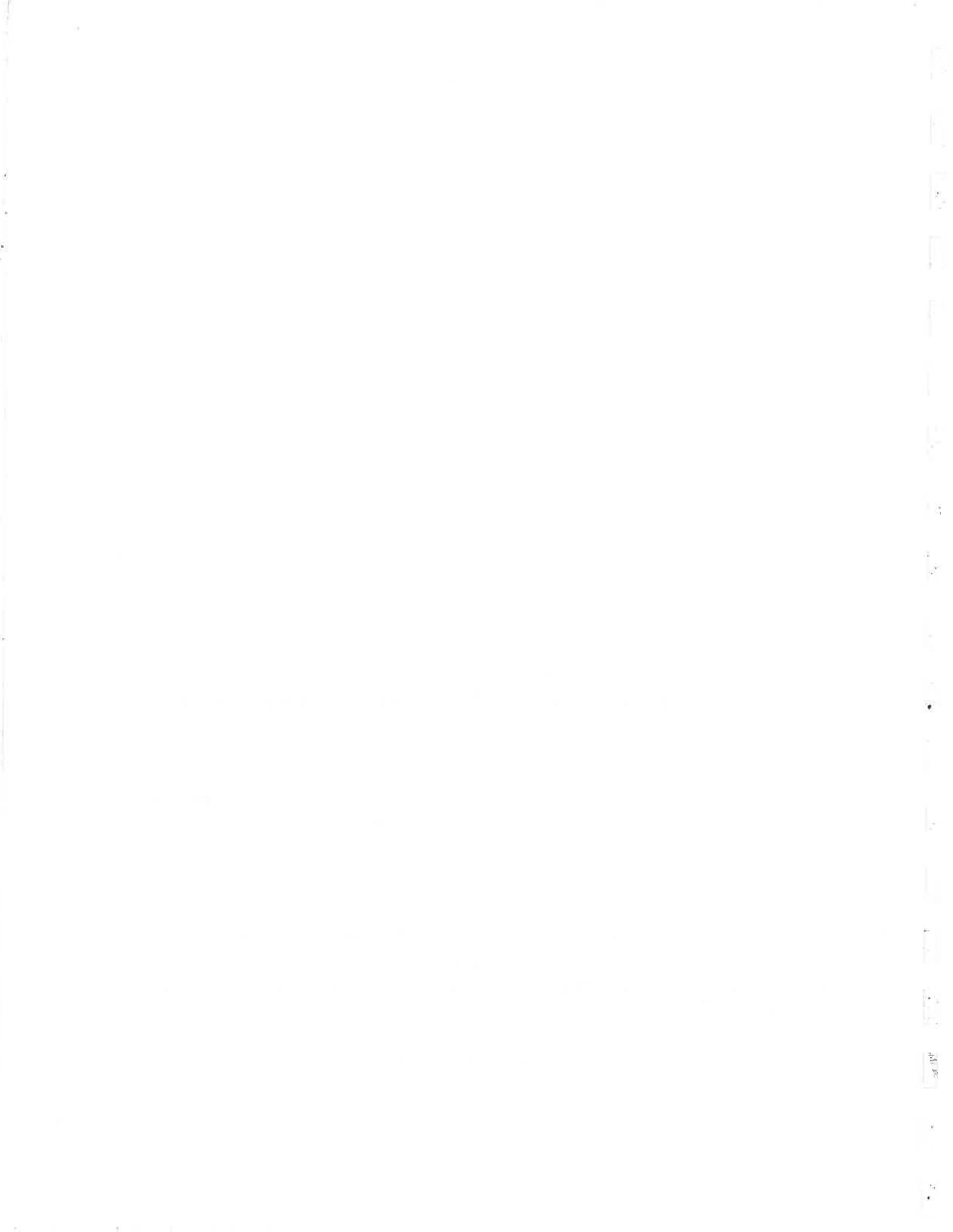
Briefly, the state agencies express their concerns on the following significant issues: air quality, solid waste disposal, and project-generated traffic impacts.

The Air Resources Board recommends that an air quality analysis addressing both direct and cumulative impacts caused by the project be done. The DEIR did not determine the air quality benefits which would occur if the identified mitigation measures mentioned within the documentation were implemented.

The Solid Waste Management Board asserts that the data on the disposal of solid waste is insufficient. The department suggests an assessment of the potential cumulative impacts on existing (local) facilities be provided in the final EIR.

Lastly, the Department of Transportation Planning concerned itself with the down-play on public transit. The department recommends that an analysis of intersection traffic capacity and mitigation measures required to handle the project-generated traffic be discussed and implemented.

You may formally respond to the agencies' comments by writing to them (including the State Clearinghouse number on all such correspondence). When filing the Final EIR, you must include all comments and responses (State EIR Guidelines, Section 15146). State review of your draft environmental document will then be complete.



April 24, 1980
Page Two
Mr. David Miller

Sincerely,

A handwritten signature in cursive script that reads "Anna Polvos". The signature is written in black ink and is positioned below the word "Sincerely,".

Anna Polvos
State Clearinghouse
(916) 445-0613

Attachments

Memorandum

To : Steve Williamson
 State Clearinghouse
 Office of Planning and Research
 1400 - 10th Street
 Sacramento, California 95814

Date : April 22, 1980

File No.:

Subject: SCH #79122502A
 Morgan Hill Business
 Park

From : DEPARTMENT OF TRANSPORTATION
 Division of Transportation Planning
 ANN BARKLEY, Chief



Caltrans has reviewed the Draft Environmental Impact Report (DEIR) for the Morgan Hill Business Park consisting of a land use and circulation plan for 400 acres of industrial and commercial use, eventually employing 9,200 people.

A The DEIR is heavily biased in favor of automobile commuting while all suggested alternate commuting means are either unplanned or downplayed altogether. The Metropolitan Transportation Commission/ Association of Bay Area Governments report referred to in several places of the DEIR is obviously outdated or the proponents of this project are blind to the dramatic changes that are taking place in automobile travel today. It's hard to believe that 90 percent of all trips in Santa Clara County in 1990 will be made by auto, yet much of the traffic-circulation-transportation planning for this project is based on these outdated projections.

B A project design feature that will inhibit public transit is the variance provision for the elimination of sidewalks mentioned on page 18, last paragraph. Also in the deed restrictions (Appendix II, Article III B, No. 8), mention is made of the design of parking areas and size of parking spaces; there is no equivalent statement made in regards to public transit facilities. For example, there could be requirements for the design standards of bus bays and shelters.

C Other than the above mentioned design features, the close proximity of this project site to rail lines and highways, along with the layout of the park's road networks, makes this project ideally suited for public transit, vanpooling and carpooling for the future labor force.

With a few minor changes to the plan and the promotion of public transit access, this project can be greatly enhanced, if not, major auto traffic-related impacts will occur. The following comments relate more specifically to the auto traffic impacts of the proposed project.

d The project-generated AM and PM peak hour traffic will have an extremely severe impact on traffic operation on Cochran Road at the Cochran Road/Route 101 interchange and on Route 101 itself, assuming most trips are to and from the north (the most likely trip distribution, as stated on page 5.8). The adverse impact must be quantified in the EIR by means of traffic capacity analyses at the following intersections:

1983 Before Freeway Is Completed

1. Monterey Road/Cochran Road
2. Sutter Boulevard/Cochran Road
3. Southbound On-ramp/Cochran Road
4. Northbound Off-ramp/Cochran Road

Freeway and Project Completed

1. Southbound Off-ramp/Cochran Road
2. Northbound Off-ramp/Cochran Road

d Completion of major phases of the development should be considered in the aforementioned analyses.

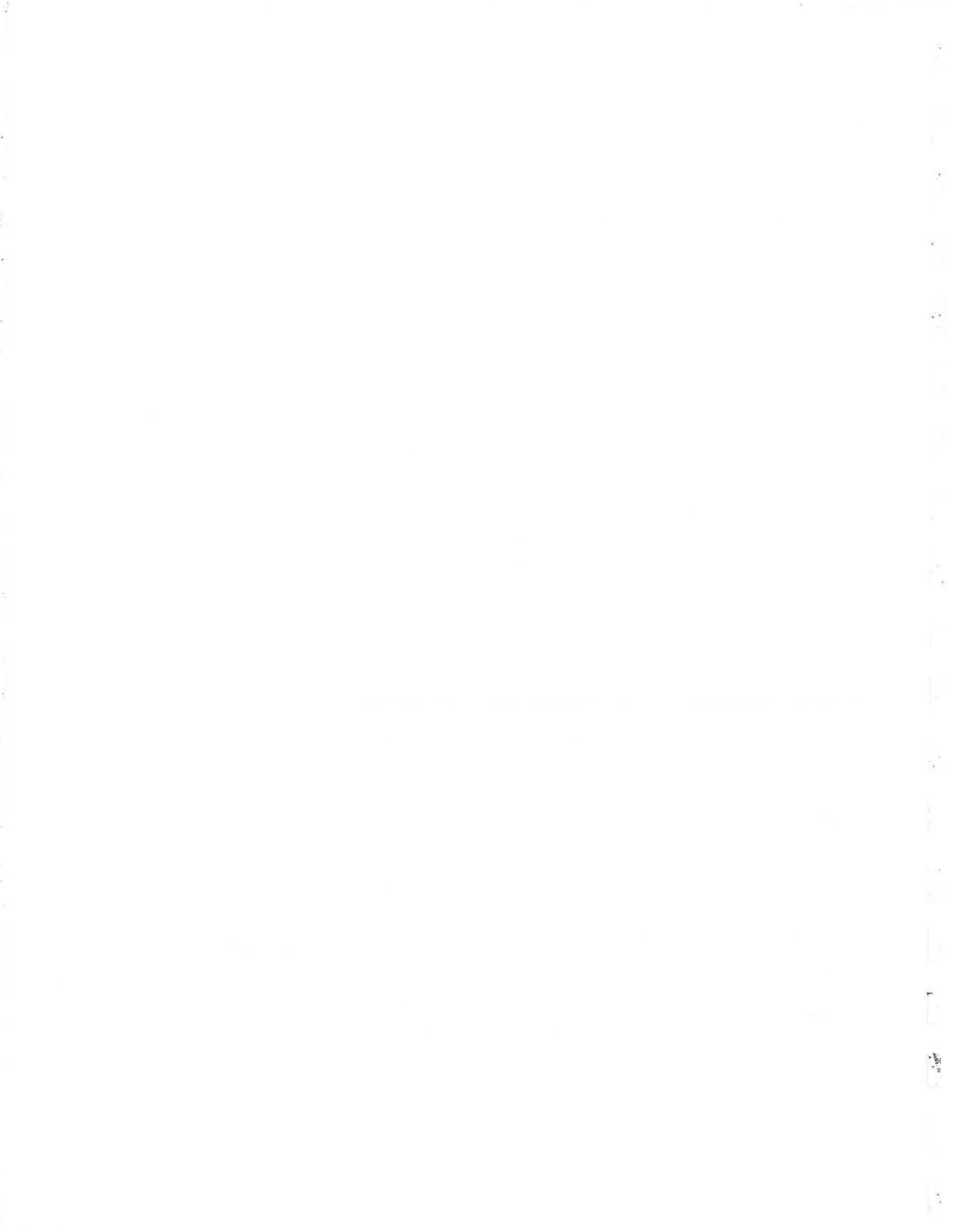
d The capacity analyses must be based on AM and PM peak hour intersection traffic from the project plus all other existing and planned sources in the future year of the analysis. The EIR should include diagrams showing the peak hour volumes for all through and turning movements in the intersections, and also the capacity analyses calculations.

d In addition to the intersection capacity analyses, the impact of the AM and PM peak hour project-generated traffic on the Route 101 freeway traffic operation must be discussed.

d The EIR must discuss mitigation measures required to handle the project-generated traffic. These could include additional through and turning lanes at the intersection and additional freeway lanes. Capacity analysis(es) is the quantitative method whereby impacts can be identified, solutions can be evaluated and data can be verified by those involved.

Mitigation measures that begin on page 5.14 do discuss various strategies suggested in our response to the Notice of Preparation, however there is no indication of commitment nor responsibility.

The trip generation rate for office/commercial (page 5.6) seems to be on the high side as compared to a Caltrans research project.



Steve Williamson
Page 3
April 22, 1980

Ten commercial office sites were studied throughout the Metropolitan Bay Area that indicated an average trip rate of 144/acre with the highest being 327/acre. This is not to dispute the document, just to advise you of the results of our research on the subject.

e It is suggested that bicycle lockers be provided by the developers at all facilities to accommodate at least 2 percent, preferably 4 percent, of anticipated employees.

f The traffic and circulation sections must disclose that Monterey Road and Cochran Road (Route 101) will be relinquished from the State highway system to the City of Morgan Hill after the Route 101 freeway (South Valley Freeway) is completed.

g A State Highway Encroachment Permit will be required for any work required in the State right of way. This was noted in the response to the Notice of Preparation. A condition of the permit process is a copy of the approved Final EIR that has adequately addressed our concerns. Other pertinent information to include in this respect is that traffic signals cannot be installed without proper warrants--this may apply to the Sutter/Cochran intersection.

We request that a copy of the FEIR, and responses or other related actions, be sent to:

Caltrans District CEQA Coordinator
Engineering Services Branch
P. O. Box 3366 Rincon Annex
San Francisco, California 94119
(Telephone (415) 557-2448)

Memorandum

To : 1. Jim Burns, Projects Coordinator
Resources Agency

2. David Milur
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA

Date : April 14, 1980

Subject : Morgan Hill Business
Park, Santa Clara
County
SCH. No. 79122502

From : Air Resources Board

My staff has reviewed the proposed 387-acre Morgan Hill Business Park Master Plan and Draft Environmental Impact Report (DEIR). The primary use proposed for the Morgan Hill Business Park consists of high technology production and research facilities.

The DEIR states that an estimated 53,900 weekday trips would occur at project build-out. The direct and cumulative air quality impacts resulting from these 53,900 trips need to be analyzed fully in the environmental impact report.

We suggest an air quality analysis be performed which addresses the following:

1. The proposed development is in an area designated as nonattainment of national ambient air quality standards for ozone, carbon monoxide, and total suspended particulates. The DEIR needs to present this information in the environmental setting portion of the document;
2. The projected average trip length, additional vehicle miles traveled associated with the project, and resulting vehicle emissions need to be calculated.

The DEIR identified mitigation measures for aiding in the reduction of the projected vehicle trips. However, the DEIR did not determine the air quality benefits which would occur if these measures were implemented. The DEIR needs to determine the projected reduction in vehicle miles traveled and/or motor vehicle trips and resultant air quality benefits associated with each mitigation measure.

If you need any assistance, Sue Scott of my staff is available to help. Sue can be reached at (916)445-0960.


William C. Lockett, Chief
Regional Programs Division

cc: M. Feldstein, BAAQMD
A. Polvos, OPR



Memorandum

To : Mr. James W. Burns
Resources Agency

Date: April 15, 1980

Mr. David Miller
City of Morgan Hill
17555 Peak Avenue
Morgan Hill, CA 95037

From : **STATE SOLID WASTE MANAGEMENT BOARD**

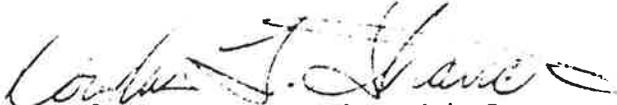
Subject: SCH #79122502 - Master Plan and Draft Environmental Impact Report
for Morgan Hill Business Park.

We have reviewed the draft Environmental Impact Report (EIR) for the Morgan Hill Business Park and find the report lacks data regarding the generation and disposal of solid waste material. Because of disposal problems associated with growth and development, we suggest the final EIR include a discussion on the management of solid waste.

In order to assess the potential cumulative impact of growth projects on local solid waste facilities, the following information should be provided:

1. A brief description of existing solid waste facilities, including collection, transfer, and method of disposal.
2. An estimated volume of waste expected to be generated, based on the number of square feet of commercial building proposed.
3. The location, capacity and life expectancy of the local landfill.
4. A brief discussion of local plans for developing future disposal sites.
5. Possible mitigation measures for reducing solid waste through recycling policies and resource recovery programs.

Thank you for the opportunity to review the draft EIR for this proposed development. If you have any questions regarding our comments, please contact Mr. Frank Plesko of my staff at (916) 322-1448.


Douglas L. Strauch, Chief
Enforcement Division

FPlesko:cs

SECTION 4 - SCHOOLS

Letter from: R. J. Melone, Superintendent President
Gavilan College
April 14, 1980

- Coment: 1. Ability of the Community College to provide service and training for the Community and industry.
2. Sources of funding for construction of facilities and programs.

Response:

An example of the cooperation of the Community Colleges and industry can be seen in the northern part of Santa Clara County and, particularly, in the Foothill District. Curriculum has been planned to provide the level of technical background expected from a Community College through both daytime and evening classes.

Wiltron has indicated it plans to cooperate with Gavilan College in several ways.

- ... providing electronic test equipment for school laboratory use.
- ... encourage other R & D companies that locate in the Morgan Hill Business Park to make tangible efforts in supporting Gavilan College.
- ... investigate ways of providing financial support.

Other actions that could be taken include:

- ... on-the-job training to supplement academic training.
- ... student financial assistance by providing full and part-time jobs for students. This includes, in addition to technical electronics or mechanical jobs, the full range of business-oriented training such as accounting, clerical, secretarial services and business management practices.
- ... allowing for flexible working hours in order for the student and employer to coordinate school time with work.
- ... as these programs develop, and when there are sufficient students participating, possibly a shuttle bus service could be instituted between the Business Park and Gavilan College. An alternative to this is for Santa Clara County Transit to provide improved bus circulation routes to both the Business Park and the College.

SECTION 4 - SCHOOLS

Letter from: Robert Stannard, District Superintendent
Morgan Hill Unified School District

Concern: 1. Correct several statistical errors.
2. School District's new housing and student projections.

Response:

See pages 4.1 to 4.4 of the DEIR in the revision section of this Addendum for the additions and changes requested by the School District. Where changes have been made in the text, they have been underlined.

SECTION 6 - UTILITIES AND PUBLIC SERVICES

Wastewater Facilities

Letter from: City of Gilroy
Planning Department
Michael Dorn
Director of Planning
April 10, 1980

Comment: Morgan Hill's 42% of the new treatment plant capacity is estimated to be used by 1985. Expansion of the plant will require approval of State and Federal Agencies and is not assured.

Response:

We are in full agreement with this comment by Mr. Dorn and have referred to the actions necessary under the heading "MITIGATION MEASURES" on page 6.16. As soon as the new treatment plant is in operation and data is available on the plant's treatment capacity and performance, action should be started toward expanding the allowed capacity limits.

Letter from: California Regional Water Quality Control Board
Central Coast Region
Kenneth R. Jones
Executive Officer

Comment: 1. The effect of industrial wastes from the Morgan Hill Business Park, need for pretreatment regulations, and effect on the treatment facility.
2. Clarify the type of discharge regulations. An NPDES permit has not been issued.

Response:

The industries expected to locate in the R & D portion of the project will probably be similar to the electronic industries predominant in the northern part of Santa Clara County. We do not have specific knowledge of any industries except for Wiltron.

Wiltron's production is primarily assembly of components and does not require the use of acids, solvents or rinse water. At their Mountain View facility, they discharge to the City's sanitary sewer system without providing treatment.

As for other industries, to make any projection of the type of industrial operation and the nature of the wastewater would be speculative. There will no doubt be some industries which will process materials requiring special treatment. Each industry should be considered individually, and requirements established on a case-by-case basis.

The Cities of Morgan Hill and Gilroy are in the process of developing treatment requirements in accordance with the requirements of the Regional Water Quality Control Board and EPA. The Regional Water Quality Control Board will be amending discharge requirements to mandate development of a pretreatment program prior to July 1, 1982. This will include an ordinance establishing discharge standards and regulations for treatment of industrial wastes and will consider the type of treatment provided at the Gilroy-Morgan Hill Wastewater Treatment Plant and the EPA Guidelines. Treatment of wastewater generated by each industry could facilitate the reuse and recycling of industrial wastewaters, thus reducing the impact on the wastewater treatment plant and reducing the demand on the potable water system.

SECTION 6 - UTILITIES AND PUBLIC SERVICE

Solid Waste Disposal

Letter from: State Solid Waste Management Board
Douglas L. Strauch, Chief
Enforcement Division
April 15, 1980

Comment: Discuss the impact of solid waste disposal from this project and specifically the following items:

1. A brief description of existing solid waste facilities, including collection, transfer, and method of disposal.
2. An estimated volume of waste expected to be generated, based on the number of square feet of commercial building proposed.
3. The location, capacity and life expectancy of the local landfill.
4. A brief discussion of local plans for developing future disposal sites.
5. Possible mitigation measures for reducing solid waste through recycling policies and resource recovery programs.

Response:

1. Existing Facilities

South Valley Refuse Disposal, Inc., provides the solid waste disposal services for the entire south county area, Morgan Hill, San Martin and Gilroy. Their offices are in Gilroy, and the disposal site near the Pacheco Pass Road. They do the billing for the rural areas and the cities handle it inside the city limits. All services are provided by South Valley Refuse Disposal, Inc. provides collection services and operates the disposal site.

Curb and pick-up service is available with 2 to 6 yard dumpster bins which can be collected on a flexible schedule varying from a minimum of once a week to six times a week. The company hauls the refuse directly to the disposal facility.

In San Martin, a transfer station has been provided for the public to use as a more convenient disposal site.

The daily pick-ups and the full transfer station containers are hauled to the Pacheco Pass Road site. The site is a typical Class II landfill. A Class II landfill is one where protection of groundwater, surface water, public health and wildlife resources is provided through careful design and management. Only non-toxic wastes are allowed to be deposited in a Class II site. These are items such as construction debris and common garbage, rubbish, sheet refuse and agricultural crop residue.

A Class II landfill must be compacted and a dirt cover applied on a daily basis to prevent debris from being blown by the wind and odors. The Pacheco Pass site is covered on a daily basis.

<u>Proposed Use</u>	<u>Phase I</u>	<u>Solid Waste Produced lb/week*</u>	<u>Total Develop.</u>	<u>Solid Waste Produced lb/week*</u>
Garden Hotel	22.9	1,100	22.9	1,100
Garden Hotel Reserve	5.4	260	5.4	260
Non Manufacturing Business	10.7	510	41.8	2,000
Research & Development Manufacturing	130.9	<u>11,500</u>	275.3	<u>24,200</u>
TOTAL		13,370		27,560

*Basis for quantity estimates:

Commercial - 48 lb/acre/week
 Industrial - 88 lb/acre/week

3. The solid waste disposal site is on Pacheco Pass Road near Bloomfield Road.

The landfill is sufficient to take care of the needs of the south county area until the year 2000+.

4. The County has done some very preliminary studies for future landfills in the south county area. One site has been chosen on a preliminary basis - at Coyote Narrows.

5. In the Metcalf & Eddy Report "Solid Waste Management Plan for Santa Clara County," resource recovery in the south county was studied. It concluded that centralized resource recovery in this rural area is not presently economically justified nor will it be in the foreseeable future.

6. Hazardous Wastes

If any of the industries which move into the Morgan Hill Business Park were to produce any kind of hazardous waste, they would be required to truck it to the nearest Class I disposal site.

A Class I disposal site is designed for complete protection of the groundwater, surface water and public health for all time. The kinds of wastes which must be disposed of in a Class I disposal site are those which contain substances which could significantly impair the quality of usable waters. Examples of this kind of wastes are acids, alkalis and pesticides.

There are no Class I disposal sites in Santa Clara County.

The nearest Class I disposal site which will accept wastes from an out-of-the-County industry is a privately owned and operated business in Martinez, Contra Costa County.

SECTION 7 - STORM DRAINAGE

Letter from: California Regional Water Quality Control Board
San Francisco Bay Region
Will Bruhns
Water Quality Engineer

- Comment:
1. Increase in erosion and sedimentation rates.
 2. Impact on storm drainage - both surface water and groundwater.
 3. Methods to prevent pollutants from entering the surface or groundwater.

Response:

There will be some short-term increases in the erosion and sedimentation potential due to construction activities. Because of the extremely flat topography, this should not be significant. In addition, with proper precaution by the grading contractor, provision can be made to retain any sediment on site before discharging into either Fisher Creek or Llagas Creek. The storm drainage system is predicated on providing two detention basins as part of the Phase I construction. These detention basins will regulate the downstream discharge and can also function as a settling basin for downstream flows.

After completion of the project, there will be an increase in the amount of pollutants from street surfaces. This would be in proportion to the surface area of the streets and parking areas. The detention basins previously referred to will also allow for the settling of dirt from the stormwater runoff. The City of Morgan Hill does not have any standards for catch basins which trap oil pollutants or sediments. The accumulation of pollutants on the streets and parking areas can be reduced and/or eliminated by a routine program of street sweeping.

Prevention of industrial spills should be the responsibility of each industry and the prevention methods in keeping with the types of chemicals handled. At this time, we cannot make an estimate of the type or volumes of chemicals handled. In the event any toxic chemicals entered the storm drainage system, they could be intercepted in the detention basins before they flow off site.

MITIGATION MEASURES

- ... provide in the construction contracts a provision for winterization and prevention of erosion. This would make the contractor responsible for maintaining the detention basins and preventing erosion and sedimentation. This is a standard practice for construction work.

- ... the Public Works Department should consider whether the City's standard stormwater catch basins should be modified to act as an oil trap.
- ... on an individual basis, each industry should be evaluated for the need to provide for chemical spills. Where a chemical hazard might exist, the individual industry should be required to provide a means of intercepting and collecting any chemical before entering the storm drainage system. This could be with slide gates or valves which could be closed as necessary to retain industrial spills.
- ... a routine program of sweeping should be planned and implemented for the public streets and private parking areas. This will remove particulate matters and chemicals from the paved surfaces and reduce and/or eliminate pollutants from the storm drainage system. Frequency of sweeping should be adjusted to weather conditions and the area being maintained.

With the foregoing mitigating measures, the impact of pollutants on the storm drainage system can be controlled.

SECTION 10 - LAND USE

Letter from: R. W. Sullivan
Sullivan's Last Stand
April 21, 1980

Comment: The DEIR overlooked the present zoning of 26 acres of thoroughfare commercial at the intersection of Highway 101 and Cochrane Road north and east of the Morgan Hill Business Park.

Response:

The following paragraphs are added under the headings as noted:

General Plan

The existing General Plan and zoning includes the 26 acres located north of Cochrane Road both east and west of the Highway 101 and Cochrane Road intersection. The proposed General Plan amendment, as shown on Figure 10.1, proposes that the land use north of Cochrane Road and west of the freeway be changed to Industrial. The area east of the freeway is proposed as residential (Rural Estate). These changes are not the subject of this DEIR and are the subject of the Proposed General Plan revision and its DEIR.

Existing Land Use

A portion of the 26 acres zoned as Thoroughfare Commercial located across from the Morgan Hill Business Park is developed for commercial use including the business known as Sullivan's Last Stand. The remainder of the commercially zoned area is either vacant or in agricultural use. As of the date of preparation of this DEIR, there are no plans on file with the Morgan Hill Department of Community Development for the remainder of the commercial property.

PROJECT REQUIREMENTS AND IMPACTS

As the Morgan Hill Business Park develops in accordance with the proposed plan, it could influence the development of the lands north of Cochrane Road. How these areas develop will depend upon the owners of those properties, zoning requirements, and the City's General Plan. Each proposal for development will be required to meet its own environmental requirements.

SECTION 10 - LAND USE

Letter From: Doris Leverton, Director
Loma Prieta Resource Conservation District
Gilroy, California

Comment: 1) Evaluate Cortina soil found at the project site
2) Discuss suitability of soil for foundations and percolation

Response:

EXISTING CONDITIONS - SOILS

The Cortina Soil covers an area of 10 acres or less adjacent to Cochrane Road. It has an agricultural capability which has low fertility, rooting is usually very deep with root density limited by drought. It has an agricultural capability which is less than the other soils covering the project site. The combination of small area of coverage and capability makes this soil of minor significance in this area.

An engineering soils investigation has been conducted of the project site by John V. Lowney & Associates. Findings reported are as follows:

1. The percolation rate in the pond area is estimated to vary from 0.5 to 3.0 feet per day depending upon the final design and type of soils encountered.
2. The boring capacity of the soil was measured between medium to dense. There are no apparent problems for road construction or foundation design.

The detailed soils investigation and recommendations are on file for review at the offices of John V. Lowney & Associates and the Project's Engineer, Mark Thomas & Company, San Jose, California.

SECTION 10 - LAND USE

Letter from: Charles Q. Forester
Director of Planning
Association of Bay Area Governments
January 4, 1980

Comment: Relate the Morgan Hill Business Park Plan to Regional Policies

Response:

The proposed plan for the Morgan Hill Business Park is consistent with the General Plan revision now in the process of being adopted by the City of Morgan Hill. ABAG's Santa Clara Valley Corridor Evaluation Study outlined a number of recommendations to guide future growth in Santa Clara County. Several of the recommendations relate specifically to the South Valley Area. These include:

- ... Support existing industrial development policies of Gilroy and Morgan Hill to assure continued economic growth.

The successful development of the Morgan Hill Business Park provides basic economic growth and provides an employment center which will provide local employment. Growth of the Industrial Park is expected to be consistent with the City's residential growth policies.

Most significant is the potential provided by the project to balance the local employment/housing situation. Presently, there is a job shortage in the Morgan Hill area which includes the City of Morgan Hill and the adjacent county area of over 7,900 jobs. The employment/housing ratio for Morgan Hill and vicinity is 18%.

- ... Support City policies in Gilroy and Morgan Hill that provide residential growth consistent with economic growth.

The Employment/Housing Analysis Addendum to Section 3 enumerates the present and projected situation in Morgan Hill and the adjacent county area (see Figure 3.2). The objective of the Morgan Hill Community Development Department is to balance as closely as possible the employment and housing needs for the City and adjacent county area. Morgan Hill presently has an employment shortage. If the proposed project develops over a period of 10-15 years or longer, the proposed project can be compatible with residential growth control regulations of the City.

The mitigation measures discussed in Section 5 of the DEIR recommends a number of alternatives for improving public transportation and reducing vehicle trips to the proposed project. Accomplishment of these transportation solutions is beyond the control of the Project's Sponsor, Wiltron Company. Provision should be made so that the proposed plan is flexible and could accommodate improvements in public transportation including bus service, Southern Pacific Commuter Service and light rail.

SECTION 18 - GROWTH INDUCING IMPACTS

Letter from: R. W. Sullivan
Sullivan's Last Stand
April 21, 1980

Comment: DEIR overlooked the 26 acres zoned for Thoroughfare Commercial north of Cochrane Road.

Response:

The following paragraph is revised to read as follows:

North of Cochrane Road

The properties immediately to the north of Cochrane Road are presently zoned for Thoroughfare Commercial. If the proposed General Plan Revision is implemented, that area could be rezoned for Light Industry in accordance with the proposed General Plan Revision. This is not the subject of this report. Although the Morgan Hill Business Park is zoned for light and heavy industry, Wiltron does not intend to situate any heavy industry there. For all practical purposes, then, both properties have the same potential use. The Wiltron site is scheduled to be developed in two phases: the easterly 189.7 acres as Phase I, and the westerly 197.8 acres as Phase II. The anticipated build-out for each phase is 5-10 years; therefore, development of the entire site will probably not be completed for 15 years or more. It is possible that the land use of the Morgan Hill Business Park site will be competitive with the site across Cochrane Road and could affect development there. Any possible future restrictions placed by the City of Morgan Hill on industrial development would also influence development north of Cochrane Road. In the long run, however, it would seem that the hotel, restaurant, commercial and entertainment facilities planned for the Morgan Hill Business Park would make the property across the road an attractive area for development, whether it is developed for commercial or industrial uses.

SECTION 5 - TRAFFIC - CIRCULATION - TRANSPORTATION

Letter from: Ann Barkley, Chief
Department of Transportation
Division of Transportation Planning

Concern: (Paragraph letters refer to specific paragraphs as noted in the Cal-Trans Letter)

1. Consider types of transportation for commuting other than automobiles (Paragraph A)
2. Elimination of sidewalks (Paragraph B)
3. Deed restrictions do not consider design of bus bays or shelters (Paragraph B)
4. Close proximity of project site to rail lines and highways makes the project ideally suited for public transit, van pooling and carpooling (Paragraph C)
5. Analyze the impacts on the Cochrane/Monterey Road intersection for 1983 before the freeway is completed, and for the freeway interchange after the freeway and project are completed. If additional improvements are needed, discuss as mitigation measures (Paragraph D)
6. Suggest providing bicycle lockers for from 2-4% of the anticipated employees (Paragraph E)
7. Discuss the relinquishing of Monterey Road and Cochrane Road from the highway system after the South Valley Freeway is completed (Paragraph F)
8. Encroachment Permit Application (Paragraph G)

Response:

1. Other types of transportation for commuting (Paragraph A)

As recently as January 4, 1980, a letter was received by the Community Development Department in Morgan Hill from ABAG with the Santa Clara Valley Corridor Evaluation Summary enclosed. This report on Page 11 predicts that over 90% of all trips in 1990 will be made by auto unless there is a dramatic change in energy resources.

This past year has seen an increase of over 40% in ridership on Santa Clara County Transit buses. For bus service to have a meaningful effect on employees in the Morgan Hill Business Park, a number of conditions would have to change:

1. More frequent bus service;
2. More routes throughout the County and particularly the South County;
3. When the Business Park is in operation, bus routes scheduled through the Park with stops conveniently located.

The Santa Clara County Transportation Agency has a committed objective to providing transportation modes. By 1990, its goal is to place 50% of commuters in a ride-sharing mode of either bus, rail, carpool, or vanpool; increase vehicle occupancy to 1.48 and increase the total current road capacity to move people by more than 30%. These objectives were recently restated in the May, 1980 issue of Trans Reporter published by the Santa Clara County Transportation Agency.

If these objectives are met, there could be beneficial impacts on Air Quality in Santa Clara County and, particularly, the South County including Morgan Hill. To achieve this will require the cooperation of public agencies and private industry through vanpooling, providing shuttle bus service from main routes to each business and industry. Also, vanpooling by multiple employees could be organized as a cooperative effort. Possibly, the vanpool vehicles could be furnished through public agencies to encourage a program of this type.

Recently, it has been announced that an agreement was reached between Southern Pacific, Cal-Trans and local agencies for operation of commuter service between San Jose and San Francisco. A similar type of service could be considered for the South County between San Jose and Gilroy. If and when this service is provided, a commuter stop could be included at a station site along the westerly side of the Morgan Hill Business Park. One consideration in planning for rail commute service to Morgan Hill is the fact that the existing main rail line is a simple track with sidings. Without additional rail construction, this could inhibit service. In any case, use of the existing rail facilities for commuter service is beyond the control of the Business Park.

If and when commuter service is available, employees can be expected to take advantage of this service, particularly as the cost of operating private vehicles increases.

Refer to pages 5.14 to 5.16 of the DEIR for the discussion of Mitigation Measures which can reduce vehicular travel and improve travel between home and work.

2. Elimination of sidewalks inhibit public transit (Paragraph B).

Typically, business and industrial parks do not have sidewalks. The Morgan Hill Business Park will have a par course that generally parallels the street system. This par course can be used by pedestrians. Also, it should be noted the project is planned for large parcels and individual

companies. If and when bus service is provided through the Park, stops could be located at the main entrances to each of the larger industries, and at convenient corner points for the smaller companies.

3. Deed Restrictions Consider Design of Parking but not Bus Bays, etc. (Paragraph B)

Deed restrictions are directed to the development of individual parcels and not to public street improvements. If and when bus service is provided, bus bay turnouts, and all-weather shelters can be added with modest changes to the existing street improvements. Without a bus service plan provided the Transit District, it is not possible or practical to install bus turnouts or shelters at this time.

4. Project is ideal for Public Transit, Vanpooling, etc. (Paragraph C)

Refer to the discussion under Item 1.

5. Analyze the impacts on the Cochrane Road/Monterey Road Intersection for 1983 prior to completion of the Freeway and when the Freeway and Project are completed (1995) (Paragraph D)

See the detailed analysis of this question by Russell C. Pearson & Associates which follows.

RUSSELL C. PEARSON & ASSOCIATES

Traffic and Transportation
Planning and Engineering
Consulting Services

780 West Olive Avenue
Sunnyvale, California 94086
Phone (408) 735-0460

27 May 1980
File #357

Mr. Stanley Kulakow
Project Engineer
Creegan & D'Angelo Engineers
1046 West Taylor Street
San Jose, CA 95126

Dear Mr. Kulakow,

In response to your recent request, we have reviewed the MORGAN HILL BUSINESS PARK MASTER PLAN and DRAFT ENVIRONMENTAL IMPACT REPORT for CITY OF MORGAN HILL and WILTRON COMPANY--February 1980.

We have also reviewed a letter of opinions, critique, and request for additional detailed traffic analyses concerning that Draft report, from MS. ANN BARKLEY, CHIEF, DIVISION OF TRANSPORTATION PLANNING, DEPARTMENT OF TRANSPORTATION, BUSINESS AND TRANSPORTATION AGENCY, STATE OF CALIFORNIA, dated April 22, 1980, and addressed to: STEVE WILLIAMSON, STATE CLEARINGHOUSE, OFFICE OF PLANNING AND RESEARCH, 1400 10th STREET, SACRAMENTO, CALIFORNIA 95814.

With these two documents as background, we have conducted the semi-detailed traffic analyses which you have requested.

In addition to those references cited, we have used traffic count data from the CALTRANS annual census as well as a special CALTRANS study of the intersection of Monterey Highway and Cochrane Road, conducted in August of 1978.

For the 1983 development traffic, we have used the updated Draft Environmental Impact report data which you have given us.

In the course of the analyses, our assumptions were made on the basis of a reasonable familiarity with traffic operations in the Morgan Hill area in general, and along Cochrane Road in particular. (See our traffic signal warrant analysis of Cochrane Road and the proposed Sutter

Blvd., prepared for Mark Thomas and Company, and dated 16 May 1980.)

Our analyses are also supported by peak hour (7-8 am and 5-6 pm) turning movement counts taken this month at the intersections of Cochrane Road with the Monterey Highway and the Route 101 Freeway.

All level-of-traffic-service calculations were made using methodology developed by the City of San Jose (the nearest municipal community with a full-time Traffic Engineering Department).

FINDINGS (GENERAL)

- 1) Cochrane Road between Monterey Highway and the end of the Route 101 Freeway is presently a major link in the State Highway System.
- 2) Based on available data, it does not exhibit the usual urban operational characteristics, i.e., it does not have the typically distinctive morning and evening volume peaks. The available data shows the weekday morning peak hour volumes occur between 10 am and noon (equal volumes between 10 and 11 am and again between 11 am and noon). The weekday afternoon peak hourly volume occurs between 3 and 4 pm.
- 3) These data also indicate that the roadway serves as a major recreational route, i.e., between 5 and 6 pm, the traffic volume on Sunday is something in the order of 20% higher than the same time period on a weekday.
- 4) Our earlier signal warrant study identified the current 85th percentile speeds as being in the order of 46 MPH westbound, and 54 MPH eastbound.

1983 CAPACITY AND ANTICIPATED LEVELS OF SERVICE

- A) In these analyses it was assumed that the development would consist of completed and occupied research and development facilities on 16.4 acres (parcel #12) and that all presently planned improvements to the intersection of Cochrane Road and Sutter Blvd. are complete and operational.

The analyses assumed that the planned Route 101 freeway link between Morgan Hill and San Jose was not open to

traffic. The analyses also assumed a general traffic growth rate of the same magnitude as was experienced on Cochrane Road between the opening of the existing freeway (1973) and 1978 (the latest available census data).

Under these conditions the estimated levels of traffic service at the indicated locations for assumed morning and evening peaks would be:

<u>COCHRANE ROAD</u>	<u>7-8 AM</u>	<u>5-6 PM</u>
At Monterey Highway	C	A
At Sutter Blvd.	A	A
At Existing Freeway	A	A

- B) In this set of analyses, all of the assumptions made in A) are the same except that the planned freeway link between Morgan Hill and San Jose would have been completed.

Under these conditions the estimated levels of traffic service at the indicated locations for assumed morning and evening peaks would be:

<u>COCHRANE ROAD</u>	<u>7-8 AM</u>	<u>5-6 PM</u>
At Monterey Highway	A	A
At Sutter Blvd.	A	A
At Signalized Freeway Off-Ramps*	A	A

*The analysis was made of anticipated conditions only on the west side of the bridge--the data suggests that signals may not be required on the east side of the bridge.

INTERMEDIATE LEVELS OF PROJECT DEVELOPMENT

We understand that there presently is no precise schedule for completing and occupying the various elements of the proposed development and that, even though the engineering drawings prepared to date show two distinct phases, it

is more likely that some of the second phase elements would be completed and occupied before completion of the first development phase. Because of these uncertainties, we have not conducted any traffic analyses of intermediate levels of development.

1995 CAPACITY AND ANTICIPATED LEVELS OF SERVICE

In these analyses we have assumed that the proposed development would be fully completed and occupied. We have used the traffic distribution used in the Draft Environmental Impact Report which was based on the assumption that all of the planned adjacent roadways were completed and fully operational and that the trips would be fairly distributed throughout the adjacent land areas.

As before, we assumed a general traffic growth of non-development traffic at a rate similar to that experienced between 1973 and 1978.

Under these conditions the estimated levels of traffic service on the western half of the Freeway 101-Cochrane Road bridge would be A for both the AM and PM peak hours.

As before, the data suggests that traffic signals may not be required on the east half of the bridge.

In the course of this study we have interviewed representatives of District IV, CALTRANS Advanced Planning Staff. Their current activities include updating (to year 1995) an earlier (mid 1970's) subregional traffic flow model.

The updating procedure and the previous model recognize the current land use zoning within the geographical area studied.

Consequently the current model estimate of something in the order of 80,000 ADT on State Route 101 Freeway in the vicinity of the Cochrane Road interchange for year 1995 includes the effect of the proposed development based on the gross parameters of the modeling analysis. Our analysis indicates that something in the order of 20% of this estimated 1995 freeway traffic in the immediate vicinity of Cochrane Road will be attributable to the proposed development.

For comparison purposes, the projected 1995 traffic on the Route 101 freeway (4 lanes) in the vicinity of Cochrane Road would likely be about the same (72,000 ADT in 1978) as

existing traffic flows on the Route 17 freeway between Campbell and Los Gatos. This is a reasonable comparison since both routes have a strong recreational orientation.

With respect to mass transport, we agree with Ms. Barkley's challenge of increased mass transport ridership and we hope that, through her good offices, significant mass transport ridership can be achieved for this site as well as all of California's sensitive areas. Meanwhile however, the current situation is that limited public transit is, and will continue to be, available to the site. The County Dial-a-Ride system serves the project area and no schedule changes or special facilities would be necessary to accomodate riders generated by the development.

Between 1979 and 1980, Santa Clara County Transit ridership experienced a 40% increase, attributed to the rising cost of gasoline. The County plans to augment existing runs with more frequent service, however no route changes are planned at this time.

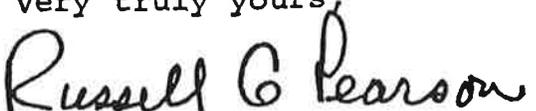
We suspect however, that as the population density of the site grows, the Transit operators would be influenced to modify existing fixed routes and locate stops at the appropriate points.

The current design plans have sufficient street width to accomodate on-street bus turnouts (10' between property line and face of curb). If and when fixed routes are established within the development, the appropriate bus turnouts and all-weather shelters could be provided with modest street reconstruction.

In this regard, the owner could also have some immediate influence on increased mass transport by encouraging subscription bus service, car and van pooling, bicycles, preferential parking and other incentives which would tend to reduce single occupant auto travel.

We hope that this report will be of assistance in responding to, and amplification of, the anticipated traffic impacts of the proposed development.

Very truly yours,


Russell C. Pearson

RCP/jh
enc: Calculation Sheets (43 pgs)
Copy-Mark Thomas Signal Warrant

6. Provide Bicycle Lockers for from 2-4% of Employees (Paragraph E)

We believe that providing a fixed number, or percentage, of bicycle lockers is not warranted. A more practical procedure would be to provide bicycle lockers, racks or storage space as needed to be responsive to the actual needs of the employees.

7. Discuss Relinquishing Monterey Road and Cochrane Road from the Highway System (Paragraph F)

The following paragraph is added to page 5.2 ahead of the paragraph which begins: East Main Avenue . . .

"The policy of the California Department of Transportation is to relinquish existing highways to the local jurisdiction when a new section of freeway is completed. This is expected to be done in the near future for the section of Monterey Road through Morgan Hill (south of Cochrane Road) when the present freeway has been completed. In 1983 after completion of the freeway north of Cochrane Road, the existing highway section beginning at Cochrane Road and continuing north along Monterey Road to the vicinity of Ford Road will be relinquished to the City of Morgan Hill to its north City Limits and the remainder northward to the City of San Jose. Repairs are usually made by Cal-Trans so that the roadway surface and appurtenances are in good condition prior to relinquishing the highway."

8. Encroachment Permit Application

This is not a requirement of the EIR but must be submitted and approved prior to any construction.

SECTION 9 - METEOROLOGY AND AIR QUALITY

Letter from: William C. Lockett, Chief
Regional Programs Division
Air Resources Agency

Concern: Add the following items to the report:

1. Present in the Environmental Setting section, a discussion that the area is designated as non-attainment of national standards for ozone, carbon monoxide, and total suspended particulates.
2. Calculation of average trip length, additional vehicle mile and resulting vehicular emission.
3. Benefits associated with mitigating measures.

Response:

The following paragraphs are added to the DEIR as noted:

1. Non-attainment status

Add after fifth paragraph on page 9.2 of Draft EIR:

"The project is within the Bay Area Air Quality Management District, which has been designated by the Federal Environmental Protection Agency as a non-attainment area for carbon monoxide, ozone, and total suspended particulates. This means that the air basin experiences concentrations of these pollutants which exceed National Ambient Air Quality Standards, although not necessarily everywhere in the District. As previously noted, two of the pollutants do exceed standards in the general project area (South Santa Clara County), while CO has not been a significant local problem identified by District monitoring stations."

2. Estimation of incremental project emissions (CO):

*Estimated average project trip length

External: 10 mi.

Internal: 0.5 mi

*Project Vehicle Miles Traveled (VMT) at Total Development and Occupancy

External: $48,500 \times 10 = 485,000$ miles per workday

Internal: $5,400 \times 0.5 = 2,700$ miles per workday

Total project VMT = 488,000 miles per working day

*Assume composite vehicle emissions at 25 gms per mile (CO)

*Emissions from project trips = 12.2 M grams per day or 13.4 tons per day

Under present conditions, it is estimated at least 7,500 employees commute from Morgan Hill and the adjacent County area to work in San Jose and the North County. The average commute distance is at least 20 miles (one way), for a total daily commute distance of 300,000 miles per work day. This equals 8.2 tons of emission per work day. This is the no-project condition.

The Morgan Hill Business Park is expected to provide employment opportunities for local residents. If 50% of these trips northward are eliminated, the net increase would be 13.4 tons less 4.1 tons or 9.3 tons of emissions.

The estimated total daily CO emissions in the District for the year 2000 is about 5600 tons. (Source: BAAQMD)

(Source: BAAQMD)

3. Estimated benefits of proposed Mitigation Measures

*Full employment at build-out = 9720

*Therefore, daily commute trips with no mitigation measures = 18500 and commute VMT = 18500 x 10 = 185,000 miles per workday

*Lunch trips, assuming 30% use auto = 5550 trips so lunch VMT = 5550 x 2 = 11,100 miles per workday assuming an average 2 mile lunch trip one way

*If mitigation measures are implemented, the following trip reductions could be achieved, along with the associated percent project emission reductions:

<u>Assume</u>	<u>VMT Reduction</u>	<u>Emissions Reduction</u>
10% diversion of trips to transit	18,500 miles	4%
10% diversion of trips to car-vanpool	18,500 miles	4%
2% diversion of shorter trips to bicycle	1,000 miles	negl.
10% elimination of lunch trips, and		
10% reduction in length of lunch trips (0.5 mile instead of 2 miles)	7,000	1.5%

VARIOUS SECTIONS

Letter From: Roy S. Cameron, Director
Santa Clara County
Planning Department
April 24, 1980

- Comments:
1. Jobs and Housing Implications
 2. Growth Inducing Impacts
 3. Sewage Treatment Capacity
 4. Traffic
 5. Air Quality
 6. Agriculture

Response:

Following are specific responses to the comments in the Planning Department letter. Where an answer is covered in a different part of this Addendum, that section is referenced. Paragraphs which are under a heading are referenced by letters for specific response.

1. Jobs and Housing Implications (See Addendum to Section 3 Employment and Housing).

Paragraphs A and B

The Planning Department estimates Table 3.10 apparently overlooked the potential for basic industries in the Morgan Hill area. The total employment basic and service projected for this project includes the 2,600 shown on County Table 3.10 and is not additive. (See Table 3.19 in this Addendum). The combined total for existing employment plus project-related employment is estimated to be 18,000.

Paragraph C

The County Planning Department estimates for Morgan Hill housing in 1990 does not agree with projections by the Morgan Hill Community Development Department. Their 1990 projections for housing are 8,705. There are also, in the adjacent County area, 1,555 existing units and a potential for 2,650 units by 1990. (See page 3.31 of Employment and Housing Addendum.)

Paragraph D

See Employment and Housing Addendum for analysis of this question, refer to Tables 3.19, 3.20, 3.21.

Paragraph E.

The employee calculations contained in the DEIR Table 3.12, page 3.20, are based on separate employee densities for each type of land use. This differs from the average referred to in the letter. Also, it should be noted under mitigation measures, that a program be established to periodically monitor the number of employees for two purposes.

- (1) Maintain a check on the employment and housing balance for the City and adjacent county area.
- (2) Provide a check on the estimates made in this report as a means of updating planning information.

Paragraphs F and G.

Morgan Hill is presently in a position of an employment shortage. No one can predict where future employees will locate housing. The alternatives for this situation are outlined on page 3.40 of the Section 3 Addendum on Employment and Housing.

Paragraphs H and I.

As discussed in the Addendum on Employment and Housing, Morgan Hill and the adjacent county areas now have a housing surplus as related to local employment. The proposed project will bring this surplus into balance over a period of 10-15 years or longer. If the mitigation measure proposed by the County, which entails sharing of revenues, is implemented, the City of Morgan Hill should receive the benefits of the revenue sharing up until the time an employment and housing balance is reached.

2. Growth-Inducing Impacts

It can be expected that there will be continuing competition for companies to locate in San Jose, Morgan Hill and Gilroy. Morgan Hill presently has the most severe employment shortage of the three cities. When new industries locate in either of the cities, their employees will have to solve their own housing situation. The available housing will limit the potential for industrial growth.

Housing availability as described in the DEIR is limited to where new housing is being constructed. Morgan Hill and Gilroy are presently allowing construction to the limit of their individual growth control measures. The projected housing development in San Jose is generally described in the DEIR. Until there are governmental regulations that require each resident to live in the City where he or she works, the utilization of new and existing housing is upon the choice of each family.

To mitigate the growth-inducing impact of this project as well as other projects in San Jose or Gilroy, the employment growth could be limited to maintaining a balance of employment and housing. This ratio is for the three cities:

Gilroy	0.81
San Jose	0.77
Morgan Hill (only)	0.27
Morgan Hill (with adjacent county area)	0.18

Should a ratio of 1.00 be reached, the total future employment growth could be limited to the ability to provide additional housing. This would require periodic monitoring of these factors.

The County's letter suggests employment growth should be limited to the ability to provide housing. Another approach to this question is to provide employment opportunities for the available existing housing as well as new housing. By providing a wide range of employment opportunities in Morgan Hill, the need to commute to work can possibly be reduced.

3. Sewage Treatment Plant Capacity

It is apparent that the approved treatment plant capacity will require expansion. As stated in the DEIR, the new plant capacity is 6.1 MGD. A Final EIR was approved for a 9.0 MGD treatment capacity. That EIR presumably addressed the impacts from growth related to the approved treatment plant capacities. This type of analysis is beyond the responsibility or scope of this EIR. Refer to the Final EIR for the Wastewater Treatment Plant for any impacts related to the treatment plant or growth inducing impacts due to the plant.

4. Traffic

As presented in the Addendum to Section 3 (Employment and Housing), over 80% of the existing employees living in Morgan Hill and the adjacent county area commute to work. Probably most of them travel north to San Jose or to the North County electronics industries. Any portion of these employees who eventually find employment in the Morgan Hill Business Park will reduce the impacts on traffic. Also, we are of the opinion there will probably be some employees living north of the area who will commute to work in Morgan Hill.

If employees lived in the Evergreen and Edenvale areas their travel distance to Morgan Hill would be shorter than to the North County area. It is our opinion that the net effect on traffic would be to reduce the peak hour congestion by better utilization of the freeways both in north and south directions.

Concerning travel to the downtown Morgan Hill area, traffic on Monterey Road south of Cochrane Road is substantially below capacity. We anticipate a slow start up of the project and project less than 500 employees

prior to completion of the freeway. Therefore, traffic at the Monterey Road/Cochrane Road intersection will not be significantly increased prior to completion of the freeway. Also, the City of Morgan Hill is now actively working toward formation of an assessment district to finance the construction of Sutter Boulevard. This will provide a parallel link to the downtown area. A third option for access to the downtown Morgan Hill area is by way of the freeway to Dunne Avenue and then west to the downtown area.

Restaurant and lunch room facilities will be available on site for employees. It is more than likely that a portion of the employees will use these facilities with others traveling to downtown Morgan Hill for lunch or shopping.

The City of Morgan Hill is presently preparing a downtown rehabilitation plan. If you have concerns about the capacity of the downtown area to handle employees from the Business Park, we suggest these concerns be directed to the planners for the downtown area.

5. Air Quality

Air quality impacts have been discussed in Section 9 of the DEIR. Also, refer to response to the Air Resource Board included in this Addendum.

If there are constraints due to air quality as dictated by Air Quality Maintenance plan for the South County, these commitments should be implemented through the General Plan and Zoning. The proposed plan is consistent with the General Plan Revision which has been prepared by the Morgan Hill Department of Community Development.

6. Agriculture

The viability of agriculture in Santa Clara County and, particularly, the South County area, is not an appropriate subject of this report. The DEIR in Section 10 discusses the agricultural capability of the soils in the 387 acres of the Morgan Hill Business Park. Maintaining agriculture in the Coyote Area and in the 17,400 acres east of Gilroy can best be accomplished through the County's General Plan Revision, now in progress, and implementing the General Plan through zoning.

Obviously, because of the current housing demand in Santa Clara County, there will continue to be pressure for development of the agricultural reserve areas. Development of the Morgan Hill Business Park presents an opportunity to balance Employment and Housing in the City of Morgan Hill and the adjacent County area (see Figure 3.2) without residential development in the Coyote or east Gilroy area. The Morgan Hill General Plan revision has designated specific areas for residential and industrial development. The proposed plan is consistent with these areas and with the Measure E growth control plan.

VARIOUS SECTIONS

Letter from: Gary J. Schoennauer
Director of Planning
Planning Department
City of San Jose
April 8, 1980

- Comments:
1. Housing Demand
 2. Jobs/Housing
 3. San Jose Housing Resource
 4. Growth-Inducing Impacts

Response:

1. Housing Demand

Tables 3.19, 3.20 and 3.21 of this Addendum relate the projected number of employees to existing and future housing in the City of Morgan Hill and the adjacent county area as shown on Figure 3.2.

2. Jobs/Housing

The Addendum to Section 3, Employment and Housing, and, particularly, Tables 3.19, 3.20 and 3.21 show the relationship of existing and future employment and housing.

3. San Jose Housing Resource

Morgan Hill now has an extreme deficiency in employment. The proposed Morgan Hill Business Park will improve this situation. In the DEIR, we have identified areas where new housing is being constructed. No one can predict where these employees will locate housing. The alternatives describing where future employees could locate are discussed on page 3.40 of the Addendum to Section 3, Employment and Housing.

With regard to the 692 acres of industrial land developed in San Jose from 1975 to 1979, has there been a cumulative analysis of the jobs/housing balance where these areas are fully developed. The substantial development of industrial lands in San Jose could have a greater impact on the jobs and housing balance than the proposed Morgan Hill project. The Morgan Hill Business Park presents an opportunity to locally balance the jobs and housing situation by providing employment opportunities for persons who now commute to San Jose and North County area for employment.

4. Growth-inducing Impacts

The relationship of employment and housing has been discussed in the Addendum to Section 3. If a balance of jobs and housing within the

community is the objective, the proposed project is then responsive to this objective. As the Morgan Hill Business Park project is developed and industries locate there, the opportunity for local residents to obtain employment closer to home increases. Economic pressures, such as the cost of transportation and the value of housing will probably be incentives for local residents to consider the opportunity to work closer to home and reduce their commute and travel expenses.

If the preservation of agricultural uses in the Coyote Valley is the policy of both San Jose and Morgan Hill, and if general plans and zoning define these policies, there should be no impact from this Project. There have been many proposals in the past and no doubt there will be future proposals for development in the Coyote area. Each of these should be considered on its own merit. The pressure for new housing throughout Santa Clara County is more likely to be an influence on the Coyote Area than the proposed business park.

SUMMARY OF PUBLIC HEARING
ON
DRAFT ENVIRONMENTAL IMPACT REPORT

A public hearing on the Morgan Hill Business Park Draft Environmental Impact Report was held by the Morgan Hill City Council on Wednesday, May 21, 1980, at 7:00 P.M. in the Council Chambers. The tape recording for the entire hearing is on file with the City Clerk and may be reviewed on request.

Mayor Heiman opened the hearing which began with a brief description of the proposed project. A summary of each speaker's comments with responses is presented below.

Michael Dorn, Gilroy Planning Director - Restated the letter submitted by him for the City of Gilroy concerning the housing pressure on Gilroy due to this project and the need for future expansion of the wastewater treatment plant.

Response: The Addendum to Section 3 Employment and Housing, explains Morgan Hill's relative situation related to this concern and particularly the employment deficiency in Morgan Hill. Pages 3.40 and 3.41 of the Addendum present some alternatives for where employees will live. A benefit of the project will present the opportunity for people now living in Morgan Hill and the South County to work close to home.

The DEIR recognizes the need for expansion of the treatment plant and the many governmental approvals necessary. This can best be accomplished by a cooperative effort from both Morgan Hill and Gilroy through the Public Works Department and the Joint Sewer Committee (see Page R-3).

John Dossetti, President, Morgan Hill Chamber of Commerce - Agreed with the proposed project and had no questions or comments.

Response: None.

Susan Tichinin, Member County Housing/Industry Task Force - Suggested the Industry and Housing Management Task Force "Living within Our Limits" be reviewed. Also questioned the impact on other areas (Gilroy, San Martin and Coyote); Employee Health; Industrial Waste Disposal; Labor Training; and requested expansion of the Employment-Housing section.

Response: Without repeating information contained in other parts of this Addendum or the DEIR, the questions of Employment and Housing, impact on the adjacent County area are discussed in the Addendum to Section 3 pages 3.28-3.41; Industrial Waste Disposal, see response to Letter from Solid Waste Management Board beginning on page R-5; Labor Training - see pages R-1 and R-2 and Mitigation Measures on page 4.4 in this Addendum; Employee Health - this is a recognized concern of all industries and particularly the Electronics Industry. Other than Wiltron, there are no specific companies identified that plan to locate in the Business Park. A specific response to this concern cannot be made at this stage of the project.

Carol Anderson, Watsonville Road Resident - Questioned air pollution, hiring local employees, opportunities for employment, sewage treatment and water supply capacity, industrial solid waste, impacts on agriculture.

Response: These questions have been addressed in various parts of this Addendum and in the DEIR. They are found on the following pages: Air Pollution (DEIR Section 9 and Addendum pages R-23 and R-24); Sewage Treatment Capacity (Addendum pages 6.13 to 6.16); Water Supply (pages 6.1-6.4 of DEIR); Industrial Solid Waste (Addendum page R-5 to R-7); and Agriculture (Addendum pages R-28 and R-30).

As for hiring local employees and opportunities for employment, the Morgan Hill Business Park is the first significant project in Morgan Hill that will present the opportunity for employment in the electronics industry or related R&D industries. Presently, over 80% of the employable population in Morgan Hill and the adjacent County area commute outside of the City for employment. With the present demand for qualified employees, industries locating in the Business Park will probably attempt to recruit local residents who meet their requirements. The R&D industries and service businesses locating in the project will also have a need for a wide range of non-technical employees. This should also present opportunities for those who are typically unemployed.

Ciddy Wardell, Committee for Green Foothills - Questioned how the project relates to the County wide job growth; balance jobs with existing housing supply; job growth rate and housing should be consistent; stated that the number of housing units and jobs in Morgan Hill were not consistent with County General Plan projections; provide for local resident needs.

Response: These questions are answered in Section 3, Employment and Housing, beginning on pages 3.28 of this Addendum. As for the County projections compared with the figures used in this report, the population-housing growth presented herein are based on the Morgan Hill General Plan revisions, also see page R-25. The proposed project will present the opportunity for employment for the unemployed if those persons have the initiative to obtain work. Many of the jobs will be non-technical for those who have no interest or ability in engineering work.

Pat Forst, Chairperson, Morgan Hill Chamber of Commerce Industrial Committee - Stated the DEIR was satisfactory to the Industrial Committee.

Response: None.

John Sergi, Resident on Barrett Avenue - Questioned the effect of this project on commercial property at Dunne Avenue and the Freeway, Industrial property in south Morgan Hill and Storm Drainage.

Response: The Morgan Hill Business Park will not limit the ability to develop these other properties. Their use will depend upon the individual owners developing plans consistent with the Morgan Hill General Plan and Commercial and Industrial demands. Drainage questions have been resolved to the satisfaction of the Public Works Department and Santa Clara Valley Water District. See Section 7 of the DEIR.

Dee Heiman, Resident on Thomas Grade - Questioned the impact on schools.

Response: School impacts will be the result of the City of Morgan Hill, San Jose and Santa Clara County residential growth policies and not directly from industrial or business growth. The Morgan Hill Unified School District has reviewed the project in relation to their 1980 General Plan for schools. See the changes they have recommended in Section 4 of this Addendum.

